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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
SHAMAR BEY, : Hon. Michael A. Hammer  
a/k/a "Fleeko," :  
a/k/a "Bills," : Mag. No. 21-10338  
a/k/a "Moneybills" :  
:

I, Jason Kidd, 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 ("FBI") and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

/s/ Jason Kidd  
Jason Kidd  
Special Agent  
Federal Bureau of Investigation

Special Agent Jason Kidd attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on October 18, 2021, in the District of New Jersey

Honorable Michael A. Hammer  
United States Magistrate Judge

/s/ Michael A. Hammer  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Violent Crime in Aid of Racketeering Activity – Assault  
with a Dangerous Weapon)

On or about June 19, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**SHAMAR BEY,  
a/k/a “Fleeko,”  
a/k/a “Bills,”  
a/k/a “Moneybills,”**

for the purpose of gaining entrance to, and maintaining and increasing position in, the SaLaf Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposely assault Victim-1 with a dangerous weapon, specifically, a firearm, in violation of N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(3).

**COUNT TWO**

(Discharging a Firearm During and in Relation to a Crime of Violence)

On or about June 19, 2020, in the District of New Jersey and elsewhere, the defendant,

**SHAMAR BEY,  
a/k/a “Fleeko,”  
a/k/a “Bills,”  
a/k/a “Moneybills,”**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Assault with a Dangerous Weapon in Aid of Racketeering charged in Count One of this Complaint, did knowingly and intentionally use, carry, brandish and discharge a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

## **ATTACHMENT B**

I, Jason Kidd, 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, videos, photographs, and other items of evidence. The information set forth herein contains information obtained from investigators and other law enforcement officers who have interviewed numerous witnesses and sources and reviewed various social media posts. 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 SaLaf Enterprise**

1. At all times relevant to this Complaint, defendant Shamar Bey, a/k/a “Fleeko,” a/k/a “Bills,” a/k/a “Moneybills” (“BEY” or the “Defendant”) and others, known and unknown, were members and associates of a neighborhood street gang that operated in and around the Salem Lafayette Apartments and surrounding areas in Jersey City, New Jersey. Specifically, the gang operated in the area of Bramhall Avenue to Forrest Street between Ocean Avenue and Martin Luther King Drive. Based on its location and territory, the gang referred to itself as “SaLaf” (the “SaLaf Enterprise”).

2. Individuals who associated with the SaLaf Enterprise referred to themselves as the “Junnie Gang,” which is a tribute to Alshaakir Talmadge, a/k/a “Junnie,” who was killed in June 2017. Members of the Enterprise also pay homage to, among other deceased Enterprise members, Khalif Sawyer, a/k/a “Kha,” who was killed in March 2011, and Ahmin Colclough, a/k/a “Green,” who was killed in September 2016. Talmadge, Colclough, and Sawyer were all killed in connection with gang violence. In homage to Green, those affiliated with the SaLaf Enterprise often refer to Green by name or post green-colored icons, such as a green heart emoji, on social media.

3. The SaLaf Enterprise is known for violence, to include shootings, murders and assaults against rival Jersey City-based neighborhood gangs. Those rival gangs include: “Marion,” a gang comprised of individuals associated with the Marion Gardens Housing Complex; “Rutgers,” a gang comprised of individuals associated with Rose Avenue and McAdoo Avenue, as well as with Triangle Park, which is located at the intersection of Rose Avenue, Cator Avenue, and Old Bergen Road; and “Curries Woods,” a gang comprised of individuals associated with the Curries Woods Housing Complex. Further, the SaLaf Enterprise is aligned with a gang called “Wilkinson,” which operates around Wilkinson Avenue, Ocean Avenue, Martin Luther King Drive, and Wegman Parkway in Jersey City.

4. The SaLaf Enterprise, including its leadership, members, and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1959(b)(2)—namely, a group of individuals associated in fact that engages in, and the activities of which affect, interstate and foreign commerce. At all times relevant to this Complaint, the SaLaf Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of that Enterprise.

5. At all times relevant to this Complaint, the SaLaf Enterprise, through its respective leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely:

- a. acts involving murder, in violation of 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; and
- b. 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 communication facility to violate the Controlled Substances Act).

#### **Purposes of the Enterprise**

6. The purposes of the SaLaf Enterprise include, but are not limited to, the following:

- a. Enriching the members and associates of the Enterprise through criminal activity, including but not limited to drug trafficking;
- b. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise through intimidation, threats of violence, and acts of violence, including acts involving murder and assault against, among others, members of rival organizations;
- c. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

## **Membership in the Enterprise**

7. BEY is a member and associate of the SaLaf Enterprise. Among other things, BEY utilized social media to show his allegiance to and affiliation with the SaLaf Enterprise and to tout its power to instill fear in victims and rivals. Law enforcement has reviewed pursuant to a search warrant the contents of a social media account BEY used during the time period of his involvement with the SaLaf Enterprise. BEY routinely posted messages indicating his allegiance to the SaLaf Enterprise and his willingness to commit acts of violence on its behalf against the Enterprise's rivals. For example, in or around early April 2020, BEY posted the following to his account, "if you aint from sunnyside Wilkinson NG or Montgomery its free smoke for whoever onna guys." Based on my training and experience, and my experience investigating gangs and gang violence in and around Jersey City, New Jersey, I understand that BEY was touting his affiliation with the Enterprise and its allies and that he would not hesitate to commit violent acts against its rivals. To carry out the goals of the SaLaf Enterprise, as described below, BEY committed at least one act of violence for and on behalf of the Enterprise.

## **Means and Methods of the Enterprise**

8. Among the means and methods by which BEY and other members and associates of the SaLaf Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the SaLaf Enterprise committed, attempted, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand the Enterprise's criminal operations;
- b. Members and associates of the SaLaf Enterprise acquired and maintained firearms to use during violent criminal acts on behalf of the Enterprise, including to protect themselves, their territory, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Members and associates of the SaLaf Enterprise were expected to participate in criminal activity, particularly violent acts directed at rivals or as directed by the Enterprise's leadership, in order to increase the respect accorded to those members, and resulted in those members' maintaining and increasing status within the Enterprise;
- d. Members and associates of the SaLaf Enterprise promoted a climate of fear through violence and threats of violence and reprisal;

- e. Members and associates of the SaLaf Enterprise used and threatened to use physical violence against various individuals, including witnesses and members of rival criminal organizations;
- f. Members and associates of the SaLaf Enterprise trafficked controlled substances as a means of enriching themselves;<sup>1</sup> and
- g. Members and associates of the SaLaf Enterprise used social media, including Instagram and Facebook, to intimidate rival gang members, witnesses, and other members of the community, and to promote the SaLaf Enterprise.

#### **The Rival Gangs – Rutgers, Marion, and Curries Woods**

9. Since in or around 2018, there have continued to be retaliatory exchanges, including assaults and homicides through shootings and stabbings, between members of SaLaf and rival neighborhood street gangs, to include members associated with Rutgers, Marion and Curries Woods.

10. Individuals who associate with Marion consist primarily of members and associates of the Brim and Sex, Money, Murder sets of the Bloods street gang. Individuals who associate with Curries Woods and Rutgers are primarily members and associates of the 52 Hoover set of the Crips street gang.

11. In recent years, there have been a series of violent retaliatory exchanges between the SaLaf Enterprise and Wilkinson against their shared rivals—Marion, Curries Woods, and Rutgers.

