

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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|--------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA | : | Hon. |
| | : | |
| v. | : | Crim. No. 21- |
| | : | |
| MARC TAYLOR, | : | 18 U.S.C. § 1959(a)(3) |
| a/k/a “Bando” | : | 18 U.S.C. § 924(c)(1)(A)(iii) |
| | : | 18 U.S.C. § 2 |
| | : | |

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE

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

The Racketeering Enterprise

1. At all times relevant to this Information, Marc Taylor, a/k/a “Bando,” and others, known and unknown, were members and associates of a criminal organization in Jersey City, New Jersey known as “300” (the “300 Enterprise” or the “Enterprise”), which criminal organization operated jointly and in conjunction with the criminal organization known as “Rutgers” (the “Rutgers street gang”) and the criminal organization known as “Curries Woods” (the “Curries Woods street gang”).

2. The name “300” is a tribute to Rondell Rush, a/k/a “Mr. 300,” who was killed in April 2016. Since Rondell Rush’s murder, the number 300 has become symbolic of the Enterprise. Individuals associated with the Enterprise also pay homage to Judane Holmes, a/k/a “Draco,” who was killed in December

2018. Further, they frequently gesture a hand sign associated with the Enterprise by extending their pinky, ring, and middle fingers and joining their thumb and pointer fingers to form a circle. The gang is known for drug distribution in and around its controlled territory as well as for violence against numerous rival neighborhoods.

3. Historically, members of “300” were a subgroup of a criminal organization that operated within the Marion Gardens Housing Complex in Jersey City (the “Marion Gardens street gang”). Individuals who associated with the Marion Gardens street gang generally consisted of members and associates of the Brim and Sex, Money, Murder sets of the Bloods street gang and operated within the Marion Gardens Housing Complex. Beginning in or around 2019, members of the 300 Enterprise became a subgroup of the Rutgers street gang and began to follow the leadership and rules thereof. Individuals who associated with Rutgers consisted primarily of members and associates of the 52 Hoover set of the Crips street gang. They operated 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. Given the Hoover Crip affiliation, those associated with Rutgers often wear the color orange.

4. The 300 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.

5. At all times relevant to this Information, the 300 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. multiple 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;
- b. multiple acts involving robbery, in violation of N.J.S.A. 2C:15-1, 2C:5-1(a), and 2C:5-2;
- c. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, and extortion); and
- 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 a communication facility to violate the Controlled Substances Act).

Purposes of the Enterprise

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

- a. Enriching the members and associates of the Enterprise, as well as their allies, through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise, as well as their allies, with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise and its allies, both in and out of prison, through the use of acts, which involved intimidation, threats of violence, and acts of violence involving murder and assault;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates, as well as its allies; and
- e. Concealing the activities of the Enterprise from law enforcement.

Manner and Means of the Enterprise

7. Among the manner and means by which the members and associates of the Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Enterprise committed and agreed to commit acts of intimidation and violence, including acts involving

murder and assault, against rival gang members or others to: avenge attacks or perceived slights against other members and associates of the Enterprise and its allies; punish or discipline enterprise members and associates who had been disloyal and to resolve internal disputes; retaliate against rivals; silence individuals who were perceived to be cooperating with law enforcement against members and associates of the Enterprise; and maintain and enhance the reputation of the Enterprise for the purpose of, among other things, protecting and otherwise assisting its drug trafficking business.

b. Participation in criminal activity by a member or associate, particularly violent acts directed at rivals, increased the respect accorded to that member or associate, and resulted in that member's or associate's maintaining and increasing position in the gang.

c. Members and associates of the Enterprise were directed to carry or have immediate access to firearms, and did in fact carry and use firearms, in order to protect themselves, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the criminal enterprise.

d. Members and associates of the Enterprise trafficked in illegal drugs.

e. Members and associates of the Enterprise used social media, including Facebook and Instagram, to: disseminate the rules and protocols of the enterprise, intimidate witnesses and other members of the

community, and bolster the reputation of the Enterprise for violence and drug trafficking.

f. Members and associates of the Enterprise sought to conceal their criminal activities by, among other means, obstructing justice and threatening and intimidating witnesses.

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

8. On or about July 7, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

MARC TAYLOR,
a/k/a “Bando,”

for the purpose of gaining entrance to, and maintaining and increasing position in, the 300 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, and did aid and abet the same.

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

COUNT TWO

(Discharge of a Firearm During and In Relation to a Crime of Violence)

On or about July 7, 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

MARC TAYLOR,
a/k/a “Bando,”

during and in relation to a crime of violence for which he 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 Information—did knowingly use and carry a firearm, which was discharged, and did aid and abet the same.

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

FORFEITURE ALLEGATION

1. The allegations contained in Count Two of this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As the result of committing the firearms offense alleged in Count Two, the defendant,

MARC TAYLOR,
a/k/a “Bando,”

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 firearm and ammunition involved in or used in the commission of such offenses, including but not limited to the following:

- (a) one Intratec AB-10 9mm Luger handgun, bearing partially defaced serial number AOC6041; and
- (b) one Glock 21 .45 caliber handgun, bearing serial number ESX122.

RACHAEL A. HONIG
Acting United States Attorney