
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 : **CRIMINAL COMPLAINT**
v. :
 : Hon. James B. Clark, III
MARC TAYLOR, :
 a/k/a "Bando," : Mag. No. 20-12249
JASHAWN TATE, :
 a/k/a "Trilly," and :
DAMARI BLACKWELL, :
 a/k/a "Juggy" :

I, David Scanlon, 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 Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") and that this complaint is based on the following facts:

SEE ATTACHMENT B

s/David L. Scanlon

David Scanlon
ATF Task Force Officer

Task Force Officer David Scanlon attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on July 14, 2020, in the District of New Jersey

Honorable James B. Clark, III
United States Magistrate Judge

s/James B. Clark III

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

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

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 Marion-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 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 Complaint—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.

COUNT THREE

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

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

JASHAWN TATE,
a/k/a “Trilly,”

for the purpose of gaining entrance to, and maintaining and increasing position
in, the Rutgers 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 FOUR

(Discharge of a Firearm During a Crime of Violence)

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

JASHAWN TATE,
a/k/a “Trilly,”

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 Three of this Complaint—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.

COUNT FIVE

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

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

DAMARI BLACKWELL,
a/k/a “Juggy,”

for the purpose of gaining entrance to, and maintaining and increasing position
in, the Curries Woods 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 SIX

(Discharge of a Firearm During a Crime of Violence)

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

DAMARI BLACKWELL,
a/k/a “Juggy,”

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 Five of this Complaint—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.

ATTACHMENT B

I, David Scanlon, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. 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, listened to hundreds of hours of communications, and reviewed numerous 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 Enterprises

1. At all times relevant to this Complaint, defendants MARC TAYLOR, a/k/a “Bando” (“TAYLOR”), JASHAWN TATE, a/k/a “Trilly” (“TATE”), DAMARI BLACKWELL, a/k/a “Juggy” (“BLACKWELL”), and others, known and unknown, were members and associates of three allied neighborhood gangs in Jersey City, New Jersey: the Rutgers street gang (hereinafter the “Rutgers Enterprise”); the Marion Gardens street gang otherwise known as “300” (hereinafter the “Marion-300 Enterprise”); and the Curries Woods street gang (hereinafter the Curries Woods Enterprise). Specifically, TAYLOR was a member of the Marion-300 Enterprise, TATE was a member of the Rutgers Enterprise, and BLACKWELL was an associate of the Curries Woods Enterprise.

2. Individuals who associate with the Rutgers street gang have historically consisted of members and associates of the 52 Hoover set of the Crips street gang. They operate 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, New Jersey. Given the Hoover Crip connection, those associated with the Rutgers Enterprise often wear the colors orange and blue. Members of the Rutgers Enterprise also refer to themselves as the “Get Bacc Gang,” which notably replaces the letter “k” with the letter “c” in order to avoid the use of “ck”—a common denotation for “crip killer.” Moreover, the phrase “Get Bacc,” which originated with gangs in Chicago, Illinois, refers to retaliatory acts of violence. Members of the Rutgers Enterprise also pay homage to Isaiah Jackson, a/k/a “Tutu,” a Rutgers member who was killed in June 2015. They are known for drug distribution in and around their controlled territory as well as for violence against numerous rival neighborhoods.

3. Individuals who associate with the Marion-300 gang have historically consisted of members and associates of the Brim and Sex, Money, Murder sets

of the Bloods street gang and operate within the Marion Gardens Housing Complex. A subset of the Marion-300 Enterprise identifies as “300,” which 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 Marion-300 Enterprise. Individuals associated with the Marion-300 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 Marion-300 Enterprise, by extending their pinky, ring, and middle fingers and joining their thumb and pointer fingers to form a circle. They are known for drug distribution in and around their controlled territory as well as for violence against numerous rival neighborhoods.

4. Individuals who associate with the Curries Woods street gang (the “Curries Woods Enterprise”) have historically consisted of members and associates of the 52 Hoover set of the Crips street gang and operated within the Curries Woods Housing Projects. Individuals associated with the Curries Woods Enterprise, particularly those who identify as Hoover Crips, refer to themselves as the Tay Tay Shrimp Gang, which pays homage to Javonte Galbreath, a/k/a “Tay Tay,” who was killed in November 2015, and also use the term “Uptop” to refer to their territory. Given the Hoover Crip connection, those affiliated with the Curries Woods Enterprise often wear the colors orange and blue, and in turn, often wear clothing associated with the Houston Astros and the New York Mets. They also pay homage to Jayden Fondeur, a/k/a “Zero,” who was killed in September 2018, and Jordan Herron, a/k/a “23,” who was killed in July 2019. They are known for drug distribution in and around their controlled territory as well as for violence against numerous rival neighborhoods.

