

RCH:PP/ADG/CMP
F.# 2024R00522

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

DA'VANTE BOLTON,

Defendant.

- - - - - X

TO BE FILED UNDER SEAL

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF ARREST
WARRANT

(T. 18, U.S.C., § 371)

24-MJ-435

EASTERN DISTRICT OF NEW YORK, SS:

GLADYS CAMBI, being duly sworn, deposes and states that she is a Deputy Inspector General with the New York City Department of Investigation (“DOI”) duly appointed according to law and acting as such.

In or about and between June 2022 and February 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DA'VANTE BOLTON, 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 her belief are as follows:¹

1. I am a Deputy Inspector General with DOI and have been since August 2022. I have worked at DOI since April 2013. I am currently assigned to a DOI squad that investigates misconduct affecting the juvenile detention system in New York City. 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. DOI and the Federal Bureau of Investigation have been investigating the smuggling of contraband, including narcotics, cellphones and weapons, into 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 DA'VANTE BOLTON, in exchange for bribes from the residents or their associates.

II. The Defendant

8. The defendant DA'VANTE BOLTON has been employed at Crossroads since March 2020. BOLTON is a "youth development specialist," which requires him to supervise residents. BOLTON's responsibilities are similar to those of a correction officer at a jail facility, except, among other differences, BOLTON 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 DA'VANTE BOLTON received money from Crossroads residents and their associates in exchange for smuggling contraband, including marijuana and weapons, into Crossroads.

10. Crossroads staff recovered two contraband cell phones from residents that contained communications regarding providing contraband to the defendant DA'VANTE BOLTON to smuggle into the facility in exchange for money. Specifically, on or about September 14, 2023, Crossroads staff recovered a contraband phone with a phone number ending in -4877 from the H Residence Hall at Crossroads. On or about September 5, 2023, a resident whose identity is known to me ("Resident-1"), using this contraband phone, told an acquaintance ("Acquaintance-1") that he needed "some weed"; he later asked Acquaintance-1 if the acquaintance "made the [quarter pound] for [him]" and instructed that Acquaintance-1 separate "2 ounces and 2 ounces and drop it off to my pops," meaning his father. That same day, Resident-1, using the contraband phone, messaged his father ("Relative-1") reiterating the instructions for Acquaintance-1 to separate the marijuana; Resident-1 also requested "put strike and p in their

please for me thank you love you ...”² Phone records show approximately six communications between BOLTON and Relative-1 on September 5-6, 2023. Further, phone records show approximately 248 communications between BOLTON and Relative-1 between June 2022 and November 2023. In addition, phone records show approximately 26 communications between Acquaintance-1 and BOLTON between November 2023 and February 2024. Therefore, based on my training and experience and these communications, there is probable cause to believe that Resident-1 arranged for BOLTON to smuggle contraband into Crossroads.

11. In addition, on or about April 21, 2023, Crossroads staff recovered a contraband phone ending in -3059. Communications on that phone show that Resident-1 communicated with an individual whose identity is known to me (“Relative-2”). Relative-2 is the mother of a Crossroads resident whose identity is known to me (“Resident-2”). Resident-1 communicated with Relative-2 on behalf of Resident-2 because Resident-2 no longer had access to a contraband phone and was in a different residence hall than Resident-1. Text messages from the -3059 phone show extensive communications in April 2023 between Resident-1 and Relative-2 regarding smuggling contraband into the facility, including discussions about “weed” being provided by “B.” For example, on or about April 10, 2023, Resident-1 messaged Relative-2, “[Resident-2] said ask bro bro how much is he gonna charge to bring in 2 zips of weed and he also said to tell him to bring the scape in on the walk in.”³ Relative-2 responded, “when I asked him he said he was gonna talk to him. He said he has to wait till it’s not hot in there,” meaning that

² Based on my training and experience and speaking to other law enforcement officers, I believe “strike” refers to a lighter and “p” refers to rolling papers.

