

NR:VTN  
F. #2019R00035

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

DARRINGTON JAMES,  
also known as “Jamaica” and  
“Jamaica Ave,”  
ALDRIN LIVINGSTON,  
also known as “Big Apple” and “444,”  
MICHAEL MURRAY,  
also known as “Latoya” and “Toya,”  
CHRISTOPHER WALKER,  
CLARENCE BROOKS,  
KYLE CHARLES,  
also known as “Forty,”  
CHRISTOPHER RIVAS,  
[REDACTED]  
JORCETTA KING,  
also known as “Joey,”  
STYLES SHEPHARD and  
TONY WEST,  
also known as “Tone,”

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

Kristen Schill, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between August 2018 and November 2019, within the Eastern District of New York and elsewhere, the defendants DARRINGTON JAMES, also known as “Jamaica” and “Jamaica Ave,” ALDRIN LIVINGSTON, also known as “Big Apple” and

**TO BE FILED UNDER SEAL**

COMPLAINT AND  
AFFIDAVIT IN  
SUPPORT OF ARREST  
WARRANTS

(18 U.S.C. §§ 371 and 3551 et seq.; 21  
U.S.C. §§ 841(b)(1)(D) and 846 )

Case No. 20-MJ-31

“444,” MICHAEL MURRAY, also known as “Latoya” and “Toya,” CHRISTOPHER WALKER, CLARENCE BROOKS, KYLE CHARLES, also known as “Forty,” CHRISTOPHER RIVAS, [REDACTED] JORCETTA KING, also known as “Joey,” STYLES SHEPHARD and TONY WEST, also known as “Tone,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(D); Title 18, United States Code, Sections 3551 et seq.)

In or about and between September 2018 to November 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DARRINGTON JAMES, also known as “Jamaica” and “Jamaica Ave,” ALDRIN LIVINGSTON, also known as “Big Apple” and “444,” MICHAEL MURRAY, also known as “Latoya” and “Toya,” CHRISTOPHER WALKER, CLARENCE BROOKS, KYLE CHARLES, also known as “Forty,” CHRISTOPHER RIVAS, [REDACTED] JORCETTA KING, also known as “Joey,” STYLES SHEPHARD and TONY WEST, also known as “Tone,” 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, contrary to New York Penal Law Section 200.10, 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, Sections 371 and 3551 et seq.)

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

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been involved in the investigation of numerous cases involving public corruption and other crimes against the government. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

I. Background

2. FBI agents and investigators from the New York City Department of Investigation ("DOI") have been investigating contraband rings involving, among other things, the payment to and receipt of bribes by New York City Department of Correction ("DOC") correction officers in exchange for the introduction of narcotics into the George R. Vierno Center (the "GRVC"). The GRVC is a correctional facility located in East Elmhurst, New York and is one of several DOC facilities located on Rikers Island. In connection with these investigations, agents have, among other things, reviewed telephonic call detail records, financial records, including online transfer tools such as Cash App, conducted surveillance and initiated stops of DOC employees as they entered the GRVC.

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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.

3. Law enforcement agents have also reviewed recorded telephone calls made by inmates at the GRVC using DOC's Securus system. To use the Securus system, each inmate records voice exemplars that enable the system to recognize the inmate's voice. The inmate is then assigned a PIN permitting access to the system. Although inmates are required to only use their own PIN to make outgoing telephone calls, in practice inmates frequently use other inmates' PINs to disguise the source of their calls.<sup>2</sup> Because of the voice exemplars, however, the Securus system can typically recognize a given inmate's voice even when he is improperly using another inmate's PIN. Inmates also receive notice at the start of each call that their conversations using the Securus system are recorded and monitored.

## II. The Defendants

### A. *The Correction Officers*

4. DARRINGTON JAMES, also known as "Jamaica" and "Jamaica Ave" ("CO JAMES"), was employed by the DOC as a correction officer in or about and between July 23, 2018 and December 11, 2019. Beginning on or about December 20, 2018, JAMES was assigned to the GRVC, where he remained until on or about November 27, 2019, when he was suspended for bringing contraband into the GRVC.

5. ALDRIN LIVINGSTON, also known as "Big Apple" and "444" ("CO LIVINGSTON"), was employed by the DOC as a correction officer in or about and between

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<sup>2</sup> Included among the calls discussed herein are calls in which the inmate who is identified as a participant in the call improperly used another inmate's PIN to place the call. In those instances, a member of the investigative team who is familiar with each of the defendant inmate's voices from having reviewed dozens of recorded calls for each has identified the inmate's voice.

June 27, 2016 and the present. Beginning on or about May 29, 2018, CO LIVINGSTON was assigned to the GRVC, where he remained until on or about April 28, 2019, when he was suspended for bringing contraband into the GRVC.

6. MICHAEL MURRAY, also known as “Latoya” and “Toya” (“CO MURRAY”), was employed by the DOC as a correction officer in or about and between March 5, 2015 and the present. Beginning on or about June 30, 2015, CO MURRAY was assigned to the GRVC, where he remained until on or about November 7, 2019, when he was suspended for bringing contraband onto Rikers Island.

7. CHRISTOPHER WALKER (“CO WALKER”) was employed by the DOC as a correction officer in or about and between June 19, 2017 and July 3, 2019. Beginning on or about December 23, 2017, WALKER was assigned to the GRVC.

B. *The Individuals Incarcerated at the GRVC*

8. CLARENCE BROOKS (“BROOKS”) is a former inmate who was incarcerated at the GRVC from on or about and between January 11, 2018 and April 15, 2019.

9. KYLE CHARLES, also known as “Forty” (“CHARLES”), is an inmate who was incarcerated at various times at the GRVC from on or about and between February 23, 2018 to April 15, 2019.

10. CHRISTOPHER RIVAS (“RIVAS”) is an inmate who has been incarcerated at the GRVC from since on or about May 16, 2018.

C. *The Intermediaries*

11. [REDACTED] (“[REDACTED]”) is a resident of Bronx, New York and an associate of BROOKS. [REDACTED] is employed by [REDACTED].

12. JORCETTA KING, also known as “Joey” (“KING”), is a resident of Bridgeport, Connecticut and the girlfriend of CHARLES.

13. STLYES SHEPHARD (“SHEPHARD”) is a resident of New York, New York and the brother of RIVAS.

14. TONY WEST, also known as “Tone” (“WEST”), is a resident of Brooklyn, New York and a family friend of RIVAS and SHEPHARD.

III. The Contraband Conspiracy

A. *Bribes Paid to Correction Officer Christopher Walker*

15. In or about September 2018, law enforcement agents began monitoring Securus calls placed by CHARLES. A review of these telephone communications revealed that CHARLES was frequently communicating with KING by calling her at telephone number [xxx-xxx]-8950 (the “KING Phone”)

16. A series of telephone calls between CHARLES and KING in August 2018 revealed that CHARLES had KING collect money and contraband so that KING could deliver the money and contraband to an individual whom CHARLES referred to as “my son,” “the man,” and “my brother.” As described below, that individual was subsequently identified as CO WALKER. CO WALKER then delivered the contraband to CHARLES at the GRVC on or about August 28, 2018.

17. Some of those August 2018 calls between CHARLES and KING are described here:

- a. On August 25, 2018, in a telephone call starting at approximately 1:35 p.m., CHARLES instructed KING to send a text message to 917-319-3847 (the “3847 Number”), saying “hello.”
- b. On August 26, 2018, in a telephone call starting at approximately 9:54 a.m., CHARLES told KING that CHARLES just spoke to “my son” and that he “guaranteed” he would call KING today. CHARLES said that CHARLES just needed to get “the bread,” which I understood to mean money, to KING. CHARLES said that he needed to get \$1,000, which he also referred to as a “band,” to the man. CHARLES said that the man wanted \$100, which CHARLES called “a buck,” for each item that he brings in. CHARLES discussed how he planned to get the money to KING, including having people CHARLES knows send money to KING using Western Union. CHARLES told KING, “it’s gonna be a little bit of running around, but it’s gonna be profitable, because once it lands, it’s gonna bring me back at least [...] \$6,000.”
- c. On August 27, 2018, in a telephone call starting at approximately 4:01 p.m., CHARLES told KING that he needed her to pick up “money, three packs of cigarettes, and the five ounces” from someone CHARLES identified as “Bam.” CHARLES specified that “Bam” would have \$350, “five magazines” and “three books,” and that another person would be sending KING \$500, and that KING would need to contribute \$150, so that when “the man” calls KING, KING would have a total of \$1,000. CHARLES further instructed KING that when the man calls, KING should go meet him and give him everything, specifically, the “\$1,000, the five [ounces], and the three [packs of cigarettes].” Based on my knowledge and experience, I believe that CHARLES was using coded language to evade detection by law enforcement and that his reference to “books” and “magazines” were code words for different kinds of contraband.
- d. On August 27, 2018, in a telephone call starting at approximately 5:29 p.m., KING told CHARLES that she had met “Bam” and received \$350 and other items packaged inside a bag. CHARLES instructed KING to text and call the 3847 Number and to offer to meet the man at 7:30 p.m. KING could then be heard making a telephone call, using a second device, and arranging for a meeting at 7:30 p.m., at a location in Queens, New York.
- e. On August 27, 2018, in a telephone call starting at approximately 7:50 p.m., CHARLES asked KING if she had met up with “my brother” yet. KING answered that she had met him and that he said he would bring it in

“periodically” and that he wouldn’t do it “all at once.” Based on my knowledge and experience, I believed that KING was telling CHARLES that the man did not want to bring in all of the contraband to CHARLES inside the GRVC at one time, but preferred to spread out the deliveries.

- f. On August 28, 2018, in a telephone call starting at approximately 5:22 a.m., CHARLES told KING that “the situation touched down.” Based on my training and experience, I believe this to mean that CHARLES had received the contraband as planned. CHARLES told KING that he hadn’t opened up “the book” yet because he was waiting until later in the day. KING laughed and said, “I guess I won’t be hearing from you once you start opening it.” Based on my training and experience, I believed that the reference to a “book” was coded language for a controlled substance.<sup>3</sup>

18. An analysis of the records received from T-Mobile relating to the KING Phone (the “KING Phone Records”) reflect communications described above in paragraph 17. For example, on August 25, 2018, at about 1:37 p.m., KING sent a text message to the 3847 Number. (See ¶ 17(a) above). The KING Phone Records further showed that on August 26, 2018, at about 9:16 p.m., KING received a telephone call from telephone number [xxx-xxx]-4475 (the “4475 Number”) that lasted approximately 71 seconds. (See ¶ 17(b) above).

19. A review of the records relating to the 4475 Number revealed that the subscriber of that number is “Christopher Walker” of Saint Albans, New York. Law enforcement authorities have confirmed that CO WALKER resided at the same address associated with the 4475 Number in August 2018. Additionally, in August 2018, WALKER was employed as a DOC correction officer and assigned to the GRVC.

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<sup>3</sup> Law enforcement authorities were unable to obtain any video surveillance from within the GRVC to depict any events from on or about August 28, 2018 because they had already been deleted from the surveillance system by the time the above-described calls had been reviewed.



20. A review of the records relating to the 3847 Number showed that on August 27, 2018, at about 5:36 p.m., the 3847 Number received an incoming call from telephone number [xxx-xxx]-8240, which, based on a review of Securus calls, including the call described above in paragraph 17(d), I know that to be the telephone number of KING's daughter. Accordingly, I believe that while CHARLES was speaking to KING on the KING Phone during the call described above in paragraph 17(d), KING used her daughter's telephone to contact WALKER on the 3847 Number.

21. I have also reviewed telephone calls between CHARLES and KING in September 2018, which demonstrate that CHARLES instructed KING to collect money and contraband to deliver to WALKER, who in turn delivered the contraband to CHARLES inside the GRVC on or about September 19, 2018.

22. Some of those September 2018 calls between CHARLES and KING are described here:

- a. On September 8, 2018, in a telephone call starting at approximately 7:31 p.m., CHARLES provided KING with a Western Union tracking number for a \$300 payment and instructed her to go pick up the money. CHARLES further instructed KING to contact "my brother" and tell him that CHARLES needs three "NPs". CHARLES told KING that the man is charging \$300 for each "sandwich" and that KING should meet him and give him "the five books and eleven sandwiches." Based on my knowledge and experience, I believe that CHARLES was using coded language to evade detection by law enforcement and that his reference to "books" and "sandwiches" were code words for different kinds of contraband. Based on my training and experience and my conversations with DOI investigators, I know that Newport cigarettes are a commonly trafficked form of contraband among inmates and that "NPs" is a common term used for Newport cigarettes.
- b. On September 9, 2018, in a telephone call starting at approximately 6:48 p.m., KING told CHARLES that "your brother" told me to wait until after the visit. CHARLES told KING to text him and "tell him I said that he sees that it was one less, so throw three of them things in there for me and I'm still gonna hit him with the 18. . . . Tell him since it was one less, throw three packs of

NPs in there for me.” Based on my knowledge and experience, I believe that CHARLES expected CO WALKER to examine the contraband he would receive from KING and discover that there was one less package than expected. Accordingly, CHARLES instructed KING to tell CO WALKER to add three packs of Newport cigarettes and that in exchange, CHARLES would still pay WALKER \$1,800.

- c. On September 10, 2018, in a telephone call starting at approximately 8:31 p.m., CHARLES asked KING, “What did my brother say?” KING told CHARLES that the man said it would be next week or the week after and that the man wanted to know when he would get the rest. KING told the man that he would get the rest when he brings “it.” CHARLES instructed KING to text the man and tell him that if it was going to take that long, CHARLES would need at least “one” to hold him over. KING told CHARLES that she texted the man as instructed. I understood this conversation to mean that CHARLES wanted CO WALKER to make a partial delivery of the contraband since CO WALKER was not planning to bring in the entire package containing contraband for at least a week.
- d. On September 14, 2018, in a telephone call starting at approximately 8:05 p.m., CHARLES instructed KING to contact “my brother” and tell him that CHARLES wants three “longs.” KING told CHARLES that she sent a text message to the man. When there was no response, CHARLES instructed KING to call the man using her telephone, but without conferencing them into the same telephone call. KING placed the call as instructed and told CHARLES that there was no answer.
- e. On September 17, 2018, in a telephone call starting at approximately 5:02 p.m., KING told CHARLES, “Your brother called and he said don’t worry about it. The next time he sees you, he got you. . . . Tomorrow night or the next day.” Based on my knowledge and experience, I believed this to mean that CO WALKER would deliver contraband to CHARLES with the next two days.
- f. On September 19, 2018, in a telephone call starting at approximately 11:16 a.m., CHARLES reported to KING, “my brother pulled up on me last night.” Based on my training and experience, I believed this to mean that CO WALKER had delivered the contraband to CHARLES. CHARLES further complained to KING that he was frustrated because other inmates kept “calling him” and waking him up while he was asleep. CHARLES described the situation as “aggravating” and explained that it was the reason why he did not want to “hustle.” CHARLES told KING, “I smoke weed. I don’t sell weed.”

23. Law enforcement authorities reviewed video surveillance from inside the GRVC, which showed that on September 19, 2018, starting at about 1:49 a.m., CO WALKER entered Housing Unit 7B, hid a small object within a roll of toilet paper, and slid the roll under the door to cell number 19, which is the cell where CHARLES was housed on that date. Based on my conversations with DOI investigators, who are familiar with DOC procedures and the roles and responsibilities of correction officers, the amount of time taken by CO WALKER and the areas where CO WALKER moved within the housing area were inconsistent with completing the basic task of providing toilet paper to an inmate. Based on my investigation, I believe that CO WALKER was providing contraband to CHARLES and that CO WALKER hid the contraband in the toilet paper to disguise his true purpose.

24. The KING Phone Records revealed communications that reflect some of the events described above in paragraph 22. For example, on September 9, 2018, at approximately 6:54 p.m., KING sent a text message to the 3847 Number. (See ¶ 22(b) above). The KING Phone Records further showed that on September 14, 2018, at approximately 8:08 p.m., KING sent a text message to the 3847 Number and then called the 3847 Number at 8:11 p.m. (See ¶ 22(d) above). The KING Phone Records also showed that on September 17, 2018, at about 4:12 p.m., KING received a telephone call from the 3847 Number that lasted approximately 77 seconds. (See ¶ 22(e) above).

25. Based on their review of Securus calls made by CHARLES from the GRVC, law enforcement authorities identified at least seven different dates, specifically on October 9, 2018, November 3, 2018, December 2, 2018, December 14, 2018, January 18, 2019, February 6, 2019 and February 25, 2019, when CO WALKER brought contraband into the GRVC and delivered or attempted to deliver the contraband to CHARLES. Law

enforcement authorities confirmed these deliveries of contraband by CO WALKER to CHARLES by reviewing surveillance video from the housing unit inside the GRVC where CHARLES was housed on the specified dates.

26. Law enforcement authorities obtained records from Western Union that revealed that KING received wire transfers from a number of individuals, including [REDACTED]. On or about and between September 24, 2018 and December 3, 2018, [REDACTED] sent five wires for a total amount of \$2,350 to KING using Western Union. The telephone number listed by [REDACTED] with Western Union was [xxx-xxx]-2919 (the “[REDACTED] Phone”). A review of the records relating to the [REDACTED] Phone revealed that the subscriber of that number is [REDACTED]. Law enforcement authorities have confirmed that [REDACTED] resided at the same address associated with the [REDACTED] Phone during the relevant period of the conspiracy.

27. A review of the Securus calls revealed that the [REDACTED] Phone was in regular contact with BROOKS. By monitoring the Securus calls made by BROOKS from the GRVC to [REDACTED] and another coconspirator (“Coconspirator 1”), law enforcement authorities determined that [REDACTED] received contraband and money from Coconspirator 1 and others and then provided the contraband and money to KING, all at BROOKS’s direction. KING subsequently delivered that contraband to CO WALKER, who delivered it to CHARLES on December 2, 2018.

28. Some of the calls between BROOKS and Coconspirator 1 are described here:

- a. On November 1, 2018, in a telephone call starting at about 8:05 p.m., BROOKS asked Coconspirator 1 if Coconspirator 1 knows about “food saver shit” to vacuum-seal food because BROOKS may need Coconspirator 1 to do

something like that for him. Coconspirator 1 confirmed that he could do that for BROOKS. BROOKS told Coconspirator 1 that he needed “it” separated into eight-inch parts and that someone will pick it up from Coconspirator 1 in the near future. BROOKS asked, “You know how fish got a certain smell?” Coconspirator 1 said, “I would have to find out, but I know that shit sucks out the smell, sucks out everything . . . nothing can get in there.” In my training and experience, a vacuum sealer is frequently used to package marijuana because it minimizes the detectible odor of marijuana. Based on my knowledge of the investigation to date, I believe that in this call, BROOKS was asking Coconspirator 1 if Coconspirator 1 could obtain and package marijuana into eight-ounce bundles using a vacuum sealer.

- b. On November 14, 2018, in a telephone call starting at about 7:08 p.m., Coconspirator 1 asked BROOKS if BROOKS wanted the “whole plate” this time. BROOKS answered, “Yeah, the whole thing, the 16.” Coconspirator 1 told BROOKS that he is going to tell the person to put it together now and “after that, then I go down, I gotta hit the bank to take the money out for you. That’s it.” BROOKS clarified, “I told you the way I need it though.” Coconspirator 1 confirmed that he understood what BROOKS meant and that they had already talked about that. BROOKS provided Coconspirator 1 with the [REDACTED] Phone and said that it is “[REDACTED]’s number.” BROOKS then said he would contact [REDACTED] to give her Coconspirator 1’s telephone number and Coconspirator 1 confirmed, “I’m gonna put in that order right now.”
- c. On November 16, 2018, in a telephone call starting at about 8:29 p.m., Coconspirator 1 told BROOKS, “You just now called me as I just got done doing that thing for you. We sucked it . . . We had to triple bag it.” Coconspirator 1 told BROOKS that he had not heard from BROOKS’s “girl,” but that “tomorrow, I’m gonna meet up with her and just give her everything . . . I gotta give her that and give her what we talking about.”
- d. On November 17, 2018, in a telephone call starting at about 1:05 p.m., Coconspirator 1 told BROOKS that he is going to “get up out of here” and text “your lady.” BROOKS confirmed, “You’ll be able to give her “the bread and everything today” and Coconspirator 1 confirmed that he would. Based on my training and experience I understood “the bread and everything” to mean money and marijuana.

29. On November 17, 2018, in a telephone call starting at about 4:54 p.m.,

BROOKS instructed [REDACTED] to call Coconspirator 1 in a three-way call to “my brother,”

who BROOKS called “Urkel.” BROOKS provided [REDACTED] with Coconspirator 1’s

telephone number, which is the telephone number BROOKS used to call Coconspirator 1 in the telephone calls described above in paragraphs 28(a)-(d). [REDACTED] called the telephone number, but there was no answer. While [REDACTED] was still talking to BROOKS, Coconspirator 1 called [REDACTED] back, and BROOKS was able to speak to Coconspirator 1. Coconspirator 1 told BROOKS, "As soon as Lib get in, I bust that move . . . Why? What up? You good?" BROOKS responded, "I'm good. I just want to know what was up and shit, man, 'cause she just woke up and whatever and she just ready to holler at you." Coconspirator 1 laughed and said, "Alright, I didn't forget her. I'm gonna call her if anything change. I'm just waiting for Libby." Based on my training and experience and knowledge of the investigation, I believe that BROOKS was asking Coconspirator 1 when he would be ready to meet [REDACTED] with the money and contraband. Coconspirator 1 hung up the telephone and BROOKS and [REDACTED] continued their conversation.

30. BROOKS told [REDACTED] that he needs her to send a Western Union payment, which [REDACTED] agreed to do so long as Coconspirator 1 meets her before 7:30. BROOKS asked [REDACTED] to write down the information for the Western Union. BROOKS spelled out the name "Jorcetta King" and said, "Queens, New York" for \$500. BROOKS explained that the stuff that Coconspirator 1 is dropping off is not needed today but that the Western Union to KING needs to be sent today. BROOKS stated, "I know we dealt with her before, but do you still got her number?" [REDACTED] said that she did not. BROOKS told [REDACTED] to take her number down and to "send it" when [REDACTED] does it. BROOKS can then be heard calling out to "Forty," who I know from the investigation to be CHARLES,<sup>4</sup>

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A review of internal DOC databases attribute the nickname "Forty" to

and who was housed in the same area as BROOKS during this time, and asking CHARLES for “Joey’s” telephone number. BROOKS provided [REDACTED] with the KING Phone and told [REDACTED] “That’s Jorcetta . . . send it to her . . . tracking number, your name. ‘Cause she need sender name and tracking number if it’s an ID.” I understood that BROOKS was instructing [REDACTED] to provide KING with the tracking number and [REDACTED] name because KING would need that information to pick up the Western Union payment.

31. BROOKS proceeded to make plans with [REDACTED] in subsequent telephone calls and instructed [REDACTED] on what she needed to do so that BROOKS could receive the contraband. Some of those calls between BROOKS and [REDACTED] are described here:

- a. On November 17, 2018, in a telephone call starting at about 8:27 p.m., BROOKS asked [REDACTED] “You was able to do that?” [REDACTED] responded, “Yes, I did it. I sent it out.” BROOKS thanked her and told her he appreciated it. Based on my knowledge of the investigation, I believe that [REDACTED] was telling BROOKS that [REDACTED] had successfully sent a \$500 payment to KING using Western Union.
- b. On November 18, 2018, in a telephone call starting at about 4:03 p.m., BROOKS asked, “What’s going on with my brother? He hit you up?” [REDACTED] responded that he had contacted her at five in the morning and “everything is good, Gucci.” [REDACTED] told BROOKS that she had seen him and that he had given her “everything.” BROOKS asked, “How that shit look?” [REDACTED] responded, “Perfect. Vacuum-sealed.” BROOKS asked [REDACTED] “About how big is it?” [REDACTED] described it as “a good amount” and about the size of “a pan sheet, a regular, small cake pan.” BROOKS asked, “You got the bread?” [REDACTED] responded, “Yeah, he gave me a band.” BROOKS said, “Cool, so with the other bread, how much is that altogether?” [REDACTED] said, “I sent that girl five hundred . . . you got \$50 left.” BROOKS advised [REDACTED] that he would let her know what to do with “the other shit” and that BROOKS may have someone pick it up from her or that he may need her to drop it off. Based on my training and experience and knowledge of the investigation, I believe that [REDACTED] was advising BROOKS that she had

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CHARLES beginning in 2012. A review of current Securus calls by CHARLES reveals he has a pre-recorded greeting in which he self-identifies as “Forty.”

received contraband and \$1,000 from Coconspirator 1.

- c. On November 22, 2018, in a telephone call starting at about 7:51 p.m., BROOKS asked [REDACTED] about whether she was able to pick up payments from Western Union and they discuss how much money she received from Western Union. BROOKS told [REDACTED] “Yo, I was thinking that I might need you to fix, fix that package for me. I don’t think that shit is correct. . . . I think it’s too big.” BROOKS asked [REDACTED] if she knows how to use the “food saver” or “vacuum saver.” [REDACTED] said that she would need to get the equipment, but that she was willing to help him. BROOKS told [REDACTED] that he wants [REDACTED] to buy the equipment and do it. [REDACTED] states she won’t be able to do anything until Monday but when she comes back she will do everything he wants her to do.
- d. On November 23, 2018, in a telephone call starting at about 8:23 p.m., [REDACTED] told BROOKS that she is at Target in Georgia and that a food saver costs \$150. [REDACTED] said that the bags that come with it are one-gallon bags so she has to buy the smaller eight-inch bags separately. [REDACTED] told BROOKS that a roll is eight inches by 20 feet but that it can be cut it up into wherever size you want. BROOKS said, “OK, alright, I guess that’ll work.” BROOKS then asked, “You can put like fish in there too? . . . You know how fish, it stinks sometimes? Would you be able to smell it or what?” [REDACTED] responded, “You got to do it more than once though. You got to vacuum it more than once, like two or three times.” [REDACTED] then told BROOKS about a second food saver that costs \$160, and BROOKS told [REDACTED] to and buy the one that costs \$160. [REDACTED] informed BROOKS that total cost is \$181. [REDACTED] can then be heard telling someone in the background to double-bag the items and she is taking them back to New York.
- e. On November 25, 2018, in a telephone call starting at about 2:25 p.m., [REDACTED] informed BROOKS that she is “back in the city.” BROOKS asked to look up a Western Union payment for him that was sent to [REDACTED].” BROOKS and [REDACTED] then discussed how much money [REDACTED] has collected for him from various sources, including Western Union and Cash App. [REDACTED] told BROOKS that she is going to buy a handheld food scale. BROOKS told her, “You’re going to need something bigger than that. A handheld, nah that’s not gonna work out.” BROOKS advised [REDACTED] that they sell them on Gun Hill at the “smoke shops” and “ock stores.” BROOKS continued, “I’m gonna need you to buy something from that shit anyway. . . I need eight packs of raw paper. . . I need eight dollar



leaves, eight fonto [sic] leaves . . . and I need probably like eight packs of matches.” BROOKS then advised, “I’m going to give you all the instructions tonight.”

