

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. John Michael Vazquez
 :
 v. : Crim. No. 19-803 (JMV)
 :
 TYQUAN DANIELS, : 18 U.S.C. §§ 1962(d) and 1963
 a/k/a "YT" :
 :
 :

SUPERSEDING INFORMATION

COUNT ONE

(Racketeering Conspiracy)

The Enterprise

1. At various times relevant to this Superseding Information, in the District of New Jersey and elsewhere, defendant TYQUAN DANIELS, a/k/a "YT" (hereinafter "DANIELS"), and others known and unknown, were members and associates of a criminal organization, hereinafter referred to as the "Brick City Brims," that operated principally in Essex County, New Jersey.

2. The Bloods are a street gang founded in Los Angeles, California, that spread to other areas in the United States, including Essex County, New Jersey. The Bloods have a strong presence in Newark, East Orange, and Orange.

3. The Brick City Brims are a set of the Bloods street gang operating within the cities of Newark, East Orange, and Orange. The Brick City Brims have followed many of the same traditions and protocols of the Bloods street gang, including:

a. Tattoos signifying their membership in the Brick City Brims;

b. Use of a system of rules and regulations which govern the Bloods, its membership, entry into the Bloods and conduct of members. These regulations establish a hierarchical membership structure, from senior rank to junior rank, such as “OOOG” (Triple OG; “OG” is short for “Original Gangster”); “OOG” (Double OG); “OG”; “Baby OG”; followed by captains, five-star generals, lieutenants, sergeants, and individual members, who are called soldiers.

c. Rules governing the Bloods that establish penalties for those who violate the rules, fail to carry out orders of higher-ranking members, or “disrespect” the gang. Such penalties can include being stripped of one’s status within the Bloods, being placed on probationary status within the Bloods, or being labeled “food.” All members of the Bloods are directed to violently attack or kill any person labeled as “food.”

4. The criminal activity of the Brick City Brims also included retaliation against persons who “disrespect” Brick City Brims members, who threaten or who are perceived to pose a threat to the gang’s authority, power, or control of a neighborhood, or who are otherwise perceived as rivals of the Brick City Brims. The Brick City Brims’ chief rival was a separate set of the Bloods street gang, known as “MOB Piru,” that also operated in Newark, East Orange, and Orange.

5. The Brick City Brims, including its leadership, membership and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The

enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The Brick City Brims were engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Brick City Brims Enterprise

6. The purposes of the Brick City Brims included the following:
 - a. enriching the members and associates of the Brick City Brims, including those who were in prison, through, among other things, acts involving murder, assault,, threats of violence, and trafficking in controlled substances;
 - b. preserving and protecting the power and influence of the Brick City Brims, and its members and associates, both in and out of prison, through the use of acts involving murder, assault, threats of violence, and trafficking in controlled substances; and
 - c. promoting and enhancing the Brick City Brims and its members' and associates' reputations, both in and out of prison.

Methods and Means of the Enterprise

7. Among the methods and means by which the defendant and other members and associates of the Brick City Brims conducted and participated in the conduct of the affairs of the Brick City Brims were the following:
 - a. The Brick City Brims used violence, including acts involving murder, and assault, to avenge attacks or perceived slights against other members and associates of the Brick City Brims, to punish Brick City Brims

members and associates who had fallen into disfavor, to punish Brick City Brims members and associates who had been disloyal, to retaliate against rival gangs, and to silence Brick City Brims members and associates who were perceived to be cooperating or potentially would cooperate with law enforcement against members and associates of the Brick City Brims.

b. Participation in criminal activity by a member or associate, particularly violent acts directed at rival gangs or as directed by the gang leadership, increased the respect accorded to that member or associate, resulted in that member or associate maintaining or increasing position in the gang, and could result in a promotion to a leadership position.

c. Members of the Brick City Brims were specifically directed to carry or have immediate access to firearms in order to protect themselves and threaten others in furtherance of the interests of the criminal enterprise.

d. To bolster their reputation for violence, to promote their drug distribution business, and to obscure their true names from law enforcement and others, members and associates of the Brick City Brims used and referred to each other by "street" names. For example, DANIELS was known as "YT," and his social media moniker was "Yung Tripout Gunz."

e. In and around May 2018, DANIELS and other members and associates of the Brick City Brims engaged in a "turf war" with members of the MOB Piru set of the Bloods street gang. The dispute centered on the efforts of the rival gangs to control drug distribution, including heroin and cocaine base

("crack cocaine"), from areas within and around Oakwood Place, and elsewhere, in Orange, New Jersey.

Role of Defendant and Other Members and
Associates of the Brick City Brims

8. DANIELS and other members and associates of the Brick City Brims participated in unlawful and other activities in furtherance of the conduct of the Brick City Brims' affairs, as further described below.

9. DANIELS was one of the leaders of the Brick City Brims and held a high-ranking position within this sub-set of the Bloods street gang. Among other activities, he carried out, and directed other members and associates of the Brick City Brims to carry out, unlawful and other activities in furtherance of the conduct of the Brick City Brims' affairs, including murder, attempted murder, assault, and drug distribution.

10. Beginning at least in and around January 2018 through in or around June 2018, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TYQUAN DANIELS,
a/k/a "YT,"

together with others known and unknown, each being a person employed by and associated with the Brick City Brims, 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 Brick City Brims 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, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1, 2C:5-2 and 2C:2-6;
- b. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances 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), and Section 841 (distribution and possession with intent to distribute controlled substances); and
- c. multiple acts indictable under Title 18, United States Code, Section 1952 (relating to racketeering).

11. It was part of the conspiracy that the 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

12. In furtherance of the conspiracy and to achieve its objective, the defendant and his coconspirators committed the following overt acts, among others, in the District of New Jersey and elsewhere:

- a. In or about January 2018 through in or about June 2018,

the Brick City Brims members, including the defendant, distributed controlled substances, including heroin, in certain areas the gang controlled in Orange, East Orange and Newark, New Jersey.

b. In or about January 2018 through in or about June 2018, the Brick City Brims engaged in a “turf” war with a rival gang known as MOB PIRU over the control of drug territory.

c. On or about May 13, 2018, defendant and at least one coconspirator, a member of the Brick City Brims, planned to murder Raymond White, a/k/a “Ruger” (“White”), a leader of the MOB PIRU gang, as part of the drug turf war and to further the goals of the Brick City Brims enterprise.

d. On or about May 13, 2018, in furtherance of the conspiracy to murder White, defendant and his coconspirator used an interstate facility, namely a telephone, to call White and arrange a meeting near White’s residence.

e. On or about May 13, 2018, Daniels shot and killed White on a street in Essex County, New Jersey.

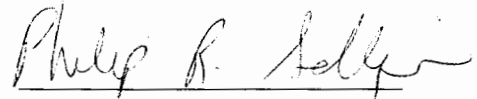
NOTICE OF SPECIAL SENTENCING FACTORS

1. On or about May 13, 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant,

TYQUAN DANIELS,
a/k/a "YT,"

did knowingly and purposely cause the death and serious bodily injury resulting in death of another person, namely, R.W., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

All in violation of Title 18, United States Code, Section 1962(d) and 1963.



PHILIP R. SELLINGER
United States Attorney