
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Michael A. Hammer,
 : U.S.M.J.
 OMARI SHOMARI, :
 a/k/a "Shmoney" : Mag. No. 21-10565
 :

I, Rodney Severe, 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 Deputy with the United States Marshals Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

s/ Rodney Severe
Rodny Severe, Special Deputy
United States Marshals Service

Special Deputy Rodney Severe attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on December 10, 2021, in the District of New Jersey

Honorable Michael A. Hammer
United States Magistrate Judge

s/ Hon. Michael A. Hammer
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about September 18, 2021, in Essex County, in the District of New Jersey, the defendant,

**OMARI SHOMARI,
a/k/a “Shmoney,”**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce at least two firearms and ammunition—namely, a Girsan .45 caliber handgun, bearing serial number T6368-20AP00152, which was loaded with five .45 caliber rounds of ammunition; two additional rounds of .45 caliber ammunition; a 9mm Luger Smith & Wesson M&P Shield semi-automatic handgun, bearing serial number HYU7910; and eight rounds of 9mm ammunition, and did aid and abet the same.

In violation of Title 18, United States Code, Section 922(g)(1), and Title 18, United State Code, Section 2.

ATTACHMENT B

I, Rodney Severe, am a Special Deputy with the United States Marshals Service. 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, 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.

1. Since at least as early as in or around June 2021, law enforcement has been investigating a series of retaliatory assaults and homicides committed by and between rival neighborhoods in Newark, New Jersey. Specifically, law enforcement has been investigating retaliatory shootings committed by and between members and associates of the Grape Street Crips street gang who operate in the Oscar Miles Housing Complex (the “Crips”) and members and associates of the Bloods street gang who operate in the areas of Fabyan Place and Voorhees Street, Elizabeth Avenue, and the Bradley Court Housing Complex (the “Bloods”).

2. During the course of the investigation, which has included fixed and mobile surveillance, social media reviews, and the utilization of confidential sources, among other investigative techniques, law enforcement has determined that Omari Shomari, a/k/a “Shmoney” (“SHOMARI”), is a member and associate of the Bloods who has engaged in multiple acts of violence for and on behalf of the Bloods. For example, law enforcement has determined that SHOMARI and other members and associates of the Bloods engaged in a retaliatory gun fight in the area of the Oscar Miles Housing Complex in Newark, New Jersey on or about September 18, 2021, shortly after 9:00 p.m.

3. The investigation has revealed that SHOMARI and his co-conspirators traveled to the area of Broome Street in Newark, New Jersey in a 2021 Alfa Romeo Stelvio, which had been stolen out of Elizabeth, New Jersey, shortly before the shooting on September 18, 2021 (the “Alfa Romeo”). The investigation has revealed that multiple firearms were fired from the Alfa Romeo and that during the immediate aftermath of the shooting, the Alfa Romeo crashed in the immediate vicinity of the shooting.

4. Law enforcement has determined that SHOMARI and his co-conspirators utilized multiple firearms during this gunfight, including a .45 caliber Girsan MC1911C semi-automatic handgun, bearing serial number T6368-20AP00152 (“Bloods Firearm-1”), and a 9mm Luger Smith & Wesson M&P Shield semi-automatic handgun, bearing serial number HYU7910 (“Bloods Firearm-2”). Law enforcement recovered two shell casings attributable to Bloods

Firearm-1 at the scene of the September 18, 2021 gunfight, one of which was located inside the Alfa Romeo, and the other of which was located in the roadway in front of 74B Broome Street. Moreover, law enforcement recovered Bloods Firearm-1 on the sidewalk adjacent to 74B Broome Street. Law enforcement also recovered eight shell casings attributable to Bloods Firearm-2 at the scene of the September 18, 2021 gunfight, one of which was located inside the Alfa Romeo, and seven of which were located in the roadway adjacent to 50 Broome Street.¹

5. Law enforcement has determined that SHOMARI's intended target(s) utilized multiple firearms, including a 9mm Polymer80 "ghost" gun ("Crips Firearm-1") and a .40 caliber firearm ("Crips Firearm-2"). Law enforcement recovered one shell casing attributable to Crips Firearm-1 and two shell casings attributable to Crips Firearm-2 at the scene of the September 18, 2021 Broome Street gunfight, all of which were located inside the Oscar Miles Housing Complex in the area where video surveillance footage depicts individuals associated with the Crips return fire.

6. On or about October 4, 2021, law enforcement conducted a motor vehicle stop in the area of Fabyan Place and Voorhees Street, which is territory associated with SHOMARI and his fellow Bloods members and associates, at which time law enforcement encountered SHOMARI erratically driving a stolen vehicle. During the course of the motor vehicle stop, law enforcement recovered a 9mm Luger Canik semi-automatic TP9SF handgun, bearing serial number 19AT03032 ("Bloods Firearm-3") from inside the vehicle that SHOMARI was driving.

7. A subsequent review of ballistics information generated by the National Integrated Ballistic Information Network ("NIBIN") and attendant law enforcement reports revealed the following information, which individually and collectively demonstrates the ongoing feud between the members and associates of the Crips operating in the Oscar Miles Housing Complex and the members and associates of the Bloods operating in the areas of Fabyan Place and Voorhees Street, Elizabeth Avenue, and the Bradley Court Housing Complex:

- a. Bloods Firearm-1 was used in a prior shooting on or about June 21, 2021, which shooting occurred in the area of Harding Terrace—known Crips territory;
- b. Bloods Firearm-2 was used in three subsequent shootings between September 26, 2021 and October 18, 2021, including one shooting that occurred on Keer Avenue in Newark, New Jersey on or about October 1, 2021 (the "Keer Avenue Shooting");

¹ Law enforcement also recovered an additional 9mm shell casing in the roadway adjacent to 50 Broome Street, the ballistics for which reveal that there was a third firearm utilized by SHOMARI and his co-conspirators.

- c. Bloods Firearm-3 was used in two shootings prior to its recovery on October 4, 2021, including in the Keer Avenue Shooting;
- d. Another member and associate of the Bloods (“Co-Conspirator-1”), was arrested in possession of Bloods Firearm-2 on or about October 28, 2021 in the area of Voorhees Street—known Bloods’ territory. SHOMARI was present with Co-Conspirator-1 at the time of Co-Conspirator-1’s arrest;
- e. Crip Firearm-2 was used in a shooting two days before the September 18, 2021 gunfight, which shooting occurred in the same area of Voorhees Street where Bloods Firearm-2 was ultimately recovered.

8. As a result of SHOMARI’s arrest on or about October 4, 2021, law enforcement seized SHOMARI’s cell phone. A subsequent search warrant for SHOMARI’s cell phone revealed numerous photos of the Alfa Romeo from the evening of September 18, 2021 shortly before the shooting. Specifically, SHOMARI’s phone contained four photos, all of which are time stamped 6:45 p.m., which depict the Alfa Romeo, including a clear depiction of the license plate.

9. SHOMARI’s cell phone also contained numerous photos of firearms, several of which depict firearms inside of SHOMARI’s residence. For example, SHOMARI’s phone contains a photo dated March 30, 2021, which depicts SHOMARI brandishing a high-capacity assault rifle. In addition, SHOMARI’s phone contains a photo dated July 2, 2021, which depicts an assault weapon loaded with a high-capacity magazine and a short-barreled rifle loaded with a 100-round drum. Further, SHOMARI’s phone contains a video dated September 18, 2021, at 9:52 p.m.—approximately forty minutes after the September 18, 2021 gunfight, in which SHOMARI displays an AK47 assault rifle.

10. SHOMARI’s cell phone also contained numerous conversations discussing the September 18, 2021 gunfight. Notably, SHOMARI sent a news article, which covered the September 18, 2021 gunfight and which included video footage of the shootout, to several individuals. In one conversation, SHOMARI sent the article with the accompanying text, “Like how I did that.” In another conversation, SHOMARI sent the article with the accompanying text, “That’s the ovo” – “If you know what I mean.” And in a third conversation, SHOMARI shared the article with the accompanying text, “I ain’t playing wit n****s nomore they woke me up.”

11. Bloods Firearm-1, the ammunition contained therein, and Bloods Firearm-2, were manufactured outside the State of New Jersey, and thus necessarily traveled in interstate commerce prior to September 18, 2021.

12. Prior to knowingly possessing the Firearms and Ammunition, and aiding and abetting the possession thereof, SHOMARI knew that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year. For example, on or about December 9, 2019, SHOMARI was convicted in the Superior Court of New Jersey, Essex County, of conspiracy to commit burglary, contrary to N.J.S.A. 2C:18-2A(1), in violation of N.J.S.A. 2C:5-2A(2).