

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti, U.S.D.J.
	:	
v.	:	Crim. No. 24-600
	:	
JASUN ALLAH,	:	18 U.S.C. § 1962(d)
a/k/a “Racks,”	:	18 U.S.C. § 1951(a)
MICHAEL DAVIS,	:	18 U.S.C. §§ 111(a)(1) and (b)
a/k/a “Baby Three,”	:	18 U.S.C. § 924(c)(1)(A)(ii)
CHRISTOPHER THOMAS,	:	18 U.S.C. § 2
a/k/a “CJ,”	:	21 U.S.C. § 846
JAZMEIR REYES,	:	21 U.S.C. §§ 841(a)(1), (b)(1)(B), and
a/k/a “Baby Joe,”	:	(b)(1)(C)
a/k/a “Joe,”	:	
KYZIEK ROBINSON,	:	
a/k/a “Doo Doo,”	:	
a/k/a “King Sparks,”	:	
a/k/a “Sparks,”	:	
JACIM PITTS,	:	
a/k/a “Jefe,”	:	
BORN ALLAH,	:	
a/k/a “Freedom,”	:	
a/k/a “Free,”	:	
ELIJAH RUBIO,	:	
a/k/a “Lottery,”	:	
TRASEAN SHORT,	:	
a/k/a “TreHound,”	:	
a/k/a “Hound,”	:	
ELIJAH BYRD,	:	
a/k/a “CEO,” and	:	
QUINCY FRANKLIN,	:	
a/k/a “Double O”	:	

**SUPERSEDING INDICTMENT**

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

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

**The Enterprise**

1. At various times relevant to this Superseding Indictment, in the District of New Jersey, and elsewhere, defendants JASUN ALLAH, a/k/a “Rackz,” (“J.ALLAH”); MICHAEL DAVIS, a/k/a “Baby Three” (“DAVIS”); CHRISTOPHER THOMAS, a/k/a “CJ” (“THOMAS”); JAZMEIR REYES, a/k/a “Baby Joe,” a/k/a “Joe” (“REYES”); KYZIEK ROBINSON, a/k/a “Doo Doo,” a/k/a “King Sparks,” a/k/a “Sparks” (“ROBINSON”); JACIM PITTS, a/k/a “Jefe” (“PITTS”); BORN ALLAH, a/k/a “Freedom,” a/k/a “Free” (“B.ALLAH”); ELIJAH RUBIO, a/k/a “Lottery” (“RUBIO”); TRASEAN SHORT, a/k/a “TreHound,” a/k/a “Hound” (“SHORT”), ELIJAH BYRD, a/k/a “CEO” (“BYRD”), and QUINCY FRANKLIN, a/k/a “Double O” (“FRANKLIN”), and others were members and associates of a criminal organization known as “100k” or “Down the Hill” (the “100k Enterprise” or the “Enterprise”). The 100k Enterprise, including its leaders, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), 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 100k Enterprise**

2. The 100k Enterprise is a hybrid local community street gang that operates primarily out of the area surrounding North Main Street and Jefferson Street in Paterson, New Jersey, including the five-block stretch of North Main Street that begins at Haledon Avenue and ends at Clinton Street (“100k Territory”). The term “hybrid” means that membership in the 100k Enterprise is comprised of individuals associated with both the “NineTre” set of the “Bloods” and the “Grape Street” set of the “Crips” national street gangs. Despite these differing national gang affiliations, members of the 100k Enterprise represent, first and foremost, the 100k Enterprise and their local Paterson community. The 100k Enterprise distributes drugs and commits acts of violence against numerous rival groups within and around Paterson. These acts of violence, including robberies and shootings, extend throughout Passaic and Bergen Counties in New Jersey.

