

RCH:PP/ADG/CMP
F.# 2023R00520

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

ROGER FRANCIS,

Defendant.

- - - - - X

TO BE FILED UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT OF
ARREST WARRANT

(T. 18, U.S.C., § 371)

24-MJ-432

EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW LONDON, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”) duly appointed according to law and acting as such.

In or about and between May 2022 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROGER FRANCIS, together with others, did knowingly and intentionally conspire to use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of one or more unlawful activities, to wit: Bribe Receiving in the Third Degree, in violation of New York Penal Law Section 200.10; Bribery in the Third Degree, in violation of New York Penal Law Section 200.00; and Criminal Liability for Conduct of Another, in violation of New York Penal Law Section 20.00, and thereafter to perform acts to promote, manage, establish, carry

on and facilitate the promotion, management, establishment and carrying on, of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

(Title 18, United States Code, Section 371).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the FBI and have been since April 2022. I am currently assigned to an FBI squad that investigates corruption by public officials. During my career in law enforcement, I have received training and gained experience related to a variety of criminal activities, including the corrupt practices of public officials and other types of fraud. Based on my training and experience I am also familiar with certain common phrases for narcotics and other contraband commonly used by criminals. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

I. Background

2. Crossroads Juvenile Center in Brownsville, Brooklyn ("Crossroads") is a secure juvenile detention facility, which is managed by New York City's Administration for Children's Services ("ACS"), for youth who are alleged or adjudicated juvenile delinquents, juvenile offenders or adolescent offenders, and have been remanded to secure detention. The FBI and the New York City Department of Investigation ("DOI") have been investigating the

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

smuggling of contraband, including narcotics, cellphones and weapons, into Crossroads by ACS employees assigned to Crossroads.

3. Approximately 120 residents, ranging from ages 14 to 20, are detained at Crossroads, and approximately 290 staff members work at the facility. ACS receives benefits in excess of \$10,000 per year under various federal government programs.

4. Residents at Crossroads are prohibited from possessing any contraband, including narcotics, cellular telephones, cigarettes, weapons and alcohol, among other prohibited items. ACS employees at Crossroads are trained to confiscate any contraband they discover and must notify a supervisor if any contraband is discovered.

5. ACS prohibits Crossroads staff from offering or giving contraband or gifts to residents, receiving any gifts or money from residents or anyone associated with them, and having any unauthorized contact with residents or anyone associated with them. Crossroads staff receive training on these and other prohibitions.

6. Crossroads staff undergo a security screening when they arrive to work at the facility. Staff members' belongings are put through an X-ray machine, and all staff pass through a magnetometer (metal detector). Crossroads staff are required to put their personal cell phones and any other prohibited items in a locker prior to undergoing the security screening.

7. A significant amount of contraband has recently been recovered in Crossroads. Between approximately March 2022 and May 2024, at least 75 cell phones and more than 340 scalpels or blades were recovered from the facility, as well as narcotics and tobacco. Based on my training and experience, and the evidence gathered in this

investigation, at least a portion of this contraband was smuggled into the facility by Crossroads staff, including the defendant ROGER FRANCIS, in exchange for bribes from the residents or their associates.

II. The Defendant

8. The defendant ROGER FRANCIS is a staff member at Crossroads and has been employed at the facility since July 2018. FRANCIS is a “youth development specialist,” which requires him to supervise residents. FRANCIS’s responsibilities are similar to those of a correction officer at a jail facility, except, among other differences, FRANCIS and other youth development specialists may use force in narrower circumstances and do not carry pepper spray or restraints.

III. The Defendant’s Bribery Scheme

9. There is probable cause to believe that the defendant ROGER FRANCIS received money from Crossroads residents and their associates in exchange for smuggling contraband, including marijuana and contraband phone accessories, into Crossroads.

10. The defendant ROGER FRANCIS has received a significant amount of money from Crossroads residents or their associates. Between approximately May 2022 and November 2023, Cash App records show that FRANCIS or his relative (“Relative-1”) received approximately \$17,000 from Crossroads residents and their associates.² For example, in October 2023, FRANCIS received \$100 over two transactions into his Cash App account, with subject lines

² According to Cash App records, the Cash App accounts for FRANCIS and Relative-1 list their true names, home address and dates of birth.

“FOR [Crossroads resident’s first name] 2 8ths” and “[Crossroads resident’s first name] 3 8th now and papers and toe.” Based on my training and experience, these memo lines indicate that the payment is to bring marijuana (frequently packaged per “8th” of an ounce), rolling papers (“papers”) and tobacco (“toe”) into the facility. As another example, on or about October 6, 2023, FRANCIS received \$50 into his Cash App account with the subject line “eight for [Crossroads resident’s nickname] F hall.” F Hall is one of the residence halls in Crossroads and, therefore, based on my knowledge, training, and experience, and my participation in the investigation to date, this subject line means that the payment is for Francis to bring an eighth of an ounce of marijuana to a resident in F Hall.³ On or about January 13, 2023, FRANCIS received \$210 from Cash App user “Man kool” with the subject line “G money.” Cash App user “Man kool” has numerous payments with multiple Crossroads residents or their associates, including a resident who has unauthorized communications and payments with other Crossroads staff, indicating that there is probable cause to believe “Man kool” is associated with a Crossroads resident. Finally, on two occasions in April and May of 2023, Cash App user “Free JoJo” sent FRANCIS \$150. Cash App user “Free JoJo” also has sent payments to other Crossroads staff members as well as other Crossroads residents or their associates.

11. As discussed above, Crossroads staff members are not permitted to have any unauthorized contact with residents or their associates. Phone records show significant contact between the defendant ROGER FRANCIS and Crossroads residents or their associates. For example, phone records show approximately 391 contacts (meaning calls or text messages) between October 2022 and January 2023 between a number that FRANCIS previously used for

³ Law enforcement has identified a Crossroads resident with this nickname and confirmed he was housed in F Hall during the relevant time period.

his Cash App account (and provided to ACS when he was hired) and a contraband cell phone recovered from Crossroads. Phone records also show 157 contacts between FRANCIS' same phone and a different contraband phone.⁴ In addition, FRANCIS applied for cash assistance with the City of New York and listed a different phone number as his primary number. Phone records show approximately 450 contacts between June 2023 and January 2024 between this number and a contraband phone recovered from Crossroads. These are just some examples of the numerous contacts between Francis' multiple phone numbers and contraband phones used by Crossroads residents.

12. On or about April 19, 2024, law enforcement executed a judicially authorized search and seizure of the defendant ROGER FRANCIS's cell phones. During the search, law enforcement located messages in an encrypted chat application between FRANCIS and a Crossroads resident whose identity is known to me ("Resident-1") about smuggling marijuana and other contraband into the facility. For example, on or about April 2, 2024, Resident-1 complained to FRANCIS that he did not get all the "weed" he was supposed to get and that the "zips" he received "wasn't even zips."⁵ However, at this time, FRANCIS was on medical leave and could not bring contraband into the facility himself and had to arrange it through another staff member. FRANCIS asked Resident-1 how much money Resident-1 needed to be made whole, indicating that FRANCIS or the staff member he arranged it through failed to smuggle all

⁴ Although Crossroads staff have not recovered this contraband phone, based on law enforcement's review of other contraband phones, law enforcement has identified this phone number as being associated with a contraband phone present at Crossroads. In other words, the contents of communications with this phone number make clear that the user(s) of this phone number were housed at Crossroads.

⁵ Based on my training and experience, I believe "zips" is another way to refer to an eighth of an ounce of marijuana.

the marijuana he agreed to into the facility. Resident-1 responded, “Bro I got 4 8ths by myself and 3 zips. The 4 8ths u sent only 2 was mines the other one was gpays. Then my zips that’s I got wasn’t even zips.” Later that evening, Resident-1 and FRANCIS had an audio call on the encrypted chat application. Resident-1 also sent FRANCIS a photograph of a known packaging of marijuana branded as a popular cereal and wrote, “I’m missing this I ain’t get this.”

13. In another message, the defendant ROGER FRANCIS confirmed to Resident-1 that he knows how much the “fee” will be, but that he did not hear back yet from the other Crossroads staff member. Resident-1 complained, “You can’t just come and leave on ya duty free,” and FRANCIS responded, “I would but I’m not medically cleared for work. He ducking cause he was trying to extort more \$\$.” On or about April 7, 2024, Resident-1 asked FRANCIS, “How’s that looking today,” and FRANCIS responded, “That’s crazy I literally set the meet.” The next day FRANCIS told Resident-1 “it’s done.” Resident-1 responded, “Thanks jus[t] got it.” FRANCIS then told Resident-1 “No problem still got 2 here it was too big.” Later that day, Resident-1 told FRANCIS to go downstairs because “my people downstairs” and to “open it.” FRANCIS said, “It’s open Shirts and charger maybe a hat.” The next week, Resident-1 said, “Try to get my shirts and charger cord in with the package,” and FRANCIS responded, “I was saying it’s kind big but I know I’m a magician.”


14. Other messages on the device show that the defendant ROGER FRANCIS worked with other staff members to smuggle in contraband while he was on medical leave. On or about March 13, 2024, FRANCIS messaged another Crossroads staff member, “Peach colored sock same spot top lock right hand soon as u come in locker room.” The staff member subsequently “liked” the message.

15. During the execution of the above search warrant, the defendant ROGER FRANCIS voluntarily spoke to law enforcement agents. FRANCIS admitted that Crossroads residents called him using contraband phones but denied bringing any contraband into the facility or ever receiving payments from Crossroads residents. At first, FRANCIS stated that he never had a Cash App account. However, when law enforcement agents showed FRANCIS a portion of his Cash App account (with his name and social security number) which had payments to him from Crossroads residents and their associates, FRANCIS stated that he was merely a middleman between the Crossroads residents and another employee who actually smuggled the contraband into the facility, and that he never profited from any of the money he received and then gave to the other Crossroads employee. Finally, FRANCIS stated that he knew marijuana and Percocet pills were smuggled into Crossroads.

WHEREFORE, your deponent respectfully requests that the defendant ROGER FRANCIS be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving

the defendant an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.



Matthew London
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this 21st day of June, 2024

Vera M. Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK