

**FILED**

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OCT 11 2024

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**AT 8:30 4:32 P M  
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon. Michael E. Farbiarz
	:	
v.	:	Crim. No. 23-1019
	:	
MYRON WILLIAMS,	:	18 U.S.C. § 1962(d)
a/k/a "Money,"	:	18 U.S.C. § 1959(a)(1)
a/k/a "Tunchi,"	:	18 U.S.C. § 1951(a)
ROGER PICKETT,	:	18 U.S.C. § 924(c)(1)(A)(iii)
a/k/a "ZyG,"	:	18 U.S.C. § 924(j)(1)
a/k/a "ZyGz," and	:	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
KHALIL KELLEY,	:	18 U.S.C. § 922(g)(1)
a/k/a "Billski"	:	18 U.S.C. § 2

**SECOND SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark,  
charges:

**COUNT ONE**  
**(Racketeering Conspiracy)**

**The Racketeering Enterprise**

1. At various times relevant to this Second Superseding Indictment, in the District of New Jersey, and elsewhere, defendants Myron Williams, a/k/a "Money," a/k/a "Tunchi" ("Williams"); Roger Pickett, a/k/a "ZyG," a/k/a "ZyGz" ("Pickett"); Khalil Kelley, a/k/a "Billski" ("Kelley"); and others were members and associates of a criminal organization known as "Marion" or "300" (hereinafter the "Marion Gardens Enterprise" or "the Enterprise"). The Marion Gardens Enterprise, including its leadership, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4) and

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 Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

**History, Rules, and Organization of the Marion Gardens Enterprise**

2. The Marion Gardens Enterprise is a criminal street gang comprised primarily of members of the “Brim” and “Sex, Money, Murder” subsets of the Bloods street gang who reside in and around the Marion Gardens Housing Complex located in Jersey City, New Jersey (“Marion Gardens” or the “Marion Projects”). Although associated with the Bloods street gang, members of the Marion Gardens Enterprise represent, first and foremost, the Marion Projects. The Marion Gardens Enterprise distributes drugs in and around the area of the Marion Gardens Housing Complex and commits acts of violence against numerous rival groups within and around Jersey City, New Jersey.

3. Members and associates of the Marion Gardens Enterprise followed certain practices of the Enterprise, including:

a. visible demonstrations of gang affiliation, such as an identification with the number “57” or “five-seven,” which is a reference to building 57 within the Marion Gardens Housing Complex where members of the Marion Gardens Enterprise congregate;

b. the utilization of social media platforms to proclaim affiliation with, and highlight, the Enterprise by posting gang-related photographs and

videos, including those paying homage to deceased members of the Enterprise and taunting rival gang members, as well as to communicate with other members and associates; and

c. the use of slogans and hand gestures, as well as the display of tattoos, signifying membership in the Enterprise.

4. Members and associates of the Marion Gardens Enterprise engaged in, or controlled, drug trafficking and other criminal activities within the Marion Projects. Only those individuals who were members of, or associated with, the Marion Gardens Enterprise were permitted to distribute narcotics within the Marion Projects.

5. Members and associates of the Marion Gardens Enterprise engaged in retaliatory acts of violence with rival gangs, including those that identify as “Wilkinson” and “SaLaf,” among others. Members and associates were expected to commit acts of violence against rival gang members whenever rival gang members were encountered. Failure to do so would result in “discipline” by fellow gang members and a lack of respect within the Enterprise.

6. Members and associates of the Marion Gardens Enterprise paid homage to deceased members of the Enterprise and were expected to retaliate in order to seek retribution for their deceased fellow gang members.

7. At all relevant times, Williams, Pickett, Kelley, and others, were members and associates of the Marion Gardens Enterprise who operated in and around Hudson County, New Jersey.

**Purposes of the Marion Gardens Enterprise**

8. The purposes of the Marion Gardens Enterprise included the following:

a. promoting and enhancing the Enterprise and the activities of its members and associates, both in and out of prison, which activities included, but were not limited to, drug trafficking, acts involving murder, robbery, and other criminal activities;

b. preserving and protecting the power, territory, reputation, and profits of the Enterprise and of its members and associates, both in and out of prison, through the use of intimidation, violence, threats of violence, and acts involving murder;

c. providing assistance to gang members and associates who were imprisoned after having committed crimes on behalf of the Enterprise;

d. confronting and retaliating against rival gangs through intimidation, threats of violence, and acts of violence; and

e. hindering, obstructing, and preventing law enforcement from identifying participants in the gang's criminal activity, from apprehending the offenders of those crimes, and from successfully prosecuting and punishing those offenders.

**The Racketeering Conspiracy**

9. Beginning at least as early as in or around 2013, and continuing through the date of this Second Superseding Indictment, in the District of New Jersey, and elsewhere, the defendants,

**MYRON WILLIAMS,  
a/k/a “Money,”  
a/k/a “Tunchi,”  
ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,” and  
KHALIL KELLEY,  
a/k/a “Billski,”**

together with others, being persons employed by and associated with the Marion Gardens Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with others to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the Marion Gardens Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- a. multiple acts involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3), 2C:5-1, 2C:5-2, and 2C:2-6;
- b. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion);
- c. multiple 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 communications facility to violate the Controlled Substances Act).

10. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

**Manner and Means of the Marion Gardens Enterprise**

11. Among the manner and means by which the defendants and other members and associates of the Marion Gardens Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Marion Gardens Enterprise acquired and maintained weapons, including firearms, to use during violent criminal acts on behalf of the Enterprise.

b. Members and associates of the Marion Gardens Enterprise shared firearms to be used in the commission of violent criminal acts.

c. Members and associates of the Marion Gardens Enterprise committed and agreed to commit violent acts, including murder and assault with deadly weapons, on behalf of the Marion Gardens Enterprise; to punish Enterprise members and associates who had been disloyal; to retaliate against rivals; to maintain and enhance the reputation of the Marion Gardens Enterprise; and to protect and otherwise assist their drug trafficking activities.

d. Participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by other high-ranking members of the gang, increased the respect accorded to that member and resulted in that member's maintaining and increasing position in the gang.

e. Members and associates of the Marion Gardens Enterprise used social media, including Instagram and Facebook, to intimidate rival gang members and other members of the community and to promote the Marion Gardens Enterprise.

f. Members and associates of the Marion Gardens Enterprise enriched themselves through drug trafficking within the Marion Gardens Housing Complex and elsewhere, and members and associates prevented those who were not associated with the Marion Gardens Enterprise from trafficking narcotics within the Enterprise's territory.

#### **Overt Acts**

12. In furtherance of the conspiracy and to achieve its purposes, the defendants, along with others, committed and caused to be committed the following overt acts, among others, in the District of New Jersey, and elsewhere:

a. Beginning at least as early as in and around 2013, numerous members and associates of the Marion Gardens Enterprise, including, but not limited to, the defendants, engaged in multiple acts of distribution of controlled substances, and possession with intent to distribute controlled substances, in and around the Marion Gardens Housing Complex and elsewhere in the District of New Jersey.



b. Beginning at least as early as in and around 2013, numerous members and associates of the Marion Gardens Enterprise, including, but not limited to, certain of the defendants, engaged in multiple acts of violence for and on behalf of the Enterprise, which acts of violence targeted rival gang members and any other individuals who disrespected the Enterprise or its members.

c. Beginning at least as early as in and around 2013, the defendants and other members and associates of the Marion Gardens Enterprise utilized social media, to include Facebook and Instagram, to conduct the business of the enterprise, including flaunting membership in the Enterprise, paying homage to deceased members and associates of the Marion Gardens Enterprise, taunting rival gang members, and threatening retribution for acts of violence committed against members of the Enterprise.

d. On or about March 11, 2020, Williams and other members and associates of the Marion Gardens Enterprise posted, shared, and were depicted in an Instagram post, depicting Williams and other members and associates of the Marion Gardens Enterprise gesturing gang signs associated with the Marion Gardens Enterprise, which post contained the accompanying caption, "I'm with the Sharks – On Land You Know The Drill," thus communicating their membership in and association with the Enterprise.

e. On or about December 26, 2020, on the two-year anniversary of the death of Enterprise member Judane Holmes, a/k/a "Draco," Kelley posted two stories to his Instagram account, which stories depicted members and associates of the Enterprise inside the Marion Gardens Housing Complex



gesturing gang signs associated with the Enterprise. One post included the text “Dracooo” and depicted Judane Holmes, a/k/a “Draco,” thus paying homage to the deceased Enterprise member.

f. On or about January 24, 2021, Pickett posted a story to his Instagram Account, which depicted Pickett, Kelley, Williams, and other members of the Enterprise inside the Marion Gardens Housing Complex. In that photo, Kelley, and the other Enterprise members are gesturing hand signs associated with the Marion Gardens Enterprise. In addition, the post contained music—namely, the song “When We Shoot” by Lil Durk. The post contained a geolocation tag for “Marion Garden’s Projects – MG” and the caption, “You was just standing by my side.”

g. On or about March 27, 2021, members and associates of the Marion Gardens Enterprise encountered members and associates of a rival gang, at which time a fight ensued, and members and associates of the Marion Gardens Enterprise stole the cell phone of rival gang member, A.M.

h. On or about March 29, 2021, using the phone of rival gang member, A.M., Kelley and other members and associates of the Enterprise lured rival gang member K.T. out of his residence and shot and killed victim K.T. before fleeing.

i. On or about March 29, 2021, shortly after committing the murder of victim K.T., Pickett picked up Kelley and other Marion Gardens Enterprise associates from the location at which they discarded the murder vehicle and transported them back to the Marion Gardens Housing Complex.

j. On or about April 21, 2021, Pickett possessed with intent to distribute heroin and unlawfully possessed a firearm and ammunition.

k. On or about November 4, 2021, Pickett posted a photo of Williams and four other members and associates of the Marion Gardens Enterprise, in which Williams is displaying hand gestures that mimic holding a firearm. That photo contains the caption, "RIGHT OR WRONG THEY GONE STEP FASHO , FREE THE REST OF THE GUYS."

l. On or about November 20, 2021, Williams, Pickett, and Naim Richardson, a/k/a "Ninicks" ("Richardson")—another member of the Enterprise who is not charged in this Second Superseding Indictment—lured rival gang member R.B. out of his residence, at which time Williams and Richardson shot and killed victim R.B. before fleeing in a vehicle that Pickett drove.

m. On or about November 20, 2021, shortly after Williams, Pickett, and Richardson committed the murder of victim R.B., Williams, Pickett, and Richardson discarded the murder vehicle in Newark, New Jersey, after which Enterprise associate T.B. transported Williams, Pickett, and Richardson from the location at which they discarded the murder vehicle back to Jersey City.

n. The following day, members and associates of the Enterprise returned to the location where the murder vehicle was discarded and set it on fire.

o. On or about November 30, 2021, Williams possessed with intent to distribute heroin and cocaine within the Marion Gardens Housing Complex.

p. On or about July 1, 2022, Kelley posted a story to his Instagram account, which depicted Kelley, Williams, Pickett, and another member of the Enterprise in the courtyard of the Marion Gardens Housing Complex, with five heart emojis.

q. On or about July 18, 2022, Kelley posted a photo on Instagram, depicting himself and another member of the Enterprise in the courtyard of the Marion Gardens Housing Complex, which post included the notation “Dales”—a reference to the address of the Marion Gardens Housing Complex—followed by the emoji depicting a house and the emoji depicting a shark.

r. On or about September 19, 2022, Williams distributed narcotics within the Marion Gardens Housing Complex.

s. On or about September 20, 2022, Williams distributed narcotics within the Marion Gardens Housing Complex.

t. On or about October 20, 2022, Williams possessed with intent to distribute eighteen glassine envelopes of heroin and eight vials of cocaine within the Marion Gardens Housing Complex.

u. On or about November 1, 2022, Pickett, along with Quaseame Wilson (“Wilson”) and Jawaad Davis (“Davis”)—other members of the Enterprise who are not charged in this Second Superseding Indictment—coordinated a narcotics transaction with individuals from Paterson, New Jersey.

v. On or about November 1, 2022, Davis escorted victim J.H. and one of J.H.'s associates through the courtyard of the Marion Gardens Housing Complex and into a vestibule.

w. On or about November 1, 2022, after Davis had escorted victim J.H. and his associate into the vestibule, Pickett and Wilson, who had been lying in wait, entered the vestibule and held the victims at gunpoint.

x. On or about November 1, 2022, while Pickett and Wilson held the victims at gunpoint, Davis took from J.H. and his associate a bag containing controlled substances, which victim J.H. and his associate had brought to complete the narcotics transaction.

y. On or about November 1, 2022, Pickett and Wilson told victim J.H. and his associate to empty their pockets and to comply with their commands or else they would be killed.

z. On or about November 1, 2022, Pickett shot and killed victim J.H. while victim J.H. attempted to flee. Thereafter, Pickett and Wilson fled the Marion Gardens Housing Complex in Pickett's vehicle—the same vehicle Pickett used to pick up Kelley and others after the murder of victim K.T.

aa. On or about January 3, 2023, Williams and other members of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

bb. On or about January 10, 2023, Williams and other members of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

cc. On or about February 1, 2023, Williams and other members of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

dd. On or about February 13, 2023, Williams distributed narcotics within the Marion Gardens Housing Complex.

ee. On or about February 16, 2023, Williams and another member of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

ff. On or about February 21, 2023, Williams distributed narcotics within the Marion Gardens Housing Complex.

gg. On or about February 22, 2023, Williams and other members of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

hh. On or about March 1, 2023, Williams and other members of the Enterprise distributed narcotics within the Marion Gardens Housing Complex.

ii. On or about March 17, 2023, Williams possessed with intent to distribute controlled substances and unlawfully possessed ammunition.

