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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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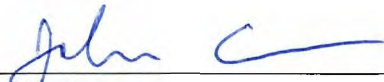
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Hon. James B. Clark, III  
 :  
 PHILLIP WIGGINS, JR. : Mag. No. 21-12274  
 :  
 :

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

**SEE ATTACHMENT A**

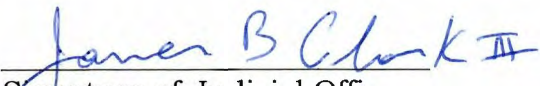
I further state that I am a Task Force Officer with the Federal Bureau of Investigation ("FBI") and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

  
\_\_\_\_\_  
John Gikas  
FBI Task Force Officer

Task Force Officer John Gikas attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on June 16, 2021, in the District of New Jersey

Honorable James B. Clark, III  
United States Magistrate Judge

 *JG*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

**(Murder in Aid of Racketeering Activity)**

On or about March 31, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**PHILLIP WIGGINS, JR.,**

for the purpose of gaining entrance to, and maintaining and increasing position in, the Wilkinson Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim-1, 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).

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

On or about March 31, 2020, in Hudson County, the District of New Jersey and elsewhere, the defendant,

**PHILLIP WIGGINS, JR.,**

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

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

**COUNT THREE**  
**(Causing Death Through Use of a Firearm)**

On or about March 31, 2020, in Hudson County, the District of New Jersey and elsewhere, the defendant,

**PHILLIP WIGGINS, JR.,**

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Two of this Complaint, did knowingly and purposely cause the death of Victim-1 through the use of a firearm, which killing constituted murder as defined in Title 18, United States Code, Section 1111.

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

## **ATTACHMENT B**

I, John Gikas, am a Task Force Officer 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, 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 Wilkinson Enterprise**

1. At all times relevant to this Complaint, defendant Phillip Wiggins, Jr. ("WIGGINS" or the "Defendant") and others, known and unknown, were members and associates of a neighborhood street gang that operated within and in the vicinity of Wilkinson Avenue, Ocean Avenue, Martin Luther King Drive, and Wegman Parkway in Jersey City, New Jersey ("the Wilkinson Enterprise").

2. Individuals who associate with the Wilkinson Enterprise have historically included members and associates of both the Bloods and Crips gangs, to include the Grape Street Crips. Individuals associated with the Wilkinson Enterprise refer to themselves as the "Nuski Gang," in homage to Leander Williams, a/k/a "Nuski," a member of the Enterprise who was killed in August 2016, and frequently pay homage to, among other deceased Enterprise members, Akim Ward, a/k/a "Kimmy" ("Ward"), a leader of the enterprise who was killed in April 2020. Because of the connection to the Grape Street Crips, those affiliated with the Wilkinson Enterprise often wear the color purple.

3. The Wilkinson Enterprise is known for violence against rival, Jersey City-based neighborhood gangs, including but not limited to Marion, which is comprised of individuals associated with the Marion Gardens Housing Complex; Rutgers, which is comprised of individuals who are associated with the areas in the vicinity of Rose Avenue and McAdoo Avenue, as well as with the area in the vicinity of Triangle Park, which is located at the intersection of Rose Avenue, Cator Avenue, and Old Bergen Road; and individuals associated with the Curries Woods Housing Complex. Further, the Wilkinson Enterprise is aligned with individuals associated with the Salem Lafayette Apartments, who utilize the abbreviation "SaLaf," and who operate in the area of Bramhall Avenue to Forrest Street between Ocean Avenue and Martin Luther King Drive.

4. The Wilkinson 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 Wilkinson 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 Wilkinson 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;
- b. acts involving robbery, in violation of N.J.S.A. 2C:15-1, 2C:15-1(a)(1), 2C:5-1(a), 2C:5-2, and 2C:2-6; and
- c. 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**

6. The purposes of the Wilkinson 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**

7. WIGGINS was a low-ranking member and associate of the Wilkinson Enterprise. Among other things, WIGGINS utilized social media to tout the power of the Enterprise, in an effort to keep victims and rivals in fear of the Enterprise, to post photographs of himself with other members and associates of the Enterprise, and to communicate with other members and associates of the Enterprise. Further, as described herein, WIGGINS committed at least one act of violence for and on behalf of the Enterprise.

### **Means and Methods of the Enterprise**

8. Among the means and methods by which Defendant and other members and associates of the Wilkinson Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Wilkinson 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 Wilkinson 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 Wilkinson 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 resulted in those members' maintaining and increasing status within the Enterprise;
- d. Members and associates of the Wilkinson Enterprise promoted a climate of fear through violence and threats of violence and reprisal;
- e. Members and associates of the Wilkinson 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 Wilkinson Enterprise trafficked controlled substances as a means of enriching themselves; and
- g. Members and associates of the Wilkinson Enterprise used social media, including Instagram and Facebook, to intimidate rival gang members, witnesses, and other members of the community, and to promote the Wilkinson Enterprise.

### **The March 31, 2020 Murder of Victim-1**

1. Victim-1 was a member and associate of the rival Rutgers street gang (“Rutgers”).

2. On or about March 31, 2020, in the vicinity of Rose and Cator Avenues in Jersey City, New Jersey, which is known as an area frequented by members of Rutgers, Victim-1 was fatally shot. A review of surveillance footage capturing events leading up to and including the homicide revealed that WIGGINS was the individual who shot Victim-1. At the time of his arrest, law enforcement lawfully recovered from WIGGINS’s residence a pair of sneakers that matched those worn by the shooter. A review of a social media account maintained by WIGGINS (the “Account”) revealed numerous photographs of WIGGINS wearing clothing similar or identical to that worn by the shooter. Law enforcement additionally identified a video posted to an Instagram account utilized by Enterprise member Ward on the day of the murder that depicted WIGGINS wearing clothing similar or identical to that worn by the shooter.

3. A review of the Account further revealed that WIGGINS has posted numerous messages indicating his willingness to commit acts of violence against rivals of the Wilkinson Enterprise, referred to by members and associates of the Wilkinson Enterprise as “opps,” an abbreviation for “opposition.” For example, in late December 2019, WIGGINS posted the following to his account, “Catch an opp he get pop in his head no we not sending no warnings stay with killers they draw in no we not talking my n—as scoring . . .” Further, approximately one month prior to the murder, WIGGINS posted a photograph depicting himself, together with other members and associates of the Wilkinson Enterprise, with the caption, For My N—as You Will Get Put in a Box.” Less than one week prior to the murder, WIGGINS posted, “Opps make me sick I just want em all dead.”

4. Less than 24 hours after the murder of Victim-1, WIGGINS posted to the Account an article from a local media outlet detailing the circumstances of the murder. Within a week of the murder, WIGGINS also posted to the Account a series of photographs of himself with other Wilkinson Enterprise members, with the caption “Kimmy Told Me Go Get em And I Got him” followed by three emojis.