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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	<b>CRIMINAL COMPLAINT</b>
	:	
v.	:	
	:	
MYRON WILLIAMS,	:	Honorable Michael A. Hammer
a/k/a "Money,"	:	
a/k/a "Tunchi,"	:	
HERBERT THOMAS,	:	
ROGER PICKETT,	:	Mag. No. 23-10076
a/k/a "Zy Gz,"	:	
ANDRE ALOMAR,	:	
a/k/a "Dre8,"	:	
ANTHONY ROGERS,	:	
a/k/a "MG,"	:	<b><u>FILED UNDER SEAL</u></b>
NAIM RICHARDSON,	:	
a/k/a "Ninicks,"	:	
QUASEAME WILSON,	:	
a/k/a "Qua Gz,"	:	
JAVON WILLIAMS,	:	
a/k/a "J45,"	:	
JAWAAD DAVIS, and	:	
KEITH ANDERSON	:	

I, Dallas Herrmann, 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 Bureau of Alcohol, Tobacco, Firearms, and Explosives and that this criminal complaint is based on the following facts:

**SEE ATTACHMENT B**

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Dallas Herrmann, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, & Explosives

Special Agent Dallas Herrmann attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on March 16, 2023, in the District of New Jersey.

Honorable Michael A. Hammer  
United States Magistrate Judge

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Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

**(Conspiracy to Distribute Controlled Substances)**

From at least in or around March 2022 through on or about March 16, 2023, in the District of New Jersey and elsewhere, defendants,

MYRON WILLIAMS,  
a/k/a "Money,"  
a/k/a "Tunchi,"  
HERBERT THOMAS,  
ROGER PICKETT,  
a/k/a "Zy Gz,"  
ANDRE ALOMAR,  
a/k/a "Dre8,"  
ANTHONY ROGERS,  
a/k/a "MG,"  
NAIM RICHARDSON,  
a/k/a "Ninicks,"  
QUASEAME WILSON,  
a/k/a "Qua Gz,"  
JAVON WILLIAMS,  
a/k/a "J45,"  
JAWAAD DAVIS, and  
KEITH ANDERSON,

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and 500 grams or more 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) and (b)(1)(B).

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

## **ATTACHMENT B**

I, Dallas Herrmann, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives. 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, photographs, recordings, and other items of evidence. 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 MARION GARDENS DRUG TRAFFICKING ORGANIZATION**

1. At all times relevant to this Complaint, Myron Williams, a/k/a “Money,” a/k/a “Tunchi” (“Myron Williams”); Javon Williams, a/k/a “J45” (“Javon Williams”); Anthony Rogers, a/k/a “MG” (“Rogers”); Roger Pickett, a/k/a “Zy Gz” (“Pickett”); Naim Richardson, a/k/a “Ninicks” (“Richardson”); Andre Alomar, a/k/a “Dre8” (“Alomar”); Quaseame Wilson, a/k/a “Qua Gz” (“Wilson”); Keith Anderson (“Anderson”); and Jawaad Davis (“Davis”), among others, were members and associates of the neighborhood-based street gang that operates primarily within and around the Marion Gardens Housing Complex in Jersey City, New Jersey. As members and associates of the Marion Gardens street gang, these defendants distributed controlled substances, including heroin, fentanyl, and cocaine, within and around the Marion Gardens Housing Complex.

2. At all times relevant to this Complaint, Herbert Thomas supplied members of the Marion Gardens Drug Trafficking Organization (“DTO”), including Myron Williams, Javon Williams, Rogers, and Richardson, with controlled substances.

### **VIOLENCE COMMITTED BY MEMBERS OF THE DTO**

3. Since in or around March 2021, members of the DTO who are associated with the Marion Gardens street gang have committed numerous acts of violence, to include the murder of K.T. on or about March 29, 2021; the murder of R.B. on or about November 20, 2021; and the murder of J.H. on or about November 1, 2022.

4. The murder of J.H. was committed in furtherance of the DTO’s drug trafficking activities—namely, during an attempted robbery of controlled substances. Davis, for his part, facilitated the murder of J.H. on or about November 1, 2022 by communicating with J.H. to coordinate a narcotics transaction. When J.H. and another associate arrived at the Marion Gardens Housing Complex to complete the narcotics transaction, Davis robbed J.H.’s narcotics supply while Pickett and Wilson held J.H. and his associate at gunpoint. After a struggle ensued, Pickett shot and killed J.H. while his

associate fled. Pickett and Wilson then fled the Marion Gardens Housing Complex in Pickett's vehicle.

### **THE DTO'S DISTRIBUTION OF CONTROLLED SUBSTANCES**

5. The Marion Gardens Housing Complex is equipped with a CCTV surveillance video system, which depicts nearly every area in and around the complex. The complex, in its entirety, consists of fifteen buildings, each of which contains multiple entrances, which collectively contain 228 residential units. The DTO primarily operates within the courtyard between Building 1 and Building 2, which is located between the Head Start School—an early education preschool for children ages 0 to 5—and the housing complex's playground. While some hand-to-hand narcotics transactions occur in the open courtyard, the majority are conducted within the vestibule areas of 13 Dales Avenue in Building 1 and 17 Dales Avenue in Building 2.

6. Throughout the duration of the investigation, law enforcement has utilized numerous investigative techniques, including fixed and mobile surveillance, lawfully recorded communications, GPS mobile tracking devices, and the use of confidential sources, among others. Moreover, law enforcement has arrested individuals who have purchased controlled substances from members of the DTO immediately after such transactions on multiple occasions. These arrests, and subsequent laboratory testing of the substances seized, have confirmed that the DTO sells cocaine, heroin, and fentanyl.

7. With these investigative techniques, law enforcement has observed that members of the DTO distribute controlled substances at the Marion Gardens Housing Complex daily. Significantly, the investigation has resulted in the documentation of hundreds of narcotics transactions committed by the DTO's members. Notably, for months, law enforcement officers have observed and documented transactions involving Myron Williams, Pickett, Alomar, Rogers, Richardson, Wilson, Javon Williams, Davis, and Anderson. For example:

- a. On or about September 19, 2022, law enforcement observed Myron Williams conduct narcotics sales utilizing the vestibule of 17 Dales Avenue.
- b. On or about September 20, 2022, law enforcement observed Myron Williams and Alomar conduct narcotics sales utilizing the vestibule of 17 Dales Avenue, after which Alomar and Myron Williams also exchanged United States currency.
- c. On or about October 20, 2022, law enforcement arrested Myron Williams after observing him discard a can that contained eighteen glassine envelopes and eight vials of cocaine.

- d. On or about January 3, 2023, law enforcement observed Myron Williams, Javon Williams, and Rogers conduct narcotics sales utilizing the vestibule of 13 Dales Avenue, as well as direct sales to buyers located in vehicles.
- e. On or about January 10, 2023, law enforcement observed Myron Williams, Richardson, and Wilson conduct narcotics sales utilizing the vestibule of 13 Dales Avenue.
- f. On or about February 1, 2023, law enforcement observed Myron Williams, Anderson, Alomar, Davis, and Wilson conduct narcotics sales utilizing the vestibule of 13 Dales Avenue, as well as direct sales to buyers located in vehicles.
- g. On or about February 13, 2023, law enforcement observed Myron Williams and Anderson conduct narcotics sales utilizing the vestibule of 13 Dales Avenue.
- h. On or about February 14, 2023, law enforcement observed Davis, Richardson, and Wilson in the parking lot between Building 2 and Building 3, at which time Davis conducted a narcotics sale.
- i. On or about February 16, 2023, law enforcement observed Myron Williams and Javon Williams conduct narcotics sales utilizing the vestibule of 13 Dales Avenue.
- j. On or about February 21, 2023, law enforcement observed Myron Williams and Alomar conduct narcotics sales utilizing the vestibule of 17 Dales Avenue, after which Alomar and Myron Williams also exchanged United States currency.
- k. On or about February 22, 2023, law enforcement observed Myron Williams, Javon Williams, Richardson, Davis, and Rogers conduct narcotics sales utilizing the vestibule of 13 Dales Avenue and surrounding areas.
- l. On or about March 1, 2023, law enforcement observed Myron Williams, Richardson, and Wilson conduct narcotics sales utilizing the vestibule of 13 Dales Avenue and surrounding areas.
- m. On or about March 8, 2023, law enforcement observed Anderson conduct narcotics sales utilizing the vestibule of 13 Dales Avenue and surrounding areas.

## **HERBERT THOMAS'S DISTRIBUTION TO THE DTO**

8. Throughout the investigation, law enforcement has observed and documented numerous transactions during which Thomas has supplied members of the DTO with controlled substances. For example:

- a. On or about May 4, 2022, law enforcement observed a transaction between Thomas, Javon Williams and Myron Williams during which Javon Williams provided a quantity of United States currency to Thomas, after which Thomas provided Javon Williams with controlled substances.
- b. On or about May 24, 2022, law enforcement observed a transaction between Thomas and Javon Williams during which Javon Williams and Thomas exchanged items consistent with a narcotics sale.
- c. On or about December 15, 2022, law enforcement observed a transaction between Thomas, Rogers, and Myron Williams during which Rogers provided a large quantity of United States currency to Thomas, and Thomas provided Rogers with a clear bag with a white substance consistent with controlled substances. As Rogers walked away from Thomas, he removed the clear bag with a white substance from his pocket and smelled it—conduct consistent with an assessment of controlled substances.
- d. On or about January 5, 2023, law enforcement observed multiple interactions and transactions between members of the DTO and Thomas. First, law enforcement observed Javon Williams and another member of the DTO obtain an item containing a white substance consistent with controlled substances from Thomas.
- e. Thereafter on or about January 5, 2023, law enforcement observed Rogers provide a quantity of United States currency to Thomas, after which Thomas entered his residence and then provided Rogers with an item consistent with controlled substances. After this exchange, law enforcement observed Thomas utilize the flashlight on his cellphone to illuminate the item he had just handed to Rogers while both Thomas and Rogers examined the item. Thomas then smelled the item that was now in Rogers's hand, consistent with an assessment of controlled substances.
- f. On or about February 22, 2023, law enforcement observed Richardson provide Javon Williams with United States currency, after which Richardson walked to 13 Dales Avenue to conduct

narcotics transactions and Javon Williams communicated and met with Thomas.

9. The investigation has revealed that the DTO distributed in excess of 100 grams of heroin, a Schedule I controlled substance; 40 grams of fentanyl, a Schedule II controlled substance; and 500 grams of cocaine, a Schedule II controlled substance.