- f. On November 25, 2018, in a telephone call starting at about 8:19 p.m., BROOKS told ██████ “I want to tell you what to do with the package.” BROOKS asked if ██████ knows about weight and grams. ██████ asked if BROOKS is sure he wants to discuss this over the telephone. BROOKS said that he wants to make sure it is done correctly since “Urkel” didn’t do it properly. BROOKS said to ██████ “You’re acting like we’re talking about a fucking murder or some shit.” ██████ said, “Of course not,” and then agreed to discuss it over the telephone. BROOKS told ██████ that one ounce equals 28 grams. BROOKS instructed ██████ to weigh out 16 ounces first, to create 16 different piles of 28. He specified, “Altogether, I need . . . eight separate packs . . . two ounces would go in a pack. . . so one pack would have 56 grams in it . . . Also with the 56 grams, I need the leaf and the raw . . . So one pack would be 56 grams, the leaf, and one pack of raw.” ██████ confirmed that she understands BROOKS instructions by repeating them back to him. BROOKS told ██████ that he wants someone to pick it up on Wednesday. BROOKS said, “You know where this is going. I need that shit to be as small as possible . . . The biggest, one pack should be eight by five.” BROOKS would prefer them to be smaller but they can’t be bigger than eight by five inches. BROOKS reminded ██████ to get a scale.
- g. On November 27, 2018, in a telephone call starting at about 4:01 p.m., ██████ told BROOKS that she had to go back to Target because the first machine was not working when she turned it on, so she had to exchange the machine. BROOKS asked ██████ what she was doing and ██████ responded that she is doing what he told her to do. ██████ confirmed, “Everything is done.” BROOKS asked, “Was anything left over?” After ██████ responded that there was a little left, BROOKS asked if she had tried it. ██████ responded, “No, I’m gonna try it after.” BROOKS said, “I want you to tell me what you think about it.” BROOKS asked, “Can I have somebody pull up on you tomorrow?” ██████ answered, “Yeah.” During the telephone call, I could hear the sound of a machine running in the background that was consistent with the sound of a food sealer machine. Based on my training and experience, I believe that ██████ was packaging and vacuum-sealing the contraband during her telephone conversation with BROOKS and that BROOKS was going to send someone to come pick up the contraband from her tomorrow.
- h. On November 29, 2018, in a telephone call starting at about 9:09 a.m., ██████ told BROOKS that she is “meeting up with Shorty.” ██████ said that the reason they could not meet yesterday was due to Shorty’s kids. BROOKS thanked ██████ for putting him where he needs to be. ██████

said that it was all in the “food process” and that it was “a piece of cake.” BROOKS informed [REDACTED] that “Joey,” who they also refer to as “Shorty,” is “Forty’s wife.” As described above in paragraph 30, I know that “Forty” is a name for CHARLES.

32. Law enforcement authorities subsequently identified a telephone call between BROOKS and Coconspirator 1 in which they believed that BROOKS told Coconspirator 1 that he had received the contraband that Coconspirator 1 had procured for him. More specifically, on December 3, 2018, in a telephone call starting at about 7:29 p.m., BROOKS asked Coconspirator 1 about “that shit that you sent.” Coconspirator 1 told BROOKS that it’s “Moon Rock.” Based on my training and experience, I believe that the contraband included marijuana because “Moon Rock” is a way of preparing marijuana before consumption.

33. Law enforcement authorities identified video surveillance that showed that on December 2, 2018, at about 2:18 a.m., CO WALKER hid a small object within a roll of toilet paper and slid the roll under the door to cell number 19, which is the cell where CHARLES was housed on that date. Based on my knowledge of the investigation, I believe that CO WALKER handed contraband to CHARLES and that CO WALKER hid the contraband in the toilet paper to disguise his true purpose, in a method similar to the one he used on September 19, 2018 (see paragraph 23 above).

34. I believe that at least some of the packages smuggled into the GRVC by CO WALKER contained marijuana and/or synthetic cannabinoids. Although CHARLES and his coconspirators typically spoke in code, they periodically used terms that appear to explicitly refer to marijuana. For example, during conversations that appear to be about packages meant to be delivered to CHARLES, CHARLES used the terms “weed” and “late

night,” which, in my training and experience, are terms commonly used to describe marijuana. CHARLES also described the packages as having a certain weight in ounces. Once again, in my training and experience, weight is a common method by which to describe the quantity of marijuana at issue. Similarly, BROOKS and his conspirators used the term “Moon Rocks” and spoke about the packages having a certain weight in ounces and grams.

35. In reviewing surveillance video from inside the GRVC on February 25, 2019, law enforcement authorities observed CO WALKER discreetly place a package inside a garbage can, underneath the garbage bag lining the can, in CHARLES’s housing area. Before CHARLES had an opportunity to retrieve the package, a DOC staff member came to collect the garbage from the can and retrieved the package hidden underneath the bag. DOC authorities examined the package and found contraband, more specifically a green leafy substance. A field test was conducted on the substance with a positive result for the presence of synthetic cannabinoids.

36. Following the above-described recovery of contraband on February 25, 2019, in a telephone call starting at approximately 10:17 a.m., CHARLES informed KING that people had “knocked the whole situation.” CHARLES informed KING that CO WALKER did some “straight bozo, lame, clown shit” and that it was over for him “when they do what they do... as far as eye in the sky, it’s over.” CHARLES informed KING that a DOC employee other than CO WALKER had found the contraband and turned it in.

37. On February 26, 2019, in a telephone call starting at about 11:04 a.m., KING informed CHARLES that she had spoken to CO WALKER the day before and that CO WALKER had informed KING that CO WALKER was interested in retaining an attorney, knowing that “it was a wrap” because CO WALKER was not supposed to be in the

housing area where the contraband had been recovered. CHARLES surmised that once law enforcement reviewed the video surveillance, CO WALKER would be caught.

B. *Bribes Paid to Correction Officer Aldrin Livingston*

38. In a recorded telephone call between CHARLES and KING on March 24, 2019, starting at approximately 12:02 p.m., CHARLES was talking to KING when KING received a telephone call on a second telephone from someone that CHARLES identified as “Shaq.” KING made it possible for CHARLES and Shaq to speak to one another across the two telephones. CHARLES told Shaq, “Tell son to call...and [KING] will meet him.” CHARLES further explained that Shaq needed to tell the man that CHARLES would give half now and half after the “drop.” CHARLES clarified that CHARLES will give him the “8 and the band” and then following the drop, CHARLES would give him another “band.” Based on my training and experience, I know that “band” is a coded term for \$1,000. Shaq provided KING with the telephone number of the man she needed to contact, specifically [xxx-xxx]-4440 (the “4440 Number”).

39. On March 29, 2019, in a telephone call starting at approximately 9:43 a.m., CHARLES informed KING that he was able to get in contact with “Shaq” the day before. CHARLES confirmed that “Shaq” “sent [his] shit” but that “Shaq” “tried to hold it to see if the n\*\*\*a was going to get his bread.” Based on my knowledge and experience, I understood this to mean that CHARLES had received the contraband. CHARLES informed KING that “Shaq” was holding the contraband until CHARLES sent the second half of the payment, understood to be the second payment of \$1,000.

40. A review of the records received from Pinger associated with the 4440 Number (the “4440 Phone Records”) revealed that the email address listed for the

accountholder of the 4440 Number was alivingston.gjdc@gmail.com, which is the same email address provided by CO LIVINGSTON to DOC in his application for employment. CO LIVINGSTON was assigned to the GRVC until April 28, 2019, when he was suspended for bringing contraband into the GRVC.

41. A review of the 4440 Phone Records further revealed that the user of the 4440 Number was in regular contact with two telephone numbers that both appeared on the call log of an inmate whose identity is known to the undersigned (“Inmate A”), who was incarcerated at the GRVC from December 7, 2018 to February 21, 2019. As a result, law enforcement authorities began reviewing and monitoring telephone calls made by Inmate A using the Securus system.

42. A review of the telephone calls made by Inmate A revealed that he directed coconspirators to collect money and contraband and deliver them to an individual whom Inmate A referred to as “Big Apple,” who would then deliver the contraband to Inmate A at the GRVC. As described herein, Big Apple has been identified as CO LIVINGSTON.

43. Some of the calls made by Inmate A are described here:
- a. On January 8, 2019, in a telephone call starting at approximately 5:23 p.m., Inmate A told a coconspirator (“Coconspirator 2”) that “Big Apple” was “jacking my bop.” Inmate A said that he wanted “D&Bs” and “fly ty” and that “Big Apple” was trying to meet up to get “the keys and all that.” Based on my knowledge and experience, I understood this to mean that Big Apple had approached Inmate A and was prepared to meet with someone to pick up a package containing D&Bs, keys and fly ty on behalf of Inmate A. Based on my knowledge and experience, I know that the terms “D&Bs” and “keys” are used by inmates as substitute terms for tile cutters, box cutters or an object that can be used as a slashing instrument. Based on my knowledge and experience, I believe that Inmate A and Coconspirator 2 were using coded language to evade detection by law enforcement and that their reference to “fly ty” was a coded term for a kind of controlled substance.

- b. On January 9, 2019, in a telephone call starting at approximately 4:09 p.m., Inmate A asked a coconspirator (“Coconspirator 3”) if Coconspirator 3 was able to find “tile cutters,” as he had previously requested. Inmate A directed Coconspirator 3 to try to find tile cutters from a different store. Based on my knowledge and experience, I know that ceramic tile cutters can be used by inmates housed at DOC and other facilities as weapons, particularly because they do not set off metal detectors used throughout the facilities.
- c. On January 11, 2019, in a telephone call starting at approximately 4:43 p.m., Inmate A asked Coconspirator 3 to place a three-way call to Coconspirator 2. Inmate A instructed Coconspirator 2 to send \$100 and to collect money from others. Inmate A further instructed Coconspirator 2 to give some unspecified items to “Big Apple”, to include “the fly ty” and to “wrap that up” and spray some “smell good” on it. Inmate A said that “Big Apple” would most likely contact Coconspirator 2 that very day.
- d. On January 15, 2019, in a telephone call starting at approximately 7:35 p.m., Inmate A provided Coconspirator 3 with a Western Union tracking number and instructed Coconspirator 3 to pick up the money from Western Union so that Coconspirator 3 would have money to send to “Big Apple” the next day using Cash App.<sup>5</sup>
- e. On January 16, 2019, in a telephone call starting at approximately 7:44 p.m., Inmate A told Coconspirator 3 that on the next day, Inmate A would tell Coconspirator 3 where to send the money using Cash App.
- f. On January 17, 2019, in a telephone call starting at approximately 12:37 p.m., Inmate A said to Coconspirator 3, “Take this information down.” Coconspirator 3 asked, “What information?” Inmate A replied, “Remember what I said yesterday? Don’t say it over the phone.” Inmate A then spelled out “mahaica1988” to Coconspirator 3. Based on my knowledge and experience, I believe that “mahaica1988” is the Cash App user ID of the person to whom Coconspirator 3 was instructed by Inmate A to send money.
- g. On January 20, 2019, in a telephone call starting at approximately 8:15 p.m., Inmate A asked a coconspirator (“Coconspirator 4”) if the situation involving “Big Apple, 62 keys, [and] fly ty” had been handled. Coconspirator 4 confirmed that the “fly ty” was likely there and that the 62 keys were there, but that Coconspirator 4 did not have “everything.” Inmate A complained that everything was supposed to be with Coconspirator 4 and that Coconspirator 4 was supposed to be “bagging everything together.” Coconspirator 4 said, “If

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<sup>5</sup> Cash App is a payment service that can be accessed using a mobile device. In order to use Cash App, a user can provide a valid bank account or credit card account to which the Cash App account can be linked.

it's not, if that's not wrapped up, he going to get one of them by tomorrow and the latest, he get the next one is sooner than next week."

