

RCH:PP/ADG/CMP  
F.# 2024R00524

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

NIGEL KING,

Defendant.

- - - - - X

**TO BE FILED UNDER SEAL**

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF ARREST  
WARRANT

(T. 18, U.S.C., § 371)

24-MJ-431

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 April 2022 and July 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NIGEL KING, 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:<sup>1</sup>

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.

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<sup>1</sup> 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 NIGEL KING, in exchange for bribes from the residents or their associates.

## II. The Defendant

8. The defendant NIGEL KING is a staff member at Crossroads and has been employed at the facility since October 2021. KING is a “youth development specialist,” which requires him to supervise residents. KING’s responsibilities are similar to those of a correction officer at a jail facility, except, among other differences, KING 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 NIGEL KING received money from Crossroads residents and their associates in exchange for smuggling contraband, including marijuana, alcohol and prescription pills, into Crossroads.

10. Crossroads staff recovered two contraband cell phones from residents that contained communications with the defendant NIGEL KING; as stated above, these communications are strictly prohibited by ACS. In addition, law enforcement has identified an additional nine contraband phones that were present in Crossroads and were used to communicate with a cell phone associated with KING.

11. For example, on or about April 14, 2023, Crossroads staff recovered a contraband cell phone from a resident whose identity is known to me (“Resident-1”), who resided

in G Residence Hall.<sup>2</sup> A review of Resident-1's phone revealed text messages with a cell phone used by KING ending in -7688 (the "KING Phone") regarding contraband smuggling.<sup>3</sup>

12. As one example, on or about January 21, 2023, the user of the Resident-1's contraband phone texted the defendant NIGEL KING, "Get me the big bag of grabba<sup>4</sup> you be getting me and sum papers and a 40<sup>5</sup> for me big bro." The user of Resident-1's phone then texted KING, "I'm bout to send you \$10." At approximately the same time, a Cash App account belonging to KING<sup>6</sup> (the "KING Cash App Account") received a \$10 payment from the Cash App account "TopOppLA"<sup>7</sup> with the message containing the initials of Resident-1 so that KING knew this payment was for Resident-1. (Within this approximate 24-hour period, KING also received, via Cash App, an additional \$140 from TopOppLA and another Cash App account that routinely

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<sup>2</sup> G Residence Hall is one of 10 separate resident halls at Crossroads in the same building.

<sup>3</sup> Records produced by T-Mobile show that the -7688 number is subscribed to by KING with KING's known home address. Records produced by Apple, Inc. also show that the KING Phone was connected to KING's Apple ID. Finally, in some messages between users of contraband phones and the KING Phone, the users of the contraband phone refer to the person they are speaking to as "King."

<sup>4</sup> Based on my training and experience, I believe "grabba" means a type of tobacco.

<sup>5</sup> Based on my training and experience, I believe a "40," means a 40-ounce container of alcohol.

<sup>6</sup> According to Cash App records, the Cash App account uses KING's true name, and the user of the account listed KING's true date of birth and last four digits of his Social Security number in the account information.

<sup>7</sup> One of the phone numbers associated with this Cash App account was a contraband cell phone possessed by a resident in Crossroads and subsequently seized by Crossroads staff.

sent and received money with TopOppLA and also made payments to numerous other Crossroads staff.)

13. On or about April 14, 2023, the same day ACS staff recovered Resident-1's phone, they recovered a contraband cell phone from another resident whose identity is known to me ("Resident-2"), also in G Residence Hall. Resident-2's phone also contained numerous text messages with the defendant NIGEL KING. For example, on or about January 28, 2023, the user of Resident-2's phone<sup>8</sup> texted KING, "If you come in bring papers cause the shits you gave is fucked up." Based on my training and experience, and the surrounding context, I believe the user of Resident-2's phone was relaying that KING had previously brought in rolling papers for narcotics or tobacco, which he did not like and was requesting different rolling papers to be smuggled in. Approximately two hours after the message requesting "papers," the user of Resident-2's phone texted KING, "Plz get me a 40 bro." On that day, KING received approximately \$52 in Cash App payments from accounts that were associated with Crossroads residents or related individuals. On or about March 16, 2023, the user of Resident-2's phone texted KING, "Come in w some fronto<sup>9</sup> & a 40." That day, KING received more than \$200 in

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<sup>8</sup> Based on the content of these messages and because Crossroads resident sometimes share contraband phones, it is unclear, in this instance, whether the messages from Resident-2's phone to KING were sent by Resident-2 or another resident.

<sup>9</sup> Based on my training and experience, I believe "fronto," is a type of whole leaf, dried tobacco.

payments from different Cash App accounts that were, according to Cash App records, associated with Crossroads residents or related individuals.