The Alliance

5. While initially operating as three distinct neighborhood street gangs, the Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise aligned in or around September 2019 such that members and associates of each individual Enterprise now function as one cohesive unit.

6. The alliance between the Rutgers Enterprise and the Marion-300 Enterprise originated, in part, due to proximity—specifically, the “300” subset of Marion, which initially operated in the area of Bidwell Avenue and Martin Luther King Drive, relocated its territory in early 2019 to Armstrong Avenue and Martin Luther King Drive. This relocation placed these members in closer proximity to Triangle Park—the area controlled by the Rutgers Enterprise.

7. Further, the Rutgers Enterprise has historically engaged in retaliatory acts of violence against the neighborhood street gang that operates in the area of the Salem Lafayette Apartments, more commonly referred to as “SaLaf.” The Marion-300 Enterprise, for its part, has historically engaged in retaliatory acts of violence against the neighborhood street gang that operates in the area of

Wilkinson Avenue, Ocean Avenue, Martin Luther King Drive, and Wegman Parkway, more commonly referred to as “Wilkinson.” Members of both SaLaf and Wilkinson have historically associated with the Grape Street set of the Crips street gang, and as a result, these two neighborhood gangs have maintained an alliance. Consequently, the alliance between the Rutgers Enterprise and the Marion-300 Enterprise likewise stemmed from their respective feuds with the allied SaLaf and Wilkinson gangs.

8. As noted above, members of both the Rutgers Enterprise and the Curries Woods Enterprise have historically been associated with the 52 Hoover set of the Crips street gang. As a result, these two neighborhood gangs have maintained an alliance due to this shared Crips affiliation. Moreover, the Curries Woods Enterprise has historically engaged in retaliatory acts of violence against Wilkinson. In short, due to shared rivals and common gang set affiliations, the historically localized neighborhood gangs in Jersey City have aligned such that there is presently an ongoing feud between, on one side, the Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise, and on the other side, SaLaf and Wilkinson.

9. The Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise (collectively, the “Enterprises”), including their respective leadership, members, and associates, each 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. Each Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of that Enterprise.

10. At all times relevant to this Complaint, each 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), and 2C:5-2; and
- b. 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 Enterprises

11. The purposes of each respective Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of that Enterprise through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of that Enterprise with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of that Enterprise, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey, which involved intimidation, threats of violence, and acts of violence, including murder, attempted murder, and assault against, among others, members of rival organizations;
- d. Keeping victims and rivals in fear of that Enterprise and its members and associates; and
- e. Concealing the activities of that Enterprise from law enforcement.

Membership in the Enterprises

12. Defendant MARC TAYLOR, a/k/a “Bando” (“TAYLOR”) is a member of the Marion-300 Enterprise. He utilizes the Facebook handle “Bando Wipeout” and the Instagram handle “bando_wipeoutgang,” both of which reference his street name. The bio for his Instagram account includes the following notations: “Draco Gang,” “Munchy Gang,” “Double O Gang,” “Ron Gang,” “Rell Gang,” and “23 Gang,” all of which reference deceased members and associates of the Rutgers Enterprise, the Marion-300 Enterprise, or the Curries Woods Enterprise. Specifically, “Draco” was the street name for Judane Holmes, a member of the Marion-300 Enterprise, who was killed in December 2018; “Munch” was the street name for Damone Smith, a member of the Rutgers Enterprise, who was killed on March 31, 2020; “Ron” is a reference to Rondell Rush, a/k/a “Mr. 300,” a member of the Marion-300 Enterprise, who was killed in April 2016; “Rell” was the street name for Darrell Rush, a member of the Marion-300 Enterprise, who was killed in June 2018. Finally, “23” was the street name for Jordan Herron, an associate of the Curries Woods Enterprise, who was killed in July 2019. Law enforcement has encountered TAYLOR on numerous occasions in territory associated with the Marion-300 Enterprise and in the presence of other individuals known to be members and associates of the Marion-300 Enterprise.

13. Defendant JASHAWN TATE, a/k/a “Trilly” (“TATE”) is a member of the Rutgers Enterprise. He utilizes the Facebook handle “Trilly G Wipeout” and the Instagram handle “trillyg.wip3outgang,” both of which reference his street name. The bio for his Instagram account includes, among other notations, “300,” which refers to the subset of the Marion-300 Enterprise and which pays homage to Rondell Rush, a/k/a “Mr. 300,” a member of the Marion-300 Enterprise, who was killed in April 2016. In addition, TATE’s Facebook and Instagram accounts contain numerous photographs of TATE with other members and associates of the Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise, in which the individuals depicted, including TATE, are gesturing gang signs and firearms and/or are displaying large quantities of currency. For example, on or about March 31, 2019, TATE posted a photo on Instagram, which depicted TATE with four other members and associates of the Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise, in which TATE and several others are standing in Triangle Park—the area controlled by the Rutgers Enterprise—gesturing gang signs or firearms. This photo is accompanied by the caption, “Boy My Killers Dont Play Fair – Knocking At Ur Door Like Them Boys Really Stay There.” Law enforcement has encountered TATE on numerous occasions in territory associated with the Rutgers Enterprise and in the presence of other individuals known to be members and associates of the Rutgers Enterprise.

