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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
: Hon. James B. Clark, III  
: Mag. No. 24-12279  
MICAH REID, :  
a/k/a "Nips" :  
:

I, Nicole Mizrahi, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

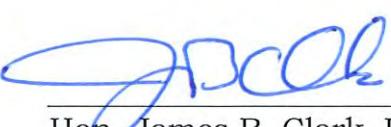
**SEE ATTACHMENT A**

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

**SEE ATTACHMENT B**

s/Nicole Mizrahi  
Nicole Mizrahi, Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Special Agent Mizrahi attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on October 30, 2024.

  
Hon. James B. Clark, III  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Violent Crime in Aid of Racketeering Activity – Assault with a Dangerous Weapon)

On or about October 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**MICAH REID,  
a/k/a “Nips,”**

for the purpose of gaining entrance to, and maintaining and increasing position in, the Rutgers Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposely assault Victim-1 with a dangerous weapon, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

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

**COUNT TWO**

(Discharge of a Firearm During a Crime of Violence)

On or about October 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**MICAH REID,  
a/k/a "Nips,"**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon in aid of racketeering activity charged in Count One of this Criminal Complaint, did knowingly use and carry a firearm, which was discharged.

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

**ATTACHMENT B**

I, Nicole Mizrahi, 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 other law enforcement officers, and my review of reports, documents, videos, photographs, and other items of evidence. The information set forth herein contains information obtained from investigators and other law enforcement officers who have interviewed numerous witnesses and sources and reviewed various social media posts. 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.

**The Rutgers Enterprise**

1. At all times relevant to this Complaint, Micah Reid, a/k/a “Nips,” and others, known and unknown, were members and associates of a neighborhood street gang that operated within and in the vicinity of Triangle Park in Jersey City, New Jersey (the “Rutgers Enterprise”).

2. Individuals who associate with the Rutgers Enterprise have historically consisted of members and associates of the 52 Hoover set of the Crips street gang. They operate primarily in the area of Rutgers Avenue and McAdoo Avenue, as well as within Triangle Park, which is located within the intersection of Rose Avenue, Cator Avenue, and Old Bergen Road in Jersey City, New Jersey. Given the Hoover Crip connection, those associated with the Rutgers Enterprise often wear the colors orange and blue. Members of the Rutgers Enterprise also refer to themselves as the “Get Bacc Gang,” which notably replaces the letter “k” with the letter “c” in order to avoid the use of “ck”—a common denotation for “rip killer.” Moreover, the phrase “Get Bacc,” which originated with gangs in Chicago, Illinois, refers to retaliatory acts of violence. Members of the Rutgers Enterprise also pay homage to Isaiah Jackson, a/k/a “Tutu,” a Rutgers Enterprise member who was killed in June 2015, as well as Joshua Houston, a/k/a “Smoke,” a Rutgers Enterprise member who died of a drug overdose in February 2020. A subset of the Rutgers Enterprise identifies as “300,” which is a tribute to Rondell Rush, a/k/a “Mr. 300,” who was killed in April 2016. Individuals associated with “300” also pay homage to Judane Holmes, a/k/a “Draco,” who was killed in December 2018. The Rutgers Enterprise is known for drug distribution in and around its controlled territory as well as for violence against numerous rival neighborhoods.

3. The Rutgers Enterprise has historically engaged in retaliatory acts of violence against the neighborhood street gang that operates in the area of the Salem Lafayette Apartments, more commonly referred to as “SaLaf,”

and the neighborhood street gang that operates in the area of Wilkinson Avenue, Ocean Avenue, Martin Luther King Drive, and Wegman Parkway, more commonly referred to as "Wilkinson." Members of both SaLaf and Wilkinson have historically associated with the Grape Street set of the Crips street gang.

4. The Rutgers 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 engages in, and the activities of which affect, interstate and foreign commerce. At all times relevant to this Complaint, the Rutgers 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.

5. At all times relevant to this Complaint, the Rutgers Enterprise, through its respective 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).

6. For example, on or about July 20, 2019, at approximately 12:30 a.m., members and associates of the Rutgers Enterprise shot victim C.F., a member and associate of the SaLaf street gang, as well as another victim, while operating a stolen vehicle. One of the firearms used to commit this shooting was recovered in the area of Linden Avenue East in Jersey City on or about April 20, 2020.

7. As another example, on or about December 27, 2019, at approximately 11:30 a.m., members and associates of the Rutgers Enterprise attempted to shoot members and associates of the SaLaf street gang with at least eighteen rounds of ammunition. One of the firearms used to commit this attempted shooting was the same firearm used to commit the July 20, 2019 shooting mentioned above, which was recovered on in the area of Linden Avenue East in Jersey City on or about April 20, 2020.

8. As another example, on or about January 13, 2020, a member and associate of the Rutgers Enterprise shot victim I.C., a member and associate of

the Wilkinson street gang, as well as another seemingly unintended victim within Wilkinson territory. The following day, on or about January 14, 2020, the same member and associate of the Rutgers Enterprise who had committed the shooting on January 13, 2020, along with two other members and associates of the Rutgers Enterprise, attempted to shoot several members and associates of the Wilkinson street gang. Immediately after the January 14, 2020 attempted shooting, the three members and associates of the Rutgers Enterprise were apprehended, and two firearms were recovered. One of the recovered firearms was the same firearm used to commit the January 13, 2020 shooting of victim I.C., a member and associate of the Wilkinson street gang, and the second unintended victim.

**Purposes of the Enterprise**

9. The purposes of the Rutgers Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of the Enterprise through criminal activity, including but not limited to drug trafficking;
- b. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise through the use of acts which involved intimidation, threats of violence, and acts of violence, including acts involving murder and assault against, among other members of rival organizations;
- c. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal 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.

**Membership in the Enterprise**

10. REID is a member and associate of the Rutgers Enterprise. Among other things, he has utilized social media to promote membership in, and affiliation with, the Enterprise, to communicate with fellow and allied gang members, and to taunt and/or threaten rival gang members.

11. REID has a tattoo on his neck that says "Rutgers" and a tattoo on his face that says, "Munchie D," which pays homage to fellow gang member, Damone Smith, a/k/a "Munch," who was killed by a rival gang member on March 31, 2020.

12. Reid and his associates also engage in acts of violence, intimidation, and drug trafficking in furtherance of the Enterprise.

**Means and Methods of the Enterprise**

13. Among the means and methods by which Reid and other members and associates of the Rutgers Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Rutgers Enterprise committed, attempted, and threatened and agreed to commit acts of violence, including murder and assault, to protect and expand the Enterprise's criminal operations;
- b. Members and associates of the Rutgers Enterprise acquired and maintained firearms to use during violent criminal acts on behalf of the Enterprise, including to protect themselves, their territory, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Members and associates of the Rutgers 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, and the commission of crimes and violent acts resulted in those members' maintaining and increasing status within the Enterprise;
- d. Members and associates of the Rutgers Enterprise promoted a climate of fear through violence and threats of violence and reprisal;
- e. Members and associates of the Rutgers 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 Rutgers Enterprise trafficked controlled substances as a means of enriching themselves; and
- g. Members and associates of the Rutgers Enterprise used social media, including Instagram and Facebook, to intimidate rival gang members, witnesses, and other members of the community, and to promote the Rutgers Enterprise.

**The October 1, 2023 Mass Shooting**

14. On or about October 1, 2023, at approximately 2:36 a.m., police responded to Culver Avenue in Jersey City, New Jersey because of a report of shots fired into a crowd of individuals exiting a nightclub (the “October 1 Shooting”). Six individuals suffered gunshot wounds and several victims were identified as members and associates of the Wilkinson street gang and the SaLaf street gang. As noted above, Wilkinson and SaLaf are aligned with each other, and both are rivals of the Rutgers street gang.

15. Law enforcement, upon reviewing video surveillance footage from the area, identified a white Kia Seltos (the “White Kia”) as being involved in the shooting.

16. Law enforcement later learned that the White Kia was stolen in Jersey City on September 29, 2023 by a member and associate of the Rutgers Enterprise. The White Kia was abandoned in Newark, New Jersey after the October 1 Shooting and recovered by law enforcement two days later.

17. Through a review of video surveillance and location data from REID’s phone, law enforcement determined that REID was dropped off at the White Kia shortly before the October 1 Shooting. REID got into the driver’s seat of the White Kia and picked up another individual (“Individual-1”) who rode in the passenger’s side of the White Kia during the October 1 Shooting. After the October 1 Shooting, REID abandoned the White Kia in Newark.

18. Video footage that law enforcement collected from October 1, 2023 in connection with the investigation depicted the following:

a. At approximately 2:03 a.m., an individual – later identified as REID – was observed entering the driver’s seat of the stolen White Kia, which was parked on Danforth Avenue in Jersey City.

b. The White Kia drove out of camera view and at approximately 2:19 a.m., the White Kia was observed circling the area of Culver Avenue in Jersey City.

c. At approximately 2:19 a.m., the October 1 Shooting occurred outside of a night club in the area of Culver Avenue. Specifically, the White Kia was observed idling nearby. As a group of individuals emerged from the lounge, the White Kia pulled up. An individual exited the passenger side of the White Kia and thereafter chased and shot certain individuals. The driver – later identified as REID – fired several rounds from the driver’s seat of the car.

d. After the October 1 Shooting, the White Kia fled northbound. License plate readers revealed that the White Kia traveled toward

Newark immediately after the shooting. Other video surveillance footage depicted an individual – later identified as REID – getting into another car in Newark after abandoning the White Kia.

19. Location information from REID’s phone indicates that REID left Newark and at approximately 4:51 a.m., REID returned to an address on Danforth Avenue in Jersey City known to law enforcement as REID’s residence (the “Danforth Premises”).

20. On or about October 20, 2023, law enforcement executed judicially authorized search warrants at several locations associated with the Rutgers street gang, including the Danforth Premises.

21. REID was present when law enforcement executed the search warrant of the Danforth Premises. At the Danforth Premises, law enforcement recovered from REID’s bedroom, among other items, one Taurus G3C 9mm handgun with an obliterated serial number (the “Firearm”) and one handgun magazine, located in the primary bedroom closet.

22. Law enforcement submitted the Firearm to the National Integrated Ballistic Information Network (“NIBIN”). A preliminary NIBIN report revealed that the Firearm was involved in the October 1 Shooting, as well as at least four other gang-related shootings in Jersey City.