
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 : Hon. James B. Clark, III
 :
 v. :
 : Mag. No. 24-12178
 :
 :
 JAZMEIR REYES, : **CRIMINAL COMPLAINT**
 a/k/a "Baby Joe," :
 a/k/a "Joe," : **FILED UNDER SEAL**
 MICHAEL DAVIS, :
 a/k/a "Baby Three," :
 KYZIEK ROBINSON, :
 a/k/a "Doo Doo," :
 a/k/a "King Spark," :
 a/k/a "Spark," and :
 JACIM PITTS :

I, Lyndsay LeBedda, 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 Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

Lyndsay R. LeBedda

Special Agent Lyndsay LeBedda
Bureau of Alcohol, Tobacco, Firearms and Explosives

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

Hon. James B. Clark, III

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Fentanyl, Heroin, and Cocaine)

From at least in or around August 2023 through in or around April 2024, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

**JAZMEIR REYES,
a/k/a “Baby Joe,”
a/k/a “Joe,”
MICHAEL DAVIS,
a/k/a “Baby Three,”
KYZIEK ROBINSON,
a/k/a “Doo Doo,”
a/k/a “King Spark,”
a/k/a “Spark,” and
JACIM PITTS,**

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, its salts, optical or geometric isomers, or salts of isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Lyndsay LeBedda, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). 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 in or around January 2022, law enforcement, including, but not limited to, the 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 100k Enterprise sells drugs in the area of and controls the five-block stretch of North Main Street that begins at Haledon Avenue and ends at Clinton Avenue within Paterson (the 100k Enterprise’s “turf”). 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 gang’s 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”), Michael Davis, a/k/a “Baby Three” (“DAVIS”), and Kyziek Robinson, a/k/a “Doo Doo,” a/k/a “King Spark,” a/k/a “Spark” (“ROBINSON”) are all members of the 100k Enterprise, and were all involved in the trafficking of narcotics within Paterson, and elsewhere. The investigation has further revealed that Jacim Pitts (“PITTS”) is a member of So Icey and

aligned with and an associate of the 100k Enterprise and was involved with REYES, DAVIS, and ROBINSON in the trafficking of narcotics within Paterson, and elsewhere.

The 100k Enterprise's Narcotics Conspiracy

4. The investigation has revealed that, during the conspiracy period, members and associates of the 100k Enterprise distributed narcotics, including fentanyl, heroin, and cocaine, in and around their turf. Members of the 100k Enterprise frequently sold heroin that was mixed with fentanyl, a potent, synthetic opioid that is approximately 50 times stronger than heroin. Heroin and fentanyl distributed by the 100k Enterprise were packaged in glassine envelopes, commonly referred to as “decks,” which are the quantities associated with a single use of heroin or fentanyl. These decks were commonly sold by the 100k Enterprise in “bundles” and “bricks.”¹ Based on my training, experience, and investigation into the sale of illegal narcotics, I am aware that a brick of heroin or fentanyl weighs approximately one gram.

5. During the conspiracy, members and associates of the 100k Enterprise distributed decks of heroin and fentanyl that were typically stamped or labeled with various “brand names” in colored ink. These brand names allowed the dealers and purchasers alike to differentiate and market batches of heroin. For example, as described further below, on various occasions, decks stamped “Pokemon” were sold by REYES, ROBINSON, and DAVIS. On various occasions, desk stamped “Popcorn” were also sold by REYES and ROBINSON. Moreover, on various occasions, decks stamped “Patrick Mahomes” and “McDonalds” were sold by REYES and PITTS.

6. During the conspiracy, members and associates of the 100k Enterprise worked together to ensure that outsiders are unable to distribute narcotics within their turf. Thus, members and associates of the 100k Enterprise worked together to preserve and protect the power, territory, and reputation of the gang, and to hinder, obstruct, and prevent law enforcement officers from identifying participant's criminal activities, from apprehending offenders of the crimes, and from successfully prosecuting and punishing the offenders.

