
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Honorable James B. Clark, III
	:	
GARY SHAHID,	:	
a/k/a "Sha,"	:	
JOSE LORA,	:	
a/k/a "Wakka,"	:	Mag. No. 20-12072
DAYQUAN JORDAN,	:	
a/k/a "DayDay,"	:	
RICKY TERRELL,	:	<u>FILED UNDER SEAL</u>
a/k/a "Slim,"	:	
CHARLES MELLS,	:	
a/k/a "AD,"	:	
RAQUAN RAWLS,	:	
a/k/a "Bandz,"	:	
NASIR WILLIAMS,	:	
a/k/a "Hitta,"	:	
QUADIR HATCHER,	:	
a/k/a "Qua,"	:	
TYREE PURKETT,	:	
a/k/a "TP,"	:	
JAMES WICKER,	:	
a/k/a "JP," and	:	
MICHAEL MAYSE	:	

I, Ramon Perez, 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 Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B



Ramon Perez, Special Agent
Bureau of Alcohol, Tobacco, Firearms, &
Explosives

Sworn to before me and subscribed in my presence,
February 21, 2020, Essex County, 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
Controlled Substances)**

From at least in or around February 2019 through in or around February 2020, in Essex County, in the District of New Jersey and elsewhere, the defendants,

GARY SHAHID,
a/k/a "Sha,"
JOSE LORA,
a/k/a "Wakka,"
DAYQUAN JORDAN,
a/k/a "DayDay,"
RICKY TERRELL,
a/k/a "Slim,"
CHARLES MELLS,
a/k/a "AD,"
RAQUAN RAWLS,
a/k/a "Bandz,"
NASIR WILLIAMS,
a/k/a "Hitta,"
QUADIR HATCHER,
a/k/a "Qua,"
TRYEE PURKETT,
a/k/a "TP,"
JAMES WICKER,
a/k/a "JP," and
MICHAEL MAYSE,

did knowingly and intentionally conspire with each other and 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, 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), (b)(1)(B) and (b)(1)(C).

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

COUNT TWO
(Distribution of Heroin and Cocaine Base)

On or about November 21, 2019, in the District of New Jersey and elsewhere, the defendants,

DAYQUAN JORDAN,
a/k/a "DayDay,"
RAQUAN RAWLS,
a/k/a "Bandz,"
NASIR WILLIAMS,
a/k/a "Hitta,"
QUADIR HATCHER,
a/k/a "Qua," and
MICHAEL MAYSE,

did knowingly and intentionally 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).

COUNT THREE
(Murder During and in Relation to a Drug Trafficking Crime)

On or about December 15, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

MICHAEL MAYSE,

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, did knowingly and intentionally use and carry a firearm, and in doing so, knowingly and purposely caused the death of Victim-1.

In violation of Title 18, United States Code, Sections 924(j) and 2.

ATTACHMENT B

I, Ramon Perez, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives ("ATF"). 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. Stephen Crane Village ("Crane Village") is a public-housing complex located on the border of Newark and Belleville near Branch Brook Park. Crane Village consists of 27 stand-alone buildings, with 354 apartments in total, all of which are accessible via exterior entrances. The buildings are clustered around courtyards and pedestrian walkways with roadways bisecting the complex. Given its location and its layout, which makes it difficult for law enforcement to surveil, Crane Village is the site of an open-air narcotics market.

2. Since at least February 2019, law enforcement, including ATF and local law enforcement, has been investigating a drug trafficking organization ("DTO") which controls the open-air narcotics market in Crane 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 regularly congregate within the pedestrian courtyards and in "Cashville," a DTO-designated area on the south side of Crane Village that abuts the railroad tracks, to conduct hand-to-hand narcotics transactions with purchasers.

4. While some members of the DTO live in Crane Village, others travel to Crane Village to conduct narcotics transactions. The investigation has also identified certain stash locations within Crane Village, including an apartment on Franklin Avenue (the "Drug Stash Apartment"), where members of the DTO package and store narcotics for street-level distribution.

5. Based upon the investigation to date, including a review of social media, photographs of tattoos, and lawful searches of cellular telephones seized, members of the DTO self-identify as members or associates of "SCP", referring to Stephen Crane Projects.

THE DEFENDANTS

6. At various times relevant to this Criminal Complaint, Gary Shahid, a/k/a "Sha" ("SHAHID") distributed quantities of heroin, fentanyl and crack cocaine (cocaine base) to other members of the DTO for street-level distribution and to purchasers directly. SHAHID has been observed by law enforcement distributing narcotics from a residence in Crane Village and law enforcement has made controlled purchases from SHAHID, as set forth below.

