

RTP:PP  
F.#2021R00894

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 371)

KATRINA PATTERSON,  
IMANI MATTHEWS,  
ASHLEY MEDINA and  
MICHAEL ROSS,  
also known as “Sparks,”

22-MJ-377

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

DIANNA OGLIO, being duly sworn, deposes and states that she is a Special Agent with the Department of Homeland Security, duly appointed according to law and acting as such.

In or about and between October 2020 and March 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants KATRINA PATTERSON, IMANI MATTHEWS, ASHLEY MEDINA and MICHAEL ROSS, also known as “Sparks,” 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, contrary to 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:<sup>1</sup>

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), and have been since 2018. I am currently assigned to the New York Violent Gang Task Force. I am familiar with the facts and circumstances of this investigation from: my personal participation in the investigation, review of documents, training and experience, and discussions I have had with other law enforcement personnel. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

I. Background

2. HSI, the New York City Department of Investigation ("DOI") and the New York City Police Department ("NYPD") are investigating the smuggling of contraband, including cell phones and narcotics, by corrections officers working at Rikers Island to

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<sup>1</sup> Because the purpose of this Complaint 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.

incarcerated individuals, including members of the Bloods, a street and prison gang that operates in New York City and across the United States. Members and associates of the Bloods engage in narcotics trafficking and commit acts of violence, including murder, robbery, and assault, among other crimes.

3. In connection with this investigation, agents have, among other things, reviewed surveillance video and financial records (including those related to online monetary transfer tools such as Cash App), conducted surveillance, and seized contraband.

4. Law enforcement agents have also reviewed recorded telephone calls made by incarcerated individuals using New York City Department of Correction's ("DOC") Securus system. To use the Securus system, each incarcerated individual is assigned a personal identification number ("PIN"). Although incarcerated individuals are required to use only their assigned PIN to make outgoing phone calls, in practice individuals frequently use the PINs assigned to other inmates to disguise the source of their calls.<sup>2</sup> Incarcerated individuals who use the Securus system also receive notice at the start of each call that their conversations are recorded and monitored.

i. Rikers Island

5. Rikers Island is an island in the East River between Queens and the Bronx that is home to New York City's main jail complex. Rikers Island contains a number

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<sup>2</sup> Included among the calls discussed herein are calls in which the inmate who is identified as a participant in the call improperly utilized another inmate's PIN to place the call. In those instances, a member of the investigative team who is familiar with the defendants' voices from having reviewed dozens of recorded calls for each has identified the defendant's voice.

of different facilities which are located in separate buildings' those facilities each contain a number of different housing units. Currently, approximately 6,000 individuals are incarcerated on Rikers Island. Members of the same gang are often placed in the same housing unit on Rikers Island in an attempt to avoid violence among different gangs.

6. Incarcerated individuals at Rikers Island are not permitted to possess cell phones and must place any telephone calls through consensually monitored and recorded telephone lines of the DOC Securus system. Based on my training and experience and information obtained from other law enforcement officers, I am aware that contraband cell phones are often smuggled into Rikers Island by correction officers, often in exchange for bribes from incarcerated individuals. Contraband cell phones are extremely valuable items within a jail because they allow incarcerated individuals to make telephone calls without being monitored by the DOC. Cell phones also allow incarcerated individuals to send text messages and use the internet, including looking up information on other incarcerated individuals' criminal cases. In addition, based on my training and experience and information obtained from members of the gang, I believe members of the Bloods often use these contraband cell phones in furtherance of their gang activity, including by using the calls to direct or receive instructions to further criminal activity such as narcotics trafficking.

7. Narcotics, like cell phones, are also contraband in a secure jail facility. I have learned that contraband, including cell phones and narcotics, often sell for many multiples greater than their cost outside a correctional facility.

8. Due to the need to promote the safety and security of fellow inmates and corrections officers, DOC regulations permit the search of an incarcerated individual's cell at any time for contraband, including cell phones and narcotics.

## II. The Defendants

9. KATRINA PATTERSON has been a correction officer with DOC since approximately June 2016. During the relevant time period, PATTERSON was a correction officer at the Robert N. Davoren Center ("RNDC") on Rikers Island and was assigned to the housing area where MICHAEL ROSS was incarcerated.