¹ A “bundle” commonly refers to approximately ten decks of heroin, grouped together. A “brick” commonly refers to approximately 50 decks, often packaged as five bundles that have been grouped together.

7. The investigation has revealed the manner and means by which members and associates of the 100k Enterprise carried out the objectives of the charged conspiracy to distribute narcotics. Among other things, members and associates of the 100k Enterprise committed the following acts in furtherance of the conspiracy's unlawful objectives:

a. Negotiated narcotics sales to take place around various business establishments, parking lots, and abandoned properties located within the 100k Enterprise's turf;

b. Represented the 100k Enterprise on social media, by using names, or "handles" that contained references to the 100k Enterprise;

c. Communicated through social media to discuss the sale of narcotics;

d. Would engage in similar patterns of behavior when conducting narcotics transactions. Specifically, members or associates of the 100k Enterprise would tell the buyer an agreed upon location in the 100k Enterprise's turf to meet. Once the buyer approached the predetermined location, the member or associate would then tell them to drive to a different location a block away. At that point, the buyer would pull up next to the member or associate's vehicle and be handed the narcotics through the car window with all parties remaining in their vehicles; and

e. Took affirmative steps to evade detection by law enforcement, including using multiple cellular telephone facilities to communicate with each other and with narcotics purchasers, engaging in counter-surveillance driving maneuvers to avoid physical surveillance, and speaking in coded language to disguise the illicit nature of their discussions. For example, members and associates of the 100k Enterprise typically referred to cocaine base as "hard."

8. Often, and as more specifically detailed in the following section, multiple members and associates of the 100k Enterprise worked together to distribute narcotics. For example, one member may have arranged for the sale, and then arrived with or sent a second member or associate to provide the controlled substances to the buyer. Members and associates of the 100k Enterprise sometimes worked as "lookouts" or otherwise acted as "backup" for other gang members during a narcotics transaction, to ensure that law enforcement or rivals were not in the vicinity while other members distributed controlled substances. Finally, members and associates of the 100k Enterprise also relied on each other to carry quantities of narcotics for other members to access when needed for a sale.

9. The investigation has also revealed that members and associates of the 100k Enterprise have access to firearms. For example, law enforcement has reviewed photographs and videos from publicly available social media accounts that revealed ROBINSON, DAVIS, and other members and associates of the gang are in possession of firearms.

Controlled Buys of Fentanyl, Heroin, and Cocaine

10. Between in or around August 2023 and in or around April 2024, law enforcement used two undercover officers (“UC-1” and “UC-2”) to conduct approximately 16 controlled purchases of narcotics, including fentanyl, heroin, and cocaine, from members and associates of the 100k Enterprise. Prior to each controlled purchase, law enforcement officers outfitted UC-1 and UC-2 and/or their vehicle with audio recording devices. Law enforcement maintained constant surveillance during each controlled purchase. Law enforcement also provided UC-1 and UC-2 with U.S. currency to use to purchase the controlled substances. These controlled purchases are outlined in the chart below:

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance(s) Confirmed by Laboratory Test
August 24, 2023	REYES and an uncharged conspirator (“Conspirator-1”)	1 brick, stamped “Fendi” 5 Plastic Bags	Fentanyl Cocaine
August 29, 2023	REYES and DAVIS	1 brick, stamped “007” 5 Plastic Bags	Heroin and Fentanyl Cocaine
September 7, 2023	REYES	3 bricks, stamped “Harlem Nights” Folded dollar bill containing loose suspected cocaine	Fentanyl Cocaine