3. The 100k Enterprise derived its name and originated from the 2016 murder of Kasiem McCaskill, a/k/a “Baka,” a/k/a “100k” (“McCaskill”), which caused the local Paterson-based street gang known as “Brick Squad” or “GlockBoyz” to split into the 100k Enterprise and their primary rival, the “Blockboyz,” which operates from and controls the Presidential Tower Housing Complex on the North Side of Paterson (the “Blockboyz”). The 100k Enterprise has been in a violent feud with the Blockboyz ever since each gang’s founding. Membership in the 100k Enterprise is based primarily on whether an individual

was born or raised in areas of Paterson controlled by the 100k Enterprise, but membership is also open to those with a close connection to, and who engaged in criminal activities with, members of the 100k Enterprise. The 100k Enterprise has other rivals in Paterson besides the Blockboyz, including the local gang known as “4k,” which operates in the areas of Rosa Parks Boulevard and Keen Street (“4k”). Another primary rival of the Enterprise was a local gang known as “230” or “UpTop,” which operated in the area of Rosa Parks Boulevard and Godwin Avenue and Carroll and Governor Streets in Paterson.

4. The 100k Enterprise is aligned with: (1) individuals who identify as “34,” which is a subset of the 100k Enterprise that operates out of 34 Jefferson Street in 100k Territory; individuals who associate with 10th Avenue and East 19th Street, who self-identify with the name “So Icey”; and individuals who identify as “5th Ave” or “Loopside,” who, as of in or around 2020, operate out of the area of Main Street and Mary Street in Paterson and previously associated with the Riverside Terrace Housing Complex on 5th Avenue, which was demolished in or around January 2020.

5. Members and associates of the 100k Enterprise follow certain practices of the Enterprise, including:

a. visible demonstrations of gang affiliation, such as an identification with the number “100” followed by the letter “k,” which spells out 100k, the number “34,” which is a reference to the 34 gang subset of the Enterprise and a residence at 34 Jefferson Street in Paterson, New Jersey, where

high-ranking 100k members have resided, and the number “1017,” which is a reference to Brick Squad, the originating gang of the Enterprise;

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. tattoos, slogans, and hand gestures signifying membership in the 100k Enterprise.

6. Members and associates of the 100k Enterprise engage in, or control, drug trafficking and other criminal activities within the five-block stretch of North Main Street that begins at Haledon Avenue and ends at Clinton Street. Only those individuals who are members of, or associate with, the 100k Enterprise are permitted to distribute drugs within this area of the first ward of Paterson, which locals refer to as “Down the Hill.”

7. Members and associates of the 100k Enterprise engage in retaliatory acts of violence with rival gangs, including those that identify as “Blockboyz” and “4k,” among others. Members and associates are expected to commit acts of violence against rival gang members whenever they encounter rival gang members. Failure to do so will result in “discipline” by fellow gang members and a lack of respect within the Enterprise.

8. Members and associates of the 100k Enterprise pay homage to deceased members of the Enterprise, including McCaskill, and are expected to retaliate in order to seek retribution for their deceased or targeted fellow gang members.

9. At all relevant times, J.ALLAH, DAVIS, THOMAS, REYES, ROBINSON, PITTS, B.ALLAH, RUBIO, SHORT, BYRD, and others, were members and associates of the Enterprise, and FRANKLIN, along with others, were leaders or otherwise high-ranking members of the Enterprise, all who operated in and around Passaic and Bergen Counties, and elsewhere, in New Jersey.

**Purposes of the 100k Enterprise**

10. The purposes of the 100k 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, murder, aggravated assault, robbery, drug trafficking, bank fraud, 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, assaults, and 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.

