

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton, U.S.D.J.
	:	
v.	:	Crim. No. 21-369-6
	:	
AMIR WARDEN,	:	18 U.S.C. § 1962(d)
a/k/a “Stamps,”	:	18 U.S.C. § 922(g)(1)
a/k/a “Killa”	:	
	:	

SUPERSEDING INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Racketeering Conspiracy)

The Racketeering Enterprise

1. At various times relevant to this Superseding Information, in the District of New Jersey, and elsewhere, defendant AMIR WARDEN, a/k/a “Stampz,” a/k/a “Killa” (“WARDEN”), and others, known and unknown, were members and associates of a criminal organization known as the Rollin’ 60s Neighborhood Crips (the “Rollin’ 60s” or the “Enterprise”). The Rollin’ 60s, including its leadership, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates

functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

History, Rules, and Organization of the Rollin' 60s Crips

2. The Enterprise originated in the West Side of South Los Angeles and now operates in numerous states, including but not limited to California, Pennsylvania, North Carolina, Florida, Tennessee, and New Jersey. Members and associates of the Enterprise within the District of New Jersey operate under the umbrella of the Silverbacc Gorillas, or "SBG," and are then further divided into "districts" and "units."

3. The Rollin' 60s operated throughout the District of New Jersey, including in Essex, Middlesex, Mercer, and Union Counties, as well as within the New Jersey prison system. At all relevant times, WARDEN operated in and around Union and Essex Counties.

4. The Rollin' 60s members and associates followed certain traditions and protocols of the Enterprise, including:

a. visible demonstrations of gang affiliation, such as an identification with the colors blue and white, which appear in clothing, hats, and bandanas that Rollin' 60s members wear;

b. greeting each other with the phrase, "NH," which is an acronym for "neighborhood," and thus shorthand for "Neighborhood Crip," and referring to each other as "Hoodsta" and "Loc";

c. using of social media platforms to proclaim their affiliation and highlight the Enterprise by posting gang-related photographs and videos and to communicate with other members and associates; and

d. tattoos, slogans, and hand gestures signifying membership in the Rollin' 60s.

5. The rules governing the Rollin' 60s establish, among other things:

a. a hierarchical power structure in which members are given designations or ranks signifying their status within the gang and;

b. a system of discipline and punishment for those members who violated rules or failed to carry out orders from higher-ups.

6. Members and associates of the Rollin' 60s engaged in, or controlled, drug trafficking and other criminal activities in various neighborhoods and public-housing complexes in and around Newark, Irvington, Elizabeth, and East Orange, New Jersey, including, among others:

a. Within Newark, between Sanford Avenue to Stuyvesant Avenue, from South Orange Avenue to Tremont Avenue, as well as in the Blue Hills region of Newark, located in the vicinity of Clifton Avenue and Victoria Avenue, and on Livingston Street, between 18th Avenue and Avon Avenue. The Enterprise's primary area for narcotics distribution within Newark was South Orange Avenue and Salem Street.

b. Within Irvington, the Crescent Lane public-housing complex ("Crescent Lane") and its surrounding vicinity, bordered by Nye and Lyons

Avenues, from Lincoln Place to Ball Street. The Enterprise's primary area for narcotics distribution outside Crescent Lane was between Lyons and Union Avenues. Within Crescent Lane, the Enterprise operated primarily within Building Eight.

c. Within Elizabeth, the Mravlag Manor housing complex and its surrounding vicinity, located within the Bayway section of the City.

d. Within East Orange, on Ashland Avenue between Park Avenue and William Street, which was an area referred to as "Cashland."

Purposes of the Rollin' 60s Crips Enterprise

7. The purposes of the Rollin' 60s included the following:

a. promoting and enhancing the Enterprise and the activities of its members and associates, both in and out of prison, which activities included, but were not limited to, drug trafficking, murder, robbery, automobile theft, and other criminal activities;

b. preserving and protecting the power, territory, reputation, and profits of the Enterprise and of its members and associates, both in and out of prison, through the use of intimidation, violence, threats of violence, assaults, and murder;

c. providing assistance to gang members and associates who were imprisoned after having committed crimes on behalf of the Enterprise;

d. confronting and retaliating against rival gangs through intimidation, threats of violence, and acts of violence; and

e. hindering, obstructing, and preventing law enforcement from identifying participants in the gang's criminal activity, from apprehending the offenders of those crimes, and from successfully prosecuting and punishing those offenders.

WARDEN'S Role in the Enterprise

8. WARDEN was a senior member of the Rollin' 60s. Among other responsibilities, WARDEN organized the transport of large quantities of marijuana from California and other places to New Jersey and elsewhere. WARDEN also coordinated drug distribution, including heroin and marijuana, in and around Irvington and Elizabeth.

The Racketeering Conspiracy

9. Beginning at least as early as in or about 2015, and continuing through on or about September 29, 2022, in the District of New Jersey, and elsewhere, the defendant,

**AMIR WARDEN,
a/k/a "Stamps,"
a/k/a "Killa,"**

together with others known and unknown, being a person employed by and associated with the Rollin' 60s Crips, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with others to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the Rollin' 60s Crips enterprise through a pattern of racketeering

activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- a. multiple offenses involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), 2C:5-2, and 2C:2-6;
- b. multiple offenses involving robbery, contrary to N.J.S.A. 2C:15-1(a)(1), 2C:5-1(a), 2C:5-2, and 2C:2-6;
- c. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communications facility to violate the Controlled Substances Act);
- d. multiple offenses indictable under Title 18, United States Code, Section 1029 (relating to fraud and related activity in connection with access devices);
- e. multiple offenses indictable under Title 18, United States Code, Section 1343 (relating to wire fraud);
- f. multiple offenses indictable under Title 18, United States Code, Section 1344 (relating to financial institution fraud); and
- g. multiple offenses indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant).

10. It was part of the conspiracy that WARDEN agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Manner and Means of the Conspiracy

11. Among the manner and means by which WARDEN and other members and associates of the Rollin' 60s agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

a. It was part of the conspiracy that the members and associates of the Rollin' 60s acquired and maintained weapons, including firearms, to commit violent criminal acts on behalf of the Enterprise.

b. It was further part of the conspiracy that the members and associates of the Rollin' 60s shared firearms to use in committing violent criminal acts.

c. It was further part of the conspiracy that the members and associates of the Rollin' 60s committed, attempted, agreed, and threatened to commit violent acts, including murder and assault with deadly weapons, to avenge attacks or perceived slights against other members and associates of the Rollin' 60s; to punish Enterprise members and associates who had been disloyal; to retaliate against rivals; to maintain and enhance the reputation of the Rollin' 60s; and to protect and otherwise assist their drug trafficking business.

d. It was further part of the conspiracy that participation in criminal activity by a member, particularly violent acts directed at rivals or as

directed by the gang leadership, increased the respect accorded to that member, resulted in that member's maintaining and increasing position in the gang, and could result in a promotion to a leadership position.

e. It was further part of the conspiracy that members and associates of the Rollin' 60s used social media, including Instagram and Facebook, to intimidate witnesses and other members of the community, to promote the Rollin' 60s, and to share amongst members and associates information relating to members and associates of the Enterprise suspected of being disloyal to the Enterprise, as well as individuals who provided information to law enforcement related to the Enterprise's criminal activities.

f. It was further part of the conspiracy that members and associates of the conspiracy enriched themselves through drug trafficking, wire fraud, bank fraud, access device fraud, car theft, carjacking, and robberies.

Overt Acts

12. In furtherance of the conspiracy and to achieve its purposes, WARDEN and his co-conspirators committed the following overt acts, among others, in the District of New Jersey, and elsewhere:

a. Beginning at least as early as in or around 2015, numerous members and associates of the Rollin' 60s, including WARDEN, engaged in multiple acts of distribution of controlled substances, and possession with intent to distribute controlled substances, in and around the District of New Jersey.

b. Beginning at least as early as in or around 2015, WARDEN and other members and associates of the Rollin' 60s used social media, to include Instagram and Facebook, to conduct the business of the enterprise, including: raising funds for the Enterprise's members; referencing penalties for violating the Rollin' 60s rules; discussing the initiation of new members; scheduling meetings; and paying homage to members and associates of the Rollin' 60s who were killed.

c. Beginning at least as early as in or around 2015, WARDEN and other members and associates of the Rollin' 60s used social media, including Instagram and Facebook, to conduct the illegal activities of the Enterprise, to include planning violent activities; purchasing, selling and exchanging firearms; and coordinating drug sales.

d. On or about August 19, 2019, in the vicinity of West Stratford Place and Union Avenue in Irvington, WARDEN distributed heroin to another individual.

e. On or about October 6, 2020, WARDEN and other members and associates of the Enterprise participated in a group discussion through use of Instagram relating to profiting from the sale of marijuana and shirts, with Co-Conspirator-1 stating, "I don't NEED n—as to go in with me on nothing, I can handle that. I need help moving," and WARDEN "liking," or showing his agreement, with Co-Conspirator-1's statement.

f. On or about January 1, 2021, WARDEN, using Instagram user ID "bossmanstampz," and Co-Conspirator-2, using Instagram user ID "rr_chase,"

communicated regarding a debt owed by Co-Conspirator-2 to WARDEN, with WARDEN stating, “U betta b ona bloc n hav my cash I’m bouta start tweekin on yal n—as fucking my bread up,” and Co-Conspirator-2 responding, “I’m tryna get it right now I got a new job from 5 to 12 p.m. That’s y I came out there to get a couple dollars up I didn’t forget I know I owe u and I’m a make it right onna set cuz.”