12. Victim-1 was a member and associate of Curries Woods.

#### **The June 19, 2020 Assault of Victim-1 by BEY**

13. On or about June 19, 2020, at approximately 12:20 a.m., Victim-1 was shot near Gates Avenue and John F. Kennedy Boulevard in Jersey City, New Jersey. A review of surveillance footage, including video taken from Jersey City Police Department closed-circuit cameras (“CCTV”) capturing events leading up to and including the shooting revealed that BEY shot Victim-1. Victim-1 survived the shooting.

14. Specifically, surveillance video from the area of Union Street in SaLaf Court at approximately 11:47 p.m. on or about June 18, 2020 showed BEY, wearing a dark hoodie, black Puma sweatpants with white Puma lettering on

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<sup>1</sup> Evidence of narcotics trafficking by members of the SaLaf Enterprise includes physical surveillance, witness interviews, and arrests of certain members while in possession of narcotics, including BEY. Indeed, on or about November 1, 2019, BEY was arrested in SaLaf in possession of three wax folds of heroin and charged with possession of a controlled dangerous substance.

the left pant leg, and black Nike Vapormax sneakers, entering a black Hyundai Sonata (the “Vehicle”).

15. The Vehicle was then captured on CCTV video driving to the area of Bidwell Avenue and Martin Luther King Drive, an area known to be within rival Marion gang territory. The Vehicle circles around the two-block radius of Bidwell Avenue and Martin Luther King Drive and Bergen and Stedman Street twice. Law enforcement has probable cause to believe, based on the Vehicle’s movements that individuals from SaLaf, including BEY were attempting to locate a worthy rival gang member to target.

16. The Vehicle thereafter is captured on CCTV video driving to the area of Ocean and Neptune Avenue in Jersey City, an area known to be within rival Curries Woods territory, where Victim-1 was standing before entering a white colored Kia (the “Kia”). After initialing passing Victim-1, the Vehicle circled around and eventually followed the Kia, containing Victim-1, to a nearby gas station (the “Gas Station”) where the shooting occurred.

17. Surveillance video showed an individual, wearing the same clothing worn by BEY described above and a face mask, exiting the Vehicle, walking through a fenced area and into the Gas Station and approach the driver’s side the parked Kia, where he shot Victim-1, who was sitting inside the rear driver’s seat.

18. After the shooting, the individual reentered the Vehicle, which traveled back to the area of Union Street in SaLaf Court. BEY, in the same clothing described above, again exited the Vehicle.

19. A review of a social media account maintained by BEY (the “Account”) revealed a photograph of BEY wearing similar clothing to those worn by the individual who carried out the shooting of Victim-1. Those clothes include the black Puma sweatpants with white Puma lettering on the left pant leg and black Nike Vapormax sneakers.

20. Following the above-described shooting of Victim-1, law enforcement obtained a search warrant for Bey’s girlfriend’s home that Bey was known to reside (the “Residence”). During the search of the Residence, law enforcement recovered the black Puma sweatpants matching those worn by BEY on the night of the shooting from a laundry bag located in the bedroom.

21. On or about June 20, 2020, less than 24 hours after BEY shot Victim-1, at approximately 12:19 a.m., three unidentified individuals parked near SaLaf, walked into the housing complex, and opened fire into the crowd. Five individuals were shot, including a high-ranking member of SaLaf, who ultimately died from the gunshot wounds he sustained (the “SaLaf Murder”). Following the SaLaf Murder, BEY posted to the Account the message, “No sad shit..straight savage time.” Based on my training and experience, and my

experience investigating gangs and gang violence in and around Jersey City, New Jersey, I understand that BEY was stating that the Enterprise would attempt to engage in reprisals for the SaLaf Murder.

22. Approximately two hours later, on June 20, 2020 at approximately 2:20 a.m., unidentified individuals opened fire on a group within the Curries Woods Housing Complex, striking two individuals (the “Curries Woods Shooting”). Law enforcement recovered 21 spent shell casings at the scene. Law enforcement later confirmed through ballistics testing that some of the shell casings recovered from the Curries Woods Shooting came the firearm that BEY used to shoot Victim-1.