10. IMANI MATTHEWS is a resident of the Bronx, New York and is the mother of one of MICHAEL ROSS' children.

11. ASHLEY MEDINA is a resident of the Bronx, New York and is the mother of one of MICHAEL ROSS' children. On or about April 25, 2018, and then again on February 26, 2020, MEDINA was arrested as she attempted to smuggle marijuana to ROSS on Rikers Island. Those charges were dismissed.

12. MICHAEL ROSS is presently detained at the Great Meadow Correctional Facility in Comstock, New York, serving a sentence of 16 years to life for criminal possession of a weapon in the second degree after being convicted at trial. At the times relevant to this complaint, ROSS was detained at RNDC on Rikers Island. ROSS is a member of the Bloods. I am aware that ROSS has admitted to DOC officials that his nickname is "Sparks."

### III. The Bribery Conspiracy

13. Based on written communications on TextNow – a voice over internet application – seized pursuant to a search warrant, financial records, surveillance video, and other evidence obtained from Rikers Island, there is probable cause to believe that KATRINA PATTERSON received money from IMANI MATTHEWS and ASHLEY MEDINA on behalf of MICHAEL ROSS in exchange for smuggling contraband to ROSS at RNDC. Records obtained from Cash App, a mobile payment service, show that KATRINA PATTERSON regularly received (or attempted to receive) payments from IMANI MATTHEWS and ASHLEY MEDINA.<sup>3</sup> Between October 2020 and March 2021, MATTHEWS paid PATTERSON approximately \$19,190 through Cash App, and MEDINA paid PATTERSON approximately \$14,900 through Cash App.<sup>4</sup> MATTHEWS and MEDINA also attempted to send PATTERSON thousands of dollars in additional funds that were not processed because they were blocked by Cash App.<sup>5</sup>

14. These payments were made in exchange for KATRINA PATTERSON smuggling contraband to MICHAEL ROSS on numerous occasions. Between October 15,

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<sup>3</sup> At various points while ROSS was incarcerated on Rikers Island, MATTHEWS visited ROSS (either in person or virtually) on approximately 167 occasions and MEDINA visited ROSS (either in person or virtually) on approximately 30 occasions.

<sup>4</sup> Personal identifying information to include name, date of birth, address, bank accounts, phone number and/or the last four digits of her social security number links PATTERSON to her Cash App accounts, including multiple accounts using pseudonyms and fake addresses. The Cash App accounts for MATTHEWS and MEDINA are in their true names.

<sup>5</sup> PATTERSON also sent MATTHEWS or MEDINA approximately \$3,608 over several transactions.

2020, and November 4, 2020, ASHLEY MEDINA paid PATTERSON approximately \$3,300 via Cash App. Written communications on TextNow indicate that PATTERSON and MEDINA met in person on or about October 30, 2020. On November 10, 2020, approximately 49.9 grams of marijuana and a Samsung cell phone which had been broken into numerous pieces were found in ROSS' cell. After the contraband was found in ROSS' cell, DOC officials moved ROSS to punitive segregation at the George R. Vierno Center ("GRVC") on Rikers Island.

15. On November 13 and 14, 2020, ASHLEY MEDINA and KATRINA PATTERSON communicated several times on TextNow about this seizure. PATTERSON first asked MEDINA why DOC had moved ROSS to GRVC, and then wrote to MEDINA, "I hope it's not for the phone." PATTERSON later wrote that "he" has 30 days at the other facility "then he back to my building." Approximately three hours later, PATTERSON wrote to MEDINA, "call me I gotta see you asap did he destroy the phone they found the phone and mad weed . . . they have the phone I hope he deleted everything." PATTERSON also told MEDINA, "they said my building is on fire cause of this." PATTERSON later told MEDINA she heard that ROSS had broken his hand while trying to get rid of the phone and "we good," and MEDINA responded, "as long as he got rid of it." PATTERSON also told MEDINA, "I got the name of the person that snitched on him." During this conversation, PATTERSON also complained that she wanted to take vacation leave for a month but that "Sparks was crying like nah[] that's to[o] long."

16. On November 25, 2020, PATTERSON, over TextNow, told MEDINA to relay to ROSS that "he good" and that ROSS would be returned to PATTERSON's

facility. MEDINA responded, “Am change my number [you] probably goin[g to] deal with someone else sis it was nice meeting you.”

