
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 : Hon. James B. Clark, III
 :
 v. :
 : Mag. No. 24-12179
 :
 :
 JAZMEIR REYES, :
 : **CRIMINAL COMPLAINT**
 a/k/a "Baby Joe," :
 :
 a/k/a "Joe" : **FILED UNDER SEAL**


I, Justyna Ramotowski, 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 Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

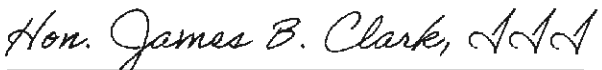
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Postal Inspector Justyna Ramotowski
United States Postal Inspection Service

Sworn to and subscribed to me by telephone pursuant to F.R.C.P. 4.1(B)(2)(A), on June 17, 2024 in Newark, New Jersey

Honorable James B. Clark, III
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Attempted Hobbs Act Robbery)

On or about July 28, 2023, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**JAZMEIR REYES,
a/k/a “Baby Joe,”
a/k/a “Joe,”**

did knowingly and intentionally attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten physical violence to any person or property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

(Assaulting, Resisting, or Impeding Certain United States Officers or Employees)

On or about July 28, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,
a/k/a “Baby Joe,”
a/k/a “Joe,”**

did forcibly assault, resist, oppose, impede, intimidate, or interfere with a person designated in 18 U.S.C. § 1114 while engaged in or on account of his or her performance of official duties, namely, Victim-1, and in the commission of this act, did use a deadly or dangerous weapon.

In violation of Title 18, United States Code, Section 111(b).

COUNT THREE

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

On or about July 28, 2023, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

**JAZMEIR REYES,
a/k/a “Baby Joe,”
a/k/a “Joe,”**

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, assaulting, resisting, or impeding certain officers or employees of the United States, as charged in Count Two of this Complaint, did knowingly use and carry a firearm, which firearm was brandished.

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

ATTACHMENT B

I, Justyna Ramotowski, am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in 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 Investigation

1. Since at least as early as January 2022, law enforcement, which has included the USPIS, the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), New Jersey State Police, and local law enforcement, have been investigating the members and associates of a neighborhood-based street gang known as “100k” or “Down the Hill,” which operates primarily in and around the area of North Main Street and Jefferson Street in the First Ward of Paterson, New Jersey (the “100k Enterprise”). The investigation has consisted of, among other investigative tools, numerous controlled purchases of narcotics, physical surveillance, and the analysis of telephone call detail records and social media records.

2. The 100k Enterprise derived its name and originated from the 2016 murder of Kasiem McCaskill, a/k/a “Baka,” a/k/a “100k,” which caused the local street gang known as “Brick Squad” to split into the 100k Enterprise and their primary rivals, the “Blockboyz,” which operate from and control the Presidential Tower Projects on the North Side of Paterson. The 100k Enterprise has been in a violent feud with the Blockboyz ever since each gangs’ founding. The 100k Enterprise is also in a violent feud with a local street gang known as “230” or “Up Top,” which operates in the area of Rosa Parks Boulevard and Godwin Avenue in Paterson. The 100k Enterprise is aligned with the local street gang known as “So Icey,” which operates in the area of Tenth Avenue and East 28th Street in Paterson, as well as the local street gang known as “34,” which is a subset and affiliate of the 100k Enterprise.

3. The investigation has revealed that Jazmeir Reyes, a/k/a “Baby Joe,” a/k/a “Joe” (“REYES”) is a member of the 100k Enterprise.

The Postal Employee Robbery

4. On or about July 28, 2023, at approximately 4:10 p.m., an individual wearing a light grey hoodie, black sweatpants, and a black face mask approached on bicycle behind a mail carrier employed by the United States Postal Service (“USPS”) (“Victim-1”) on Liberty Street in Paterson. The individual dismounted his bicycle, stood in front of Victim-1, and pulled out a firearm. The individual pointed the firearm at Victim-1 and grabbed at Victim-1’s mail bag, repeatedly demanding, “give me the key.” Based on my training and experience, I am aware that the “key” the individual was referring to was an arrow key, which allows mail carriers to access all of the USPS mailboxes in a given area. Despite the individual’s repeated shouts of “I’ll shoot you” at Victim-1, Victim-1 refused to give the individual the arrow key. The individual then got on his bicycle and fled down Liberty Street towards Paterson Avenue.

5. Video and audio of the entire attempted robbery was captured on cameras located on the corner of Liberty Street.

6. Law enforcement gathered and reviewed video footage from surrounding houses, street cameras, and businesses in Paterson and were able to track the individual’s bicycle route back to territory controlled by the 100k Enterprise. Specifically:

a. At approximately 4:11 p.m., the individual turned right on Paterson Avenue and headed northwest;

b. A minute later, the individual turned right on to Union Avenue and then biked towards West Broadway;

c. At approximately 4:16 p.m., the individual turned left from West Broadway onto Matlock Street;

d. At approximately 4:17 p.m., the individual removed his hood and mask, revealing his face, on the intersection of Temple Street and Matlock Street, which is known by law enforcement to be an area of Paterson that is controlled by the 100k Enterprise;

e. The individual continued to ride his bicycle down Matlock Street and removed his grey hoodie, revealing a white t-shirt;

f. Seconds later, the individual turned onto Clinton Street, dropped his bicycle, and walked in between two houses. The individual then reemerged from behind the two houses still wearing the white t-shirt but wearing bright orange shorts that he was not wearing previously. At this point, the individual was no longer wearing or carrying the grey hoodie or black sweatpants. The individual proceeded to walk northwest on Clinton Street and,

at approximately 4:24 p.m., turned on to North 1st Street;

g. At approximately 4:26 p.m. and again at approximately 4:50 p.m., the individual was observed with others in the area of Jefferson and North 1st Street in Paterson, the above-described primary location frequented by the 100k Enterprise; and

h. At approximately 5:49 p.m., surveillance footage showed the same individual again in the area of Jefferson and North 1st Street without a shirt but still wearing the bright orange shorts.

7. Based on the investigation, law enforcement identified the individual in the videos as REYES.

8. During the investigation into the 100k Enterprise, law enforcement obtained a telephone number that it learned was used by REYES (the “Reyes’s Cellular Device”).

9. A review of cellular data records associated with the Reyes’s Cellular Device revealed that:

a. At some point before approximately 5:07 p.m. on or about July 28, 2023, the Reyes’s Cellular Device was near a cell tower located at 359 Totowa Avenue in Paterson, which is approximately 0.1 miles from the location of the attempted robbery that occurred on Liberty Street at approximately 4:10 p.m.;

b. At approximately 5:55 p.m. on or about July 28, 2023, the Reyes’s Cellular Device was near a cell tower located at 64/68 Keen Street in Paterson, which is approximately 0.6 miles from the 100k Enterprise-controlled territory where REYES was observed on video footage minutes earlier, at approximately 5:49 p.m.; and

c. The cell tower located at 359 Totowa Avenue in Paterson was 1.5 miles from the cell tower located at 64/65 Keen Street in Paterson.