



indirectly, corruptly demanded, sought, received, accepted and agreed to receive and accept things of value in return for being induced to do or omit to do any act in violation of their official duties, to wit, WILLIAMS and ALLEN, correction officers at a private detention facility that houses pretrial detainees on behalf of the United States Marshals Service (the "Jail"), solicited and accepted payments in return for smuggling contraband, including, but not limited to, smokeable synthetic cannabinoids ("K2"), marijuana, alcohol and tobacco, into the Jail, in violation of Title 18, United States Code, Section 201(b)(2)(C).

3. It was further a part and an object of the conspiracy that SAQUAN WILLIAMS, a/k/a "Will," and JABAR ALLEN, the defendants, and others known and unknown, in violation of a statute and a rule and order issued under a statute, would and did provide to inmates of the Jail contraband, including, but not limited to, K2, marijuana, alcohol and tobacco, and did attempt to do so, in violation of Title 18, United States Code, Section 1791(a)(1).

#### OVERT ACTS

4. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about November 2016, SAQUAN WILLIAMS, a/k/a "Will," the defendant, smuggled marijuana and tobacco into the Jail for an inmate in exchange for money.

b. On or about November 24, 2016, a co-conspirator not named herein sent a wire transfer of \$225 from the Bronx, New York to a second co-conspirator not named herein in Queens, New York, which money the second co-conspirator used to purchase the marijuana and tobacco that WILLIAMS then smuggled into the Jail.

c. In or about December 2016, JABAR ALLEN, the defendant, smuggled K2 into the Jail in exchange for money.

d. On or about December 16, 2016, a third co-conspirator not named herein sent a wire transfer of \$500 from Irvington, New Jersey to an acquaintance of ALLEN in Queens, New York, as payment for the K2 that ALLEN smuggled into the Jail.

(Title 18, United States Code, Section 371.)

COUNT TWO  
(Conspiracy - PETTIGREW)

5. From at least in or about January 2017, up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, SHAWN PETTIGREW, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, (1) bribery, in violation of Title 18, United States Code, Section 201(b)(2)(C), and (2) providing contraband in prison, in violation of Title 18, United States Code, Section 1791(a)(1).

6. It was a part and object of the conspiracy that SHAWN PETTIGREW, the defendant, and others known and unknown, being a public official, directly and indirectly, corruptly demanded, sought, received, accepted and agreed to receive and accept things of value in return for being induced to do or omit to do any act in violation of his official duties, to wit, PETTIGREW, a correction officer at the Jail, solicited and accepted payments in return for smuggling contraband, including, but not limited to, K2, marijuana and tobacco, into the Jail, in violation of Title 18, United States Code, Section 201(b)(2)(C).

7. It was further a part and an object of the conspiracy that SHAWN PETTIGREW, the defendant, and others known and unknown, in violation of a statute and a rule and order issued under a statute, would and did provide to inmates of the Jail contraband, including, but not limited to, K2, marijuana and tobacco, and did attempt to do so, in violation of Title 18, United States Code, Section 1791(a)(1).

OVERT ACTS

8. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about February 2017, SHAWN PETTIGREW, the defendant, smuggled K2 into the Jail for an inmate in exchange for money.

b. In or about February 2017, PETTIGREW met a co-conspirator not named herein in the Bronx, New York to accept payment for the K2 he smuggled into the Jail.

(Title 18, United States Code, Section 371.)

**COUNT THREE**  
**(Bribery - WILLIAMS)**

9. From at least in or about 2016, up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, SAQUAN WILLIAMS, a/k/a "Will," being a public official, directly and indirectly, corruptly demanded, sought, received, accepted and agreed to receive and accept a thing of value in return for being induced to do or omit to do any act in violation of his official duty, to wit, WILLIAMS, a correction officer at the Jail, solicited and accepted payments in return for smuggling contraband, including, but not limited to, K2, marijuana, alcohol and tobacco, into the Jail.

(Title 18, United States Code, Section 201(b)(2)(C).)

**COUNT FOUR**  
**(Bribery - ALLEN)**

10. From at least in or about 2016, up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, JABAR ALLEN, being a public official, directly and indirectly, corruptly demanded, sought, received, accepted and agreed to receive and accept a thing of value in return for being induced to do or omit to do any act in violation of his official duty, to wit, ALLEN, a correction officer at the Jail, solicited and accepted payments in return for smuggling contraband, including, but not limited to, K2, marijuana and tobacco, into the Jail.

