
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	CRIMINAL COMPLAINT
v.	:	
	:	Honorable James B. Clark, III
CALVIN SWINTON,	:	
a/k/a "Forty", a/k/a "40,"	:	Mag. No. 24-12215
LANCE YARBOUGH,	:	
a/k/a "L-Boog,"	:	<u>FILED UNDER SEAL</u>
JAHAD GORSUCH,	:	
a/k/a "Hadi Mu,"	:	
COYETTE ELLIOTT,	:	
a/k/a "Q,"	:	
DERRICK DAVIDSON,	:	
a/k/a "Lefty,"	:	
RASHEM BATTS,	:	
a/k/a "Dae Dae,"	:	
KHION SCOVIL,	:	
a/k/a "Skrapp,"	:	
TISHAWN SCOVIL,	:	
a/k/a "Ty," and	:	
AMANDA BROWN,	:	
a/k/a "Manda	:	

I, Michael Amaturro, 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Michael Amaturio

Michael Amaturio, Special Agent
Federal Bureau of Investigation

Special Agent Amaturio attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

June 21, 2024

Date

at District of New Jersey
County and State

HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

/s/ James B. Clark, III

Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Distribute Controlled Substances)

From in or around June 2022 through in or around June 2024, in Essex County, in the District of New Jersey and elsewhere, defendants

CALVIN SWINTON,
a/k/a “Forty”, a/k/a “40”,
LANCE YARBOUGH,
a/k/a “L-Boog”,
JAHAD GORSUCH,
a/k/a “Hadi Mu”
COYETTE ELLIOTT,
a/k/a “Q”,
DERRICK DAVIDSON,
a/k/a “Lefty”,
RASHEM BATTTS,
a/k/a “Dae Dae”
KIION SCOVIL,
a/k/a “Skrapp”,
TISHAWN SCOVIL,
a/k/a “Ty”,
AMANDA BROWN,
a/k/a “Manda”

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 400 grams or more 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) and (b)(1)(A); 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, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and (b)(1)(C).

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

ATTACHMENT B

I, Michael Amaturro, am a Special Agent with the Federal Bureau of Investigation. 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, video footage, and photographs of the 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 WEST END AND ALEXANDER DTO

1. The defendants are members of a drug trafficking organization that operates an open-air narcotics market in and around the area of West End Avenue in Newark, New Jersey (“West End”), as well as in and around the area of 18th Avenue and Alexander Street in Newark, New Jersey (“Alexander”). Members of the conspiracy include Calvin Swinton, a/k/a “Forty,” a/k/a “40” (“SWINTON”), Lance Yarbough, a/k/a “L-Boog” (“YARBOUGH”), Jahad Gorsuch, a/k/a “Hadi Mu” (“GORSUCH”), Coyette Elliott, a/k/a “Q” (“ELLIOTT”), Derrick Davidson, a/k/a “Lefty” (“DAVIDSON”), Rashem Batts, a/k/a “Dae Dae” (“BATTS”), Kiion Scovil, a/k/a “Skrapp” (“K. SCOVIL”), and Tishawn Scovil, a/k/a “Ty” (“T. SCOVIL”), and Amanda Brown, a/k/a “Manda” (“BROWN”) (collectively the “Defendants”). During the timeframe relevant to the conspiracy charged in Count One of this Complaint, law enforcement extensively surveilled the areas of West End and Alexander through physical and fixed surveillance; used confidential informants to purchase narcotics, including substances that tested positive for the presence of fentanyl, heroin, and cocaine; reviewed arrests and drug seizures made by local law enforcement in the areas of West End and Alexander; and analyzed telephone records demonstrating interactions between the Defendants, among other lawful means of investigation. The investigation has revealed that the West End and Alexander drug trafficking organization (the “West End and Alexander DTO”) is affiliated with, and the Defendants are members and associates of, the Sex, Money, Murder subset of the Bloods street gang (“SMM”).