7. At various times relevant to this Criminal Complaint, SHAHID, Jose Lora, a/k/a "Wakka" ("LORA"), Dayquan Jordan, a/k/a "DayDay" ("JORDAN"), Ricky Terrell, a/k/a "Slim" ("TERRELL"), Charles Mells, a/k/a "AD" ("MELLS"), Daquan Rawls, a/k/a "Bandz" ("RAWLS"), Nasir Williams, a/k/a "Hitta" ("WILLIAMS"), Quadir Hatcher, a/k/a "Qua" ("HATCHER"), Tyree Purkett, a/k/a "TP" ("PURKETT"), James Wicker, a/k/a "JP" ("WICKER"), and Michael Mayse ("MAYSE") have worked together and with others, including Victim-1,¹ to distribute and possess with intent to distribute narcotics, including heroin and crack cocaine, in Crane Village. As set forth below, controlled purchases of narcotics have been made from each of the defendants.

8. At various times relevant to this Criminal Complaint, LORA, JORDAN, TERRELL, MELLS, RAWLS, WILLIAMS, HATCHER, PURKETT, WICKER, MAYSE and others, including Victim-1, have utilized the Drug Stash Apartment in Crane Village for narcotics distribution-related activities and in furtherance of the DTO.

CONTROLLED PURCHASES OF NARCOTICS

9. During the investigation, between in or around February 2019 and February 2020, using more than one confidential source ("CS") and an undercover law enforcement agent ("UC"), law enforcement conducted several controlled purchases of heroin, fentanyl, cocaine and crack cocaine from members of the DTO. Prior to each controlled purchase, law enforcement outfitted the CS, UC and/or his/her vehicle with audio and video recording devices. Law enforcement also provided U.S. currency to use to purchase the controlled substances. Some of the controlled purchases are summarized in the chart below.

¹ Victim-1 was a member of the DTO and distributed narcotics in Crane Village. Victim-1 was murdered on December 15, 2019, as set forth in Count Three and Paragraphs 12 through 16 of this Criminal Complaint.

Date	Defendant(s) Involved	Amount Purchased²
2/14/19	Shahid Victim-1	18 jugs of crack and 2 bricks of fentanyl
2/19/19	Mells Terrell	2 bricks of heroin
3/4/19	Shahid	5 bricks of heroin
3/21/19	Shahid	10 bricks of fentanyl
4/3/19	Lora Terrell FNU LNU	2 clips of crack
5/6/19	Lora	3 clips of crack and 3 bundles of heroin
5/21/19	Shahid	26 bricks of fentanyl
7/9/19	Shahid	25 bricks and 2 bundles of heroin and 2 clips of crack
7/18/19	Shahid Terrell Jordan	1 clip of crack and 1 brick of fentanyl
8/22/19	Lora Terrell Victim-1	2 clips of crack and 4 bundles of heroin
10/9/19	Lora FNU LNU	20 jugs of crack

² For heroin and fentanyl purchases, a "bundle" commonly refers to approximately ten single-dose packets, or glassine envelopes, grouped together; and a "brick" commonly refers to approximately fifty single-dose packets, or glassine envelopes, often packaged as five bundles grouped together. 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.

Date	Defendant(s) Involved	Amount Purchased²
10/24/19	Shahid Lora Rawls FNU LNU	1 clip of crack and 1 brick of fentanyl
10/30/19	Shahid	30 bricks of heroin
11/6/19	Lora Jordan Rawls	1 clip of suspected crack and 1 brick of suspected heroin (pending laboratory analysis)
11/13/19	Shahid Lora Rawls Victim-1	2 clips of crack and 2 bricks of heroin
11/21/19	Rawls Jordan Williams Hatcher Mayse Victim-1	2 clips of crack and 2 bricks heroin
11/26/19	Lora Terrell Jordan Hatcher Rawls Purkett Wicker Victim-1	1 jug of crack, 1 bag of cocaine (approx. 19 grams), and 3 bricks of heroin
12/3/19	Shahid	40 jugs of crack and 40 bricks of heroin
12/13/19	Rawls	3 bricks of heroin
12/20/19	Shahid	1 bag of crack (approx. 32 grams) and 31 bricks of heroin
1/15/20	Williams	1 bag of approx. 38 grams of suspected crack (pending laboratory analysis)

Date	Defendant(s) Involved	Amount Purchased²
1/22/20	Lora	4 bags of approx. 10 grams each of suspected crack and 2 bricks of suspected heroin (pending laboratory analysis)
1/30/20	Shahid Lora Williams Wicker	4 bricks of suspected heroin (pending laboratory analysis)
2/6/20	Purkett Lora	4 bricks of suspected heroin (pending laboratory analysis)