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance(s) Confirmed by Laboratory Test
September 21, 2023	REYES and PITTS	2 bricks, stamped "Shrek," and 3 bricks, stamped "Patrick Mahomes" \$200 worth of suspected cocaine	Fentanyl Cocaine
September 25, 2023	REYES and PITTS	5 bricks, stamped "Patrick Mahomes" 3 grams of suspected cocaine	Fentanyl Cocaine
October 10, 2023	REYES	10 bricks, stamped "Pokemon" 3 grams of suspected cocaine	Fentanyl Cocaine
October 17, 2023	REYES	10 bricks, stamped "Pokemon" 7 grams of suspected cocaine	Fentanyl Cocaine
November 1, 2023	REYES and unidentified conspirators	10 bricks, stamped "Pokemon"	Fentanyl
November 15, 2023	REYES and an uncharged conspirator ("Conspirator-2")	10 bricks	Fentanyl

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance(s) Confirmed by Laboratory Test
December 4, 2023	REYES	10 bricks, stamped "Popcorn"	Fentanyl
December 12, 2023	REYES and ROBINSON	10 bricks, stamped "Popcorn"	Fentanyl
January 4, 2024	REYES	10 bricks, stamped "Play Station"	Heroin and Fentanyl
January 26, 2024	REYES and Conspirator-2	10 bricks, stamped "Chase"	Heroin and Fentanyl
February 29, 2024	REYES and ROBINSON	16 bricks, stamped "Play Station" 4 bricks, stamped "[**]k trump"	Heroin and Fentanyl Fentanyl
March 14, 2024	REYES, DAVIS, and ROBINSON	9 bricks, stamped "Thriller" 5 bricks, stamped "Trackhawk" 5 bricks, stamped "Pokemon" 1 brick, stamped "McDonalds"	Fentanyl

Date of Transaction	Defendant(s) Involved in Transaction	Approximate Quantity Purchased	Substance(s) Confirmed by Laboratory Test
March 27, 2024	REYES and PITTS	20 bricks, stamped "McDonalds"	Fentanyl

11. In total, law enforcement has acquired approximately 117 grams of a mixture and substance that tested positive for fentanyl, 38 grams of a mixture and substance that tested positive for both heroin and fentanyl, and 20 grams of mixture and substance that tested positive for cocaine from the above referenced 16 controlled purchases.

12. Since that time, surveillance conducted in the various areas controlled by the 100k Enterprise confirmed that REYES and the other members and associates of the 100k Enterprise continue to engage in activity consistent with hand-to-hand narcotics transactions.

Defendants’ Involvement in the Narcotics Conspiracy

13. As shown in the above chart, REYES frequently would work with DAVIS, ROBINSON, and PITTS to conduct narcotics sales in furtherance of the 100k Enterprise in areas controlled by the 100k Enterprise. Specifically:

a. On or about August 29, 2023, UC-1 called REYES at a telephone number that REYES previously had provided to UC-1 and negotiated the controlled purchase of 1 brick of heroin and 5 bags of cocaine. On that date, UC-1 and UC-2 drove to the predetermined meeting location on North 1st Street in Paterson. Soon thereafter, a black Nissan Altima (the “Nissan”) driven by REYES parked near them. REYES rolled down the window and handed UC-1 approximately 1 brick of a mixture and substance that later tested positive for heroin and fentanyl, in exchange for \$100. REYES then told UC-1, “I got to get hard, I’ll bring it back in 2 minutes.” Based on my training and experience, I am aware that “hard” is a term used by gang members to refer to cocaine base. Law enforcement then observed REYES drive the Nissan around the block to North Main Street and Jefferson Street in Paterson. Once there, law enforcement observed, via physical surveillance and city cameras, REYES approach DAVIS, who handed REYES several small items consistent in size and shape with bags used to carry narcotics. REYES then drove back to UC-1’s vehicle and handed UC-1 approximately 5 bags of a mixture and substance that later tested positive for cocaine, in exchange for \$40.