**NOTICE OF SPECIAL SENTENCING FACTORS**

1. On or about March 29, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,” and  
KHALIL KELLEY,  
a/k/a “Billski,”**

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely, victim K.T., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

2. On or about November 20, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**MYRON WILLIAMS,  
a/k/a “Money,”  
a/k/a “Tunchi,” and  
ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,”**

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely, victim R.B., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

3. On or about November 1, 2022, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

while engaged in the commission of a robbery, and in the course of such crime and the immediate flight therefrom, did cause the death of another person, namely, victim J.H., contrary to N.J.S.A. 2C:11-3(a)(3) and 2C:2-6.

In violation of Title 18, United States Code, Section 1962(d).



**COUNT TWO**  
**(Murder in Aid of Racketeering)**

1. The allegations set forth in Paragraphs 1 through 12 of Count One of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. At all times relevant to this Second Superseding Indictment, the above-described Marrion Gardens Enterprise, including its leaders, members, and associates engaged in racketeering activity, as defined in Title 18, United States Code, Section 1959(b)(1) and 1961(1), namely, acts involving murder, in violation of New Jersey state law, namely, N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3), 2C:5-1, 2C:5-2, and 2C:2-6; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion); and 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 communications facility to violate the Controlled Substances Act).

3. On or about March 29, 2021, in the District of New Jersey, and elsewhere, the defendants,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,” and**  
**KHALIL KELLEY,**

**a/k/a “Billski,”**

for the purpose of gaining entrance to and maintaining and increasing position in the Marion Gardens Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim K.T., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT THREE**

**(Discharging a Firearm During and in Relation to a Crime of Violence)**

On or about March 29, 2021, in the District of New Jersey and elsewhere,  
the defendants,

**ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,” and  
KHALIL KELLEY,  
a/k/a “Billski,”**

during and in relation to a crime of violence for which they may be prosecuted  
in a court of the United States, namely the Murder in Aid of Racketeering charged  
in Count Two of this Second Superseding Indictment, did knowingly use and  
carry a firearm, which firearm was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and  
Section 2.

**COUNT FOUR**  
**(Causing Death through Use of a Firearm)**

On or about March 29, 2021, in the District of New Jersey and elsewhere,  
the defendants,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,” and**  
**KHALIL KELLEY,**  
**a/k/a “Billski,”**

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Three of this Second Superseding Indictment, did knowingly and purposely cause the death of Victim K.T. through the use of a firearm, which killing constituted murder, as defined in Title 18, United States Code, Section 1111, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(j)(1) and Section 2.

**COUNT FIVE**  
**(Murder in Aid of Racketeering)**

1. The allegations set forth in Paragraphs 1 through 12 of Count One and Paragraph 2 of Count Two of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about November 20, 2021, in the District of New Jersey, and elsewhere, the defendants,

**MYRON WILLIAMS,**  
**a/k/a “Money,”**  
**a/k/a “Tunchi,” and**  
**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

for the purpose of gaining entrance to and maintaining and increasing position in the Marion Gardens Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim R.B., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT SIX**

**(Discharging a Firearm During and in Relation to a Crime of Violence)**

On or about November 20, 2021, in the District of New Jersey and elsewhere, the defendants,

**MYRON WILLIAMS,  
a/k/a “Money,”  
a/k/a “Tunchi,” and  
ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,”**

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the Murder in Aid of Racketeering charged in Count Five of this Second Superseding Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

**COUNT SEVEN**  
**(Causing Death through Use of a Firearm)**

On or about November 20, 2021, in the District of New Jersey and elsewhere, the defendants,

**MYRON WILLIAMS,**  
**a/k/a “Money,”**  
**a/k/a “Tunchi,” and**  
**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Six of this Second Superseding Indictment, did knowingly and purposely cause the death of Victim R.B. through the use of a firearm, which killing constituted murder, as defined in Title 18, United States Code, Section 1111, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(j)(1) and Section 2.



**COUNT EIGHT**  
**(Hobbs Act Robbery)**

On or about November 1, 2022, in the District of New Jersey and elsewhere, the defendant,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, in that the defendants did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim J.H.