17. That same day, IMANI MATTHEWS contacted KATRINA PATTERSON over TextNow stating: “Hey Good Morning. How Are You? I’m Sparks Babymother. He said he doesn’t want you speaking to Ashley [MEDINA] at all. He said please respect his wishes & don’t disrespect him. He wants you to reach out to me for now.” During this conversation, PATTERSON asked MATTHEWS how MATTHEWS had obtained her phone number and told MATTHEWS, “I don’t want this number spoken on that phone,” which I believe means that PATTERSON did not want her phone number relayed on the recorded Securus phone system. Later in the conversation, PATTERSON provided MATTHEWS her Cash App account and a different phone number. PATTERSON also told MATTHEWS, “you know delete our messages,” and MATTHEWS responded, “He taught me well. You’re okay.”

18. During this conversation, KATRINA PATTERSON and IMANI MATTHEWS began discussing contraband smuggling. PATTERSON told MATTHEWS, “tell him tomorrow if he ready to get back to business let me know. It’s to[o] dry out here.” PATTERSON later asked MATTHEWS, “Did [ASHLEY MEDINA] give you the papers he had made before s\*\*t went down,” and MATTHEWS responded that she had. PATTERSON told MATTHEWS, “Right now s\*\*t is real hot . . . but as long as they have the paper s\*\*t could move.” Based on my training and experience, I believe “paper” in this context means either narcotics or money. PATTERSON later complained to MATTHEWS



that she was owed money and wrote, “ask wh[a]t imma do about money cause I can’t keep doing iou or bringing stuff an[d] not getting paid.”

19. That same day, KATRINA PATTERSON and IMANI MATTHEWS planned for the smuggling of narcotics into Rikers Island. PATTERSON and MATTHEWS first discussed which inmate PATTERSON could deliver contraband to while MICHEAL ROSS remained at GRVC. MATTHEWS told PATTERSON that the contraband would be “4 black joints in 1 paper,” which I understand to be either marijuana or a synthetic cannabinoid. PATTERSON responded, “4 black joints it better be wrapped so many times I don’t want to smell it.” PATTERSON demanded \$2,000 for smuggling this contraband and reiterated, “please please please make sure it’s wrapped a[l]ot of times.” During this conversation, MATTHEWS told PATTERSON she was waiting for the money. TextNow communications indicate that MATTHEWS and PATTERSON met on December 12, 2020 and that MATTHEWS paid PATTERSON \$900 via Cash App that day.

20. During these conversations, IMANI MATTHEWS and KATRINA PATTERSON also discussed MICHAEL ROSS’ movements on Rikers Island. PATTERSON told MATTHEWS that they were supposed to bring ROSS back to RNDC that day. PATTERSON also told MATTHEWS that she was “not there,” meaning PATTERSON was not working at Rikers Island that day. MATTHEWS later asked PATTERSON, “he said are you sliding through?” PATTERSON said she was not there and that ROSS should “just wait and see” because she did not want to say anything “on those phones” because they are “watching hard.”

21. On December 18, 2020, KATRINA PATTERSON and IMANI MATTHEWS continued to discuss contraband smuggling. PATTERSON told MATTHEWS, "I got you a phone." MATTHEWS again asked PATTERSON for her Cash App account, which PATTERSON provided. Soon thereafter, MATTHEWS paid PATTERSON \$2,000 via Cash App. On December 22, 2020, MATTHEWS wrote to PATTERSON, "Hey Love. Can you come see me? I have 4 for you & something to give you as well." PATTERSON responded that she could not come until the next day. TextNow communications indicate that PATTERSON met MATTHEWS on or about December 23, 2020. On or about December 24, 2020, MATTHEWS asked PATTERSON if MICHAEL ROSS got "the phone." PATTERSON responded that she did not get ROSS a phone. MATTHEWS told PATTERSON that ROSS was on Instagram. PATTERSON told MATTHEWS that ROSS probably got a phone from someone else on the other side of the housing unit. On or about December 30, 2020, another contraband cellphone was found in ROSS' cell.

22. On approximately January 2, 2021, IMANI MATTHEWS asked KATRINA PATTERSON, "he said are you gonna do whatcha discussed?" PATTERSON responded, "not right now it's to[o] hot." MATTHEWS responded, "he said is 5 good for you right now for you to take care of it," which I believe means a \$5,000 payment to PATTERSON to smuggle contraband. PATTERSON said, "yeah is he going to cash app it." Later that day, MATTHEWS asked if PATTERSON was going to meet her, and PATTERSON said, "no hold up he still after I said he's hot want me to bring him something I told him slow down." PATTERSON then asked MATTHEWS, "did he completely

destroy it,” which I believe means a contraband cell phone. PATTERSON also told MATTHEWS, “he don’t understand that s\*\*t put me in a jam I gotta slow down.” PATTERSON then told MATTHEWS she would not be back at work for several days. On or about January 4, 2021, MATTHEWS wrote to PATTERSON on TextNow, “he’s asking when you gonna see me?” PATTERSON responded that she would see MATTHEWS later but “he’s real hot right now he don’t get it.” MATTHEWS responded, “Nope. But you just cover your end. He say he got it. Let him have it.” PATTERSON responded, “I always cover my end.” That evening, MATTHEWS paid PATTERSON \$4,500, and attempted to pay PATTERSON an additional \$500, but Cash App blocked the transaction. TextNow communications indicate that PATTERSON and MATTHEWS met in person the next day.

23. On or about January 14, 2021, based on TextNow communications, KATRINA PATTERSON met IMANI MATTHEWS again. On or about January 16, 2021, at approximately 9:15 a.m., PATTERSON entered the 6 Upper South C Post at RNDC, where ROSS was waiting with two correction officers. PATTERSON was carrying a large plastic bag, which she eventually gave to ROSS. Subsequently, at least four other incarcerated individuals (including Co-Conspirator 1 (“CC-1”)), an individual believed to be a member of the Bloods and whose identity is known to your affiant) entered the room. ROSS removed several non-contraband items from the plastic bag and placed the plastic bag on the floor. Then, with the two other correction officers distracted, CC-1 grabbed the plastic bag and brought it to a cell. Approximately five minutes later, while ROSS and PATTERSON were still talking, another incarcerated individual brought PATTERSON an electronic device charger (considered contraband in a DOC facility) and PATTERSON gave

him another item. One minute later, that individual returned to exchange an electronic device charger for another one from PATTERSON. At approximately 9:25 a.m., ROSS entered the cell where CC-1 left the plastic bag just minutes earlier. At approximately 9:48 a.m., ROSS had a three-way call with Co-Conspirator 2 (“CC-2”), an individual whose identity is known to your affiant, and IMANI MATTHEWS using the Securus system. During the call, ROSS appeared upset and asked CC-2 if what he received was worth \$400. CC-2 replied yes. MATTHEWS then stated the problem is “son,” which, based on my training and experience and the evidence discussed below, I believe was a reference to PATTERSON.

24. On or about February 18, 2021, MICHAEL ROSS called ASHLEY MEDINA using the Securus phone system on multiple occasions. During one call, ROSS and MEDINA referenced discussions with “son,” including referring to “son” as “she.” As discussed above, I believe “son” is a reference to PATTERSON. During one call, ROSS said to MEDINA, “let Son know is it ok if you holler at G three times, if you holla at B three times.” Based on my training and experience, ROSS’ use of coded language, and ROSS and MEDINA’s using the phrase “three times” in a previous conversation, I believe ROSS and MEDINA are discussing either the type or quantity of narcotics that PATTERSON should receive. On another call, ROSS directed MEDINA to text “son,” and MEDINA relayed, among other things, that “son” had responded that ROSS “owes.” Later, ROSS directed MEDINA, “Put this, put this, . . . be like, oh, he said, like the fact that you keep saying he owe you and he keep trying to give you that f\*\*\*in bread but you keep talking about ‘hold it’ or you ‘don’t want it.’ Take your f\*\*\*in bread and leave me alone.” Based on my training

and experience, I believe “bread” means money, and that ROSS is frustrated that PATTERSON is not taking payment from him. At the end of the conversation, MEDINA told ROSS, “eight,” and ROSS replied, “Alright, tell, tell Son, hold on, I’m gonna call you back.” On or about February 21 and March 3, 2021, MEDINA paid PATTERSON \$5,000 and \$3,000 respectively, for a total of \$8,000, corresponding to the amount discussed on the call above.

25. On or about February 22, 2021, at approximately 5:47 a.m. (one day after ASHLEY MEDINA sent KATRINA PATTERSON \$5,000 of the \$8,000 discussed above), prior to PATTERSON going to work on Rikers Island, her vehicle entered the Bronx (where MEDINA and IMANI MATTHEWS both live) and then drove back to Queens. At approximately 8:32 a.m., MICHAEL ROSS called MEDINA using the Securus phone system. ROSS asked MEDINA if she sent “son his bread,” and MEDINA replied, “Yes I did that.” At approximately 2:46 p.m., PATTERSON entered the “day room” on 6 Upper South at RNDC where ROSS and another incarcerated individual (Co-Conspirator 3 or “CC-3”) were present. PATTERSON handed a large paper bag to CC-3, who then immediately left the room and brought the bag to a cell. PATTERSON and ROSS spoke for approximately two minutes. Approximately two minutes later, ROSS went back to the cell where CC-3 had left the bag.

26. On or about February 27, 2021, MICHAEL ROSS called ASHLEY MEDINA using the Securus phone system. ROSS directed MEDINA to send “son” “2.” That same day, MEDINA attempted to send KATRINA PATTERSON \$2,000 via Cash App but Cash App rejected the transaction.

27. As discussed above, on or about March 3, 2021, ASHLEY MEDINA sent KATRINA PATTERSON \$3,000 via Cash App. On or about March 6, 2021, at approximately 12:32 a.m., PATTERSON wrote to CC-2 on TextNow “hey [CC-2] I’m on my way! This sp [ROSS] people.” CC-2 provided PATTERSON an address in Mt. Vernon, New York. PATTERSON responded that she would be there in five minutes. That same day, at approximately 9:15 p.m., PATTERSON went to MICHAEL ROSS’ cell and spoke to him for approximately two minutes. At approximately 9:30 p.m., even though the cell doors should have been locked for the night beginning at 9:00 p.m., PATTERSON and ROSS went by themselves to the “day room” on 6 Upper South at RNDC where PATTERSON previously passed contraband to ROSS and CC-3. Based on my review of surveillance video, it appears PATTERSON placed an item in an area of the room partially obscured from the surveillance camera instead of handing the item to ROSS. PATTERSON then left the room. Approximately one minute later, ROSS appears to take an item from this same partially obscured area and returns to his cell.

28. On or about March 22, 2021, DOC’s Special Search Team conducted a search of the housing unit where MICHAEL ROSS was assigned at the RNDC. DOC recovered tobacco and five glass bottles of liquid in ROSS’ cell, which field tested positive for K2, a synthetic cannabinoid. The search team also recovered a cell phone taped under the radiator in ROSS’ cell.


29. In addition to the payments discussed above, ASHLEY MEDINA and IMANI MATTHEWS sent and received tens of thousands of dollars in furtherance of MICHAEL ROSS’ contraband smuggling business on Rikers Island. Some of these

transactions reference “Sparks” or “Sp” (a reference to ROSS’ nickname) in the subject line, the nicknames of other gang members, or housing units on Rikers Island. For example, on or about January 20, 2021, MEDINA received \$250 with the subject line “200 plizzy 50bacco 1uppernorth,” a reference to a housing unit on Rikers Island. On or about February 20, 2021, MEDINA paid another individual \$300 with the subject line “6upper sparks,” a reference to ROSS and his housing unit. Finally, as another example, on or about May 4, 2020, MEDINA paid another individual \$200 with the subject line “tell A Sparks said to pull up on him ASAP.” Calls between ROSS and MEDINA recorded on the Securus system also show that MEDINA transferred money on behalf of ROSS. As one example, on or about February 22, 2021, ROSS and MEDINA discussed various payments MEDINA should send and what payments she has received. With respect to MATTHEWS, as one example, on or about May 7, 2021, MATTHEWS received \$400 with the subject line “for SP what I owe.” Based on my training and experience, I believe these transactions indicate that MEDINA and MATTHEWS sent and received money on behalf of ROSS to further his contraband smuggling business on Rikers Island or are other payments related to the operation of ROSS’ gang activity.

WHEREFORE, your deponent respectfully requests that the defendants KATRINA PATTERSON, IMANI MATTHEWS, ASHLEY MEDINA and MICHAEL ROSS 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 warrants. 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 defendants an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.

  
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Dianna Oglio  
Special Agent  
United States Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me by telephone this  
31st day of March, 2022

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