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

- a. During the November 6, 2019 controlled purchase, a CS first made contact with LORA in Crane Village and placed an order for a specified amount of crack cocaine and heroin. LORA then turned to RAWLS and asked RAWLS for "5." RAWLS gave 5 jugs of crack cocaine to LORA, and LORA then handed a total of 10 jugs of crack cocaine to the CS in exchange for U.S. currency. LORA then attempted to call someone to obtain the heroin without success. LORA then asked JORDAN, who was nearby, if he had any heroin, and JORDAN responded affirmatively. JORDAN was then observed by law enforcement walking to the vicinity of the Drug Stash Apartment and returning minutes later. JORDAN gave the CS the specified amount of heroin in return for U.S. currency.
- b. During the November 13, 2019 controlled purchase, a CS first made contact with Victim-1 in Crane Village and placed an order for a specified amount of heroin and crack cocaine. Victim-1 then walked away from the CS and spoke to RAWLS, who was nearby. RAWLS and Victim-1 then returned to the CS and Victim-1 told RAWLS that he would call "Sha," referring to SHAHID. RAWLS then rode into Crane Village on a bicycle. Victim-1 then entered an apartment in Crane Village and returned to the CS. LORA entered the Drug Stash Apartment and then approached the CS. Both Victim-1 and LORA sold crack cocaine to the CS. Around the same time, law enforcement observed SHAHID exit an apartment within Crane Village and hand RAWLS a small item in exchange for something.

RAWLS then returned on the bicycle to the CS and sold the CS the specified amount of heroin in exchange for U.S. currency.

- c. During the November 21, 2019 controlled purchase, a CS made contact with JORDAN in Crane Village and placed an order for a specified amount of heroin and crack cocaine. HATCHER, WILLIAMS, Victim-1, and MAYSE then approached JORDAN. Law enforcement overheard JORDAN, via audio transmitter, tell the group that they would share in the sale of narcotics to the CS. The CS then received narcotics from Victim-1, HATCHER, RAWLS, WILLIAMS, MAYSE and JORDAN.
- d. On January 8, 2020, law enforcement was conducting surveillance in Crane Village and observed TERRELL arrive in Crane Village. Thereafter, LORA and WILLIAMS arrived in Crane Village in LORA's vehicle and conducted several hand-to-hand narcotics transactions with awaiting purchasers in "Cashville." TERRELL, LORA and WILLIAMS then entered LORA's vehicle together and LORA drove away.
- e. During the January 30, 2020 controlled purchase, a CS first made contact with WICKER in Crane Village. The CS and WICKER then walked to LORA and WILLIAMS, who were near the Drug Stash Apartment. The CS placed an order for a specific amount of heroin. LORA went to his vehicle and returned to complete a sale of suspected heroin. WILLIAMS made a telephone call and then walked to an apartment in Crane Village. SHAHID exited the apartment and met with WILLIAMS, where law enforcement observed the two exchange something for currency. As WILLIAMS was walking back towards the CS, WILLIAMS handed something to LORA. LORA then returned to the CS and completed the sale of suspected heroin.

THE MURDER

11. On or about December 15, 2019, at approximately 5:00 a.m., the Newark Police Department received a 911 call regarding shots fired at the Drug Stash Apartment.

12. Upon arrival, law enforcement observed Victim-1 on the floor of the Drug Stash Apartment. Victim-1 sustained fatal gunshot wounds to his head and torso.

13. Also in the Drug Stash Apartment, law enforcement recovered items consistent with drug distribution, including vials containing cocaine and glassine envelopes containing heroin.

14. MAYSE was subsequently arrested by local law enforcement on December 16, 2019 for the murder of Victim-1. During a search of the residence where MAYSE was staying ("MAYSE's Residence"), law enforcement recovered, among other things, a Hi-Point C9 9mm handgun with serial number P1800803, a SCCY CPX-1 9mm handgun with serial number 191320 ("MAYSE's SCCY Handgun"), twenty-nine vials of cocaine, and two glassine envelopes of heroin. Several items recovered by law enforcement appeared to have blood stains, including MAYSE's jeans, his boots, and MAYSE's SCCY Handgun. MAYSE's blood-stained boots appear to match the bloody boot prints that were left at the murder scene in the Drug Stash Apartment.

15. Ballistics analysis of the discharged shell casings found at the murder scene confirmed that MAYSE's SCCY Handgun fired the rounds that killed Victim-1.

16. Based on the results of the investigation to date, including interviews of at least one witness, and on my training and experience, MAYSE murdered Victim-1 because Victim-1 owed money relating to the distribution of narcotics in and around Crane Village.