
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Hon. Edward S. Kiel
	:	
TYSHAWN JONES,	:	Mag. No. 21-15149
a/k/a "Lil Man,"	:	
WALTER GIBBS,	:	<u>FILED UNDER SEAL</u>
RODNEY MCCRAE, and	:	
SYHID ELLISON,	:	
a/k/a "Robbie Noel"	:	

I, Patrick Keane, 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



Special Agent Patrick Keane
Federal Bureau of Investigation

Sworn to and subscribed to me by telephone pursuant to F.R.C.P. 4.1(B)(2)(A),
May 5, 2021 in Newark, New Jersey

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin and Fentanyl)

From at least in or around August 2020 through on or about May 4, 2021, in the District of New Jersey and elsewhere, the defendants,

**TYSHAWN JONES,
a/k/a "Lil Man,"
WALTER GIBBS,
RODNEY MCCRAE, and
SYHID ELLISON,
a/k/a "Robbie Noel,"**

did knowingly and intentionally conspire with each other and others to 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 fentanyl, 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.

Count Two

(Possession with Intent to Distribute Controlled Substances)

On or about October 21, 2020, in the District of New Jersey and elsewhere,
the defendant,

WALTER GIBBS,

did knowingly and intentionally 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 fentanyl, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

Count Three
(Distribution of Heroin and Fentanyl)

On or about February 23, 2021, in the District of New Jersey and elsewhere, the defendant,

TYSHAWN JONES,
a/k/a "Lil Man,"

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 fentanyl, a Schedule II controlled substance.

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

Count Four

(Distribution of Heroin and Fentanyl)

On or about March 3, 2021, in the District of New Jersey and elsewhere,
the defendants,

**TYSHAWN JONES,
a/k/a "Lil Man,"
RODNEY MCCRAE, and
SYHID ELLISON,
a/k/a "Robbie Noel,"**

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 fentanyl, a Schedule II controlled substance.

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

Count Five
(Distribution of Heroin and Fentanyl)

On or about March 17, 2021, in the District of New Jersey and elsewhere,
the defendants,

**TYSHAWN JONES,
a/k/a "Lil Man,"
RODNEY MCCRAE, and
WALTER GIBBS,**

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 fentanyl, a Schedule II controlled substance.

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

ATTACHMENT B

I, Patrick J. Keane, 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, and my review of reports, documents, 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. Since at least as early as on or around August 2020, law enforcement has been investigating Tyshawn Jones, a/k/a "Lil Man" ("JONES"), Walter Gibbs ("GIBBS"), Rodney McCrae ("MCCRAE"), Syhid Ellison, a/k/a "Robbie Noel" ("ELLISON") and others, both known and unknown (collectively, the "Target Subjects"), for narcotics offenses in Elizabeth, New Jersey. The investigation has consisted of the use of controlled purchases of narcotics, fixed and mobile surveillance, and open public records searches, among other lawful means of investigation.

2. During the course of the investigation, I have learned that the Target Subjects operate an open-air narcotics market in and around the area of Third Street between Magnolia Avenue and Court Street in Elizabeth, New Jersey ("Third Street").

3. The Target Subjects sell heroin that is frequently mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. The heroin and fentanyl that the Target Subjects distribute is packaged in glassine envelopes, commonly referred to as "decks." These "decks" are commonly sold by the Target Subjects in "bundles" and "bricks." A "bundle" commonly refers to approximately ten decks of heroin, grouped together, and a "brick" commonly refers to approximately 50 decks, often packaged as five bundles that have been grouped together.

4. The Target Subjects distribute decks of heroin that are almost always stamped or labeled with various "brand names" in colored ink. These brand names allow the dealers and purchasers alike to differentiate and market batches of heroin. For example, as described herein, the Target Subjects often sold glassine envelopes stamped "Body Bag."

5. Between on or about August 28, 2020 and on or about April 8, 2021, using more than one confidential source ("CS") and law enforcement officers acting in an undercover capacity ("UC"), law enforcement conducted numerous controlled purchases of narcotics, to include heroin and fentanyl, from the Target Subjects. Prior to each controlled purchase, law enforcement

provided each CS with U.S. currency to use to purchase the controlled substances. Some of these controlled purchases are outlined in the chart, below:

