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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
 : Hon. Esther Salas  
 :  
 v. : Mag No. 10-7041  
 :  
 MARQUIS WORKS, : CRIMINAL COMPLAINT  
 a/k/a "Freak," :  
 RASHEED SMITH, :  
 a/k/a "Weed," :  
 STEVIE BUCKUSE, :  
 a/k/a "Black," and :  
 LAQUANA T. HILL :

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. From in or around May 2009 through in or around August 2009, in Essex County, in the District of New Jersey and elsewhere, defendants MARQUIS WORKS, a/k/a "Freak," RASHEED SMITH, a/k/a "Weed," STEVIE BUCKUSE, a/k/a "Black," and LAQUANA T. HILL did:

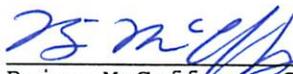
knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 50 grams or more of a mixture or substance which contains cocaine base, known as "crack cocaine," a Schedule II narcotic drug controlled substance, contrary to Title 21, United States Code, Section 841(a) and (b)(1)(A)

in violation of Title 21, United States Code, Sections 846.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

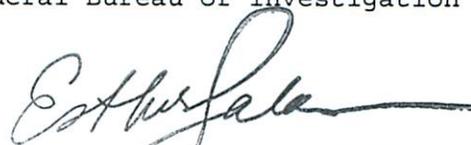
SEE ATTACHMENT A

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Brian McCaffery, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
April 2, 2010, at Newark, New Jersey

HONORABLE ESTHER SALAS  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

Attachment A

I, Brian McCaffery, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon my investigation, review of reports and discussions with other law enforcement personnel and others. All statements herein are set forth in substance and in part:

1. Beginning in or around May 2009, a confidential informant ("the CI"), with a proven record of reliability and credibility, provided information that defendants MARQUIS WORKS, a/k/a "Freak," RASHEED SMITH, a/k/a "Weed," STEVIE BUCKUSE, a/k/a "Black," and LAQUANA T. HILL (collectively, "Defendants") belonged to or are associated with a criminal street gang known as the "Grape Street Crips."

2. On or about June 4, 2009, the CI, acting under the direction and supervision of law enforcement, telephoned defendant MARQUIS WORKS, a/k/a "Freak," to to purchase a quantity of crack cocaine. On or about that same day, defendant WORKS and defendant STEVIE BUCKUSE, a/k/a "Black," met with the CI at a prearranged location in Newark, New Jersey. Defendant BUCKUSE, defendant WORKS and the CI went to a different location in Newark. At that location, the CI handed defendant WORKS approximately \$ 800.00, and defendant WORKS, in turn, handed the money to defendant BUCKUSE. Defendant BUCKUSE handed the CI a clear, plastic baggie containing a white rock-like substance. This transaction was monitored by law enforcement and consensually video and audio-recorded. The white-rock like substance field-tested positive for the presence of cocaine and weighed approximately 20 grams including packaging. Subsequent laboratory tests indicate that the white-rock like substance contained a net weight of 18.8 grams of cocaine base.

3. On or about June 15, 2009, the CI, acting under the direction and supervision of law enforcement, telephoned defendant MARQUIS WORKS, a/k/a "Freak," to to purchase a quantity of crack cocaine. On or about that same day, defendant WORKS and defendant LAQUANA T. HILL met with the CI at a prearranged location in Newark, New Jersey. The CI, defendant WORKS and defendant HILL went to a different location in Newark. The CI handed defendant WORKS approximately \$ 3,700.00. Defendant HILL and defendant WORKS left the CI for a period of time and then returned to the CI. Defendant WORKS handed the CI a clear, plastic baggie containing a white rock-like substance. This transaction was monitored by law enforcement and consensually video and audio-recorded. The white-rock like substance field-tested positive for the presence of cocaine and weighed approximately 100 grams including packaging. Subsequent

laboratory tests indicate that the white-rock like substance contained a net weight of 96.4 grams of cocaine base.

4. On or about August 13, 2009, the CI, acting under the direction and supervision of law enforcement, telephoned defendant RASHEED SMITH, a/k/a "Weed," to to purchase a quantity of crack cocaine. On or about that same day, defendant SMITH and defendant STEVIE BUCKUSE, a/k/a "Black," met the CI at a prearranged location in Newark, New Jersey. Defendant SMITH, defendant BUCKUSE and the CI went to a different location in Newark. The CI handed defendant BUCKUSE approximately \$ 3,580.00. Defendant BUCKUSE handed the CI a clear, plastic baggie containing a white rock-like substance. This transaction was monitored by law enforcement and consensually video and audio-recorded. The white-rock like substance field-tested positive for the presence of cocaine and weighed approximately 95 grams including packaging.