

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Magistrate No. 14-7239 (CLW)
: :
v. : :
: :
COREY BATTS : **CRIMINAL COMPLAINT**
a/k/a "C Murder," : :
a/k/a "Cee" : :


I, Michael Bronisz, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B


continued on the attached pages and made a part hereof.



Michael Bronisz, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

November 12, 2014 at Newark, New Jersey
Date City and State

Honorable Cathy L. Waldor
United States Magistrate Judge
Name & Title of Judicial Officer 
Signature of Judicial Officer

ATTACHMENT A

Count One
Influencing, Impeding, or Retaliating Against a Federal Official

From in or about August 2014 through in or about November 2014, in Hudson County, in the District of New Jersey and elsewhere, defendant

COREY BATTS,
a/k/a "C Murder,"
a/k/a "Cee"

did, with the intent to impede, intimidate, or interfere with a federal law enforcement officer, or an official whose killing would be a crime under Title 18, United States Code, Section 1114, while such officer was engaged in the performance of official duties, or with intent to retaliate against such officer on account of the performance of official duties, attempt to murder such officer in violation of Title 18, United States Code, Section 115(a)(1)(A).

Count Two
Solicitation to Commit a Crime of Violence

From in or about August 2014 through in or about November 2014, in Hudson County, in the District of New Jersey and elsewhere, defendant

COREY BATTS,
a/k/a "C Murder,"
a/k/a "Cee"

did, with the intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, to wit, the attempted murder of a federal law enforcement officer, contrary to Title 18, United States Code, Section 115(a)(1)(A), and under circumstances strongly corroborative of that intent, knowingly and intentionally solicit, command, induce, and otherwise endeavor to persuade such other person to engage in such conduct, in violation of Title 18, United States Code, Section 373.

ATTACHMENT B

I, Michael Bronisz, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other pertinent items of evidence. Since this Complaint is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not necessarily included each and every fact known by the government concerning this investigation. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the day alleged.

Background of Investigation

1. The FBI is currently engaged in an investigation of the Grape Street Crips (the "GSC"). The GSC is a national street gang, founded in Los Angeles, California, that operates cliques in, among other places, the District of New Jersey. Generally, each clique is supervised by a single leader, sometimes referred to as the "big homie" or an "original gangster," who is responsible for overseeing the activities of that particular clique, or "set," coordinating drug distribution and money laundering efforts, and authorizing acts of violence committed on behalf of the clique. GSC members are united in the common goals of preserving, protecting, promoting, and expanding the power and authority of the gang, and increasing respect for members of the gang in their communities. As evidenced by numerous prosecutions and convictions of GSC members in the District of New Jersey, members have engaged in and continue to engage in a variety of criminal activities, including drug distribution and other offenses, in order to further the goals and objectives of the GSC enterprise.
2. The GSC also seeks to enrich its members and associates through, among other things, the distribution of narcotics, using intimidation, violence, threats of violence, and assaults, to preserve and protect the power, territory, and profits of the enterprise.
3. Corey BATTIS, a/k/a "C-Murder," a/k/a "Cee," is a ranking member of the GSC who holds the rank of "G" or "Gangsta." On or about August 7, 2014, a federal grand jury sitting in Newark returned an 18-count Superseding Indictment charging BATTIS with, among numerous other crimes, conspiracy to commit murder, attempted murder, and aggravated assault with a deadly weapon, all in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a) (see, United States v. Kwasi Mack and Corey Batts, Crim. No. 14-220 (SRC); the "Indictment"). Prior to his arrest, BATTIS is alleged to have

led the GSC activities, including narcotics trafficking, at the Oscar Miles Housing Complex at and around Court Street in Newark, New Jersey.

Summary of the Instant Offenses

4. BATTIS is currently incarcerated at the Hudson County Corrections Center (“HCCC”) awaiting trial on the Indictment. During his period of incarceration, BATTIS has endeavored to facilitate the murder of a certain Special Agent of the FBI (the “Targeted SA”), whom BATTIS believes is largely responsible for BATTIS’s incarceration. BATTIS has enlisted the aid of at least one fellow inmate (the “CI”) and at least one unindicted co-conspirator (the “CC-1”) to assist with his plan.

5. BATTIS’s plan, which he has taken several steps to implement, involved the transfer of certain compact discs containing images of the Targeted SA from BATTIS to BATTIS’s GSC associates. Upon their receipt of the images, BATTIS intended for his associates to locate and murder the Targeted SA on BATTIS’s behalf.

6. Specifically, beginning in or around August 2014, BATTIS engaged in a series of conversations with the CI. On or about August 14, 2014, BATTIS advised the CI that BATTIS had at least one non-incarcerated, gang associate (hereafter, “GSC-1”) who had purportedly murdered a number of individuals and had not been caught by law enforcement. BATTIS then stated that BATTIS wanted to kill the FBI agent who was involved in his arrest, and specifically identified the Targeted SA as the agent he wanted to murder. BATTIS also informed the CI that the Targeted SA had attempted to convince BATTIS to provide information about GSC-1 to law enforcement, providing BATTIS with further incentive to murder the Targeted SA.¹ Finally, BATTIS told the CI that he had arranged for one of his associates to attempt to take photographs of the Targeted SA at one of BATTIS’s court appearances. BATTIS intended for the photographs to be used by his associates to subsequently locate and murder the Targeted SA.

7. On or about October 1, 2014, the CI met BATTIS in the HCCC law library and engaged in a consensually-recorded conversation. During this conversation, BATTIS was viewing a computer screen which depicted video surveillance footage of the Targeted SA. The footage was contained on a

¹ On or about November 13, 2013, following his arrest on the charges in the Indictment, BATTIS provided a Mirandized statement to the Targeted SA. In that statement, BATTIS did, indeed, provide information to the FBI regarding the identities and status of several GSC members in the Newark set. BATTIS also provided information about GSC’s narcotics trafficking activities in and around Newark, including the descriptions of the particular brands of heroin sold by GSC members, as well as the addresses of several GSC narcotics stash locations. Finally, BATTIS provided the Targeted SA information pertaining to GSC firearms trafficking activities, as well as information about several shootings involving GSC members.

compact disc which BATTs had obtained as part of the discovery materials provided to him following the Indictment. BATTs explained to the CI that he wanted to print photographs of the Targeted SA from the video footage. While viewing the video footage, BATTs pointed to the screen while the Targeted SA and his partner were clearly visible. BATTs stated, "I'm gonna send these out (the photographs of the Targeted SA)...get these niggas (meaning to kill the Targeted SA)...these is the agents (meaning the Targeted SA)..."

8. Over the course of approximately the next two hours, BATTs attempted to enlist the aid of the CI and other inmates in the library in an effort to print photographs of the Targeted SA from the compact disc. Unsuccessful in his efforts, BATTs subsequently decided to mail the compact discs to an individual he referred to as his "cousin." However, due to his concern that the package could potentially be intercepted by law enforcement, BATTs devised a plan to mail the discs to an individual he believed would not raise the suspicion of the authorities. Specifically, BATTs provided the CI with the name and telephone number of CC-1, and asked the CI to call CC-1 to obtain CC-1's mailing address.

9. On or about October 2, 2014, the CI engaged in a consensually recorded conversation with CC-1. During the conversation, the CI informed CC-1 that BATTs had directed the CI to contact CC-1. The CI advised CC-1 that BATTs intended to mail a package to CC-1 and that he needed CC-1's mailing address. CC-1 provided the CI with an address located in Newark (the "Delivery Location").

10. On or about October 3, 2014, the CI met with BATTs in the HCCC law library and engaged in a consensually-recorded conversation. During this conversation, BATTs was again viewing video surveillance footage of the Targeted SA. BATTs asked the CI if the CI had obtained CC-1's address, and the CI provided BATTs with the Delivery Location. BATTs then asked the CI to place money on CC-1's telephone account so that BATTs could make a collect telephone call to CC-1 to further discuss his plan. Finally, BATTs asked the CI for a number of compact discs. Pursuant to HCCC protocol, BATTs's discovery materials needed to be checked out from, and returned to the HCCC law library after each viewing. Accordingly, BATTs intended to substitute the CI's discs for his own discovery discs containing the Targeted SA's image, which BATTs planned to mail to CC-1 at the Delivery Location.

11. On or about October 7, 2014, the CI met with BATTs in the HCCC law library and engaged in a consensually-recorded conversation. During this conversation, the CI advised BATTs that he had placed money on CC-1's telephone. Later that day, BATTs engaged in a recorded conversation with CC-1 over the HCCC telecommunications network. During this conversation, BATTs told CC-1 that BATTs had one of his "people" (meaning the CI) put money on the telephone number associated with CC-1's account so that BATTs could call CC-1. CC-1 confirmed that an individual (meaning the CI) had

previously contacted CC-1 on BATTs's behalf to obtain the Delivery Location. BATTs further stated that he had important information to send to the Delivery Location, and that BATTs needed CC-1 to give the information to "his people." Specifically, BATTs stated that he wanted CC-1 to physically hand-deliver the information to an individual nicknamed, "the Rapper."

12. Law enforcement authorities have subsequently identified at least one known, non-incarcerated, GSC associate of BATTs who uses the nickname "the Rapper" (hereafter, "CC-2").

13. On or about October 8, 2014, the CI met with BATTs in the HCCC law library. During this meeting, the CI provided BATTs with approximately four compact discs and a number of postage stamps. The CI observed as BATTs placed his own discovery discs in a mailing envelope, which he subsequently weighed to determine the necessary postage. BATTs then substituted the CI's compact discs into BATTs's discovery materials, which he subsequently returned to the HCCC law library clerk.²

14. On or about October 17, 2014, BATTs engaged in a recorded conversation with CC-1 over the HCCC telecommunications network. During this conversation, BATTs confirmed that he mailed the package containing the discs with the images of the Targeted SA to the Delivery Location. When BATTs learned that the package had not yet been received by CC-1, BATTs expressed his concern that the package might have been intercepted by law enforcement, and that the authorities might attempt to use the information contained within the package against BATTs in future legal proceedings. BATTs further expressed concern that the CI may have alerted law enforcement about BATTs's plan to mail the discs. The pertinent parts of that conversation are further summarized below:

BATTs: Did you ever get the mail?
CC-1: No, we didn't get anything.
BATTs: You didn't?
CC-1: No, what is it, some paperwork?
BATTs: Yeah; I hope they didn't intercept my shit, yo.
CC-1: You think so?
BATTs: Oh my God you that will be fucked up.
CC-1: Should have been at (the Delivery Location) by now.
BATTs: Hell yeah, I mailed that shit out last week.
CC-1: And you remember the address?
BATTs: Yeah I wrote it down, everything is correct. That shit had some CD's in there and it had the fucking paperwork that

² On or about October 21, 2014, law enforcement officers observed four compact discs in BATTs's materials at the HCCC law library which were inscribed with the name and other identifying information of the CI.

I wanted you to take to "Jamil" (meaning Jamil Batts, believed to be the defendant's brother) to show the lawyer.
CC-1: You don't have any more? Did you make copies?
BATTS: No that's gonna be hard to make copies.
CC-1: Maybe it's still coming.
BATTS: Yeah, that shit should have been there though man that shit's scaring me.
CC-1: Who do you think took it? The people there (meaning HCCC officials)?
BATTS: Nah the other people took it, the alphabet people (meaning the FBI).

CC-1: I told Jamil that I was waiting for it.
BATTS: I'm mad as hell that shit didn't get there yo. I know it was enough, I put extra stamps on it.
CC-1: In a big envelope or a small one?
BATTS: Like a big small one, I weighed it and everything to make sure it was correct and put extra stamps and everything.
CC-1: My (relative) gave you the address or was it the one I gave to the dude (meaning the CI)?
BATTS: The one you gave to the dude.
CC-1: I mean, yeah it was the right address I think.
BATTS: (confirms Delivery Location address)
CC-1: Yeah.
BATTS: I'm gonna check, that shit should have been there yo.

BATTS: Yo I hope this nigga (meaning the CI) ain't doing no funny stuff.
CC-1: Dude that you sent it out with?
BATTS: No the dude that called you for me. That's the only dude that knew what I was doing, you feel what I'm saying?
CC-1: Well if you don't know him like that then you shouldn't have given it to him.
BATTS: Nah I didn't give him nothing. Don't know if he said something to somebody so they could intercept it. I'll know. But they can't do nothing to me. Just paperwork to show a lawyer, ain't nothing wrong with that. That's legal. I don't wanna jump to conclusions. What's (the Delivery Address) so I can go look when I hang up the phone?
CC-1: (confirms Delivery Address)

BATTS: I'm gonna look on it. Hopefully everything will be alright.

BATTS: (speaking to CC-1's friend ("UF"), who got on the phone after CC-1 to speak with Batts) Are you going to Topsy's with her tonight?

UF: Last time I went I saw, what's the boy's name? Light-skinned elf-looking boy? Rizzo?

BATTS: Yeah, the Rapper. You met him?

UF: Yeah, I met him a long time ago at your house.

BATTS: He had dreds then. I'm scared because I had some stuff to show him and I don't know if they intercepted my shit man. They're gonna probably try to use that in court, yo.