**Means and Methods of the 100k Enterprise**

11. Among the manner and means by which the defendants and other members and associates of the 100k Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the 100k Enterprise acquired and maintained weapons, including firearms, to use during violent criminal acts on behalf of the Enterprise.

b. Members and associates of the 100k Enterprise shared firearms to be used in the commission of violent criminal acts.

c. Members and associates of the 100k Enterprise committed and agreed to commit violent acts, including murder, robbery, and assault with deadly weapons, to avenge attacks or perceived slights against other members and associates of the 100k Enterprise; to punish Enterprise members and associates who had been disloyal; to retaliate against rivals; to maintain and enhance the reputation of the 100k Enterprise; and to protect and otherwise assist their drug trafficking business.

d. Participation in criminal activity by a member of the 100K Enterprise, particularly violent acts directed at rivals or as directed by Enterprise leadership, increased the respect accorded to that member, resulted in that member's maintaining and increasing position in the gang, and could result in a promotion to a leadership position.

e. Members and associates of the 100k Enterprise used social media, including Instagram and Facebook, to intimidate rival gang members and other members of the community, and to promote the 100k Enterprise and their standing within the Enterprise.

f. Members and associates of the 100k Enterprise enriched themselves through drug trafficking, bank fraud, and the commission of robberies, and members and associates prevented those who were not associated with the 100k Enterprise from trafficking narcotics within 100k Territory.



## **The Racketeering Conspiracy**

12. Beginning at least as early as in or around January 2021, and continuing through the date of this Superseding Indictment, in the District of New Jersey, and elsewhere, the defendants,

**JASUN ALLAH,**  
a/k/a “Racks,”  
**MICHAEL DAVIS,**  
a/k/a “Baby Three,”  
**CHRISTOPHER THOMAS,**  
a/k/a “CJ,”  
**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”  
**KYZIEK ROBINSON,**  
a/k/a “Doo Doo,”  
a/k/a “King Sparks,”  
a/k/a “Sparks,”  
**JACIM PITTS,**  
a/k/a “Jefe,”  
**BORN ALLAH,**  
a/k/a “Freedom,”  
a/k/a “Free,”  
**ELIJAH RUBIO,**  
a/k/a “Lottery,”  
**TRASEAN SHORT,**  
a/k/a “TreHound,”  
a/k/a “Hound,”  
**ELIJAH BYRD,**  
a/k/a “CEO,” and  
**QUINCY FRANKLIN,**  
a/k/a “Double O,”

together with others, being persons employed by and associated with the 100k 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 100k 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 and attempted murder, contrary to 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;

b. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion);

c. multiple acts indictable under Title 18, United States Code, Section 1343 (relating to wire fraud);

d. multiple acts indictable under Title 18, United States Code, Section 1344 (relating to financial institution fraud); and

e. 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).

13. 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.

**Overt Acts**

14. In furtherance of the racketeering conspiracy and to achieve its purposes, the defendants and their coconspirators 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 or around January 2021, members and associates of the 100k Enterprise, including, but not limited to, the defendants, engaged in multiple acts of distribution of controlled substances, possession with intent to distribute controlled substances, and conspired together to do same, in and around 100k Territory.

b. Beginning at least as early as in or around January 2021, members and associates of the 100k Enterprise, including, but not limited to, the defendants, utilized social media, to include Instagram and Facebook, to conduct the business of the Enterprise, including flaunting membership in the 100k Enterprise, advertising their drug distribution and check fraud businesses, paying homage to deceased members and associates of the 100k Enterprise, taunting rival gang members, and threatening retribution for acts of violence committed against members of the 100k Enterprise.

c. On or about January 13, 2022, REYES, B.ALLAH, SHORT, RUBIO, and other members and associates of the 100k Enterprise robbed a commercial marijuana store in Paterson, brandishing firearms in the process and taking by force controlled substances from the store and a firearm from a security guard.

d. On or about July 7, 2022, REYES, ROBINSON, and RUBIO uploaded a music video to YouTube called "Who Run It," which depicted numerous members of the Enterprise in 100k Territory and during which RUBIO stated, "you know what's going on, you know who run it, 100k been 100k," as a way to represent the Enterprise.

e. In the July 7, 2022 music video, B.ALLAH was in 100k Territory and displayed a firearm that he received from another member of the 100k Enterprise.

f. On or about July 1, 2023, RUBIO used his social media account to post a picture of himself displaying large amounts of United States currency with the caption "I know im takin a risk, trynna get it sent thru the mail," with the emoji for "100" followed by the letter "k."

