
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

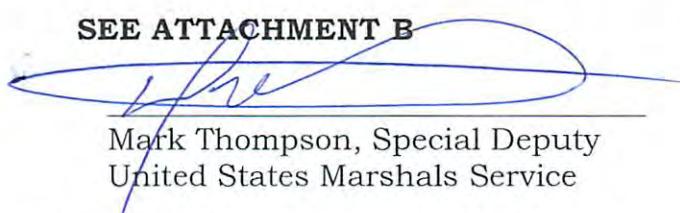
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
: Honorable James B. Clark, III
: Mag. No. 20-12117
SHERROD RICHARDSON, :
a/k/a "Drama" : **FILED UNDER SEAL**

I, Mark Thompson, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

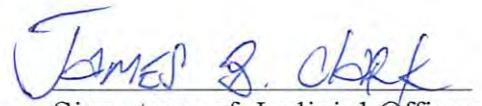
I further state that I am a Special Deputy with the United States Marshals Service and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B


Mark Thompson, Special Deputy
United States Marshals Service

Deputy Thompson attested to this Complaint
by telephone pursuant to FRCP 4.1(b)(2)(A) on
April 7, 2020, in the District of New Jersey,

Honorable James B. Clark, III
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

**(Conspiracy to Distribute and Possess with Intent to
Distribute Cocaine Base)**

From at least in or around June 2019 through in or around April 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SHERROD RICHARDSON,
a/k/a "Drama,"

did knowingly and intentionally conspire with others to distribute and possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT TWO
**(Distribution and Possession with Intent to Distribute
Heroin and Cocaine Base)**

On or about December 5, 2019, in the District of New Jersey and elsewhere, the defendant,

**SHERROD RICHARDSON,
a/k/a "Drama,"**

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

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

ATTACHMENT B

I, Mark Thompson, am a Special Deputy with the United States Marshals Service. 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, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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.

THE INVESTIGATION

1. Pilgrim Baptist Village Site II ("Pilgrim Village") is a privately-owned, affordable-housing complex located in Newark in the vicinity of Avon Avenue and Jelliff Avenue. Pilgrim Village consists of approximately 46 buildings, each with 4 units, for a total of approximately 184 apartments accessible via exterior entrances. Each unit has an assigned semi-subterranean garage that is accessible via an interior stairwell leading from each apartment to a common hallway that connects multiple buildings, as well as garages for those buildings. From observation, the garage space for each building consists of an open area beneath each building with four numbered and separate garage doors corresponding to the individual units and providing access to the open garage space. The buildings are clustered around internal courtyards and pedestrian walkways, and the complex is accessible on foot from Avon Avenue or Jelliff Avenue and by car from one of four driveways leading to the semi-subterranean garages. Given its location and its layout, which makes it difficult for law enforcement to surveil, Pilgrim Village is the site of an open-air narcotics market.

2. Since at least November 2018, law enforcement, including ATF and local law enforcement, has been investigating a drug trafficking organization ("DTO") which controls the open-air narcotics market in Pilgrim Village. The investigation has consisted of, among other investigative tools, numerous controlled purchases of narcotics, consensually recorded telephone calls and text messages, physical and electronic surveillance, and analysis of telephone call detail records.

3. Based upon the investigation to date, certain members of the DTO, including Sherrod Richardson, a/k/a "Drama" ("RICHARDSON"), regularly congregate within the pedestrian courtyards, to conduct hand-to-hand narcotics transactions with purchasers.

4. While some members of the DTO live in Pilgrim Village, others travel to Pilgrim Village to conduct narcotics transactions. The investigation has also identified at least one stash location, which is the residence of one of the DTO

members and is located a few blocks from Pilgrim Village in the vicinity of Avon Avenue and Irvine Turner Blvd., in a residential community primarily designed for senior living (the "Stash Location").¹ Members and associates of the DTO used this Stash Location at a minimum to package and store narcotics for street-level distribution and in furtherance of the DTO.