³ Based on my training and experience and evidence I have gathered in this investigation, I believe “scape” refers to scalpels.

there was too much risk for the Crossroads staff member to smuggle in the contraband. The next day, Resident-1 again messaged Relative-2 about the contraband delivery: “[Resident-2] said to tell him to bring in the blades today and how much is 4 8ths” (meaning four 1/8 ounces of marijuana); Relative-2 responded, “He said he’s gonna talk to him and he will text me back a price.” When Resident-1 responded, “Ok and what about the blades did he say anything,” Relative-2 responded “He said it’s still hot and he ain’t trying to get bagged. He said he was gonna speak to him when he went in.” The same day that these text messages were transmitted, the defendant DA’VANTE BOLTON and Relative-2 had approximately 12 phone or text communications. Later, on or about April 16, 2023, Relative-2 told Resident-1 it was “280 with fee . . . 180 + fee,” meaning that they needed to pay the Crossroads staff member a total of \$280 to smuggle the contraband. That day, Relative-2 paid BOLTON \$280 via Apple Cash.

12. In addition to the payment discussed above, the defendant DA’VANTE BOLTON received a significant amount of money from Relative-2 and other individuals associated with Crossroads residents. Between November 8, 2022, and February 4, 2024, BOLTON received approximately \$20,783 on Apple Cash from Crossroads residents or their associates. BOLTON received approximately \$14,079 in approximately 136 transactions from Relative-2. The payments from Relative-2 to BOLTON ranged from \$1 to \$485, with 16 of the payments being \$300 or more. In addition, toll records show approximately 257 communications

between Bolton and Relative-2, including communications within the days preceding or following a corresponding payment.

13. The defendant DA'VANTE BOLTON also received approximately \$1,235 in approximately 15 transactions from Acquaintance-1 who, as discussed above, arranged for contraband to be delivered to Resident-1.

14. As discussed above, Relative-2 paid the defendant DA'VANTE BOLTON to smuggle marijuana and scalpels into Crossroads. Records produced by Amazon.com show that Relative-2 ordered hundreds of scalpel blades immediately prior to when she began paying BOLTON. For example, Relative-2 purchased a two-pack of non-metallic ceramic razor blades from Amazon.com on or about December 16, 2022. From approximately December 27, 2022, to December 29, 2022, Relative-2 also purchased hundreds of scalpels and other blades in varying sizes.

15. There is probable cause to believe that the defendant DA'VANTE BOLTON also smuggled in contraband, including weapons, for additional residents. Communications on the contraband phone discussed in paragraph 10 show a resident whose identity is known to me ("Resident-3") messaged an acquaintance whose identity is known to me ("Acquaintance-2") regarding contraband smuggling. On or about September 5, 2023, Resident-3 sent Acquaintance-2 a screenshot from Amazon.com of scalpels and told him that he ordered "these chits," meaning that he ordered the scalpels off Amazon. After Resident-3 confirmed the scalpels would be delivered on "8," meaning that Friday, September 8, Resident-3 instructed "Tht Saturday u could see bou," meaning the staff member to bring the items in. Acquaintance-2 replied, "Gotta tell [associate] give me the weed than." On or about September 8, 2023, at

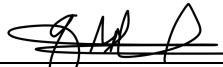
approximately 6:13p.m., Acquaintance-2 messaged Resident-3 a contact card entitled “cab.” The phone number for this “cab” contact card is BOLTON’s phone number. Based on my training and experience and this investigation, I know that a “cab” frequently refers to someone who will bring contraband into a correctional facility. Although there are no further text messages explaining why Acquaintance-2 sent Resident-3 BOLTON’s contact information with the “cab” description, the call log from Resident-3’s contraband phone shows that he and Acquaintance-2 had an approximately four-minute phone call at the exact time of the text message. Based on this information and all the other information in the case, there is probable cause to believe that Acquaintance-2 was confirming with Resident-3 that he had the correct contact information for BOLTON because Acquaintance-2 was going to provide the marijuana and scalpels to BOLTON to bring into Crossroads.

16. On April 18, 2024, law enforcement conducted a voluntary interview with the defendant DA’VANTE BOLTON. During the interview, BOLTON denied receiving money from Crossroads residents or their associates and denied bringing contraband into the facility. However, BOLTON admitted to communicating with Relative-2 and stated that they communicated in part because Relative-2 provided BOLTON with inhalers for his asthma.

WHEREFORE, your deponent respectfully requests that the defendant DA’VANTE BOLTON 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.



Gladys Cambi
Deputy Inspector General
New York City Department 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