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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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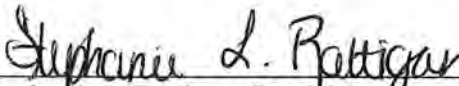
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
:   
v. : Honorable Mark Falk  
:   
KEYEEN SCOTT, : Mag. No. 18-3525  
a/k/a "Swazo" :

I, Stephanie L. Rattigan, the undersigned complainant being duly sworn,  
state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

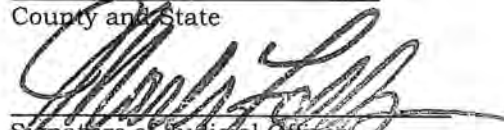
I further state that I am a Special Agent with the Federal Bureau of  
Investigation and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

  
Stephanie L. Rattigan, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed in my presence, ESSEX COUNTY, NEW JERSEY  
This 5<sup>th</sup> day of March, 2018 County and State

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

On or about December 6, 2016, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KEYEEN SCOTT,  
a/k/a "Swazo,"**

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

## **ATTACHMENT B**

I, Stephanie L. Rattigan, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Since in or around November 2016, law enforcement has been investigating a drug trafficking organization ("DTO") that has been distributing heroin and other narcotics in or around the area of Hayes Street and 14th Avenue at the New Community Corporation community development ("NCC") in Newark, New Jersey. To date, the investigation has involved physical and video surveillance, dozens of audio and video recorded controlled purchases of heroin from members of the DTO, seizures of heroin and other controlled substances, and lawfully intercepted wire and electronic communications. To date, law enforcement officers have seized or recovered at least 100 grams of heroin from the DTO.

2. Based on this ongoing investigation, law enforcement has determined that the DTO is comprised of members of the Brick City Brim set of the Bloods street gang ("BCB Bloods") and their criminal associates. The DTO primarily operates its drug sales in and around NCC at a location coined by the DTO as the "desert." The desert is a courtyard area within NCC that sits along a pedestrian-only path, making surveillance by law enforcement particularly challenging. The courtyard sits approximately one block from 72 Hayes Street, at which address is a five-story building. The apartments of the building are connected by outdoor walkways that provide optimal vantage points and allow members of the DTO to alert their co-conspirators to the presence of law enforcement or rival gang members or drug dealers.

3. The heroin sold by the DTO has been packaged in glassine envelopes stamped or labeled with various "brands," thus allowing dealers and addicts alike to differentiate and market batches of heroin. For example, the investigation revealed that heroin stamped "Black Caesar" was popular among the DTO members and their customers alike.

4. Between on or about December 6, 2016, and on or about February 8, 2018, the FBI has conducted numerous controlled purchases of heroin, and in some cases, other narcotics, in and around NCC, including from KEYEEN SCOTT, a/k/a "Swazo" ("SCOTT"). The FBI has used more than one cooperating witness ("CWs") for these purchases. Prior to each controlled

purchase, law enforcement officers outfitted each CW with an audio-video recording device, provided the CW with United States currency with which to conduct the controlled purchase, and ensured that the CW did not have any unauthorized contraband or currency before and after each controlled purchase. The FBI's single controlled purchase with SCOTT is outlined in the chart below.

Date	Amount Purchased	Stamp	Price Paid
12/6/16	50 decks <sup>1</sup> (1 brick)	Menace 2 Society	\$240

5. The substance purchased from SCOTT subsequently field-tested positive for heroin. In addition, subsequent laboratory testing confirmed that the substance purchased from SCOTT was heroin and weighed approximately 1.61 grams.

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<sup>1</sup> A "deck" of heroin commonly refers to a single-dose packet, or glassine envelope, of heroin. A "bundle" of heroin commonly refers to approximately 10 decks of heroin, often packaged together. A "brick" of heroin commonly refers to approximately 50 decks, or 5 bundles, of heroin, often packaged together.