- h. On January 21, 2019, in a telephone call starting at approximately 5:24 p.m., Coconspirator 4 told Inmate A, "I did.... I tell you I'm going to do something, I do it." Based on my knowledge and experience and participation in the investigation to date, I believe that Coconspirator 4 was informing Inmate A that Coconspirator 4 had successfully delivered a package containing contraband to Big Apple.
- i. On January 23, 2019, in a telephone call starting at about 7:35 p.m., Inmate A informed Coconspirator 4 that he was high and watching movies. Based on my training and experience and my knowledge of the investigation, I believed that Inmate A had received contraband from CO LIVINGSTON at some point after he finished the call described in the preceding paragraph and before he made this call.

44. Law enforcement authorities reviewed video surveillance from inside the GRVC, which showed that on January 21, 2019, at approximately 5:57 p.m., while in Housing Area 4A, CO LIVINGSTON approached Inmate A and proceeded to escort Inmate A to cell number 8. Upon arriving to cell number 8, CO LIVINGSTON opened the cell door and interacted with Inmate A behind the cell door for approximately 15 seconds. Inmate A then entered cell number 8 and CO LIVINGSTON returned to his post. Based on my conversations with DOI investigators, who are familiar with DOC procedures and the roles and responsibilities of correction officers, CO LIVINGSTON unnecessarily positioned himself between the door and the entrance to the cell, placing himself in a vulnerable position, out of camera view, and out of a direct line of sight of the A station. The purpose of the cameras and the A station is to maintain visual contact with the housing area and staff members. I have been further informed by DOI investigators that there have been incidents where staff members were pushed inside cells by inmates and then assaulted by inmates.

After reviewing the video surveillance, it appears as if CO LIVINGSTON positioned himself in a manner to avoid being observed by video surveillance or other staff members.

45. A review of the records maintained by the Securus system shows that the telephone number used by Inmate A to reach Coconspirator 2 was [xxx-xxx]-0495 (“Coconspirator 2’s Phone”). The telephone number used by Inmate A to reach Coconspirator 3 was [xxx-xxx]-1889 (“Coconspirator 3’s Phone”). The telephone number used by Inmate A to reach Coconspirator 4 was [xxx-xxx]-2429 (“Coconspirator 4’s Phone”).

46. A review of the 4440 Phone Records revealed the following:

- a. The user of the 4440 Number exchanged approximately 21 communications, including messages and calls, with Coconspirator 2’s Phone on or about and between January 17, 2019 and January 20, 2019.
- b. The user of the 4440 Number exchanged approximately 66 communications, including messages and calls, with Coconspirator 4’s Phone on or about January 21, 2019, between on or about 1:44 a.m. and 12:48 p.m.

47. Law enforcement authorities believe that Cash App user “mahaica1988,” described above in paragraph 43(f), is CO LIVINGSTON based on the fact that CO LIVINGSTON was born in 1988 and his social media represents he is from Mahaica Village in Guyana. Moreover, a search of the records of Pinger, Inc. associated with the 4440 Number show that the user of the 4440 Number, CO LIVINGSTON (see paragraph 40 above), sent a text message to another individual informing that individual that “mahaica1988” was his Cash App username.

48. I believe that at least some of the packages smuggled into the GRVC by CO LIVINGSTON contained narcotics because even though Inmate A and his



coconspirators typically spoke in code, they periodically used terms that appear to explicitly refer to cocaine. For example, during conversations that appear to be about packages meant to be delivered to Inmate A, Inmate A and his coconspirators used the terms “8-ball” and “the white thing” which, in my training and experience, are all terms commonly used to describe cocaine. Based on my conversations with DOI investigators, “fly ty” was identified as cocaine due to the discovery that “fly ty” was a nickname of a 1980s music producer that stated cocaine was the drug of choice at that time.

49. I believe that at least some of the packages smuggled into the GRVC by CO LIVINGSTON contained marijuana because even though Inmate A and his coconspirators typically spoke in code, they periodically used terms that seem to refer to marijuana and/or synthetic cannabinoids. For example, in a conversation between Inmate A and Coconspirator 4 on January 20, 2019, starting at about 8:15 p.m., Inmate A used the term “weed,” which, in my training and experience, is synonymous with marijuana and often used to describe synthetic cannabinoids. There were other contextual descriptions used by Inmate A and his coconspirators that lead me to believe they were referring to marijuana and/or synthetic cannabinoids. (See ¶ 43(g) above). Inmate A also instructed his coconspirators to disguise the scent of the package by using “smell good.” (See ¶ 43(c) above). Moreover, a search of the records of Pinger, Inc. associated with the 4440 Number show that the user of the 4440 Number, CO LIVINGSTON (see paragraph 40 above) sent images of what appears to be marijuana and/or synthetic cannabinoids packaged clear Ziploc bags to his co-conspirators.

50. Additionally, on or about April 28, 2019, CO LIVINGSTON was found in possession of contraband inside the GRVC. On that date, starting at approximately

2:35 p.m., law enforcement authorities stationed a canine trained in the detection of marijuana, cocaine, crack cocaine, MDMA, methamphetamines, suboxone, hashish, and heroin, along with the canine's handler at the employee entrance of the GRVC. At approximately 3:01 p.m., as CO LIVINGSTON was entering the GRVC to report for duty, CO LIVINGSTON was escorted to a corridor in the same manner that had been used for correction officers who had arrived before CO LIVINGSTON. The canine alerted to CO LIVINGSTON's right leg, near his knee.

51. Law enforcement authorities and I, posing as DOC employees, subsequently interviewed CO LIVINGSTON. At the outset of the interview, law enforcement authorities informed CO LIVINGSTON that if CO LIVINGSTON chose not to speak with them, no work-related disciplinary action would be taken against him. CO LIVINGSTON was further advised that he was free to leave and end the interview at any time.

52. During the interview, CO LIVINGSTON removed from his socks four packages of a green vegetative substance and an additional package from his cargo pants' pocket. CO LIVINGSTON subsequently admitted to smuggling contraband into the GRVC.

C. *Bribes Paid to Correction Officer Michael Murray*

53. Based on the information revealed from a review of the 4440 Phone Records, DOI investigators began monitoring telephone calls made by RIVAS from the GRVC using the Securus system. A review of those calls revealed that RIVAS was frequently communicating with WEST by calling WEST at telephone number [xxx-xxx]-7722 (the "WEST Phone"). A series of telephone calls between RIVAS and WEST in April 2019 revealed that RIVAS had WEST deliver money and contraband to an individual whom

they referred to as “B,” “Blaze,” “son,” and “Latoya.” As described below, that individual was subsequently identified as CO MURRAY. CO MURRAY then delivered the contraband to RIVAS at the GRVC on or about April 21, 2019.

54. Some of those April 2019 calls between RIVAS and WEST are described here:

- a. On April 11, 2019, in a telephone call starting at about 2:13 p.m., WEST informed RIVAS that approximately 30 to 40 minutes earlier, he had been contacted by “B,” who was subsequently identified in the same call as “Blaze.” WEST further stated that Blaze is “ready to link.” RIVAS discussed having WEST pay Blaze “12,” which I understood to mean \$1,200, to expedite having “t-shirts” and “New Yorkers,” which RIVAS also referred to as “socks,” brought into the GRVC. Because WEST did not have socks to provide Blaze, RIVAS told WEST to only pay Blaze a “bando,” which I understood to mean \$1,000, for two t-shirts. RIVAS described “New Yorkers” as “the corner store shit that they be selling for 50 cents.” Based on my training and experience and the context of their conversation, I believe RIVAS used the terms “New Yorkers” and “socks” as coded language to describe cigarettes and that “t-shirts” refer to a different form of contraband.
- b. In the same telephone call described in the preceding paragraph, RIVAS said that he had forgotten about the “Fanta soda.” WEST said that he had remembered and would take care of the Fanta soda separately. RIVAS requested four of them. Based on my training and experience and the context of their conversation, I believe RIVAS used the term “Fanta soda” as coded language to describe Fronto leaves, which are tobacco leaves that are typically sold by the individual leaf. RIVAS also requested “Bics” by quoting a verse by Lil Wayne: “my name ain’t Bic but I keep that flame.” WEST confirmed with RIVAS that RIVAS was talking about “Bic” and RIVAS responded that “he spits that fire.” Based on the context of their conversation and because BIC is a common brand for a lighter, I believe RIVAS was asking WEST to provide RIVAS with lighters.
- c. On April 11, 2019, in a telephone call starting at about 8:06 p.m., WEST told RIVAS “everything [is] kosher.” RIVAS asked WEST if it was difficult for WEST to “link” and WEST responded, “No, not at all. Son pulled up to the building.” RIVAS asked what the man had said about the Fanta soda, and RIVAS said that the man said yes. WEST confirmed that he provided Bics and paid a “bando” to the man. RIVAS and WEST described the individual as “brown skin like [RIVAS’s mother],” “the skin complexion, he wasn’t black, [he is] light, light brown,” “like Marques Houston in the face,” “lazy

eyes type shit,” “B2K in the face,” and “had the Roger cut from ‘Sister, Sister.’” RIVAS asked WEST if the “to” (pronounced as tō, with a long o sound) and “stinky” were a problem. WEST said, “Nah, not at all.” RIVAS said, “It was good money. He checked that too, right?” WEST responded affirmatively. Based on my training and experience and my knowledge of the investigation to date, I believe WEST was informing RIVAS that WEST had met with the individual and had provided him with the contraband and money as planned in the telephone call described above. I further believe that when RIVAS referred to “to” and “stinky,” he was referring to Fronto leaves, which have a readily detectible odor unless packaged in a manner conceal that odor.

