

RCH:RWN  
F. #2025R00036

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

NAJEE JACKSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

LUIS H. SANTOS, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Justice, Office of the Inspector General (“DOJ-OIG”), duly appointed according to law and acting as such.

On or about January 21, 2025, within the Eastern District of New York and elsewhere, the defendant NAJEE JACKSON did knowingly and intentionally, in violation of a statute or a rule or order issued under a statute, attempt to provide prohibited objects, to wit: marijuana and tobacco cigarettes, to a prison inmate.

(Title 18, United States Code, Sections 1791(a)(1) and 1791(b)(3)).

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint 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.

**TO BE FILED UNDER SEAL**

**COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF AN APPLICATION FOR  
AN ARREST WARRANT**

(18 U.S.C. §§ 1791(a)(1) and 1791(b)(3))

Case No. 25-MJ-18

1. I am a Special Agent with the DOJ-OIG, and have been since August 2023. Prior to working for DOJ-OIG, I was employed by the United States Secret Service for approximately four years. I have been involved in the investigation of numerous cases involving official corruption, including investigations of correctional officers at the Metropolitan Detention Center in Brooklyn, New York. I am familiar with the facts and circumstances of this investigation from my personal participation in the investigation, review of documents, and discussions I have had with other law enforcement personnel. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part.

I. Background

2. The DOJ-OIG and the United States Attorney's Office for the Eastern District of New York are investigating the smuggling of contraband by United States Bureau of Prisons ("BOP") correctional officers into the Metropolitan Detention Center ("MDC"), a federal jail in Brooklyn, New York. The MDC is currently New York City's only federal detention facility. Although most individuals incarcerated at the MDC are detained prior to their trial on federal charges filed in the United States District Court for the Eastern District of New York or the United States District Court for the Southern District of New York, some individuals at the MDC have already been convicted or sentenced. Currently, approximately 1,200 individuals are incarcerated at the MDC.

3. Incarcerated individuals at the MDC are not permitted to possess contraband inside the MDC. According to the BOP's Standards of Employee Conduct (the "Standards of Employee Conduct"), contraband is defined as "material prohibited by law, or by

regulation, or material which can reasonably be expected to cause physical injury or adversely affect the security, safety, or good order of the institution,” which includes marijuana, narcotics, cellular telephones, and cigarettes, among other prohibited items. I have learned that contraband often sells inside BOP facilities for many multiples greater than its cost outside of BOP facilities.

4. The BOP’s Standards of Employee Conduct expressly forbid BOP employees from “offer[ing] or giv[ing] to an inmate or a former inmate or any member of their family, or to any person known to be associated with an inmate or former inmate, any gift, article, favor, or service that is not authorized in the performance of the employee’s duties.” All BOP correctional officers, among other BOP employees, receive copies of the Standards of Employee Conduct and sign forms acknowledging receipt when they begin their employment. Employees also receive yearly training on the topics contained therein, including the regulations against contraband.

5. Based on my training and experience, and information obtained from other law enforcement officers, I am aware that contraband is often smuggled into MDC by correctional officers, often in exchange for bribes from incarcerated individuals.

## II. The Defendant

6. The defendant NAJEE JACKSON began his employment as a correctional officer with BOP on or about November 5, 2023. From in or about November 2023 to January 2025, JACKSON was assigned to work as a correctional officer at the MDC.

## III. JACKSON Brings Contraband into the MDC on January 21, 2025

7. On or about January 21, 2025, JACKSON was scheduled to work a night shift at the MDC, from 12:00 a.m. to 12:00 p.m. Before entering the MDC, staff members are required to pass through a staff screening area, consisting of a metal detector and a conveyor belt that passes through an x-ray machine. Staff members entering the facility are required to place their personal belongings on the conveyor belt to pass through the x-ray machine, and to walk through the metal detector. The metal detector's alarm is designed to be triggered not only by the presence of metal, but also by the presence of unusually dense objects.

8. Surveillance video footage from inside the MDC showed that the defendant NAJEE JACKSON arrived at the staff screening area to begin his shift on January 21, 2025, at approximately 12:15 a.m. JACKSON placed various personal belongings into a bin on the conveyor belt, and then walked through the metal detector, triggering the alarm. JACKSON then took off one coat, placed it into the bin, and walked through the metal detector a second time, triggering the alarm. After removing a small object from his pocket and placing it into the bin, JACKSON walked through the metal detector two more times, again triggering the alarm. JACKSON then took off a second coat. Underneath this coat, he was wearing a dark green vest. JACKSON placed his second coat into the bin and walked through the metal detector a fifth time, again triggering the alarm. JACKSON then walked through the metal detector a sixth

time, again triggering the alarm. Finally, JACKSON removed his dark green vest, placed it into the bin, and walked through the metal detector for a seventh time, this time successfully clearing the metal detector.

9. After JACKSON removed his vest, another correctional officer took possession of it and found that it contained four packages wrapped in blue paper and plastic wrap. These packages were opened and found to contain three vacuum-sealed bags containing cigarettes and one vacuum-sealed bag containing a green leafy substance, which a field test confirmed to be marijuana. JACKSON was also found to be in possession of two lighters and one box of rolling papers. Photographs of the packages seized from JACKSON's vest, their contents, and the lighters and rolling papers are shown below:



10. On or about January 23, 2025, JACKSON reported to the MDC and voluntarily resigned.

WHEREFORE, your deponent respectfully requests that the defendant NAJEE JACKSON 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 warrants. 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.

/s/ Luis H. Santos

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Luis H. Santos  
Special Agent  
United States Department of Justice, Office of the  
Inspector General

Sworn to before me by telephone this  
23 day of January, 2025

*Vera M. Scanlon*

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