
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY


UNITED STATES OF AMERICA :
 : **CRIMINAL COMPLAINT**
v. :
 : Hon. Joseph A. Dickson
JIDON ROGERS, and :
JALIL HOLMES, : Mag. No. 20-8062
a/k/a "Broadday," :
a/k/a "BD" :

I, Keith Willis, 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 Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B



Keith Willis, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
January 31, 2020, Essex County, New Jersey

Honorable Joseph A. Dickson
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

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

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

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 purposely assault Victim One with a dangerous
weapon, specifically, a firearm, 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 Title
18, United States Code, Section 2.

COUNT TWO

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

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

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 purposely assault Victim Two with a dangerous
weapon, specifically, a firearm, 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 Title
18, United States Code, Section 2.

COUNT THREE

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

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

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 purposely assault Victim Three with a dangerous
weapon, specifically, a firearm, 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 Title
18, United States Code, Section 2.

COUNT FOUR

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

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

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 purposely assault Victim Four with a dangerous
weapon, specifically, a firearm, 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 Title
18, United States Code, Section 2.

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

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

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 purposely assault Victim Five with a dangerous
weapon, specifically, a firearm, 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 Title
18, United States Code, Section 2.

COUNT SIX

(Discharge of a Firearm During a Crime of Violence)

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States—specifically, the assault with a dangerous weapon in aid of racketeering activity charged in Count One of this 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), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Discharge of a Firearm During a Crime of Violence)

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States—specifically, the assault with a dangerous weapon in aid of racketeering activity charged in Count Two of this 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), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Discharge of a Firearm During a Crime of Violence)

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States—specifically, the assault with a dangerous weapon in aid of racketeering activity charged in Count Three of this 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), and Title 18, United States Code, Section 2.

COUNT NINE

(Discharge of a Firearm During a Crime of Violence)

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States—specifically, the assault with a dangerous weapon in aid of racketeering activity charged in Count Four of this 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), and Title 18, United States Code, Section 2.

COUNT TEN

(Discharge of a Firearm During a Crime of Violence)

On or about June 30, 2018, in the District of New Jersey and elsewhere,
the defendants,

JIDON ROGERS, and
JALIL HOLMES,
a/k/a “Broadday,”
a/k/a “BD,”

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States—specifically, the assault with a dangerous weapon in aid of racketeering activity charged in Count Five of this 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), and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Keith Willis, am a Special Agent with the Federal Bureau of Investigation. 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, 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, listened to hundreds of hours of communications, and reviewed numerous 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 Enterprise

1. At all times relevant to this Complaint, defendants JIDON ROGERS, JALIL HOLMES, a/k/a “Broadday,” a/k/a “BD,” and others, known and unknown, were members and associates of a criminal organization known as the Marion Gardens street gang, also known as the “300” gang (hereinafter the “Marion Gardens Enterprise” or “the Enterprise”). 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”). While associated with the Bloods street gang, members of the Marion Gardens Enterprise represent, first and foremost, the Marion Gardens Housing Complex. The Marion Gardens Enterprise is known for drug distribution in and around the area of the Marion Gardens Housing Complex as well as for violence against numerous rival groups within and around Jersey City, New Jersey. They utilize the symbol “300” and a hand sign, which displays their pinky, ring, and middle fingers, with their thumb and pointer finger closed together in a circle.

2. The Marion Gardens Enterprise, including its leadership, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 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 functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Complaint, the Marion Gardens 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)—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), and 2C:5-2; and
- b. 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 communication facility to violate the Controlled Substances Act).

Purposes of the Enterprise

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

- a. Enriching the members and associates of the Enterprise through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey, which involved intimidation, threats of violence, and acts of violence, including murder, attempted murder, and assault against, among others, members of rival 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.

Members of the Enterprise

5. Defendant JALIL HOLMES, a/k/a “Broadday,” a/k/a “BD” (“HOLMES”), is a member of the Marion Gardens Enterprise. He has a tattoo of “300” across his neck to pay homage to the Marion Gardens Enterprise, and his Facebook handle is “broadday_II300”—a compilation of his street name and his gang. In addition, HOLMES has posted a photo with two other members of the Marion Gardens Enterprise accompanied by the text “Touch One Of Them Just Kno It Come With a Headshot,” indicating that members of the Marion Gardens Enterprise retaliate and are willing to murder on behalf of other members.

6. Defendant JIDON ROGERS (“ROGERS”) is an associate of the Marion Gardens Enterprise. ROGERS has appeared in photographs with other members of the Marion Gardens Enterprise, including one in which ROGERS captioned the photograph ““Gangshit u Already know da Rest.”

7. Individual-1, a/k/a “Meech” (“Individual-1”) was a member of the Marion Gardens Enterprise who was murdered on or about June 30, 2013, in the area of Bergen Avenue and Clinton Avenue in Jersey City, New Jersey.

Means and Methods of the Enterprise

8. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members of the Enterprise and their associates committed, attempted, and threatened to commit acts of violence, including murder and assault, to protect and expand the Enterprise’s criminal operations;
- b. Members of the Enterprise were expected to carry or have immediate access to firearms in order to protect themselves, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by the Enterprise’s leadership, increased the respect accorded to that member, and resulted in that member’s maintaining and increasing status in the Enterprise;
- d. Members of the Enterprise and their associates promoted a climate of fear through violence and threats of violence;
- e. Members of the Enterprise and their associates used and threatened to use physical violence against various individuals, including witnesses, informants, and members of rival criminal organizations; and
- f. Members of the Enterprise and their associates trafficked heroin and cocaine base as a means of enriching themselves.

“Meech Day”

9. Since 2013, members of the Marion Gardens Enterprise gather at the Marion Gardens Housing Complex on June 30 to celebrate “Meech Day” to pay homage to Individual-1, who was murdered by another gang member.

10. “Meech Day”—and the remembrance of killed members of the Enterprise—is heavily promoted on social media. For example, one member of the Marion Gardens Enterprise posted a collage of photographs on October 31, 2019 with a banner, which states, “Hood Legends” and “Marion G57.” The number 57 is a reference to building 57 within the Marion Gardens Housing Complex where members of the Marion Gardens Enterprise congregate. That post includes a photo of Individual-1 with a label “Meech.” It likewise contains a photo of Individual-2, a/k/a “Draco” (“Individual-2”), with labels of “Draco” and “300.” Individual-2 was a member of the Marion Gardens Enterprise who was killed on or about December 26, 2018.

11. Numerous other social media posts from various members of the Enterprise, both in 2018 and in other years, mention the celebration of “Meech Day.” ROGERS, for example, posted a Facebook Live video on July 1, 2019, while celebrating “Meech Day,” during which he commented on the “Meech Day” celebration at the Marion Gardens Housing Complex. In another post, Rogers posted a photo of Individual-1 with the hashtag “#everydayJune30th.”

The “Meech Day” Shooting

12. On June 30, 2018, video footage of the Marion Gardens Housing Complex revealed ROGERS, HOLMES, and other members of the Marion Gardens Enterprise had gathered in the courtyard area of the Marion Gardens Housing Complex.

13. At approximately 1:21 a.m., that video footage depicted ROGERS enter the driver’s seat of a black Chevy Malibu (the “Malibu”). It likewise depicted another associate of the Marion Gardens Enterprise (“Co-Conspirator 1”) enter the front passenger seat, another member of the Marion Gardens Enterprise (“Co-Conspirator 2”) enter the rear driver’s side seat, and HOLMES enter the rear passenger-side seat.

14. Shortly thereafter, video footage in the area of John F. Kennedy Boulevard and Oxford Avenue depicted the Malibu turn onto Oxford Avenue from John F. Kennedy Boulevard. This location is significant to the “Meech Day” celebration in that it is two blocks away from where Individual-1 was murdered and it is the area that Individual-1’s killer was known to frequent and control.

15. While ROGERS remained in the driver’s seat, HOLMES, Co-Conspirator 1, and Co-Conspirator 2 exited the Malibu, walked toward John F. Kennedy Boulevard, and turned left. Upon reaching John F. Kennedy Boulevard,

HOLMES, Co-Conspirator 1, and Co-Conspirator 2 each brandished a firearm, pointed their respective firearms in the direction of a group of individuals, and fired multiple shots.

16. Five individuals who were walking in the crowd on John F. Kennedy Boulevard were struck by gunshots. "Victim One" sustained one gunshot wound to his left thigh; "Victim Two" sustained one gunshot wound to his right calf; "Victim Three" sustained one gunshot wound to his right leg; "Victim Four" sustained two gunshot wounds to her upper right shoulder; and "Victim Five" sustained a gunshot wound to his left wrist. Members of the Marion Gardens Enterprise sought to shoot at anyone in this area as retaliation for the murder of Individual-1.

17. After shooting into the crowd of people, HOLMES, Co-Conspirator 1, and Co-Conspirator 2 returned to the Malibu, which had remained parked on Oxford Avenue. During the shooting, ROGERS—while sitting in the driver's seat—looked back toward the area of the shooting on numerous occasions. As HOLMES, Co-Conspirator 1, and Co-Conspirator 2 returned to the Malibu, ROGERS reached across to the passenger side of the vehicle to open the front passenger seat for his returning occupant. He then drove the Malibu away from the area of the shooting.

18. Approximately, fourteen minutes after the shooting, HOLMES and Co-Conspirator 2 returned to the Marion Gardens Housing Complex on foot. Approximately, one minute later, ROGERS appeared in the same area on foot, and nine minutes after that, Co-Conspirator 1 returned, also on foot.