THE DEFENDANT

5. At various times relevant to this Criminal Complaint, RICHARDSON, and other co-conspirators and members of the DTO, known and unknown, have worked together to distribute and possess with intent to distribute narcotics, including cocaine base (crack), in and around Pilgrim Village as well as other locations. Controlled purchases of narcotics were made from RICHARDSON and other co-conspirators and members of the DTO as set forth below.

CONTROLLED PURCHASES OF NARCOTICS

6. During the investigation, between in or around June 2019 and February 2020, using more than one confidential source ("CS"), law enforcement conducted several controlled purchases of crack cocaine and/or heroin from members of the DTO, including RICHARDSON. Prior to the controlled purchases, law enforcement outfitted the CS and/or his/her vehicle with audio and/or video recording devices² and provided the CS with U.S. currency to use to purchase the controlled substances. Law enforcement also searched the CS for contraband before and after each controlled purchase. Some of the controlled purchases are summarized in the chart below.

¹ During at least two of the controlled purchases set forth below, a co-conspirator ("CC-12") traveled from Pilgrim Village to the Stash Location prior to serving the CS(s) with narcotics believed to have been obtained from the Stash Location. Additionally, law enforcement executed a search warrant at the Stash Location and recovered crack cocaine and heroin, as well as a firearm. CC-12, along with another co-conspirator ("CC-13"), have been charged by separate criminal complaint. See Mag. No. 20-12115.

² Law enforcement did not utilize an audio and/or video recording device in connection with the June 23, 2019 controlled purchase listed below.

<u>Week of Controlled Purchase³</u>	<u>Individuals Involved⁴</u>	<u>Amount Purchased⁵</u>
6/23/2019	CC-1, CC-12	2 jugs of crack and 1 glassine envelope heroin (laboratory test pending) ⁶
8/25/2019	CC-1, CC-12	2 clips of crack
9/1/2019	CC-1	5 grams of crack
9/8/2019	CC-2, CC-12	5 grams of crack
9/15/2019	CC-3, CC-12	5 grams of crack
10/6/2019	CC-4, CC-12	5 grams of crack
10/13/2019	CC-12	10 grams of crack
10/20/2019	CC-4, CC-12	15 grams of crack and 5 glassine envelopes of heroin
11/17/2019	RICHARDSON, CC-1, CC-5, CC-12	5 grams
12/1/2019	CC-5, CC-7	25 grams of crack
12/8/2019	CC-5	5 grams of crack
12/15/2019	CC-5, CC-8	30 grams of crack
1/26/2020	CC-9, CC-10	40 grams of crack
2/2/2020	CC-5, CC-11	40 grams of crack

³ The controlled purchases listed in this chart did not necessarily occur on the dates listed but, instead, occurred the week beginning with the Sunday dates listed herein. The chart does not include all controlled purchases.

⁴ To date, CC-1 to CC-4, CC-7, and CC-10 are unidentified and/or uncharged co-conspirators. The remaining co-conspirators have been charged by separate criminal complaint. See Mag. No. 20-12115 (CC-12, CC-13); Mag. No. 20-12116 (CC-5, CC-8, CC-9); Mag. No. 20-12118 (CC-11).

⁵ These amounts are approximate and based upon the amount of narcotics ordered or the gross weight of the narcotics sold. For crack (cocaine base) purchases, the items purchased are described as either a "jug," which is an individual dose, or a "clip" which is ten doses grouped together. Unless otherwise stated, all substances have been laboratory tested and confirmed.

⁶ The purchased substances field-tested positive for the presence of heroin and cocaine base.