2. The defendants conspired and agreed with each other and others to distribute large quantities of heroin, fentanyl, and cocaine in the area of West End and Alexander. Since in or around June 2022, through physical and fixed surveillance, law enforcement has observed members of the West End and Alexander DTO collectively engage in hundreds of suspected hand-to-hand narcotics transactions. As described in more detail below, during the course of this investigation, law enforcement has used confidential informants to purchase narcotics from members of the DTO on numerous occasions. Through those controlled purchases, law enforcement seized substances that tested positive for

the presence of heroin, fentanyl, and cocaine. The investigation has revealed that SWINTON manages the West End and Alexander DTO and supplies the West End and Alexander DTO with fentanyl-laced heroin with the assistance of BROWN.

3. The Defendants worked together to distribute the heroin, fentanyl, and cocaine to their customers. Evidence indicating collaboration among the co-conspirators includes, for example: telephone records showing, in some instances, hundreds of contacts between co-conspirators; physical interactions between co-conspirators, and seizure of recurring stamps branding the heroin/fentanyl, indicating that members of the West End and Alexander DTO obtained their narcotics from a common source of supply.

4. The evidence described below demonstrates that the Defendants acted in concert to control the drug trade in and around West End and Alexander.

LAW ENFORCEMENT ARRESTS AND SEIZURES OF NARCOTICS¹
INVOLVING THE WEST END AND ALEXANDER DTO

5. On or about April 4, 2024, law enforcement observed YARBOUGH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-1. Following the transaction, Buyer-1 was arrested by law enforcement and found to be in possession of approximately 1 jug² of suspected cocaine.

6. On or about April 8, 2024, law enforcement observed GORSUCH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-2. Following the transaction, Buyer-2 was arrested by law enforcement and found to be in possession of approximately 6 glassine envelopes of suspected heroin/fentanyl stamped “Mortal Kombat” in purple ink and 3 jugs of suspected cocaine.

7. On or about April 11, 2024, law enforcement observed YARBOUGH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-3. Following the transaction, Buyer-3 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelope of suspected

¹ The substances seized have been submitted for laboratory testing. Laboratory testing results remains pending on substances seized after the week of February 18, 2024.

² A “jug” and “vial” refers to an individually packaged single dose of cocaine.

heroin/fentanyl stamped “Mortal Kombat” in purple ink and 1 glassine envelope of suspected heroin/fentanyl stamped “Cap’n Crunch” in red ink.

8. On or about April 15, 2024, law enforcement observed C. ELLIOTT interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-4. Following the transaction, Buyer-4 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelope of suspected heroin/fentanyl stamped “Mortal Kombat” in purple ink and 1 jug of suspected cocaine.

9. On or about April 19, 2024, law enforcement observed C. ELLIOTT interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-5. Following the transaction, Buyer-5 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelope of suspected heroin/fentanyl stamped “Mortal Kombat” in purple ink.

10. On or about April 22, 2024, law enforcement observed GORSUCH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-6. Following the transaction, Buyer-6 was arrested by law enforcement and found to be in possession of approximately 1 jug of suspected cocaine.

11. On or about April 23, 2024, law enforcement observed GORSUCH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions from a 2016 Silver Honda Fit, bearing New Jersey registration B84KNT (the “Silver Honda”). GORSUCH exited the Silver Honda, at which time law enforcement approached GORSUCH to investigate. GORSUCH provided law enforcement signed consent to search the Silver Honda. Inside the Silver Honda law enforcement, recovered a quantity of suspected heroin/fentanyl including approximately 50 glassine envelopes stamped “Tiffany” in blue ink and 30 glassine envelopes stamped “It” in red ink. In addition, Officers also recovered approximately 21 gold jugs of suspected cocaine, approximately 16 grams of unpackaged cocaine, and approximately \$1,451 in U.S. currency.

12. On or about April 30, 2024, law enforcement observed YARBOUGH interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-7. Following the transaction, Buyer-7 was arrested by law enforcement and found to be in possession of approximately 2 glassine envelopes of suspected heroin/fentanyl stamped “It” in red ink, and one torn glassine envelope stamped “It” in red ink.

