

RCH:PP/ADG/CMP
F.# 2024R00525

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER CRAIG,

Defendant.

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TO BE FILED UNDER SEAL

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF ARREST
WARRANT

(T. 18, U.S.C., § 371)

24-MJ-433

EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW LONDON, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”) duly appointed according to law and acting as such.

In or about and between February 2022 and June 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER CRAIG, together with others, did knowingly and intentionally conspire to use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of one or more unlawful activities, to wit: Bribe Receiving in the Third Degree, in violation of New York Penal Law Section 200.10; Bribery in the Third Degree, in violation of New York Penal Law Section 200.00; and Criminal Liability for Conduct of Another, in violation of New York Penal Law Section 20.00, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

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

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the FBI and have been since April 2022. I am currently assigned to an FBI squad that investigates corruption by public officials. During my career in law enforcement, I have received training and gained experience related to a variety of criminal activities, including the corrupt practices of public officials and other types of fraud. Based on my training and experience I am also familiar with certain common phrases for narcotics and other contraband commonly used by criminals. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

I. Background

2. Crossroads Juvenile Center in Brownsville, Brooklyn ("Crossroads") is a secure juvenile detention facility, which is managed by New York City's Administration for Children's Services ("ACS"), for youth who are alleged or adjudicated juvenile delinquents, juvenile offenders or adolescent offenders, and have been remanded to secure detention. The FBI and the New York City Department of Investigation ("DOI") have been investigating the smuggling of contraband, including narcotics, cellphones and weapons, into the Crossroads Juvenile Center in Brownsville, Brooklyn ("Crossroads") by ACS employees assigned to Crossroads.

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. Approximately 120 residents, ranging from ages 14 to 20, are detained at Crossroads, and approximately 290 staff members work at the facility. ACS receives benefits in excess of \$10,000 per year under various federal government programs.

4. Residents at Crossroads are prohibited from possessing any contraband, including narcotics, cellular telephones, cigarettes, weapons and alcohol, among other prohibited items. ACS employees at Crossroads are trained to confiscate any contraband they discover and must notify a supervisor if any contraband is discovered.

5. ACS prohibits Crossroads staff from offering or giving contraband or gifts to residents, receiving any gifts or money from residents or anyone associated with them, and having any unauthorized contact with residents or anyone associated with them. Crossroads staff receive training on these and other prohibitions.

6. Crossroads staff undergo a security screening when they arrive to work at the facility. Staff members' belongings are put through an X-ray machine, and all staff pass through a magnetometer (metal detector). Crossroads staff are required to put their personal cell phones and any other prohibited items in a locker prior to undergoing the security screening.

7. A significant amount of contraband has recently been recovered in Crossroads. Between approximately March 2022 and May 2024, at least 75 cell phones and more than 340 scalpels or blades were recovered from the facility, as well as narcotics and tobacco. Based on my training and experience, and the evidence gathered in this investigation, at least a portion of this contraband was smuggled into the facility by Crossroads staff, including the defendant CHRISTOPHER CRAIG, in exchange for bribes from the residents or their associates.

II. The Defendant

8. The defendant CHRISTOPHER CRAIG has been employed at Crossroads since August 2018. CRAIG is a “youth development specialist,” which requires him to supervise residents. CRAIG’s responsibilities are similar to those of a correction officer at a jail facility, except, among other differences, CRAIG and other youth development specialists may use force in narrower circumstances and do not carry pepper spray or restraints.

III. The Defendant’s Bribery Scheme

9. There is probable cause to believe that the defendant CHRISTOPHER CRAIG received money from Crossroads residents and their acquaintances in exchange for smuggling contraband, including marijuana, into Crossroads.

10. Records produced by Cash App show that, between February 2022 and October 2022, the defendant CHRISTOPHER CRAIG received more than \$5,000 from the mother (“Relative-1”) of a resident of Crossroads (“Resident-1”). CRAIG’s Cash App account lists his true name, date of birth, address, and the last four digits of his social security number. For example, on or about February 11, 2022, Relative-1 paid CRAIG \$600. On or about March 6, 2022, Relative-1 paid CRAIG \$800 divided over four transactions.

11. On some occasions, when Relative-1 made the payments to the defendant CHRISTOPHER CRAIG, Relative-1 wrote information regarding the contraband smuggling in the subject line of the payment. Based on my training and experience and information I have learned in this investigation, individuals who pay bribes to correction officers or staff members at juvenile detention facilities often include information in the subject line of the payment so that the staff member knows what the payment is for, and so it does not get mistaken for a bribe from a

different resident. For example, on or about April 25, 2022, Relative-1 paid CRAIG \$300 and wrote, “O [the first initial of Resident-1’s name] said 2 for u. 1 for him.” On or about September 14, 2022, Relative-1 paid CRAIG \$15 and wrote, “roll up.” Based on my training and experience, I believe “roll up” means tobacco, cigarettes or rolling papers. Finally, on or about September 21, 2022, Relative-1 paid CRAIG \$50 and wrote, “1 – 8th O.” Based on my training and experience and information I have learned in this investigation, I believe this message indicates that the bribe is being paid to CRAIG to bring an eighth of an ounce of marijuana into Crossroads.

12. As discussed above, Crossroads staff members are prohibited from having any unauthorized contact with Crossroads residents, or their family members and acquaintances. Despite this, the defendant CHRISTOPHER CRAIG was repeatedly in contact with these individuals. For example, phone records show that CRAIG, using his phone number ending in - 9161 and subscribed to by him, had approximately 18 communications with Relative-1 between approximately August 13, 2022, and October 16, 2022, during which time she paid CRAIG approximately \$662 via Cash App. Between June 2022 and June 2023, CRAIG also had more than 200 communications with the father of a Crossroad resident whose identity is known to me (“Relative-2”). At least three Crossroads employees, including Youth Development Specialist Da’Vante Bolton (charged in a separate complaint today for bribery), had unauthorized phone communications with Relative-2.

13. Finally, Crossroads staff recovered a contraband phone on or about September 28, 2022, from a janitor closet in H Hall. Between approximately September 4, 2022, and October 23, 2022, the defendant CHRISTOPHER CRAIG had approximately 182

communications with this contraband phone.² The contraband phone also contained screenshots of CRAIG's Cash App account.

WHEREFORE, your deponent respectfully requests that the defendant CHRISTOPHER CRAIG be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving

² Although law enforcement has been able to extract some data and photographs from this contraband phone, law enforcement is still attempting to download all of the data and communications from the device.

the defendant an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.

A handwritten signature in black ink, appearing to read 'Matthew London', written over a horizontal line.

Matthew London
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this 21st day of June, 2024

Vera M. Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK