

2022R00673/RAS/DR

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED
JUL 29 2025
2:43 PM
AT 8:00
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	Crim. No. 24-710
	:	
JATRAIL AVENT,	:	18 U.S.C. § 1959(a)(3)
a/k/a "Curry,"	:	18 U.S.C. § 924(c)(1)(A)(iii)
SHEQUAN ROBERTS,	:	18 U.S.C. § 2
a/k/a "Shingy,"	:	18 U.S.C. § 922(g)(1)
JAHMIR MOODY,	:	18 U.S.C. §§ 922(q)(2)(A), (q)(3)(A),
a/k/a "Jahdi," and	:	and 924(a)(4)
WIZAIR JOHNSON,	:	
a/k/a "Wababy"	:	

S U P E R S E D I N G I N D I C T M E N T

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

The Enterprise

1. At all times relevant to this Superseding Indictment, Jatrail Avent, a/k/a "Curry" ("AVENT"); Shequan Roberts, a/k/a "Shingy" ("ROBERTS"); Jahmir Moody, a/k/a "Jahdi" ("MOODY"); Wizair Johnson, a/k/a "Wababy" ("JOHNSON"); and others were members and associates of a neighborhood street gang that operated in the vicinity of Rosa Parks Boulevard near Lyon Street, Keen Street, and Mercer Streets in Paterson, New Jersey (the "4K Enterprise"). At all times relevant to this Superseding Indictment, the 4K Enterprise was a violent street gang operating in Passaic County, in the District of New Jersey and elsewhere. The 4K Enterprise, including its leaders, members, and associates, constituted an "enterprise" as defined in Title 18, United States

Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in and the activities of which affected interstate and foreign commerce. The 4K Enterprise constituted an ongoing organization whose members functioned as a continuing unit that had a common purpose of achieving the objectives of the enterprise.

Background on the Enterprise

2. The 4K Enterprise is a local street gang known as “4K,” which operates in the area of Rosa Parks Boulevard near Lyon Street, Keen Street, and Mercer Streets, which are closely aligned with individuals from 24th Avenue, who identify as “24” (“24”). Individuals who associate with 4K consist primarily of members and associates of the Bloods street gang, however, they first and foremost identify with and represent the 4K neighborhood.

3. Members of the 4K Enterprise use different symbols to show their allegiance and membership in the 4K Enterprise. For example, members and associates of the 4K Enterprise gesture a hand sign to demonstrate allegiance to and membership in the enterprise, which gesture depicts four fingers up with the thumb folded in against the palm of the hand and the palm of the hand facing in toward the person displaying the hand sign.

4. Members and associates of the 4K Enterprise followed certain practices of the Enterprise, including:

- a. visible demonstrations of gang affiliation, such as an identification with the number “4” or the hand sign described above, or with the number “26”—at times

displayed as “twenty-six” or “two six.” References to “26” pay homage to Jahmir Bailey, a/k/a “26,” a member of 4K who was murdered. Members of 4K who were close to Bailey sometimes refer to themselves as “26 boys”;

- b. the use 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, as well as the display of tattoos, signifying membership in the Enterprise.

5. Members and associates of the 4K Enterprise engaged in retaliatory acts of violence with rival gangs.

6. Members and associates of the 4K 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, AVENT, ROBERTS, MOODY, and JOHNSON were members and associates of the 4K Enterprise who operated in and around Passaic County.

Purposes of the Enterprise

8. The purposes of the 4K Enterprise included the following:

a. preserving and expanding the power, reputation, territory, and profits of the enterprise through the use of violence, threats of violence, and intimidation;

b. 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, and other criminal activities;

c. 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;

d. keeping victims and community members in fear of the enterprise and its members and associates through violence and threats of violence;

e. providing assistance to gang members and associates who are imprisoned after having committed crimes on behalf of the gang;

f. 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 Defendants

9. Defendant AVENT was a member and an associate of the 4K Enterprise.

10. Defendant ROBERTS was a member and an associate of the 4K Enterprise.

11. Defendant MOODY was a member and an associate of the 4K Enterprise.

12. Defendant JOHNSON was a member and an associate of the 4K Enterprise.

Means and Methods of the Enterprise

13. The means and methods by which members and associates of the 4K Enterprise conducted and participated in the conduct of the affairs of the enterprise included, but were not limited to, the following:

a. It was part of the Enterprise's means and methods that members and associates of the 4K Enterprise acquired and maintained weapons, including firearms, to use during violent criminal acts on behalf of the Enterprise.

b. It was further part of the Enterprise's means and methods that members and associates of the 4K Enterprise committed, conspired, attempted, and agreed to commit acts of murder, robbery, and assaults.

c. It was further part of the Enterprise's means and methods that members and associates of the 4K Enterprise used violence and threats of violence to impose discipline within the gang, including against disloyal and/or disobedient gang members.

d. It was further part of the Enterprise's means and methods that members and associates of the 4K Enterprise distributed controlled substances, and agreed to distribute controlled substances, on behalf of the Enterprise.

14. At all times relevant to this Superseding Indictment, the 4K Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), consisting of:

a. Acts involving murder, chargeable under N.J.S.A. 2C:11-3, 2C:5-1, 2C:5-2, and 2C:2-6;

b. Acts involving robbery, chargeable under N.J.S.A. 2C:15-1, 2C:5-1, 2C:5-2, and 2C:2-6;

c. Acts indictable under Title 18, United States Code, Sections 1951 (relating to interference with commerce, robbery, or extortion) and 2;

d. 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 communications facilities to violate the Controlled Substances Act).

COUNT ONE

(Assault with a Dangerous Weapon in Aid of Racketeering)

The allegations set forth in Paragraphs 1 through 14 above are incorporated as if set forth in full herein.

On or about November 6, 2022, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JATRIL AVENT,
a/k/a "Curry,"
SHEQUAN ROBERTS,
a/k/a "Shingy,"
JAHMIR MOODY,
a/k/a "Jahdi," and
WIZIAR JOHNSON,
a/k/a "Wababy,"**

for the purpose of gaining entrance to and maintaining and increasing position in the 4K Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally assault rival gang members with a dangerous weapon, namely, Victim-1, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

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

COUNT TWO

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

On or about November 6, 2022, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**JATRIL AVENT,
a/k/a "Curry,"
SHEQUAN ROBERTS,
a/k/a "Shingy,"
JAHMIR MOODY,
a/k/a "Jahdi," and
WIZIAR JOHNSON,
a/k/a "Wababy,"**

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Assault with a Dangerous Weapon in Aid of Racketeering alleged in Count One of this Superseding Indictment, did knowingly use and carry a firearm, and in furtherance of that crime, did possess a firearm, which was discharged, and did aid and abet the same.

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

COUNT THREE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about November 6, 2022, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**JATRIL AVENT,
a/k/a "Curry,"**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely, one F.N. FNS-40 model .40 caliber pistol, bearing serial number GKU0056323, and ammunition, namely one .40 caliber round of ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce.

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

COUNT FOUR

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about November 6, 2022, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**SHEQUAN ROBERTS,
a/k/a “Shingy,”**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely, one Bushmaster Firearms Model XM15-E2S 5.56mm caliber semi-automatic rifle, bearing serial number LBM46242a, and ammunition, namely, approximately 20 rounds of .223 caliber ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce.

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

COUNT FIVE

(Possession and Discharge of a Firearm in a School Zone)

On or about November 6, 2022, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**JAHMIR MOODY,
a/k/a "Jahdi,"**

did possess and knowingly and with reckless disregard for the safety of another discharge a firearm, that is, a Glock Model 19 9mm handgun, bearing serial number BTNP196, loaded with one round of 9mm ammunition, which had moved in and affected interstate commerce, within a distance of 1,000 feet of the grounds of Paterson Public School 21, a place that the defendant knew and had reasonable cause to believe was in a school zone.

In violation of Title 18, United States Code, Sections 922(q)(2)(A), (q)(3)(A), and 924(a)(4).

COUNT SIX

(Possession of Firearms in a School Zone)

On or about November 6, 2022, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**WIZAIR JOHNSON,
a/k/a “Wababy,”**

did possess firearms, to wit, one F.N. FNS-40 model .40 caliber pistol, bearing serial number GKU0056323, equipped with a laser sight; one Glock Model 19 9mm handgun, bearing serial number BTNP196, loaded with one round of ammunition; and one Smith & Wesson Model M&P 9 9mm handgun, bearing serial number NLK8517, loaded with four rounds of 9mm ammunition, all of which had moved in and affected interstate commerce, within a distance of 1,000 feet of the grounds of Paterson Public School 21, a place that the defendant knew and had reasonable cause to believe was a school zone.

In violation of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).

FORFEITURE ALLEGATION

As a result of committing the firearms offenses alleged in Counts Two, Three, Four, Five, and Six of this Superseding Indictment, the defendants,

**JATRIL AVENT,
a/k/a "Curry,"
SHEQUAN ROBERTS,
a/k/a "Shingy,"
JAHMIR MOODY,
a/k/a "Jahdi," and
WIZIAR JOHNSON,
a/k/a "Wababy,"**

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, including but not limited to the following:

- (1) one F.N. FNS-40 model .40 caliber pistol, bearing serial number GKU0056323;
- (2) one .40 caliber round of ammunition;
- (3) one Bushmaster Firearms Model XM15-E2S 5.56mm caliber semi-automatic rifle, bearing serial number LBM46242a;
- (4) 20 rounds of .223 caliber ammunition;
- (5) one Glock Model 19 9mm caliber handgun, bearing serial number BTNP196;
- (6) one round of ammunition;
- (7) one Smith & Wesson Model M&P 9 9mm handgun, bearing serial number NLK8517; and
- (8) four rounds of 9mm ammunition.

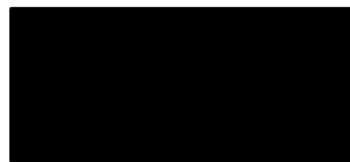
SUBSTITUTE ASSETS PROVISION

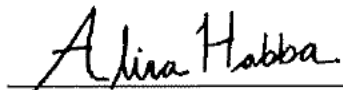
If any of the property described above, as a result of any act or omission of the defendants;

- 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 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




ALINA HABBA
Acting United States Attorney

CASE NUMBER: 24-710

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

UNITED STATES OF AMERICA

v.

JATRAIL AVENT, et al.

**SUPERSEDING INDICTMENT
FOR**

18 U.S.C. § 1959(a)(3)
18 U.S.C. § 924(c)(1)(A)(iii)
18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. §§ 922(q)(2)(A), (q)(3)(A), and 924(a)(4)

A True Bill,



ALINA HABBA
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FOR THE DISTRICT OF NEW JERSEY

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973-645-2730