a. On or about September 21, 2023, UC-1 again called REYES and arranged for the purchase of 5 bricks of heroin and approximately \$200's worth of a cocaine. REYES instructed UC-1 to meet him at an address on North Clinton Street in Paterson. On that date, UC-1 and UC-2 drove to the predetermined meeting place and observed PITTS in the driver's seat and REYES in the front passenger seat of a black Chevrolet Malibu (the "Malibu"). UC-1 and UC-2 then parked their vehicle next to the Malibu, and PITTS rolled down the driver's side window and handed UC-1 the agreed-upon narcotics, in exchange for \$700. Subsequently laboratory testing confirmed that the suspected narcotics contained fentanyl and cocaine, in exchange for \$700.

b. On or about September 24, 2023, UC-1 texted REYES and arranged for the sale of 5 bricks of heroin and 3 grams of cocaine. The next day, on or about September 25, 2023, UC-1 and UC-2 drove to the area of DeMott Avenue and 4th Street in Clifton, New Jersey and observed the Malibu with REYES in the driver's seat and PITTS in the front passenger seat. UC-1 and UC-2 drove up to the Malibu, and REYES handed UC-2 bricks of a mixture and substance that later tested positive for fentanyl and approximately 3 grams of a mixture and substance that later tested positive for cocaine through the driver's side window, in exchange for \$650.

c. On or about December 12, 2023, REYES texted UC-1 and arranged for the sale of 10 bricks of heroin. REYES instructed UC-1 and UC-2 to meet him at North 4th Street and Clinton Street in Paterson. Later that day, UC-1 and UC-2 drove to the predetermined location, and REYES called UC-1 and instructed UC-1 to drive around the block to North 5th Street. Once UC-1 and UC-2 arrived on North 5th Street, they observed REYES and ROBINSON on the sidewalk. ROBINSON walked over to UC-1 and UC-2's vehicle and delivered 10 bricks of a mixture and substance that later tested positive for fentanyl, in exchange for \$950.

d. On or about February 29, 2024, UC-1 texted REYES to arrange for the purchase of 20 bricks of heroin. Later that day, UC-1 and UC-2 drove to the predetermined location on Second Street in Clifton. Approximately five minutes later, REYES arrived at the predetermined location driving a gray Volkswagen Atlas (the "Volkswagen") with ROBINSON in the front passenger seat. Law enforcement observed REYES pull up next to the undercover's vehicle and hand ROBINSON packages which appeared to contain narcotics. ROBINSON then handed the 20 bricks of heroin and fentanyl through the passenger side window of the Volkswagen to UC-2, in exchange for \$1,800.

e. On or about March 14, 2024, UC-1 texted REYES to arrange for the purchase of 20 bricks of heroin. Later that day, UC-1 and UC-2 travelled to the predetermined location on Arlington Avenue in Paterson. Approximately five minutes later, REYES arrived at the predetermined location driving the Volkswagen with DAVIS in the passenger seat and ROBINSON in the rear passenger seat. Law enforcement observed REYES pull up next to the undercovers' vehicle and hand DAVIS packages that contained what appeared to be narcotics. DAVIS then handed 20 bricks of a mixture and substance that later tested positive for fentanyl through the passenger side window of the Volkswagen to UC-2, in exchange for \$1,900.

f. Most recently, on or about March 27, 2024, UC-1 texted REYES to arrange for the purchase of 20 bricks of heroin. UC-1 and UC-2 drove to the predetermined meeting location on Maitland Avenue in Paterson and observed PITTS and REYES arrive to the predetermined location in a gray Toyota Rav4 (the "Toyota"). PITTS was driving the Toyota with REYES in the front passenger seat. Upon arriving at the predetermined location, PITTS parked the Toyota alongside the undercover's vehicle and REYES handed UC-2 20 bricks of a mixture and substance that later tested positive for fentanyl through the passenger side window, in exchange for \$1,900.