(Title 18, United States Code, Section 201(b)(2)(C).)

**COUNT FIVE**  
**(Bribery - PETTIGREW)**

11. From at least in or about January 2017, up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, SHAWN PETTIGREW, the defendant, being a public official, directly and indirectly, corruptly demanded, sought, received, accepted and agreed to receive and accept a thing of value in return for being induced to do or omit to do any act in violation of his official duty, to wit, PETTIGREW, a correction officer at the Jail, solicited and

accepted payments in return for smuggling contraband, including, but not limited to, K2, marijuana and tobacco, into the Jail.

(Title 18, United States Code, Section 201(b)(2)(C).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

12. I am a Criminal Investigator with the USAO and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses, and others, as well as my examination of reports, records, and audio recordings. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### The Jail

13. Based on my conversations with other law enforcement officers and my review of reports and records, I know the following:

a. The United States Marshals Service ("USMS") is a federal law enforcement agency within the United States Department of Justice. Among other things, the USMS is responsible for the care and custody of federal inmates from the time of their arrest by a federal agency or remand by a judge until they either are acquitted, committed to their designated Federal Bureau of Prisons institution following a conviction, or otherwise ordered released from USMS custody.

b. The USMS does not own or operate detention facilities; rather, the USMS houses its inmates at either state or local government facilities, Federal Bureau of Prisons facilities, or private detention facilities.

c. In New York City, the USMS houses pretrial detainees at several locations, including the Jail, which is a private detention facility in Queens that is run by a publicly-traded company that has a contract with the Department of Justice, Office of the Federal Detention Trustee, to provide

"comprehensive detention services" in, among other locations, the Jail.

d. The Jail employs more than 100 people, including more than 60 Correction Officers ("COs").

e. According to the Jail's standards of employee conduct, the COs are expressly forbidden from "offer[ing] or giv[ing] those currently or formerly monitored or in the care, custody or control of [the Jail] any article, favor, or service, in the performance of the employee's duties" and from "accept[ing] any gift, personal service or favor from those currently or formerly monitored or in the care, custody or control of [the Jail]." In addition, "[t]he introduction of contraband into or upon the grounds of [the Jail] . . . without the knowledge and consent of the Facility Administrator is prohibited." Contraband is defined as "any unauthorized article" and includes, but is not limited to, "alcoholic beverages and drugs."

f. Based on my conversations with another law enforcement officer who is familiar with the employment practices at the Jail, I believe that employees of the Jail typically receive a copy of the standards of employee conduct and receive training on its requirements when they begin working at the Jail.

#### The Defendants

14. Based on my conversations with other law enforcement officers and my review of records from the Jail, I know the following:

a. SAQUAN WILLIAMS, a/k/a "Will," the defendant, has worked as a CO at the Jail since in or about April 2016.

b. JABAR ALLEN, the defendant, has worked as a CO at the Jail since in or about January 2016.

c. SHAWN PETTIGREW, the defendant, has worked as a CO at the Jail since in or about January 2017.

#### Overview

15. Based on my conversations with witnesses, my review of wire transfer and bank records, and my review of recorded telephone calls, I believe that SAQUAN WILLIAMS, a/k/a "Will," JABAR ALLEN, and SHAWN PETTIGREW, the defendants, have abused the

power entrusted to them as COs by taking bribes in exchange for smuggling contraband to inmates housed at the Jail. These corrupt COs smuggled K2, marijuana, alcohol, tobacco, and cellular phones, among other things into the Jail. In return, the COs received bribes from the inmates of hundreds and sometimes a thousand dollars at a time. These bribes typically were funneled to the corrupt COs by the inmates' non-incarcerated friends, relatives, or significant others, either in cash or by wire or bank transfers.

**WILLIAMS and ALLEN Take Bribes From Inmate-1 and PETTIGREW  
Solicits Bribes From Inmate-1**

16. Based on my conversations with other law enforcement officers who personally interviewed an inmate ("Inmate-1"),<sup>1</sup> and upon my review of notes of interviews of Inmate-1, I have learned that Inmate-1 has reported that SAQUAN WILLIAM, a/k/a "Will," and JABAR ALLEN, the defendants, smuggled contraband into the Jail in exchange for bribe payments from Inmate-1, and that SHAWN PETTIGREW, the defendant, offered to do so. In particular, Inmate-1 stated, in substance and in part:

a. On at least two occasions in or about 2016, ALLEN smuggled contraband into the Jail for Inmate-1 in exchange for bribes. On the first occasion, ALLEN smuggled several packs of cigarettes into the Jail and gave them to Inmate-1 by placing them on his bed. On the second occasion, ALLEN smuggled approximately seven or eight packs of cigarettes and an ounce of marijuana into the Jail and gave it to Inmate-1 by dropping the contraband in the trash can in a common area of the Jail, from which it was retrieved by Inmate-1. On these occasions, Inmate-1 paid ALLEN by directing a non-incarcerated friend of his or another inmate's girlfriend to pay ALLEN in cash.

b. After ALLEN smuggled contraband for Inmate-1, WILLIAMS, who had a close relationship with ALLEN predating their employment at the Jail, approached Inmate-1 and solicited bribes in exchange for agreeing to smuggle additional contraband for Inmate-1.

c. Thereafter, on at least three occasions in or about 2017, WILLIAMS smuggled contraband into the Jail for

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<sup>1</sup> Inmate-1 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, and is providing information in the hope of obtaining leniency at sentencing. The information provided by Inmate-1 has proven to be reliable and has been corroborated by other evidence.

Inmate-1 in exchange for bribes. In particular, WILLIAMS smuggled cigarettes, marijuana and, on one occasion, K2 into the Jail for Inmate-1. On each occasion, Inmate-1 paid WILLIAMS between approximately \$700 and \$1,000. On the occasion when WILLIAMS smuggled in K2, Inmate-1 arranged for a non-incarcerated individual ("CC-1") to deliver the K2, as well as cigarettes and cash, to WILLIAMS.

d. When PETTIGREW started working at the Jail, he approached Inmate-1, who at the time had already gotten contraband from ALLEN. PETTIGREW offered to smuggle contraband into the Jail for Inmate-1 in exchange for bribes. After that conversation, however, PETTIGREW rarely was assigned to Inmate-1's dormitory. By the time PETTIGREW was once again assigned to work in Inmate-1's dormitory, Inmate-1 had heard from other inmates that PETTIGREW was already smuggling contraband into the Jail for other inmates.

17. Based on my conversations with CC-1,<sup>2</sup> I have learned that, in or about 2017, at Inmate-1's request, CC-1 met with SAQUAN WILLIAMS, a/k/a "Will," the defendant, in Queens, New York, and gave him K2, a carton of cigarettes, and several hundred dollars in cash.

#### ALLEN and PETTIGREW Take Bribes from Inmate-2

18. Based on my conversations with another inmate ("Inmate-2"),<sup>3</sup> I have learned that both JABAR ALLEN and SHAWN PETTIGREW, the defendants, smuggled contraband into the Jail in exchange for bribe payments from Inmate-2, and that SAQUAN WILLIAMS, a/k/a "Will," the defendant, informed Inmate-2 that WILLIAMS and ALLEN were on the "same team." In particular, Inmate-2 stated, in substance and in part:

a. In or about December 2016, ALLEN smuggled several packs of K2 and an MP3-player into the Jail for Inmate-2 in exchange for approximately \$1,000. Inmate-2 paid ALLEN \$500 by causing a non-incarcerated individual ("CC-2") to wire \$500 to an acquaintance of ALLEN, whose name CC-2 received via text message after Inmate-2 gave CC-2's phone number to ALLEN to facilitate

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<sup>2</sup> CC-1 has not been charged with a crime, but provided the above-referenced information in the hope of obtaining leniency. The information provided by CC-1 has proven to be reliable and has been corroborated by other evidence.

