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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Michael A. Hammer  
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 v. : Mag. No. 20-10263  
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 ZAIRE DICKERSON, : **CRIMINAL COMPLAINT**  
 a/k/a "Tarzan," :  
 SHAQUEJAH WILSON-JONES, :  
 a/k/a "Kiwi," and :  
 NASSIR GRIMSLEY, :  
 a/k/a "Chop" :

I, Christopher M. Johnson, 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**

continued on the attached pages and made a part hereof.

*Christopher Johnson*  
Christopher M. Johnson, Special Agent  
Federal Bureau of Investigation

Special Agent Chris Johnson attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on July 31, 2020, in the District of New Jersey

Honorable Michael A. Hammer  
United States Magistrate Judge

S/ Honorable Michael Hammer  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Distribute Controlled Substances)

From at least in or around June 2019 through in or around July 2020, in the District of New Jersey and elsewhere, the defendants,

**ZAIRE DICKERSON,**  
a/k/a "Tarzan,"  
**SHAQUEJAH WILSON-JONES,**  
a/k/a "Kiwi," and  
**NASSIR GRIMSLEY,**  
a/k/a "Chop,"

did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 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)(C).

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

## **ATTACHMENT B**

I, Christopher M. Johnson, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, my review of reports, statements of individuals, documents, lawfully recorded communications, and photographs of the 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.

1. From at least in or around June 2019, law enforcement has been investigating members and associates of the 793 set of the Bloods street gang who distribute narcotics and commit acts of violence in the area of Avon Avenue and South 19th Street in Newark, New Jersey.

2. This investigation has revealed that Zaire Dickerson, a/k/a “Tarzan” (“DICKERSON”) and Nassir Grimsley, a/k/a “Chop” (“GRIMSLEY”) are members of the 793 set of the Bloods street gang, and Shaquejah Wilson-Jones, a/k/a “Kiwi” (“WILSON-JONES”) is associated with the 793 set of the Bloods street gang. In addition, this investigation has revealed that DICKERSON, GRIMSLEY, and WILSON-JONES all sell narcotics on behalf of the 793 set of the Bloods street gang, primarily in the area of Avon and South 19th Street in Newark, New Jersey.

3. On or about June 12, 2019, law enforcement conducted surveillance in the area of Avon Avenue and South 19th Street, during which law enforcement observed DICKERSON and WILSON-JONES engage in several hand-to-hand transactions. Specifically, law enforcement observed DICKERSON and WILSON-JONES accept U.S. Currency in exchange for items retrieved from both DICKERSON’s waistband and WILSON-JONES’s bag. After observing several transactions, law enforcement approached one individual (“Purchaser-1”) who had just engaged in a hand-to-hand exchange with DICKERSON and WILSON-JONES. Upon observing law enforcement, Purchaser-1 dropped four glassine envelopes of heroin and one jug<sup>1</sup> of cocaine base from his right hand.

4. Based on this and other information, law enforcement approached DICKERSON and WILSON-JONES. During a search incident to the arrest, law enforcement recovered forty-two glassine envelopes of heroin and twenty-two jugs of cocaine base from DICKERSON’s waistband. DICKERSON also possessed

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<sup>1</sup> A jug is a packaging unit, which typically contains one individual dose of cocaine base.

\$371 in U.S. currency. Law enforcement also recovered fifteen pills and \$1,705 in U.S. currency from WILSON-JONES.

5. On or about September 27, 2019, law enforcement conducted surveillance in the area of Avon Avenue and South 19th Street, during which law enforcement observed DICKERSON and three co-conspirators engage in several hand-to-hand transactions. Law enforcement observed DICKERSON a green Pringles can from one garbage can to another. Shortly thereafter, following a brief conversation with an individual subsequently confirmed to be a narcotics purchaser (“Purchase-2”), DICKERSON retrieved an item from the green Pringles can and handed that item to Purchaser-2 in exchange for U.S. currency. Law enforcement also observed DICKERSON, in the midst of several hand-to-hand transactions, enter and exit a black 2014 Chrysler, which was registered in DICKERSON’s name (the “Chrysler”), with the green Pringles can.

6. Based on this and other information, law enforcement approached DICKERSON and the three other Co-Conspirators. Law enforcement retrieved the green Pringles can, which had been discarded, and recovered twenty glassine envelopes of heroin and nineteen jugs of cocaine base. Search incident to arrest, law enforcement recovered two cell phones and \$138 in U.S. currency DICKERSON’s possession. In total, the three co-conspirators were found in possession of five cell phones and \$2,007 in U.S. currency.

7. Based on this and other information, law enforcement obtained a search warrant for the Chrysler. Execution of that search warrant revealed, among other items, ten glassine envelopes of heroin, \$2,028 in U.S. currency, and DICKERSON’s identification.

8. Following this arrest, DICKERSON was detained in the Essex County Jail from on or about September 27, 2019 until on or about April 2, 2020. During this time period, law enforcement learned through lawfully intercepted recorded communications that DICKERSON continued to direct and manage drug sales, primarily through communications with WILSON-JONES.

9. During the week of January 27, 2020, law enforcement utilized a confidential source (“CS”) to conduct a controlled purchase of heroin and cocaine base. At the direction of, and in the presence of, the FBI, the CS contacted WILSON-JONES and ordered approximately four bricks of heroin. WILSON-JONES directed the CS to meet her associate to complete the purchase. Thereafter, the CS met GRIMSLEY who provided the CS with approximately 200 glassine envelopes of heroin and twenty-four clips<sup>2</sup> of cocaine base.

10. During the week of February 24, 2020, law enforcement utilized a confidential source (“CS”) to conduct a controlled purchase of heroin. At the

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<sup>2</sup> A clip is a packaging unit, which typically contains ten jugs—or ten individual doses—of cocaine base.

direction of, and in the presence of, the FBI, the CS contacted WILSON-JONES and ordered approximately two bricks of heroin. WILSON-JONES directed the CS to meet her associate to complete the purchase. Thereafter, the CS met GRIMSLEY who provided the CS with approximately 100 glassine envelopes of heroin.

11. During the week of March 2, 2020, law enforcement utilized a confidential source ("CS") to conduct a controlled purchase of heroin. At the direction of, and in the presence of, the FBI, the CS contacted WILSON-JONES and ordered approximately two bricks of heroin. WILSON-JONES directed the CS to meet her associate to complete the purchase. Thereafter, the CS met GRIMSLEY who provided the CS with approximately 100 glassine envelopes of heroin.

12. During the week of July 27, 2020, law enforcement utilized a confidential source ("CS") to conduct a controlled purchase of heroin. At the direction of, and in the presence of, the FBI, the CS contacted DICKERSON and ordered approximately five bricks of heroin. Thereafter, the CS met DICKERSON who provided the CS with approximately 250 glassine envelopes of heroin.