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance Confirmed by Laboratory ("L") and/or Field Test ("FT")
January 29, 2021	GIBBS	1 bundle, stamped "Body Bag"	Heroin and Fentanyl
February 3, 2021	GIBBS	1 bundle, stamped "Body Bag"	Heroin and Fentanyl
February 3, 2021	GIBBS	1 bundle, stamped "Body Bag"	Heroin and Fentanyl
February 17, 2021	GIBBS	1 bundle, stamped "Body Bag"	Heroin and Fentanyl
February 23, 2021	JONES	1 bundle, stamped "Body Bag"	Heroin and Fentanyl
March 3, 2021	JONES, ELLISON, and MCCRAE	1 bundle, stamped "Smash and Grab"	Heroin and Fentanyl
March 3, 2021	JONES and ELLISON	1 bundle, stamped "Ferrari"	Heroin and Fentanyl
March 17, 2021	JONES, GIBBS, and MCCRAE	1 bundle, stamped "Envy"	Heroin and Fentanyl
April 8, 2021	GIBBS	1 bundle, stamped "Body Bag"	Heroin and Fentanyl

October 21, 2020 Arrest of GIBBS

6. On or about October 21, 2020, at approximately 2:20 p.m., law enforcement was conducting surveillance in the area of Third Street in Elizabeth, New Jersey, at which time officers observed GIBBS hand a small white item to INDIVIDUAL-1 in exchange for U.S. currency. Based on their training and experience, the officers believed they had just observed a hand-to-hand narcotics transaction between GIBBS and INDIVIDUAL-1.

7. The officers detained INDIVIDUAL-1, who attempted to ingest a glassine envelope stamped "Body Bag." When GIBBS saw the officers, he fled on foot toward an alleyway on Third Street and then up an adjacent building's stairwell. When the officers reached the second-floor landing of that building, the officers observed GIBBS attempt to discard items and detained him. From GIBBS, the officers recovered a plastic tube containing marijuana and \$481. From the ground where GIBBS was standing, the officers recovered seventeen (17) glassine envelopes stamped "Body Bag," containing heroin and fentanyl, and four (4) yellow capped glass vials containing cocaine. From a chair that was on the landing, the officers recovered fifty (50) glassine envelopes stamped "Body Bag," containing heroin and fentanyl, and thirty (30) yellow capped glass vials containing cocaine. GIBBS admitted that all of the items recovered were his.

8. Subsequent laboratory testing confirmed the substances to be heroin, fentanyl, cocaine, and marijuana.

UC Controlled Purchases of Narcotics from the Target Subjects

9. In addition to several controlled purchases using confidential sources, law enforcement utilized UCs to purchase narcotics from the Target Subjects on four occasions. First, on or about February 23, 2021, UC-1 arrived at Third Street and asked an unidentified female (UF-1), where UC-1 could buy heroin. At this time, UF-1 walked toward a metal gate where she met with JONES. Following a brief conversation between JONES and UF-1, JONES handed UF-1 an item. UF-1 proceeded to meet with UC-1 and handed UC-1 a bundle of heroin and fentanyl stamped "Body Bag" in exchange for \$50. UF-1 then walked back to JONES.

10. On or about March 3, 2021, UC-1 arrived at Third Street, where UC-1 was approached by ELLISON. UC-1 advised ELLISON that UC-1 wished to purchase a "bunny."¹ ELLISON then approached JONES and engaged in a brief conversation with him. ELLISON returned a few minutes later and gave UC-1 a bundle of heroin and fentanyl stamped "Ferrari" in exchange for \$50. ELLISON then again met with JONES and handed JONES the money.

¹ A "bunny" is a term commonly used to refer to a bundle of heroin.

11. Also, on or about March 3, 2021, UC-2 arrived at Third Street, where UC-2 was approached by two men, who were later identified as ELLISON and MCCRAE. UC-2 advised them that UC-2 wished to purchase a "bunny." MCCRAE remained with UC-2 while ELLISON went across the street. MCCRAE then also crossed the street to where ELLISON was located. Approximately a couple of minutes later, MCCRAE and ELLISON returned and gave UC-2 a bundle² of heroin and fentanyl stamped "Smash and Grab" in exchange for \$60. ELLISON and MCCRAE then walked up the street, where they met with JONES.

12. On or about March 17, 2021, UC-1 arrived at Third Street where UC-1 observed JONES standing near the same building on Third Street to which GIBBS had fled on October 21, 2020. UC-1 met with MCCRAE and told him that UC-1 wished to purchase heroin. MCCRAE then walked over to where JONES was located and engaged in a brief conversation with him and another man who was later confirmed to be GIBBS. Shortly thereafter, GIBBS approached UC-1 and gave UC-1 a bundle of heroin and fentanyl stamped "Envy" in exchange for \$50.

² It was later determined that ELLISON and MCCRAE provided UC-2 with eight glassine envelopes, not ten.