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

**COUNT NINE**  
**(Murder in Aid of Racketeering)**

1. The allegations set forth in Paragraphs 1 through 12 of Count One and Paragraph 2 of Count Two of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about November 1, 2022, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

for the purpose of gaining entrance to and maintaining and increasing position in the Marion Gardens Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim J.H., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT TEN**  
**(Discharging a Firearm During and in Relation to a Crime of Violence)**

On or about November 1, 2022, in the District of New Jersey and elsewhere, the defendant,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely the Hobbs Act Robbery and the Murder in Aid of Racketeering charged in Counts Eight and Nine of this Second Superseding Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

**COUNT ELEVEN**  
**(Causing Death through Use of a Firearm)**

On or about November 1, 2022, in the District of New Jersey and elsewhere, the defendant,

**ROGER PICKETT,**  
**a/k/a “ZyG,”**  
**a/k/a “ZyGz,”**

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Ten of this Second Superseding Indictment, did knowingly and purposely cause the death of Victim J.H. through the use of a firearm, which killing constituted murder, as defined in Title 18, United States Code, Section 1111, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(j)(1) and Section 2.

**COUNT TWELVE**  
**(Unlawful Possession of Ammunition)**

On or about March 17, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**MYRON WILLIAMS,**  
**a/k/a “Money,”**  
**a/k/a “Tunchi,”**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess sixteen rounds of ammunition, and the ammunition was in and affecting commerce.

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

**COUNT THIRTEEN**  
**(Possession with Intent to Distribute Controlled Substances)**

On or about March 17, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**MYRON WILLIAMS,**  
**a/k/a “Money,”**  
**a/k/a “Tunchi,”**

did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**FORFEITURE ALLEGATION ONE**

Pursuant to Title 18, United States Code, Section 1963, upon conviction of the offense charged in Count One of this Second Superseding Indictment, in violation of Title 18, United States Code, Section 1962, the defendants,

**MYRON WILLIAMS,  
a/k/a "Money,"  
a/k/a "Tunchi,"  
ROGER PICKETT,  
a/k/a "ZyG,"  
a/k/a "ZyGz," and  
KHALIL KELLEY,  
a/k/a "Billski,"**

shall forfeit to the United States of America:

- (a) any interest acquired or maintained in violation of Section 1962;
- (b) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and
- (c) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Section 1962.



**FORFEITURE ALLEGATION TWO**

As a result of committing the Hobbs Act robbery offense alleged in Count Eight of this Second Superseding Indictment, the defendant,

**ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,”**

shall forfeit to the United States: (i) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense; and (ii) pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461, any firearms and ammunition involved in or used in the commission of such offense.

**FORFEITURE ALLEGATION THREE**

As a result of committing the controlled substance offense in violation of Title 21, United States Code, Section 841, as charged in Count Thirteen of this Second Superseding Indictment, the defendant,

**MYRON WILLIAMS,  
a/k/a “Money,”  
a/k/a “Tunchi,”**

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the offenses charged in Count Thirteen of this Second Superseding Indictment, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Count Thirteen of this Second Superseding Indictment.

**FORFEITURE ALLEGATION FOUR**

As a result of committing the offenses in violation of Title 18, United States Code, Section 922(g)(1), Title 18, United States Code, Section 924(c)(1)(A)(i), Title 18, United States Code, Section 924(c)(1)(A)(iii), and Title 18, United States Code, Section 924(j) as charged in Counts Three, Four, Six, Seven, Ten, Eleven, and Twelve of this Second Superseding Indictment, the defendants,

**MYRON WILLIAMS,  
a/k/a “Money,”  
a/k/a “Tunchi,”  
ROGER PICKETT,  
a/k/a “ZyG,”  
a/k/a “ZyGz,” and  
KHALIL KELLEY,  
a/k/a “Billski,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of such offenses.

**Substitute Assets Provision**  
**(Applicable to all Forfeiture Allegations)**

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON

*Philip R. Sellinger*

PHILIP R. SELLINGER  
United States Attorney

**CASE NUMBER: 23-1019**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**MYRON WILLIAMS, et al.**

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**SECOND SUPERSEDING  
INDICTMENT FOR**

18 U.S.C. § 1962(d)  
18 U.S.C. § 1959(a)(1)  
18 U.S.C. § 1951(a)  
18 U.S.C. § 924(c)(1)(A)(iii)  
18 U.S.C. § 924(j)  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 2

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**A True Bill**

**Foreperson**

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

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**DESIREE L. GRACE  
JOHN M. MALOY  
JAVON HENRY  
ASSISTANT U.S. ATTORNEYS  
973-645-2708**

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