

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

UNITED STATES OF AMERICA	:	Hon. Kevin McNulty
	:	
v.	:	Crim. No. 22-
	:	
JAYLEN BOONE	:	18 U.S.C. § 1959(a)(3)
	:	18 U.S.C. § 2
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

(Violent Crime in Aid of Racketeering Activity –
Assault Resulting in Serious Bodily Injury)

The Racketeering Enterprise

1. At all times relevant to this Information, Jaylen Boone and others, known and unknown, were members and associates of a criminal organization in Jersey City, New Jersey, that operated within and in the vicinity of the Curries Woods Housing Complex in Jersey City, New Jersey (“the Curries Woods Enterprise” or “the Enterprise”).

2. Individuals who associate with the Curries Woods Enterprise are generally members and associates of the 52 Hoover set of the Crips street gang. Individuals associated with the Curries Woods Enterprise refer to themselves as “Sharks” or the “Tay Tay Shrimp Gang,” which pays homage to Javonte Galbreath, a/k/a “Tay Tay,” a member of the Enterprise, who was killed in November 2015, and also use the term “Uptop,” referring to their territory in

Jersey City. Given the Hoover Crip connection, those affiliated with the Curries Woods Enterprise often wear the colors orange and blue. They are known for violence against rival neighborhood gangs, including individuals who associate with a gang known as Wilkinson/OGM (“Wilkinson/OGM”), as well as for drug distribution in and around Curries Woods.

3. The Curries Woods Enterprise, including its leadership, members, and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1959(b)(2)—namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Curries Woods Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of that Enterprise.

4. At all times relevant to this Information, the Curries Woods Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely:

- a. acts involving murder, in violation of N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), 2C:5-2, and 2C:2-6; and
- b. offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute

controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communication facility to violate the Controlled Substances Act).

Purposes of the Enterprise

5. The purposes of the Curries Woods Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of the Enterprise, as well as their allies, through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise, as well as their allies, with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise and its allies, through the use of intimidation, threats of violence, and acts of violence, including acts involving murder and assault against, among others, members of rival organizations;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

Means and Methods of the Enterprise

6. Among the means and methods by which the members and associates of the Curries Woods Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Curries Woods Enterprise committed, attempted to commit, threatened to commit, and agreed to commit acts of intimidation and violence, including acts involving murder and assault, to protect and expand the Enterprise's criminal operations;

b. Members and associates of the Curries Woods Enterprise were expected to participate in criminal activity, particularly violent acts directed at rivals or as directed by the Enterprise's leadership, in order to increase the respect accorded to those members, which resulted in those members' maintaining and increasing status within the Enterprise;

c. Members and associates of the Curries Woods Enterprise were expected to carry or have immediate access to firearms and weapons in order to protect themselves, their territory, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;

d. Members and associates of the Curries Woods Enterprise promoted a climate of fear through violence and threats of violence and reprisal;

e. Members and associates of the Curries Woods Enterprise used and threatened to use physical violence against various individuals, including witnesses and members of rival criminal organizations;

f. Members and associates of the Curries Woods Enterprise trafficked controlled substances as a means of enriching themselves and the Enterprise; and

g. Members and associates of the Curries Woods Enterprise sought to conceal their criminal activities by, among other means, obstructing justice and threatening and intimidating witnesses.

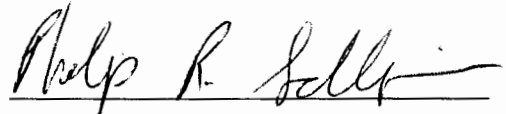
**Violent Crime in Aid of Racketeering Activity –
Assault Resulting in Serious Bodily Injury**

7. On or about August 3, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JAYLEN BOONE,

for the purpose of gaining entrance to, and maintaining and increasing position in, the Curries Woods Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposely assault another, the victim, which assault resulted in serious bodily injury, contrary to N.J.S.A. 2C:12-1(b)(1) and 2C:2-6, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.


PHILIP R. SELLINGER
United States Attorney

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v.

JAYLEN BOONE

INFORMATION FOR

**18 U.S.C. § 1959(a)(3)
18 U.S.C. § 2**

PHILIP R. SELLINGER
*UNITED STATES ATTORNEY
NEWARK, NEW JERSEY*

TRACEY AGNEW
*ASSISTANT U.S. ATTORNEY
973-645-2700*