- d. On April 17, 2019, in a telephone call starting at about 4:48 p.m., RIVAS asked WEST about the “bitch that came to your building . . . that came to see you, she said she goin’ come visit me?” WEST confirmed that she was going to visit and that “she said everything was valid.” Based on my training and experience and my knowledge of the investigation to date, I believe RIVAS was asking WEST if WEST had any more information about when RIVAS could expect to receive the contraband that WEST had previously given to the person described in the preceding paragraph, who had “pulled up to the building.”
- e. On April 21, 2019, in a telephone call starting at about 7:52 p.m., RIVAS stated “touchdown berza.” WEST responded, “Oh, I figured that. I fucking got some more [unintelligible] for you.” RIVAS asked, “How much was it?” WEST answered, “Three.” RIVAS then asked if it came from two different people and WEST told RIVAS the names of the individuals who sent it to him and how much each person sent. As part of the investigation, I have learned that “berza” is Spanish for cabbage. Based on my training and experience and my knowledge of the investigation to date, I believe that RIVAS and WEST used the word “berza” to describe marijuana and/or synthetic cannabinoids. I further believe that RIVAS was informing WEST that RIVAS had received the contraband inside the GRVC, and that WEST was not surprised because WEST had recently received \$300 from two different people. I believe the payments from the two people were payments made on behalf of other GRVC inmates who purchased or intended to purchase some of the recently delivered contraband from RIVAS.
- f. On April 22, 2019, in a telephone call starting at about 8:27 p.m., RIVAS informed WEST that he never received the Fanta soda. RIVAS then instructed WEST, “Ask her. Ask Latoya. Ask Latoya for me. Ask her. Be like, ‘when is the Fanta soda coming?’” Based on my knowledge of the investigation to date, and my understanding from the conversations described in subparagraphs (a) and (b) above that “Blaze” was supposed to bring the Fanta soda to RIVAS, I believe that Latoya is a nickname used by RIVAS and WEST to refer to “Blaze.”

55. Records received from Sprint relating to the WEST Phone (the “WEST Phone Records”) list the billing name as “Tony West.” A review of the WEST Phone Records revealed a number of communications, including a high volume of communications between the WEST Phone and telephone number [xxx-xxx]-7152 (the “7152 Number”) on April 11, 2019, which led law enforcement authorities to believe that the person to whom WEST delivered the contraband was using the 7152 Number. At about 8:53 a.m. on April 11, 2019, WEST received two text messages from the 7152 Number. Later that day, between approximately 12:32 p.m. and 4:09 p.m., there were approximately 25 text messages between WEST and the 7152 Number, and there was one telephone call between them at 4:11 p.m. that lasted approximately 41 seconds.

56. A review of the records received from T-Mobile relating to the 7152 Number (the “7152 Phone Records”) revealed that the subscriber of that number is KYRIE JOHNSON at an address in Brooklyn, New York (the “Brooklyn Address”). According to records maintained by the GRVC for its employees, CO MURRAY listed his address as the Brooklyn Address, with the addition of a specific apartment number.

57. Law enforcement authorities reviewed a photo of CO MURRAY that was available as part of his criminal history report. The photo depicts CO MURRAY with braids and other physical characteristics that match the description provided by WEST and RIVAS in the telephone call described above in paragraph 54(c). Law enforcement authorities reviewed video surveillance from inside the GRVC from April 15, 2019, which revealed that CO MURRAY wore braids similar to those depicted in this criminal history report.

58. A review of CO MURRAY's DOC schedule revealed that from in or about and between March 31, 2019 to October 12, 2019, CO MURRAY was assigned to various posts at the GRVC, and was routinely placed at "Bldg 4 Control (MMR)" and "Intake," which are assignments that would have provided opportunity for CO MURRAY to come into contact with RIVAS. A review of CityTime records and the GRVC's schedule revealed that CO MURRAY worked at the GRVC on April 21, 2019, from approximately 1:00 AM to 3:31 p.m., which would have provided CO MURRAY with an opportunity to deliver the contraband to RIVAS, as described in paragraph 54(e) above.<sup>6</sup>

59. A series of telephone calls made from RIVAS to WEST in and around June 2019 revealed that RIVAS had WEST deliver money and contraband to CO MURRAY, who in turn delivered the contraband to RIVAS inside the GRVC on or about June 15, 2019.

60. Some of those June 2019 calls between RIVAS and WEST are described here:

- a. On June 4, 2019, in a telephone call starting at about 4:09 p.m., RIVAS told WEST, "I seen . . . this bitch on TV on the Killer Part 2 shit, but you're going to have to give her my car keys back and go get it from her because somebody got to redo it over. Somebody got to drive it back to the dealership and redo the whole shit . . . So you have to meet her, go get the keys, bring it to the shop, redo it over. Feel me?" WEST asked RIVAS why "she" didn't say anything about this problem last month. RIVAS answered, "She was busy trying to get the Killer Part 2 shit." RIVAS instructed WEST, "Get to her as soon as possible. Get—pick up the keys, bring it to Styles, let him drive it back to the shop and make sure everything is good with it. I heard right now it's not super good, 'cause I hear it's kinda squeaky right now. I need you to bring the car back to Styles, have him bring it to the shop, and redo it tonight." Based on my knowledge of the investigation to date and the context of the conversation, I understood that some contraband had previously been delivered to CO MURRAY, but that the package had not been properly prepared, so RIVAS was asking WEST to retrieve the package and have

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<sup>6</sup> Law enforcement authorities were unable to obtain video surveillance depicting any interaction between CO MURRAY and RIVAS on April 21, 2019, because it had been deleted from the system by the time law enforcement authorities determined its significance.

SHEPHARD repackage the contraband. Based on my training and experience, I further believe that “Killer Part 2” is a coded term for K2, which is a synthetic cannabinoid.

- b. On June 9, 2019, in a telephone call starting at about 4:08 p.m., RIVAS asked WEST if WEST had delivered “that message” to Latoya. WEST responded that he had. RIVAS then instructed WEST to ask Latoya when she planned on “pulling up” and that if she needed him to go to her, he could arrange that. Based on my knowledge of the investigation to date and my training and experience, I believe that RIVAS was asking WEST to find out from CO MURRAY, referred to by RIVAS and WEST as Latoya, when CO MURRAY would deliver the contraband to RIVAS.
- c. On June 15, 2019, in a telephone call starting at about 4:41 p.m., WEST asked RIVAS, “What’s going on?” RIVAS responded, “TD Bank.” WEST initially did not appear to understand what RIVAS was saying, but when RIVAS said “berza,” WEST indicated that he understood. WEST then asked if some unidentified item was “selling good.” RIVAS responded affirmatively. Based on my knowledge of the investigation to date, and RIVAS’s prior references to “touchdown” and “berza” described in the telephone conversations described in paragraph 54(e) above, I believe that RIVAS was letting WEST know that the contraband had been delivered, or “touched down,” and that RIVAS was successfully selling some of the contraband to other inmates.

61. Law enforcement authorities reviewed video surveillance from inside the GRVC, which showed that on June 15, 2019, starting at about 10:51 a.m., RIVAS arrived to the intake area (“Intake”) of the GRVC. CO MURRAY and RIVAS walked down a corridor between Intake and a room known as the Attorney-Client Visiting Room. CO MURRAY appeared to hand an object to RIVAS, which RIVAS then concealed. RIVAS then entered the shower area, received a brown paper bag from another inmate (“Inmate B”), and then emerged from the shower area holding the brown paper bag.<sup>7</sup> RIVAS returned to the Intake pantry and threw a small object to Inmate B, which Inmate B then hid inside his

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<sup>7</sup> Law enforcement authorities were unable to obtain video surveillance from within the shower area of Intake because it had been deleted from the system by the time law enforcement authorities determined its significance.

shoe. Based on my training and experience, I believe that the object that CO MURRAY handed to RIVAS was contraband because RIVAS then proceeded to hide the object. I also know from my training and experience that an inmate may help another inmate engage in unlawful activity if he receives some kind of compensation or favor in return. Based on that understanding, I believe that the small object that RIVAS threw to Inmate B was a small portion of the contraband and that RIVAS was compensating Inmate B for assisting RIVAS in hiding the contraband.

62. Based on their review of RIVAS's telephone calls from the GRVC, law enforcement authorities identified at least five different dates, specifically on July 13, 2019, August 19, 2019, September 14, 2019, October 1, 2019, and October 8, 2019, when CO MURRAY brought contraband into the GRVC and delivered the contraband to RIVAS. Law enforcement authorities confirmed these deliveries of contraband by CO WALKER to RIVAS by reviewing surveillance video from Intake and the housing unit inside the GRVC where RIVAS was housed on the specified dates.

63. On October 7, 2019 a DOC Special Search Team conducted a search of Housing Area 10B of the GRVC. During the search, contraband was recovered from RIVAS's person. The contraband consisted of a green leafy substance and a brown leafy substance, which was all wrapped in clear plastic.

64. Upon reviewing the 7152 Phone Records and cross-referencing the numbers called by CO MURRAY with telephone numbers logged into the Securus system, law enforcement authorities determined that CO MURRAY was in contact with a telephone number [xxx-xxx]-7709, believed to be used by a coconspirator ("Coconspirator 5"), that was frequently called by an inmate ("Inmate C"). In reviewing the calls between Inmate C



and Coconspirator 5 from in or about and between October 13, 2019 and November 6, 2019, law enforcement authorities determined that Inmate C had instructed Coconspirator 5 to meet CO MURRAY on November 6, 2019, to deliver CO MURRAY contraband so that CO MURRAY could bring it into the GRVC for Inmate C. As a result, law enforcement authorities conducted surveillance of CO MURRAY on November 6, 2019, in the vicinity of the Ravenswood Houses in Queens, New York. Law enforcement authorities observed CO MURRAY waiting on the street corner, holding only his telephone in his hands. An unidentified individual approached CO MURRAY. CO MURRAY then returned to his car with a package in his hands. CO MURRAY then placed the package in the trunk of his car, a red BMW.

65. Later that day, November 6, 2019, starting at approximately 11:06 p.m., law enforcement authorities stationed a canine trained in the detection of marijuana, cocaine, MDMA, methamphetamines, suboxone, hashish, and heroin, along with the canine's handler at the employee entrance of the GRVC. At approximately 11:30 p.m., CO MURRAY entered the GRVC to report for duty. CO MURRAY was escorted to a corridor in the same manner that had been used for corrections officers who had arrived before CO MURRAY. The canine alerted to CO MURRAY's front midsection.

66. Law enforcement authorities and I subsequently interviewed CO MURRAY. At the outset of the interview, law enforcement authorities informed CO MURRAY that if CO MURRAY chose not to speak with them, no work-related disciplinary action would be taken against him. CO MURRAY was further advised that he was free to leave and end the interview at any time.

67. During the interview, CO MURRAY informed law enforcement

authorities that he owned a Motorola cellular telephone and that the telephone number associated with that cellular telephone was the 7152 Number. CO MURRAY further admitted to smuggling contraband into the GRVC more than once and receiving cash bribes for doing so.

68. During the interview, CO MURRAY consented to law enforcement authorities' request to search his car. Law enforcement authorities conducted a search of CO MURRAY's car, a red BMW, and found a several bags containing a green leafy substance wrapped in clear plastic, one bag containing a brown leafy substance, and three packs of Newport cigarettes.

*D. Bribes Paid to Correction Officer Darrington James*

69. While monitoring Securus calls made by RIVAS, law enforcement authorities further identified calls between RIVAS and another coconspirator ("Coconspirator 6") in which RIVAS asked to have a cellular telephone delivered to him in the GRVC. The investigation revealed that RIVAS had WEST deliver a cellular telephone to someone they referred to as "son." As described below, law enforcement authorities identified that person as CO JAMES. CO JAMES then delivered the cellular telephone to RIVAS on or about October 10, 2019.

70. Two of the calls between RIVAS and Coconspirator 6 during which RIVAS requested a cellular telephone are described here:

- a. On October 5, 2019, in a telephone call starting at about 5:29 p.m., RIVAS told Coconspirator 6, "Guess what . . . I might be a go on Live Nation. I'm gonna let you know by tonight . . . It's looking like 85%." RIVAS said that it might be "pricey" and that Coconspirator 6 "might have to go get the joint" for him. RIVAS told Coconspirator 6, "I want you to order me something with FT." Based on my training and experience, "FT" refers to the Facetime application used on Apple devices, such as iPhones, which can be used to

conduct videoconferences. Based on my training and experience, I believe that RIVAS was informing Coconspirator 6 that RIVAS might have found someone willing to deliver him an iPhone.

- b. On October 5, 2019, in a telephone call starting at approximately 6:54 p.m., RIVAS told Coconspirator 6, "It's a go. . . . I need you to order me a magazine subscription though." RIVAS said that he would pay for the "shipping and handling" of the "live nation magazine." Based on my training and experience and my knowledge of the investigation, RIVAS was informing Coconspirator 6 that someone had agreed to bring him an iPhone, and that RIVAS would pay the cost of having it delivered, so long as Coconspirator 6 paid for the telephone service plan.

71. A review of video surveillance inside the GRVC on October 5, 2018, shows that RIVAS interacted with and spoke to CO JAMES prior to and in the time period around the Securus calls described in the paragraphs 70(a) and (b) above.

72. Two of the calls between RIVAS and WEST during which they discuss getting a cellular telephone for RIVAS are described here:

- a. On October 8, 2019, in a telephone call starting at 2:11 p.m., WEST confirmed that he spoke to "boy" and that it's happening "tonight." WEST confirmed that everything had been "coordinated" and that he is going to take the F train a couple of stops. RIVAS asked, "Did son say that you had to get your own juice?" and WEST answered no. RIVAS instructed WEST, "When you get it though, make sure it's fully loaded and you download WhatsApp for him." RIVAS also said, "I need a hundred, a hundred pack on it." Based on my training and experience, I believe that WEST was informing RIVAS that WEST planned to pick up the iPhone later that night and then deliver the iPhone to "son" after WEST had downloaded WhatsApp onto the iPhone.
- b. On October 9, 2019, in a telephone call starting at about 7:46 p.m., WEST confirmed that he saw "son" last night and that "everything [is] definitely good." RIVAS asked WEST where he had to go and WEST stated that he went to Queensbridge at the projects. RIVAS asked what the joint looked like and whether it was size 5 or size 6. WEST answered that it was a size 6. RIVAS asked, "So the 15 minutes is his too, right? You gave him the 15 minutes?" WEST said that he did. Based on my training and experience and my knowledge of the investigation, I believe that WEST was informing RIVAS that that WEST delivered an iPhone 6 and \$1,500 last night.

73. A review of the WEST Phone Records showed that WEST frequently

communicated with telephone number [xxx-xxx]-5260 (the “5260 Number”), which is the same telephone number identified as belonging to CO JAMES on the DOC’s employee detail report. CO JAMES also submitted to DOC a T-Mobile billing statement for the 5260 Number with a “Bill Close Date” of April 7, 2018, in the name of “DARRINGTON [sic] H. JAMES.” In an interview conducted on November 27, 2019, CO JAMES provided the 5260 Number as his personal cellular telephone number.

74. A review of the WEST Phone Records revealed that on October 8, 2019, WEST exchanged approximately 22 text messages between 10:59 a.m., and 2:09 p.m., with CO JAMES at the 5260 Number. Based on my knowledge of the investigation, I believe that WEST was communicating with CO JAMES during this period to coordinate the delivery of the iPhone by WEST to CO JAMES, as referenced in the telephone conversation between WEST and RIVAS described above in paragraph 72.

75. Based on a review of a telephone call from RIVAS to Coconspirator 6 on October 15, 2019, starting at about 1:30 p.m., in which RIVAS appeared to reference communications made outside of the Securus system, law enforcement authorities believed that RIVAS had received a cellular telephone while inside the GRVC.

76. A review of video surveillance shows that on October 10, 2019, CO JAMES was assigned to Building 10 of the GRVC. At approximately 7:18 p.m., CO JAMES entered Housing Area 10B at the GRVC where he began communicating with RIVAS. CO JAMES then opened the janitor’s closet with RIVAS standing behind him. Before CO JAMES opened the door, another correction officer appeared and stood next to CO JAMES and RIVAS. RIVAS entered the janitor’s closet as CO JAMES waited outside. RIVAS exited the janitor’s closet and returned a few minutes later. RIVAS again opened

the janitor's closet and both CO JAMES and RIVAS entered the closet, where they remained alone inside for approximately 30 seconds. Thereafter, CO JAMES left the housing area and returned to the Bubble and RIVAS returned to his cell. Based on my training and experience, I believe that CO JAMES provided RIVAS with the contraband while the two men were inside the janitor's closet of Housing Area 10B.

77. On October 25, 2019, a DOC Special Search Team was sent to search GRVC Housing Area 10B and Intake where contraband was recovered from RIVAS's person and bag. More specifically, as the search was being conducted, investigators observed that RIVAS, who was working in Intake, attempted to hide his laundry bag in various places within Intake. Accordingly, the Special Search Team searched RIVAS's laundry bag, and recovered documents bearing RIVAS's name, an Apple iPhone 6s, and an iPhone charger. An officer assigned to the Special Search Team search RIVAS and recovered 12 clear plastic bags containing a green leafy substance. A field test was conducted on the substance with a positive result for the presence of marijuana.

78. Law enforcement authorities continued to monitor the Securus calls made from the GRVC to WEST and SHEPHARD in which they identified a plan by RIVAS and another inmate ("Inmate D") to have WEST and SHEPHARD deliver contraband and money to "Jamaica Avenue." As described below, law enforcement authorities identified "Jamaica Avenue" as CO JAMES. A review of RIVAS's DOC visitor log lists SHEPHARD as RIVAS's sibling and shows that SHEPHARD visited RIVAS on August 4,

2019. After receiving money and contraband from WEST and SHEPHARD, CO JAMES was supposed to deliver the contraband to RIVAS.

79. Some of those telephone calls to WEST and SHEPHARD are described here:

- a. On November 18, 2019, in a telephone call starting at about 10:21 a.m., RIVAS told WEST that “Jamaica Avenue” is “going to be taking over T’s spot.” Based on my training and experience and my knowledge of the investigation, RIVAS was telling WEST that CO JAMES is going to be taking over CO MURRAY’s role of bringing contraband to RIVAS into the GRVC.
- b. On November 20, 2019, in a telephone call starting at about 10:36 a.m., RIVAS told WEST, “Jamaica Ave going to be pulling up on you . . . I just need you just to line lower up for two berzas, that’s it. No, no, four—for eight berzas and then take it out of my chambers. . . . everything gonna go to Jamaica . . .” RIVAS continued, “She says she going to holler at you soon,” and that “after Thanksgiving” WEST needs to have “the eight ready.” Based on my training and experience, RIVAS was telling WEST that CO JAMES is going to be contacting WEST soon and that WEST needs to pick up eight units of contraband and have it ready after Thanksgiving.
- c. On November 21, 2019, in a telephone call starting at about 8:23 p.m., Inmate D had SHEPHARD make a three-way call to reach “E.” Inmate D told E, “my man thought it was a buck so he, he gonna do you one better. Do the one and a half for the buck. And he said tomorrow, he’s gonna come get . . . he’s gonna drop 450 tomorrow. . . . He promises he’ll come back tomorrow or the day after, he’ll drop \$350.” SHEPHARD said that he would head over to see E at around 12 o’clock. Based on my training and experience and my knowledge of the investigation, I understood that Inmate D was telling E to give SHEPHARD “one and a half” of contraband today and that SHEPHARD was going to pay E \$100 today and \$350 tomorrow.
- d. On November 22, 2019, in a telephone call starting at about 10:51 a.m., RIVAS told WEST that he needs WEST to go get the “Killer Cam Part 2” and then Jamaica Ave is going to contact WEST either today or tomorrow. RIVAS told WEST, “Give her 13 minutes of your time and then give her the TV too—13 from my chambers and then the TV.” WEST acknowledged RIVAS’s instructions. RIVAS continued, “The Killer Cam Part 2, I just, it just needs to be, it’s three berzers but it’s just got to be one whole body. Microscopic shirt pocket, you feel me?” WEST confirmed that he understood. RIVAS instructed WEST to take \$350 from his “chambers” and meet up with the person that SHEPHARD was supposed to meet in Midtown.

RIVAS offered to pay WEST \$100 to do this because RIVAS needs this to get done today. RIVAS said, "I need you to meet him to give him the 350 to get the berza from son and then you give the 13 to Jamaica Avenue. . . . I need it done today so you can see Shorty tomorrow." RIVAS and WEST then discussed why SHEPHARD should be the one to meet the person in Midtown instead of WEST. WEST suggested, "I could go meet Styles and give him the chicken." RIVAS agreed and said, "I'm gonna tell [Syles] to walk over there, grab that from you and then I'm gonna have him go straight to see son. And then I'm gonna have him link back up with you tonight to drop it off." Based on my training and experience and my knowledge of the investigation, I believe RIVAS was asking WEST to buy K2 from someone in Midtown, and then to deliver the K2, along with a phone and \$1,300, to CO JAMES. I further understood that RIVAS told WEST that the K2 was expected to come in three packages and that RIVAS needed to WEST to combine them into one single small package before giving it to CO JAMES. The two men then agreed on a plan in which SHEPHARD would get \$350 from WEST, use that to buy the K2 from someone in Midtown, and then deliver the K2 later that night to WEST so that WEST could deliver then deliver everything to CO JAMES.

- e. On November 22, 2019, in a telephone call starting at about 2:05 p.m., RIVAS asked SHEPHARD, "Are you going to meet Tone to go get that?" SHEPHARD confirmed. RIVAS asked, "And then you're gonna go see son? Did he respond yet?" SHEPHARD answered, "Nah, he didn't." RIVAS instructed, "As soon as he responds, go see him please, ASAP. You're gonna get three berzas from him. That's 350. He's supposed to give you an extra one for A Class . . . so you're leaving with four altogether." RIVAS emphasized that he needed this to get done tonight. Based on my training and experience and my knowledge of the investigation, I understood that RIVAS was instructing SHEPHARD to collect money from WEST in order to purchase three units of contraband for RIVAS, and that SHEPHARD also would receive an additional unit for Inmate D from an unidentified individual.
- f. On November 23, 2019, in a telephone call starting at about 6:26 a.m., SHEPHARD confirmed to RIVAS that he went to see him and everything is good. SHEPHARD said that he has it in his pocket but that he couldn't get the "Fonto" so he has to get "some soda" somewhere else. RIVAS asked and SHEPHARD confirmed that the phone fits in SHEPHARD's pocket. SHEPHARD said that he got "two berzas" and "extra gigabytes" that RIVAS has to "transfer to A." RIVAS asked, "You put it on a clock?" SHEPHARD answered, "Nah, not yet." RIVAS asked, "Do it look like a whole berza? . . . Both of them?" SHEPHARD answered yes. RIVAS told SHEPHARD that SHEPHARD needs to "put three in one with the soda" but it has to be "microscopic shirt pocket." Based on my training and experience, SHEPHARD was telling RIVAS that he obtained the contraband, which

consists of two packages and a smaller one which was intended for another person called "A." RIVAS then instructed SHEPHARD to combine the packages together into one single small package.

- g. On November 23, 2019, in a telephone call starting at about 9:38 a.m., RIVAS told WEST that there is going to be one change, that "instead of the 13 it is going to be 15, no device." RIVAS repeated for WEST, "15, no TV." Based on my training and experience, RIVAS was telling WEST to pay \$1,500 instead \$1,300 and that a phone will not be included with the contraband.
- h. On November 24, 2019, in a telephone call starting at about 9:20 a.m., RIVAS asked WEST, "What's the word?" WEST responded, "Everything good." RIVAS asked WEST if WEST wants some "feets" for Christmas. RIVAS said that WEST put him in a good mood. Based on my training and experience, WEST was telling RIVAS that the contraband and money had been delivered. RIVAS then offered WEST shoes for Christmas as a way to express his gratitude to WEST.
- i. On November 24, 2019, in a telephone call starting at about 11:39 a.m., SHEPHARD told RIVAS, "It's two berzers plus an extra 10 . . . one with 28 and one with 10." SHEPHARD told RIVAS that he paid \$150 for each half. RIVAS said that it was supposed to be \$150 for the whole 28 and that SHEPHARD was supposed to give "three for the whole two." Based on my training and experience, SHEPHARD was telling RIVAS that he paid \$300 in exchange for three packages – one package of 28 grams, which is equal to an ounce, and one package of 10 grams. SHEPHARD explained that he paid was \$150 for each half an ounce. RIVAS said that it was supposed to cost \$150 for each ounce and that SHEPHARD had overpaid.

80. On or about November 27, 2019, CO JAMES was found in possession of contraband inside the GRVC. On that date, starting at approximately 2:30 p.m., law enforcement authorities stationed a canine trained in the detection of marijuana, cocaine, crack cocaine, MDMA, methamphetamines, suboxone, hashish, and heroin, along with the canine's handler at the employee entrance of the GRVC. At approximately 2:40 p.m., CO JAMES entered the GRVC to report for duty. Moments after CO JAMES secured his firearm, and after he was in a position to view the canine, CO JAMES attempted to leave the GRVC. Law enforcement authorities approached CO JAMES and asked him to come back



into the GRVC so that a canine search could be conducted. The canine did not alert, but showed interest in CO JAMES. A DOI investigator conducted a pat-frisk of CO JAMES and discovered contraband in a package hidden near his ankle. The contraband consisted of a green leafy substance and a brown leafy substance vacuum-sealed in clear plastic.


81. Law enforcement authorities and I subsequently interviewed CO JAMES. At the outset of the interview, law enforcement authorities informed CO JAMES that if CO JAMES chose not to speak with them, no work-related disciplinary action would be taken against him. CO JAMES was further advised that he was free to leave and end the interview at any time.

82. During the interview, CO JAMES admitted to smuggling contraband into the GRVC more than once and receiving cash bribes for doing so.


83. In addition to the circumstances described above demonstrating that CO JAMES is the person referred to as "Jamaica Ave" by RIVAS and WEST, law enforcement authorities determined that CO JAMES is from Jamaica and that he speaks with a readily detectible Jamaican accent.

WHEREFORE, your deponent respectfully requests that the defendants CHRISTOPHER WALKER, ALDRIN LIVINGSTON, MICHAEL MURRAY, DARRINGTON JAMES, CLARENCE BROOKS, KYLE CHARLES, CHRISTOPHER RIVAS, [REDACTED] JORCETTA KING, STYLES SHEPHARD and TONY WEST be dealt with according to law. Your affiant also respectfully requests that this

affidavit and any issued arrest warrants be sealed as the defendants remain at large and public disclosure of this affidavit and/or arrest warrants may lead them to flee or otherwise seek to avoid apprehension.

  
\_\_\_\_\_  
Kristen Schill  
Special Agent, Federal Bureau of Investigation

Sworn to before me this  
9<sup>th</sup> day of January, 2020

  
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THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK