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

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UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre, U.S.M.J.  
: :  
v. : Magistrate. No. 24-13031  
: :  
JAMERE DIXON, : **CRIMINAL COMPLAINT**  
a/k/a "Rebels," : :  
JAHAD FOXWORTH, : **FILED UNDER SEAL**  
a/k/a "Hadie," : :  
TYRA JONES, : :  
JANCARLOS RODRIGUEZ, : :  
a/k/a "M's," and : :  
LANASIA SMITH, : :  
a/k/a "Lay" : :

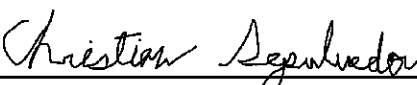
I, Christian Sepulveda, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and that this complaint is based on the following facts:

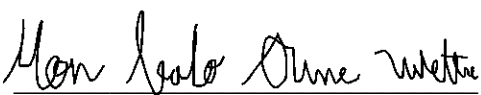
**SEE ATTACHMENT B**

Continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Special Agent Christian Sepulveda  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Special Agent Christian Sepulveda attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on February 8, 2024.

Honorable Leda Dunn Wettre  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Commit Hobbs Act Robbery)

On or about June 28, 2022, in Bergen County, in the District of New Jersey and elsewhere, the defendants,

**JAMERE DIXON,  
a/k/a “Rebels,”  
JAHAD FOXWORTH,  
a/k/a “Hadie,”  
TYRA JONES,  
JANCARLOS RODRIGUEZ,  
a/k/a “M’s,” and  
LANASIA SMITH,  
a/k/a “Lay,”**

did knowingly and intentionally conspire and agree with each other, to knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten physical violence to any person or property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

**COUNT TWO**

(Conspiracy to Use and Carry a Firearm During and in Relation to a Crime of Violence)

On or about June 28, 2022, in Bergen County, in the District of New Jersey and elsewhere, the defendants,

**JAMERE DIXON,  
a/k/a “Rebels,”  
JAHAD FOXWORTH,  
a/k/a “Hadie,”  
TYRA JONES,  
JANCARLOS RODRIGUEZ,  
a/k/a “M’s,” and  
LANASIA SMITH,  
a/k/a “Lay,”**

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, the Hobbs Act robbery offense charged in Count One of this Complaint, did knowingly and intentionally conspire and agree with each other, to use and carry a firearm, which firearm was brandished, contrary to Title 18, United States Code, Section 924(c).

In violation of Title 18, United States Code, Section 924(o).

## **ATTACHMENT B**

I, Christian Sepulveda, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in 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 on or about June 28, 2022, law enforcement has been investigating Jamere Dixon, a/k/a “Rebels” (“DIXON”), Jahad Foxworth, a/k/a “Hadie” (“FOXWORTH”), Jancarlos Rodriguez, a/k/a “M’s” (“RODRIGUEZ”), Tyra Jones (“JONES”), and Lanasia Smith, a/k/a “Lay” (“SMITH”) (collectively, the “Conspirators”) in connection with an armed robbery of a residence located in Saddle Brook, New Jersey.

2. On or about June 28, 2022, at approximately 12:32 a.m., law enforcement responded to a report of an armed robbery (the “Robbery”) at a residence in Saddle Brook, New Jersey (the “Saddle Brook Residence”). Based on information gathered in this investigation, Victim-1 and Victim-2” (collectively, the “Victims”) and a female, later identified as SMITH, were together at the Saddle Brook Residence. In the early morning hours of June 28, 2022, at approximately 12:20 a.m., SMITH exited the front door of Saddle Brook Residence. Within minutes of SMITH’s exit, three masked men entered the Saddle Brook Residence through the unlocked front door. Video surveillance footage from the Saddle Brook Residence depicts one of the three men carrying a firearm. The Victims were then ordered at gunpoint to lie face down. The masked assailants then ordered Victim-1 to show them the location of the safe and open it, to which Victim-1 complied.

3. Based on the investigation, law enforcement learned that items stolen during the Robbery included:

- a. suspected controlled substances including marijuana, cocaine, and prescription drugs;
- b. approximately \$11,000 in \$100 bills;
- c. approximately \$2,300 in one-dollar bills that were rubber-banded into denominations of \$100;
- d. two gold chains from Victim-1’s safe;

- e. Victim-1's wallet containing approximately \$1,500 cash, as well as personal and business credit cards;
- f. two cell phones belonging to Victim-1;
- g. two security cameras; and
- h. Victim-2's gold chain and two cell phones.

4. Following the Robbery, law enforcement reviewed video from the Saddle Brook Residence as well as from nearby businesses and residences (collectively, the "Videos"). Video surveillance footage from the Saddle Brook Residence shows one of the three masked men with a tattoo of "100k" on his right hand as depicted below. Based on my training and experience, as well as this investigation, I know this tattoo signifies membership in a neighborhood-based street gang known as "100K" which operates in the area of North Main Street and Jefferson Street in Paterson, New Jersey. A review of a publicly available social media account associated with FOXWORTH revealed a photograph of FOXWORTH with the same tattoo.



(Saddle Brook Residence Video Footage)

5. The Videos further show that:
- a. On or about June 27, 2022, at approximately 11:18 p.m., a white Dodge Charger (the "Charger") drove in the direction of the Saddle Brook Residence;
  - b. On or about June 28, 2022, at approximately 12:21 a.m., SMITH left the Saddle Brook Residence and walked in the direction of the Charger which was parked in the area;

- c. On or about June 28, 2022, at approximately 12:23 a.m., three men are seen on foot walking towards the Saddle Brook Residence; and
- d. On or about June 28, 2022, at approximately 12:29 a.m., the three men exit the Saddle Brook Residence and run towards and then enter the Charger which thereafter fled the area.

6. Further investigation revealed cell phone numbers for RODRIGUEZ (the “Rodriguez Phone”), JONES, SMITH (the “Smith Phone”), DIXON (the “Dixon Phone”) and FOXWORTH (collectively, the “Conspirator Phones”).

7. According to information obtained pursuant to search warrants, the Conspirator Phones all connected to cellular towers located in the area of the Saddle Brook Residence at or near the time of the Robbery. A review of call detail records of the Conspirator Phones revealed multiple contacts between the Conspirators at and around the time of the Robbery, for example:

- a. Between on or about June 27, 2022, at approximately 10:05 p.m., and June 28, 2022, at approximately 12:35 a.m., there were approximately 10 contacts between the Dixon Phone and the Rodriguez Phone; and
- b. Between on or about June 28, 2022, at approximately 12:38 a.m. and 3:11 a.m., there were approximately 7 contacts between the Dixon Phone and the Smith Phone.

8. A review of records for the Smith Phone and the Rodriguez Phone further revealed that, on or about June 27, 2022, at approximately 10:51 p.m., approximately one hour and forty minutes before the Robbery, SMITH sent a photo from the Smith Phone to the Rodriguez Phone of Victim-1’s bedroom depicting a picture of Victim-1’s safe with a circle around it.

9. On or about June 28, 2022, at approximately 1:02 a.m., a review of records revealed that one of Victim-1’s stolen credit cards was used at a gas station in Paterson, New Jersey (“Gas Station-1”). Security footage from Gas Station-1 shows the Charger present at and around the time the credit card was used. Further investigation determined that the Charger was a rental car operated by RODRIGUEZ.

10. According to information obtained pursuant to search warrants, on or about June 28, 2022, at approximately 1:00 a.m., the Smith Phone and the Rodriguez Phone connected to cellular towers located in the area of the Gas Station-1.

11. On or about June 28, 2022, at approximately 1:27 a.m., a review of records revealed an attempt to use one of Victim-1's stolen credit cards at a second gas station in Paterson, New Jersey ("Gas Station-2"). Security footage from Gas Station-2 shows a white Honda Accord (the "Honda") present at and around the same time the credit card was used. Law enforcement later identified the Honda as belonging to JONES.

12. On or about June 28, 2022, at approximately 1:37 a.m., a review of records revealed an attempt to use one of Victim-1's stolen credit cards at a convenience store in Paterson, New Jersey (the "Convenience Store"). Security footage from the Convenience Store shows two females, later identified as SMITH and JONES, along with a male, later identified as RODRIGUEZ, exit a white vehicle and enter the store at approximately 1:32 a.m. Once inside, SMITH and JONES purchase several items with cash and attempt to buy additional items with a credit card that appears to be declined. Surveillance footage from inside the Convenience Store further shows RODRIGUEZ removing large amounts of one-dollar bills from his cross-body bag. The cash was divided into rubber-banded stacks consistent with the bundling of the stolen cash from the Saddle Brook Residence.