14. On or about November 20, 2023, the Honorable Peggy Kuo, Magistrate Judge for the Eastern District of New York, issued a warrant authorizing a search of the defendant NIGEL KING's iCloud account connected to the KING Phone. During the search, law enforcement seized messages between KING and numerous individuals which demonstrate that KING smuggled contraband into Crossroads. For example, on or about November 9, 2022, KING and the user of a phone number ending in -3854 communicated regarding the smuggling of contraband.<sup>10</sup> At approximately 6:39 p.m., the user of the -3854 phone asked KING to provide a location, and KING provided an address around the corner from Crossroads in Brooklyn. The user of the -3854 phone responded, "I triple bagged it . . . it should be no smell." Based on my training and experience and the context, I believe that the user meant that he or she placed the contraband, likely marijuana, into multiple bags to mask the smell for KING to smuggle it more easily into Crossroads. As another example, on or about December 31, 2022, another Crossroads resident in G Hall whose identity is known to me ("Resident-3") texted the defendant NIGEL KING that he sent \$115 for liquor, soda, and sandwiches and \$30 for food and "2 chargers 1 android 1 iPhone JUST THE CORDS." Cash App records confirm that KING's Cash App account received these payments.

15. Based on messages between the defendant NIGEL KING and Crossroads residents, I know that Crossroads residents and their associates have sent Uber and Lyft rides

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<sup>10</sup> On that same day, a contraband cell phone located in Crossroads sent a text message giving this -3854 number to KING, demonstrating that the user of the -3854 number was the intermediary between the Crossroad resident and KING.

containing contraband to KING for KING to smuggle into Crossroads. Based on communications from contraband phones as well as communications seized from KING's iCloud account, law enforcement has identified at least 17 instances of a Crossroads resident or their associate sending an Uber or Lyft to KING's location. For example, on or about December 7, 2022, Resident-3 messaged KING, "Bout to put the erks<sup>11</sup> in [] a Lyft [right now]." Resident-3 then sent KING a link to track the Lyft ride through the Lyft application.

16. The defendant NIGEL KING also received marijuana in exchange for smuggling contraband into Crossroads. On or about September 20, 2023, Resident-1, using a contraband phone with a phone number ending in -9341 texted KING, "Be at the addy.<sup>12</sup> It's on its way," and sent KING a screenshot of a Lyft en route to an address in Brooklyn. Resident-1

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<sup>11</sup> Based on my training and experience, I believe "erks," means Percocet, a brand name of oxycodone and acetaminophen.

<sup>12</sup> Based on my training and experience and the context, I believe that "addy" means address.



then sent KING the below photograph of a plastic bag containing several other bags, two of which had a green leafy substance consistent with marijuana.



17. Regarding the photograph, Resident-1 messaged the defendant NIGEL KING, “All of that is mines . . . & the one with a green sticker on it is with a cross is yours,” and later clarified that KING’s “bag is the only one that’s loose.” KING responded “copy.” Resident-1 sent KING a screenshot of a Lyft ride in progress. Based on the photograph sent from

Resident-1 to KING, as well as my training and experience, I believe KING was paid in marijuana in exchange for smuggling contraband into Crossroads.

18. In total, between approximately April 2022 and July 2023, the defendant NIGEL KING received approximately \$6,860 in payments on his Cash App Account from Crossroads residents or individuals associated with residents. For example, on or about April 26, 2022, KING received \$100 from a Cash App account with the display name that is a nickname of Resident-3 and a subscriber name that is Resident-3's mother. On or about May 15, 2022, KING received \$500 from this same account. On or about August 1, 2022, KING received a \$200 payment with the subject line that is the nickname of Resident-2. Based on my training and experience in similar cases involving the use of Cash App in contraband smuggling schemes, individuals who pay bribes to correction officers or employees of juvenile detention facilities via Cash App sometimes put the name of the resident or the type of contraband in the subject line on Cash App so the bribe receiver knows why the payment was made.

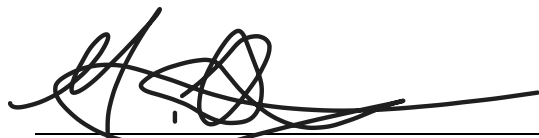
19. Finally, phone records for the KING Phone show that the defendant NIGEL KING had additional unauthorized contact with Crossroads residents. Between approximately April 2022 and July 2023, KING had nearly 300 contacts (meaning calls or text messages) with contraband phones of Crossroads residents, including ones belonging to Resident-1, Resident-2 and Resident-3.

20. In or about April 2024, the defendant NIGEL KING voluntarily spoke to law enforcement agents. During the interview, KING confirmed that the telephone number associated with his Cash App account was his phone number but denied being paid to smuggle contraband into Crossroads. KING only admitted to being paid to bring Crossroads residents food

and denied that he received any bribes or smuggled in contraband. KING also claimed that he never responded when residents contacted him, even though, as set forth above, KING was in continuous communication with residents about their bribery and contraband schemes.

WHEREFORE, your deponent respectfully requests that the defendant NIGEL KING 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 the defendant an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.



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