13. On or about April 30, 2024, law enforcement observed BATTS interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-8. Following the transaction, Buyer-8 was arrested by law enforcement and found to be in

possession of approximately 9 glassine envelopes of suspected heroin/fentanyl stamped "Bread & Butter" in orange ink, and 4 tablets of suspected prescription Alprazolam.

14. On or about May 1, 2024, law enforcement observed YARBOUGH interacting with individuals consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander, including with Buyer-9. Following the transaction, Buyer-9 was arrested by law enforcement and found to be in possession of approximately 2 glassine envelopes of suspected heroin/fentanyl stamped "It" in red ink and approximately 2 plastic jugs of cocaine. Subsequently, law enforcement arrested YARBOUGH and a search incident to his arrest revealed him to be in possession of approximately 13 glassine envelopes of suspected heroin/fentanyl stamped "It" in red ink, approximately 9 glassine envelopes of suspected heroin/fentanyl stamped "Mortal Kombat" in purple ink, and approximately 6 jugs of suspected cocaine.

15. On or about May 4, 2024, law enforcement Officers observed YARBOUGH interacting with individuals consistent with hand-to-hand narcotics transactions in the area of 18th and Alexander. YARBOUGH was arrested and a search incident to his arrest revealed him to be in possession of approximately 3 blue jugs of suspected cocaine, approximately 16 orange jugs of suspected cocaine, approximately 10 glassine envelopes of suspected heroin/fentanyl stamped "SRT 8" in green ink, approximately 8 glassine envelopes of suspected heroin/fentanyl stamped "It" in red ink, approximately 10 glassine envelopes of suspected heroin/fentanyl stamped "Mortal Kombat" in purple ink, and approximately \$125 in U.S. currency.

16. On or about May 9, 2024, law enforcement observed BATTS interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-10. Following the transaction, Buyer-10 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelope of suspected heroin/fentanyl stamped "My My My" in purple ink and approximately 1 glassine envelope of suspected heroin/fentanyl stamped "Bread and Butter" in orange ink.

17. On or about May 29, 2024, law enforcement observed DAVIDSON interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-11 and Buyer-12. Following the transaction, Buyer-11 was arrested by law enforcement and found to be in possession of approximately 2 glassine envelopes of suspected heroin/fentanyl stamped "999" in purple ink and one pink jug of suspected cocaine. Following the transaction, Buyer-12 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelopes of suspected heroin/fentanyl stamped "999" in purple ink.

18. On or about June 3, 2024, law enforcement observed DAVIDSON interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including with Buyer-10. Following the transaction, Buyer-10 was arrested by law enforcement and found to be in possession of approximately 1 glassine envelope of suspected heroin/fentanyl stamped “SRT 8” in green ink.

19. On or about June 6, 2024, law enforcement observed DAVIDSON interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including Buyer-13. Following the transaction, Buyer-13 was arrested by law enforcement and found to be in possession of approximately 2 glassine envelopes of suspected heroin/fentanyl stamped “YSL” in red ink.

20. On or about June 7, 2024, law enforcement observed DAVIDSON interacting with individuals in a manner consistent with hand-to-hand narcotics transactions in the area of West End, including Buyer-4. Following the transaction, Buyer-4 was arrested by law enforcement and found to be in possession of approximately 4 glassine envelopes of suspected heroin/fentanyl stamped “My My My” in purple ink and 2 jugs of cocaine.

CONTROLLED PURCHASES OF HEROIN AND COCAINE

21. In addition to the seizures described above, between November 2022 and June 2024, the FBI used confidential informants to purchase heroin, fentanyl, and cocaine from multiple members of the West End and Alexander DTO. All of these transactions were conducted in the area of West End and Alexander, and all of the transactions were recorded with body-worn recording devices. Prior to each controlled purchase, law enforcement officers ensured that the confidential informant making the purchase did not have any unauthorized contraband or currency.