g. On or about July 13, 2023, DAVIS used his social media account to post a story of himself with the caption "Just cause you come around don't mean you certified," with an emoji for "100" followed by the letter "K" and emojis for "3" and "4."

h. On or about July 28, 2023, in New Jersey, REYES held a firearm to Victim-1, a United States Postal Service employee, and attempted to rob Victim-1 of an arrow key, which is used by the United States Postal Service to unlock mailboxes in a given area.

i. On or about July 29, 2023, RUBIO used his social media account to post a story of himself, REYES, and ROBINSON with the caption, “Str8 like dat” followed by the “100” emoji with the letter “K.” The post then included the caption, “we the youngest pits . . . all them other n[\*\*\*]as takin cred.”

j. On or about August 5, 2023, THOMAS used his social media account to communicate with another member and associate of the 100k Enterprise by writing, “bro can we make money honestly” and “persys.” In response, that individual sent four pictures of stolen personal checks to THOMAS.

k. On or about August 24, 2023, REYES possessed with intent to distribute and distributed to another person approximately one brick of a mixture and substance containing a detectible amount of fentanyl and five bags of a mixture and substance containing a detectible amount of cocaine within 100k Territory.

l. On or about August 29, 2023, REYES and DAVIS possessed with intent to distribute and distributed to another person approximately one brick of a mixture and substance containing a detectible quantity of heroin and

fentayl and five bags of a mixture or substance containing a detectible quantity of cocaine within 100k Territory.

m. On or about September 7, 2023, REYES possessed with intent to distribute and distributed to another person approximately three bricks of a mixture and substance containing a detectible amount of fentanyl and loose amounts of a mixture and substance containing a detectible amount of cocaine within 100k Territory.

n. On or about September 21, 2023, REYES and PITTS possessed with intent to distribute and distributed to another person approximately five bricks of a mixture and substance containing a detectable amount of fentanyl and approximately three grams of a mixture and substance containing a detectible amount of cocaine within 100k Territory.

o. On or about September 25, 2023, REYES and PITTS possessed with intent to distribute and distributed to another person controlled substances within 100k Territory.

p. On or about October 1, 2023, in response to the murder of a high-ranking member of the 100k Enterprise, THOMAS used his social media account to post a publicly available story of a picture of that member with the caption, “LLBINLAD” followed by “yk [for “you know”] how n[\*\*\*]as coming 4 you babyboy.”

q. On or about October 1, 2023, at approximately 9:27 p.m., J.ALLAH, THOMAS, DAVIS, and other members and associates of the 100k

Enterprise fatally shot and killed Victim-2 in retaliation for the murder of a high-ranking member of the 100k Enterprise, in an area controlled by the 100k Enterprise's rival, the Blockboyz, in Paterson, New Jersey.

r. On or about October 2, 2023, in reference to the October 1, 2023 fatal shooting of Victim-2, ROBINSON used his social media account to send a message to another member and associate of the Enterprise, which stated, "Ain't gon speak on what we did," in response to which that individual stated, "don't speak on them assaults then," and ROBINSON replied, "Assaults n[\*\*\*]a it's b'zz lol . . . and we still ain't get rid of that chop."

s. On or about October 5, 2023, THOMAS posted a picture to his social media account of himself, DAVIS, and REYES in front of a vigil for a high-ranking member of the 100k Enterprise, four days after THOMAS and DAVIS committed the fatal shooting of Victim-2 in retaliation for that high-ranking member's murder.

t. On or about October 10, 2023, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl and approximately three grams of a mixture and substance containing a detectible amount of cocaine in 100k Territory.

u. On or about October 17, 2023, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl and

approximately seven grams of a mixture and substance containing a detectible amount of cocaine within 100k Territory.

v. On or about October 22, 2023, THOMAS used his social media account to post a publicly available story with the caption, “ima say this mad clear... if you have [Victim Bank-1], [Victim Bank-2], [Victim Bank-3], [Victim Bank-4], or [Victim Bank-5], and will like to REALLY make some \$\$ before all these upcoming holidays DM ME A\$AP LIKE FA\$T!”