g. From on or about March 26, 2021 through on or about March 29, 2021, WARDEN and Co-Conspirator-3 used Instagram to discuss drug distribution, with Co-Conspirator-3 utilizing Instagram user ID “bkig_houdini,” and WARDEN utilizing Instagram user ID “bossmanstampz.” During the conversation, Co-Conspirator-3 stated, “Aye u lit ... my cussen he be playing around if u can get me the bags for 14 or lower I can bust a play for like 30-40 of them straight cash. With my family cuhk down 19 n a half bands with my lil bro loco out here ... He spent 19 n a half two weeks again ... we can cover tht ... Twice,” and WARDEN stating, “I just seen ya messages, 4show ... U know I ca get em dwn here I just sent 17 plates to my uncle in Matthews.”

h. On or about March 29, 2021, Co-Conspirator-3, utilizing Instagram user ID “bkig_houdini,” sent a message to WARDEN, who used Instagram user ID “bossmanstampz,” informing WARDEN that Co-Conspirator-4 had been “poked up in the county,” by “Loc opps ... 200s,” meaning that he had been stabbed while in custody by gang rivals. Co-Conspirator-3 then ordered WARDEN, “So have Tryme [Co-Conspirator-2] and them spin,” or violently retaliate. The two then discussed the gang rivals who murdered an Enterprise member in March 2021.

i. On or about March 29, 2021, Co-Conspirator-3, utilizing Instagram user ID “bkig_houdini,” sent a message to WARDEN, who used Instagram user ID “bossmanstampz,” explaining the importance of recruiting young men to the Enterprise, by stating, “Cuhk u gotta get sum 128 sum young boys. It only take three to start a whole generation . Cause u know them three gone bring more lil n—as.”

j. On or about August 31, 2022, WARDEN shipped approximately five parcels of marijuana, weighing a total of approximately 50 kilograms, from California to the District of New Jersey, with the intent that the marijuana be distributed in and around the District of New Jersey.

k. On or about September 29, 2022, WARDEN was storing the following items inside an Edison, New Jersey residence: (i) approximately three bags of a mixture and substance containing a detectable amount of fentanyl; (ii) jars of narcotics cutting agents, including lidocaine and caffeine; (iii) oxycodone, codeine and hydrocodone pills; (iv) approximately 35 pounds of marijuana; (v) approximately four digital scales, suitable for the weighing of controlled substances for distribution; (vi) Ziploc bags suitable for the packaging of controlled substances for sale; (vii) approximately \$56,090.

l. On or about September 29, 2022, WARDEN was storing the following items inside an Elizabeth, New Jersey storage unit: (i) a Glock Model 30 .45 caliber semiautomatic pistol, bearing serial number BSRT548, loaded with 14 rounds of .45 caliber ammunition; (ii) a Glock Model 29 10mm caliber

semiautomatic pistol, bearing serial number BTDT020, loaded with 10 rounds of 10mm ammunition; (iii) a Ruger Model 57 5.7x28 caliber semiautomatic pistol, bearing serial number 642-17903, loaded with 20 rounds of 5.7x28 caliber ammunition; (iv) three high-capacity drum magazines; (v) approximately 1,300 rounds of additional ammunition; and (vi) approximately 17,400 glassine envelopes suitable for the packaging of heroin.

In violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about September 29, 2022, in Union County, in the District of New Jersey, the defendant,

**AMIR WARDEN,
a/k/a “Stamps,”
a/k/a “Killa,”**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce firearms and ammunition, namely, a Glock Model 30 .45 caliber semiautomatic pistol, bearing serial number BSRT548, loaded with 14 rounds of .45 caliber ammunition; a Glock Model 29 10mm caliber semiautomatic pistol, bearing serial number BTDT020, loaded with 10 rounds of 10mm ammunition; and a Ruger Model 57 5.7x28 caliber semiautomatic pistol, bearing serial number 642-17903, loaded with 20 rounds of 5.7x28 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION ONE

1. The allegations contained in Count One of this Superseding Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, defendant,

**AMIR WARDEN,
a/k/a “Stamps,”
a/k/a “Killa,”**

shall forfeit to the United States of America:

- (a) any interest acquired or maintained in violation of Section 1962;
- (b) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant[s] established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and
- (c) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Section 1962.

FORFEITURE ALLEGATION TWO

1. The allegations set forth in Count Two of this Superseding Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense alleged in Count Two of this Superseding Information, the defendant,

**AMIR WARDEN,
a/k/a “Stamps,”
a/k/a “Killa,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense, including but not limited to a Glock Model 30 .45 caliber semiautomatic pistol, bearing serial number BSRT548, loaded with 14 rounds of .45 caliber ammunition; a Glock Model 29 10mm caliber semiautomatic pistol, bearing serial number BTDT020, loaded with 10 rounds of 10mm ammunition; a Ruger Model 57, 5.7x28 caliber semiautomatic pistol, bearing serial number 642-17903, loaded with 20 rounds of 5.7x28 caliber ammunition; and approximately 1,300 rounds of assorted ammunition, recovered on or about September 29, 2022 from inside Unit 8016 of Storage Post, 1189 Magnolia Avenue, Elizabeth, New Jersey.


SUBSTITUTE ASSETS PROVISION
(Applicable to all Forfeiture Provisions)

Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute assets pursuant to Title 18, United States Code, Section 1963(m).


PHILIP R. SELLINGER
United States Attorney