Buy No.	On or about the Week of	Defendant	Substance Purchased³	Brand of Heroin/Fentanyl
1	11/20/22	K. SCOVIL	Cocaine	n/a
2	12/4/22	K. SCOVIL	Cocaine	n/a
3	12/11/22	C. ELLIOTT	Heroin/Fentanyl Cocaine	“It” “Money Talks”

³ Laboratory testing remains pending on substances seized after the week of February 18, 2024.

4	12/11/22	K. SCOVIL	Heroin/Fentanyl Cocaine	"Body Snatcher"
5	12/18/22	K. SCOVIL	Heroin/Fentanyl Cocaine	"Body Snatcher"
6	1/8/23	K. SCOVIL	Heroin/Fentanyl Cocaine	"Body Snatcher"
7	1/15/23	K. SCOVIL	Heroin/Fentanyl Cocaine	"Body Snatcher" "1 1/2" "1 1/3" "III" "NFT"
8	1/22/23	K. SCOVIL T. SCOVIL	Heroin/Fentanyl Cocaine	"Blockbuster" "Venom"
9	1/29/23	K. SCOVIL T. SCOVIL	Heroin/Fentanyl Cocaine	"Boom"
10	2/5/23	K. SCOVIL	Heroin/Fentanyl	"Venom" "It"
11	9/3/23	SWINTON	Heroin/Fentanyl	"Mortal Kombat"
12	1/14/24	SWINTON BROWN	Heroin/Fentanyl	"999"
13	2/18/24	SWINTON BROWN	Heroin/Fentanyl	"999" "SRT-8"
14	3/10/24	SWINTON	Suspected Heroin/Fentanyl	"Time to Kill"
15	4/7/24	SWINTON	Suspected Heroin/Fentanyl	"C.L.B."
16	4/21/24	GORSUCH YARBOUGH	Suspected Heroin/Fentanyl	"It"
17	5/5/24	SWINTON	Suspected Heroin/Fentanyl	"Trump Tower" "Superfly"
18	5/26/24	SWINTON	Suspected Heroin/Fentanyl	"Chief Keef"

SURVEILLANCE

22. During the timeframe of the conspiracy, law enforcement monitored West End and Alexander through physical and fixed surveillance. Over the course of the investigation, law enforcement obtained hundreds of hours of video footage depicting the West End and Alexander DTO engaging in narcotics transactions. The footage captured, among other evidence, the Defendants, among other co-conspirators, engaging in hundreds of narcotics transactions in the areas of West End and Alexander; daily interactions between members of the conspiracy; a constant stream of buyers approaching the area for brief interactions; co-conspirators holding, passing, and counting drug proceeds amongst themselves.

23. Based on the narcotics seized during the course of the investigation and the hundreds of hand-to-hand transactions captured on video footage, the investigation revealed that the co-conspirators distributed more than 400 grams of fentanyl as well as hundreds of grams of heroin and cocaine during the conspiracy period.

PHONE CONNECTIONS

24. Many of the defendants provided their phone numbers to the confidential informants to facilitate future drug transactions. Many of the defendants utilized multiple phones and phone numbers during the conspiracy period. Using these telephone numbers and telephone numbers obtained from other sources, records show hundreds of calls between nearly all of the defendants during the conspiracy period. For example:

- SWINTON and BROWN were in contact approximately 2,810 times between December 2023 and June 2024.
- SWINTON and YARBOUGH were in contact approximately 2,298 times between December 2023 and April 2024.
- SWINTON and GORSUCH were in contact approximately 691 times between December 2023 and April 2024.
- SWINTON and K. SCOVIL were in contact approximately 105 times between June 2022 and July 2022.
- SWINTON and T. SCOVIL were in contact approximately 41 times Between September 2022 and August 2023.
- K. SCOVIL and T. SCOVIL were in contact approximately 1,541 times June 2022 and November 2023.
- K. SCOVIL and GORSUCH were in contact approximately 208 times between February 2023 and June 2023.
- GORSUCH and T. SCOVIL were in contact approximately 147 times between February 2023 and July 2023.