14. Pursuant to lawfully executed search warrants, law enforcement has obtained records associated with social media accounts owned and controlled by DAVIS and ROBINSON. These records revealed, among other things, posts and messages evidencing DAVIS's and ROBINSON's involvement in the 100k Enterprise. Some specific examples are as follows:

a. On or about July 13, 2023, DAVIS posted a story of himself to social media with the caption, “Just cause you come around don’t mean you certified,” with an emoji for “100” followed by the letter “K” and emojis for “3” and “4,” as pictured below:



b. Based on my training, experience, and this investigation, I am aware that the emoji for “100” followed by the letter “K” is a common symbol posted by members of the 100k Enterprise on social media to show their allegiance and membership in the 100k Enterprise. Based on my training, experience, and this investigation, I am also aware that the emojis for “3” and “4” together are a reference to the street gang known as “34,” which operates out of Paterson and is a subset and affiliate of the 100k Enterprise. Therefore, I can conclude that this post is showing DAVIS proclaim his loyalty to and affiliation with the 100k Enterprise.

c. On or about July 29, 2023, DAVIS posted another story to social media of REYES (on the left) and ROBINSON (on the right) with the caption “Str8 like dat” followed by the same “100” emoji with the letter “K.” DAVIS then wrote “we the youngest pits . . . all them other n[***]as takin cred,” as pictured below:



d. Based on my training, experience, and this investigation, I believe this post is DAVIS further highlighting his allegiance to the 100k Enterprise. The term “pits” refers to “pit bulls” and is a term used by gang members that is synonymous with aggression. Therefore, when DAVIS writes “we the youngest pits,” he is bragging about how he, REYES and ROBINSON are among the most aggressive or violent members of the 100k Enterprise.

15. The social media records further revealed posts and messages evidencing DAVIS’s and ROBINSON’s involvement in the narcotics conspiracy outlined above. Specifically:

a. After the February 29, 2024 controlled narcotics purchase discussed above, ROBINSON posted to his social media account a live stream video of himself with numerous bills of United States currency, which is believed by law enforcement to be the money provided in the controlled purchased that had just occurred moments earlier.

b. On or about September 4, 2023, DAVIS communicated via direct message with a social media account owned and controlled by Conspirator-2 to arrange for Conspirator-2 to drive REYES to a narcotics purchase. Specifically, DAVIS messaged Conspirator-2, “Bro said take him to serve his j.” After Conspirator-2 responded “Addy,” DAVIS replied with “Clinton St.” Conspirator-2 then wrote, “Ok.” Earlier in that conversation, DAVIS and Conspirator-2 had been discussing “Joe,” which is REYES’s street name.

c. Based on my training, experience, this investigation, and the context of these and other communications, I believe when DAVIS wrote, “Bro said take him to serve his j,” he was asking Conspirator-2 to drive REYES to sell narcotics to a customer. Based on my training and experience, I am aware that “j” is a common term used by gang members for “junkie,” or an individual who is addicted to and purchases narcotics. When Conspirator-2 responded with “Addy,” he or she was asking DAVIS for the address, and DAVIS responded by stating Clinton Street, which is one of the areas in Paterson discussed above that REYES and other members of the 100k Enterprise control and from which they are known to distribute narcotics.

d. As another example, on or about October 13, 2023, Conspirator-2 wrote to DAVIS, “I cant keep doing [t]he same shit . . . it’s tiring.” DAVIS responded, “U older [Conspirator-2] u apost to teach him u know that ?!” and Conspirator-2 replied, “teach him what . . . teach him how to get money ? . . . tf.” DAVIS then wrote, “He know how to get money ? But idk y’all gotta figure it out”

e. Based on my training, experience, this investigation, and the context of these communications, I believe that when Conspirator-2 wrote that he or she “cant keep doing [t]he same shit,” he or she is referring to his or her involvement in the 100k Enterprises’ distribution of narcotics. Based on my training and experience, and the context of these and other communications, I believe that when DAVIS wrote, “u apost [*misspelling for “supposed”*] to teach him” and Conspirator-2 responded “teach him how to get money ?,” they are discussing Conspirator-2’s teaching REYES how to deal narcotics. I am aware based on my training and experience that the phrase “get money” is commonly used by gang members in reference to drug dealing.