w. On or about November 1, 2023, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

x. On or about November 14 and 15, 2023, THOMAS opened a bank account and deposited fraudulently created checks to withdraw approximately \$345 and \$430 from Victim Bank-6.

y. On or about November 15, 2023, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

z. On or about December 4, 2023, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.



aa. On or about December 12, 2023, REYES and ROBINSON possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

bb. On or about January 4, 2024, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of heroin and fentanyl within 100k Territory.

cc. On or about January 19, 2024, J.ALLAH and other members and associates of the 100k Enterprise posted a rap song to YouTube titled “free rackzzz,” where J.ALLAH stated at the beginning of the song, “It’s Rackz right here, this a 100k take over,” representing the Enterprise in his song.

dd. On or about January 22, 2024, FRANKLIN posted a publicly available story to his social media account advertising the sale of controlled substances by displaying a picture of a large bag of suspected controlled substances with the caption “Get Wit Me.”

ee. On or about January 26, 2024, REYES possessed with intent to distribute and distributed to another person approximately ten bricks of a mixture and substance containing a detectible amount of heroin and fentanyl within 100k Territory.

ff. On or about February 29, 2024, REYES and ROBINSON possessed with intent to distribute and distributed to another person

approximately sixteen bricks of a mixture and substance containing a detectible amount of heroin and fentanyl and approximately four bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

gg. On or about March 14, 2024, REYES, ROBINSON, and DAVIS possessed with intent to distribute and distributed to another person approximately twenty bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

hh. On or about March 27, 2024, REYES and PITTS possessed with intent to distribute and distributed to another person approximately twenty bricks of a mixture and substance containing a detectible amount of fentanyl within 100k Territory.

ii. On or about March 30, 2024, ROBINSON uploaded a rap album to YouTube with numerous references to the 100k Enterprise, including references to REYES, SHORT, and RUBIO on the song, "Letter to My Block."

jj. On or about March 30, 2024, FRANKLIN, RUBIO, and DAVIS posted a live, publicly accessible video to their social media accounts of FRANKLIN and RUBIO in one vehicle and DAVIS in another vehicle with DAVIS displaying a firearm.

kk. On or about May 27, 2024, PITTS and another member and associate of the 100k Enterprise shot and injured Victim-3, a member of the 100k Enterprise's rival gang, 4k, in Paterson, New Jersey.

ll. On or about July 8, 2024, after REYES, DAVIS, ROBINSON, and PITTS were arrested on federal drug charges in June of 2024, RUBIO used his social media account to post a picture of himself and SHORT with the caption “LastOnesLeft.”

mm. On or about September 10, 2024, FRANKLIN posted a publicly accessible story to his social media account of packages of what appeared to be marijuana with the caption “Tap In With Bro” and tagged a social media account used and controlled by SHORT.

nn. On or about September 25, 2024, RUBIO posted a publicly accessible story to his social media account advertising the sale of controlled substances by showing a picture of suspected marijuana with the caption “30\$ 8ths, 50\$ quarters, shii fire toooo.”

oo. On or about September 25, 2024, FRANKLIN posted a publicly accessible picture to his social media account of packages of suspected marijuana with the caption “Tapp In With Bro” and tagged a social media account used and controlled by RUBIO.

pp. On or about October 3, 2024, SHORT shot at Victim-4 in 100k Territory.

qq. On or about November 17, 2024, BYRD, SHORT, and another member and associate of the 100k Enterprise traveled to territory controlled by the 100k Enterprise’s rival gang, the Blockboyz, in Paterson, New Jersey. SHORT and the other 100k Enterprise member and associate shot at and injured Victim-

5, a member of the Blockboyz, while BYRD drove to, and fled from, Blockboyz territory to facilitate the shooting.

rr. On or about November 20, 2024, law enforcement stopped BYRD in the same vehicle used in the November 17, 2024 shooting of Victim-5 and found BYRD in possession of an AK1214 7.62 caliber rifle, bearing serial number 1981SAG1214, and seven Percocet pills.

ss. On or about November 26, 2024, SHORT was arrested in possession of the .40 caliber Glock 35 handgun, bearing serial number EXN658, which was a ballistics match to the firearms used in both the October 3, 2024 and November 17, 2024 shootings.

**NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT ONE**

As part of their agreement to conduct and participate in the conduct of the affairs of the 100K Enterprise through a pattern of racketeering activity, the following defendants committed the following act:

On or about October 1, 2023, in Passaic County, in the District of New Jersey, the defendants,

**JASUN ALLAH,**  
a/k/a "Racks,"  
**MICHAEL DAVIS,**  
a/k/a "Baby Three," and  
**CHRISTOPHER THOMAS,**  
a/k/a "CJ,"

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely, Victim-2, 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 1962(d).

**COUNT TWO**  
**(Attempted Hobbs Act Robbery)**

On or about July 28, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten physical violence to the person or property of another, namely, Victim-1, a United States Postal Service employee engaged in the performance of his or her official duties, in furtherance thereof.

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

**COUNT THREE**  
**(Assaulting, Resisting, or Impeding Certain United States Officers or Employees)**

On or about July 28, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

did forcibly assault, resist, oppose, impede, intimidate, or interfere with a person designated in Title 18, United States Code, Section 1114 while engaged in or on account of his or her performance of official duties, namely, Victim-1, a United States Postal Service employee, and in the commission of this act, did use a deadly or dangerous weapon.

In violation of Title 18, United States Code, Sections 111(a)(1) and (b).

**COUNT FOUR**  
**(Using, Carrying, and Brandishing a Firearm During and in Relation to a  
Crime of Violence)**

On or about July 28, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, assaulting, resisting, or impeding certain officers or employees of the United States, as charged in Count Three of this Superseding Indictment, did knowingly use and carry a firearm, which firearm was brandished.

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



**COUNT FIVE**  
**(Conspiracy to Distribute Fentanyl, Heroin, and Cocaine)**

From at least in or around August 2023 through in or around April 2024, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”  
**KYZIEK ROBINSON,**  
a/k/a “Doo Doo,”  
a/k/a “King Sparks,”  
a/k/a “Sparks,”  
**MICHAEL DAVIS,**  
a/k/a “Baby Three,” and  
**JACIM PITTS,**  
a/k/a “Jefe,”

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

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

**COUNTS SIX THROUGH NINE**  
**(Distribution and Possession with Intent to Distribute Fentanyl and Cocaine)**

On or about the dates set forth in the table below, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

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

<b>Count</b>	<b>Date</b>
6	August 24, 2023
7	September 7, 2023
8	October 10, 2023
9	October 17, 2023

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

**COUNT TEN**  
**(Distribution and Possession with Intent to Distribute Fentanyl, Heroin,  
and Cocaine)**

On or about August 29, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,” and  
**MICHAEL DAVIS,**  
a/k/a “Baby Three,”

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

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS ELEVEN AND TWELVE**  
**(Distribution and Possession with Intent to Distribute Fentanyl and Cocaine)**

On or about the dates set forth in the table below, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,” and  
**JACIM PITTS,**  
a/k/a “Jefe,”

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

<b>Count</b>	<b>Date</b>
11	September 21, 2023
12	September 25, 2023

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS THIRTEEN THROUGH FIFTEEN**  
**(Distribution and Possession with Intent to Distribute Fentanyl)**

On or about the dates set forth in the table below, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

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

<b>Count</b>	<b>Date</b>
13	November 1, 2023
14	November 15, 2023
15	December 4, 2023

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

**COUNT SIXTEEN**  
**(Distribution and Possession with Intent to Distribute Fentanyl)**

On or about December 12, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,” and  
**KYZEIK ROBINSON,**  
a/k/a “Doo Doo,”  
a/k/a “King Sparks,”  
a/k/a “Sparks,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and did aid and abet the same.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS SEVENTEEN AND EIGHTEEN**  
**(Distribution and Possession with Intent to Distribute Fentanyl and Heroin)**