7. Often, multiple members of the DTO worked together to distribute narcotics. For example:

- a. During the November 17, 2019 controlled purchase, a CS first communicated with CC-12 in Pilgrim Village. CC-12 then approached an individual later identified as CC-5 with the CS and asked if CC-5 had "some." CC-5 inquired "how much" and the CS ordered "five." CC-12 confirmed that CC-5 could provide the CS with "hard," or crack cocaine. CC-5 placed a phone call to another individual ("INDIVIDUAL-1") and asked if INDIVIDUAL-1 had "eagle" because CC-5 needed "five." CC-5 advised the CS in sum and substance that it would require approximately 30 minutes to obtain the narcotics. While the CS waited in Pilgrim Village, the CS encountered an individual later identified as RICHARDSON and advised him the CS was waiting for CC-5. RICHARDSON placed a phone call. While on the phone, RICHARDSON inquired whether the CS wanted "hard" (crack cocaine) or "soft" (powder cocaine). RICHARDSON then left Pilgrim Village in a taxi. When CC-5 returned, CC-5 informed the CS in sum and substance that CC-5 had spoken with RICHARDSON, who would obtain the drugs for the CS. RICHARDSON later returned with the crack cocaine and provided it to the CS who, in turn, handed RICHARDSON U.S. currency.
- b. In connection with the December 15, 2019 controlled purchase, a CS first made contact with CC-5 and placed an order for "30" of "hard," or 30 grams of crack cocaine. CC-5 provided the CS with an address located outside of Pilgrim Village at which to meet. When the CS arrived, CC-5 and an individual later identified as CC-8 entered the CS's vehicle and CC-8 handed CC-5 a clear plastic bag containing the crack cocaine. CC-5 provided the plastic bag to the CS who, in turn, handed CC-5 U.S. currency.
- c. In connection with the February 2, 2020 controlled purchase, a CS first made contact with CC-5 and ordered "40." Prior to the CS's arrival in Pilgrim Village, law enforcement observed CC-5 walk up the stairs to a second floor apartment, known by law enforcement to be the residence of CC-11. CC-5 received from an individual later identified as CC-11 a clear plastic bag containing crack cocaine. Law enforcement then observed CC-5 walk to the CS's vehicle, where CC-5 provided the CS with the plastic bag containing the crack cocaine in exchange for U.S. currency.

December 5, 2019 Recovery of Controlled Substances from RICHARDSON

8. On or about December 5, 2019, law enforcement operating in the vicinity of Frelinghuysen Avenue and Carrington Street, Newark, New Jersey, observed RICHARDSON, along with two other individuals ("INDIVIDUAL-2" and "INDIVIDUAL-3") engaging in suspicious behavior. In particular, law enforcement observed RICHARDSON, INDIVIDUAL-2, and INDIVIDUAL-3 walking back and forth along the road with no apparent destination while continuously looking in all directions.

9. While continuing to watch the three individuals, law enforcement observed an unknown female (the "UF") approach RICHARDSON and engage in a brief discussion. Law enforcement then observed RICHARDSON reach into his front waistband and remove an unknown amount of small white item(s), which he provided to the UF. The UF, in turn, provided RICHARDSON with an unknown amount of what appeared to be U.S. currency. Based upon law enforcement's training and experience, law enforcement believed a hand-to-hand narcotics transaction between RICHARDSON and the UF had just taken place.

10. Additionally, law enforcement observed what in law enforcement's training and experience appeared to be similar hand-to-hand transactions involving INDIVIDUAL-2 and INDIVIDUAL-3.

11. Some time later, law enforcement officers who were displaying their badges and wearing vests identifying them as law enforcement officers, approached RICHARDSON, INDIVIDUAL-2, and INDIVIDUAL-3. Upon their approach, RICHARDSON attempted to walk away while placing his hand near his mouth. When law enforcement stopped him, law enforcement observed in RICHARDSON's mouth what appeared to be at least one jug of the type used to package controlled substances. After being instructed multiple times by law enforcement to spit the item(s) out, RICHARDSON spit out approximately eight green jugs containing suspected crack cocaine and six glassine envelopes containing suspected heroin.

12. In a search incident to RICHARDSON's arrest, law enforcement recovered approximately ten additional green jugs containing suspected crack cocaine, twenty-four glassine envelopes stamped⁷ "POWER" in blue ink containing suspected heroin, and \$47.00 in U.S. currency consisting of suspected narcotics proceeds.

13. Law enforcement's training and experience, and the investigation to date, including the hand-to-hand transaction(s) observed by law enforcement

⁷ Based upon my training and experience, I understand that drug dealers typically stamp heroin as a means of branding that allows dealers and addicts alike to differentiate and market batches of heroin.

and RICHARDSON's subsequent attempt to conceal the controlled substances, indicate that the substances are crack cocaine and heroin that were intended for further distribution.