<sup>3</sup> Inmate-2 has been convicted of and sentenced for federal crimes unrelated to the conduct described in this Complaint, and is providing information in the hope of obtaining a sentencing reduction. The information provided by Inmate-2 has proven to be reliable and has been corroborated by other evidence.



the exchange. After receiving the contraband, Inmate-2 paid ALLEN the remaining \$500 by directing another non-incarcerated individual ("CC-3") to deliver \$500 in cash to ALLEN, which delivery took place in the Bronx.

b. After Inmate-2 successfully obtained contraband from ALLEN, Inmate-2 approached WILLIAMS to arrange a similar transaction. WILLIAMS told Inmate-2, in substance and in part, "you already mess with my man Allen, that's the same team."

c. In or about early 2017, PETTIGREW approached Inmate-2 and stated, in substance and in part, that "the job don't pay enough, I could be busting moves." Inmate-2 understood PETTIGREW to be offering to smuggle contraband into the Jail for Inmate-2 in exchange for bribes. Thereafter, on approximately ten occasions, PETTIGREW smuggled contraband into the Jail for Inmate-2, including K2, marijuana, cigarettes, and cellular telephones. On at least one occasion, Inmate-2 arranged for CC-3 to meet with PETTIGREW and pay him approximately \$1,000 in cash. On other occasions, Inmate-2 arranged for CC-2 to transfer money to PETTIGREW, including to an account belonging to PETTIGREW at a bank ("Bank-1").

19. Based on my conversations with CC-2, I know that CC-2 has stated, in substance and in part, that CC-2 met with PETTIGREW on at least one occasion, and transferred money to PETTIGREW on behalf of Inmate-2 on several occasions.<sup>4</sup>

20. Based on my review of wire transfer records and text messages, I know that, on or about December 16, 2016, CC-2 sent a wire transfer of \$500 to an individual whose name matched the acquaintance of ALLEN that Inmate-2 understood to be the designated recipient of the bribe money. That wire transfer was sent from Irvington, New Jersey to Queens, New York.

21. Based on my review of bank transfer records, I know that, on several occasions in or about April and May 2017, CC-2 transferred a total of more than \$2,000 to an account at Bank-1 in the name of SHAWN PETTIGREW, the defendant.

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<sup>4</sup> CC-2 has not been charged with a crime, but provided the above-referenced information in the hope of obtaining leniency. The information provided by CC-2 has proven to be reliable and has been corroborated by other evidence.

Other Inmates Observe WILLIAMS and PETTIGREW Deliver  
Contraband

22. Based on my conversations with several inmates, I know that many portions of the Jail are monitored by security cameras, but that there are certain portions of the Jail known to be "blind spots" that are not captured by any security cameras. As set forth herein, I believe that corrupt COs, including the defendants, utilize these blind spots, including portions of the bathrooms and the slop sinks where cleaning materials are kept, to effect the delivery of contraband to inmates.

23. I have spoken to several inmates at the Jail who have observed COs delivering contraband to other inmates. In particular:

a. Based on my conversations with an inmate ("Inmate-3"),<sup>5</sup> I have learned that, on at least one occasion in 2017, Inmate-3 saw SHAWN PETTIGREW, the defendant, drop a package into a slop sink at the Jail. Inmate-3 observed another inmate follow closely behind PETTIGREW and retrieve the package from the slop sink. Shortly thereafter, Inmate-3 observed that inmate selling cigarettes in the Jail.

b. Based on my conversations with an inmate ("Inmate-4"),<sup>6</sup> I have learned that, on at least two occasions, Inmate-4 saw PETTIGREW drop a package into a slop sink, and then saw another inmate follow closely behind PETTIGREW and retrieve the package from the slop sink. Shortly thereafter, the inmate showed Inmate-4 that he had cigarettes.

c. Based on my conversations with an inmate ("Inmate-5"),<sup>7</sup> I have learned that, on at least two occasions, Inmate-5

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<sup>5</sup> Inmate-3 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, and is providing information in the hope of obtaining leniency at sentencing. The information provided by Inmate-3 has proven to be reliable and has been corroborated by other evidence.

<sup>6</sup> Inmate-4 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, has been sentenced, and is providing information in the hope of obtaining an additional sentencing reduction. The information provided by Inmate-4 has proven to be reliable and has been corroborated by other evidence.

<sup>7</sup> Inmate-5 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, and is providing information in the hope of obtaining leniency at sentencing. The information

has seen SAQUAN WILLIAMS, a/k/a "Will," the defendant, deliver contraband to other inmates. On one occasion, while Inmate-5 was in a bathroom at the Jail, Inmate-5 saw WILLIAMS enter the bathroom and place a package in a pail where a mop was kept. Inmate-5 then heard WILLIAMS tell a group of inmates, in substance and in part, that the "stuff" was in the bathroom where the mop was kept. Shortly thereafter, Inmate-5 saw inmates smoking in the bathroom and those inmates offered Inmate-5 cigarettes and K2. On another occasion, while Inmate-5 was in a bathroom at the Jail, Inmate-5 saw WILLIAMS leave a bag on top of the urinal, and shortly thereafter saw inmates smoking in the dorm.

#### WILLIAMS Argues With an Inmate Over a Bribe

24. Based on my conversations with both Inmate-5 and another inmate ("Inmate-6"),<sup>8</sup> I have learned that, in or about April 2017, SAQUAN WILLIAMS, a/k/a "Will," the defendant, got into a shouting match with an inmate. Both Inmate-5 and Inmate-6 independently stated, in substance and in part, that they saw WILLIAMS and the inmate shout at each other in the dorm in the Jail, with the inmate complaining, in substance and in part, that he had paid WILLIAMS but WILLIAMS had not delivered on his promise.

#### WILLIAMS Accepts A Bribe to Smuggle Contraband on Thanksgiving Day

25. Based on my review of a series of recorded telephone calls made by an inmate at the Jail ("Inmate-7") to a non-incarcerated individual ("CC-4") on or about November 24, 2016, as well as my conversations with other law enforcement agents and review of reports of interviews with inmates, and my review of wire transfer records, I believe that, on or about November 24, 2016, SAQUAN WILLIAMS, a/k/a "Will," the defendant, agreed to smuggle contraband into the Jail for several inmates in exchange for a bribe, and ultimately did smuggle that contraband into the Jail several days later. In particular:

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provided by Inmate-5 has proven to be reliable and has been corroborated by other evidence.

<sup>8</sup> Inmate-6 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, and is providing information in the hope of obtaining leniency at sentencing. The information provided by Inmate-6 has proven to be reliable and has been corroborated by other evidence.

a. I have reviewed recorded telephone calls, in which Inmate-7 and CC-4 openly discussed a plan for CC-4 to purchase marijuana, tequila, and cigarettes and then meet a CO at a donut store (the "Donut Store") in the vicinity of the Jail while the CO was on a break so that the CO could obtain the contraband from CC-4 and smuggle it into the Jail. On one call, Inmate-7 explained to CC-4 that the CO "is in the dorm with me right now" and that Inmate-7 and other inmates wanted to order and pay for "weed," which I believe refers to marijuana, and "Patron," which I believe refers to a brand of tequila, as well as tobacco.

b. After CC-4 was unable to find a car to travel from the Bronx, New York to the Donut Store to meet the CO, Inmate-7 explained on another recorded telephone call that another inmate ("Inmate-8") would call a non-incarcerated individual ("CC-5"), and have CC-5 meet the CO instead. Inmate-7 instructed CC-4 to wire \$225 to CC-5 via Western Union as payment for Inmate-7's share of the contraband. CC-4 then reported to Inmate-7 on the recorded telephone call that the money had been sent to CC-5, and gave Inmate-7 the Western Union tracking number.

c. On a recorded three-way call among Inmate-7 and Inmate-8 (who were passing the prison phone back and forth), CC-4 and CC-5, CC-5 can be heard meeting the brother of another inmate (the "Dealer") to purchase marijuana. Inmate-8 told CC-5, "he's supposed to be giving you an ounce and whatever else he has. It's supposed to be like one and a half." Inmate-8 then asked to speak to the Dealer, who got on the phone, confirmed that he was the brother of another inmate, and told Inmate-8 that "it's a little over one, it's basically one." CC-5 then got back on the phone and Inmate-8 said "I'm sending dude out to you right now" and confirmed that CC-5 already poured the tequila into a water bottle.

d. On a subsequent recorded telephone call between Inmate-7 and CC-4, Inmate-7 explained that CC-5 went to the wrong location to meet the CO, and therefore was not able to give the CO the contraband on the CO's break as planned. Inmate-7 then recounted a conversation he had with the CO, who he identified as "Williams."

e. On the recorded call, Inmate-7 told CC-4 to instruct CC-5 to wait until the end of the CO's shift to make the delivery: "You missed your cue when the officer came out . . . . He gets off at 11, wait there at [the Donut Shop], he's gonna call you then. Answer the phone." Inmate-7 stated that the CO told him that he could bring the contraband into the Jail the

next day, and if the CO was working in the hallway the next day (as opposed to in Inmate-7's dorm), the CO told Inmate-7 that he should "just act like you got to go to sick hall and I got you while I'm escorting you."

26. Based on my review of wire transfer records, I know that, on or about November 24, 2016, CC-4 transferred \$225 to CC-5, and the tracking number for that transfer matched the number that CC-4 gave Inmate-7 on the phone call. CC-4's address is listed as an address in the Bronx, New York.

27. Based on my conversations with an employee at the Jail, I have learned that SAQUAN WILLIAMS, a/k/a "Will," the defendant, was assigned to work in Inmate-7's dorm on November 24, 2016.

28. Based on my conversations with another law enforcement agent and my review of that officer's notes of her interview of Inmate-7,<sup>9</sup> I have learned that Inmate-7's recollection of the foregoing is consistent with the recorded calls. In particular, Inmate-7 stated the following, in substance and in part:

a. In or about November 2016, SAQUAN WILLIAMS, a/k/a "Will," the defendant, lost a bet on a basketball game to another inmate ("Inmate-9") and, as a result, offered to bring whatever contraband Inmate-9 and his friends wanted into the Jail.

b. On or about Thanksgiving Day 2016, which in fact occurred on November 24, 2016, Inmate-7, along with Inmate-9, sought to have WILLIAMS smuggle marijuana, tequila, and cigarettes into the Jail. Because CC-4 could not travel from the Bronx to meet WILLIAMS, they enlisted another inmate, Inmate-8, who knew an individual, CC-5, who lived in the vicinity of the Jail. Inmate-8 then called CC-5 and instructed CC-5 to purchase the contraband. As described above, Inmate-7 instructed CC-4 to wire money, with which to purchase the contraband and pay WILLIAMS, to CC-5 via Western Union, and CC-4 did so.

c. Despite the foregoing plan, CC-5 went to the wrong location to meet WILLIAMS, and therefore did not deliver the contraband to WILLIAMS on his break. CC-5 then waited until the end of WILLIAMS's shift and, according to Inmate-7, delivered the

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<sup>9</sup> Inmate-7 has pleaded guilty pursuant to a cooperation agreement to federal crimes unrelated to the conduct described in this Complaint, has been sentenced to time served, and received the benefit of a downward departure based on substantial assistance provided in cases other than this one. The information provided by Inmate-7 has been proven reliable and has been corroborated by other evidence.

contraband to WILLIAMS at that time, to be delivered to the inmates the next day.

d. The next day, WILLIAMS was assigned to a different dorm than Inmate-7, Inmate-8 and Inmate-9. However, approximately one week later, WILLIAMS was assigned to the adjacent dorm, and delivered the cigarettes and marijuana to Inmate-7, Inmate-8 and Inmate-9 through an intermediary.


29. Based on my review of recorded telephone calls made by Inmate-8 to CC-5 on or about November 24, 2016, I know the following:

a. On one recorded call, CC-5 spoke to Inmate-8 about CC-5's planned meeting with the CO who was supposed to smuggle the contraband into the Jail.

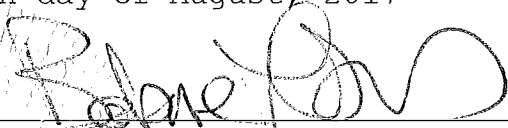
b. During the call, CC-5 can be heard meeting with the CO. CC-5, who stayed on the phone during the meeting, can be heard apologizing for the prior miscommunication about where to meet and saying "everything is in there. We'll take care of you, it's not really a big deal, since this is like really last minute."

c. During the meeting with the CO, CC-5 can be heard asking, "I'm sorry, your name again?" The CO responded, "Williams."

WHEREFORE, I respectfully request that an arrest warrant be issued for SAQUAN WILLIAMS, a/k/a "Will," JABAR ALLEN, and SHAWN PETTIGREW, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.

  
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STEFANO BRACCINI  
Criminal Investigator, USAO

Sworn to before me this  
15th day of August, 2017

  
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THE HONORABLE BARBARA C. MOSES  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