On or about the dates set forth in the table below, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

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

<b>Count</b>	<b>Date</b>
17	January 4, 2024
18	January 26, 2024

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

**COUNT NINETEEN**  
**(Distribution and Possession with Intent to Distribute Fentanyl and Heroin)**

On or about February 29, 2024, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,” and  
**KYZEIK ROBINSON,**  
a/k/a “Doo Doo,”  
a/k/a “King Sparks,”  
a/k/a “Sparks,”

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

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT TWENTY**  
**(Distribution and Possession with Intent to Distribute Fentanyl)**

On or about March 14, 2024, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”  
**KYZEIK ROBINSON,**  
a/k/a “Doo Doo,”  
a/k/a “King Sparks,”  
a/k/a “Sparks,” and  
**MICHAEL DAVIS,**  
a/k/a “Baby 3,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and did aid and abet the same.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWENTY-ONE**  
**(Distribution and Possession with Intent to Distribute Fentanyl)**

On or about March 27, 2024, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,” and  
**JACIM PITTS,**  
a/k/a “Jefe,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and did aid and abet the same.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION ONE**

1. The allegations contained in Count One of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants,

**JASUN ALLAH,**  
a/k/a "Racks,"  
**MICHAEL DAVIS,**  
a/k/a "Baby Three,"  
**CHRISTOPHER THOMAS,**  
a/k/a "CJ,"  
**JAZMEIR REYES,**  
a/k/a "Baby Joe,"  
a/k/a "Joe,"  
**KYZIEK ROBINSON,**  
a/k/a "Doo Doo,"  
a/k/a "King Sparks,"  
a/k/a "Sparks,"  
**JACIM PITTS,**  
a/k/a "Jefe,"  
**BORN ALLAH,**  
a/k/a "Freedom,"  
a/k/a "Free,"  
**ELIJAH RUBIO,**  
a/k/a "Lottery,"  
**TRASEAN SHORT,**  
a/k/a "TreHound,"  
a/k/a "Hound,"  
**ELIJAH BYRD,**  
a/k/a "CEO," and  
**QUINCY FRANKLIN,**  
a/k/a "Double O,"

shall forfeit to the United States of America:

(a) any interest acquired or maintained in violation of Title 18, United States Code, 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 Title 18, United States Code, Section 1962; and

(c) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962.

**FORFEITURE ALLEGATION TWO**

Upon conviction of the attempted Hobbs Act Robbery offense, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this Superseding Indictment, the defendant,

**JAZMEIR REYES,**  
a/k/a "Baby Joe,"  
a/k/a "Joe,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION THREE**

Upon conviction of the offenses, in violation of Title 18, United States Code, Sections 111(a)(1) and (b), and Title 18, United States Code, Section 924(c)(1)(A)(ii), as charged in Counts Three and Four of this Superseding Indictment, the defendant,

**JAZMEIR REYES,**  
a/k/a “Baby Joe,”  
a/k/a “Joe,”

shall forfeit to the United States, 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.

**FORFEITURE ALLEGATION FOUR**

Upon conviction of the controlled substance offenses charged in Counts Five through Twenty-One of this Superseding Indictment, the defendants,

**JAZMEIR REYES,**  
a/k/a "Baby Joe,"  
a/k/a "Joe,"  
**KYZIEK ROBINSON,**  
a/k/a "Doo Doo,"  
a/k/a "King Sparks,"  
a/k/a "Sparks,"  
**MICHAEL DAVIS,**  
a/k/a "Baby Three," and  
**JACIM PITTS,**  
a/k/a "Jefe,"

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.


**SUBSTITUTE ASSETS PROVISION**  
(Applicable to all Forfeiture Provisions)


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

  
\_\_\_\_\_  
VIKAS KHANNA  
Acting United States Attorney