14. Defendant DAMARI BLACKWELL, a/k/a “Juggy” (“BLACKWELL”) is an associate of the Curries Woods Enterprise. He utilizes the Facebook handle “Juggy YRN” and the Instagram handle “_.juggy,” both of which reference his street name. The bio for his Instagram account includes the notation, “LL23,” which stands for “Long Live 23” and references the street name for Jordan Herron, an associate of the Curries Woods Enterprise, who was killed in July 2019. In addition, BLACKWELL’s Facebook contains a post on or about April 10, 2020, in which BLACKWELL shared a photo of J.J., who is known to be an active member of the Curries Woods Enterprise. The original photo contained the caption, “Leader Of My Gang Cuzz Never Been a Me To.”

Means and Methods of the Enterprises

15. Among the means and methods by which the defendants and other members and associates of each respective Enterprise conducted and participated in the conduct of the affairs of each Enterprise were the following:

- a. Members of each respective Enterprise and their associates committed, attempted, and threatened to commit acts of violence, including murder and assault, to protect and expand their respective Enterprise’s criminal operations;
- b. Members of each respective Enterprise were expected to carry or have immediate access to firearms in order to protect themselves,

their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of their respective Enterprise;

- c. Participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by each respective Enterprise's leadership, increased the respect accorded to that member, and resulted in that member's maintaining and increasing status in their respective Enterprise;
- d. Members of each respective Enterprise and their associates promoted a climate of fear through violence and threats of violence;
- e. Members of each respective Enterprise and their associates used and threatened to use physical violence against various individuals, including witnesses, informants, and members of rival criminal organizations;
- f. Members of each respective Enterprise and their associates trafficked heroin, cocaine base, and/or marijuana as a means of enriching themselves; and
- g. Members and associates of each respective Enterprise acted in concert with members and associates of the allied Enterprises in order to further the objectives of the alliance.

The Feud with the SaLaf-Wilkinson Alliance

16. Beginning at least as early as in or around July 2019, members of the Rutgers Enterprise, the Marion-300 Enterprise, and the Curries Woods Enterprise began a series of retaliatory exchanges with a rival group of individuals associated with the neighborhood gangs SaLaf and Wilkinson, which—since in or around that time period—have been operating as one cohesive alliance (the “SaLaf-Wilkinson Alliance”).

17. The feud between the Enterprises and the SaLaf-Wilkinson Alliance escalated in late March and early April 2020. First, on or about March 31, 2020, at approximately 8:36 p.m., law enforcement responded to the area of Rose Avenue and Cator Avenue following a report of shots fired. Upon arrival, officers encountered Damone Smith, a/k/a “Munch,” a member of the Rutgers Enterprise, who had sustained a gunshot wound to the chest. He was transported to Jersey City Medical Center, but was pronounced dead several hours later. Phillip Wiggins, a member of Wilkinson, has been charged with this murder in the Superior Court of New Jersey, Hudson County.

18. The following day, on or about April 1, 2020, at approximately 7:55 p.m., officers heard gunshots in the area of Martin Luther King Drive and Forest Avenue. After responding to that area, law enforcement encountered a member of SaLaf, Q.S., who had sustained a gunshot wound to his thigh, and Stephanie Jacques, a seemingly unintended victim, with a gunshot wound to her thigh. Both victims were transported to the Jersey City Medical Center and released later that night. The following morning, however, Stephanie Jacques died of a pulmonary embolism that resulted from the gunshot wound she sustained. Shaquan Rush, a/k/a “Sha,” a member of the Marion-300 Enterprise, and Darby Sherdin, a/k/a “GoHard,” a member of the Rutgers Enterprise, have been charged with this murder and attempted murder in the Superior Court of New Jersey, Hudson County.

19. On or about April 4, 2020, shortly after 3:00 p.m., law enforcement responded to the intersection of Bidwell Avenue and Ocean Avenue where officers discovered Akim Ward, a/k/a “Kimmy,” a member of Wilkinson, who had sustained a gunshot wound to the head. Tyree Witherspoon, a/k/a “Sonny,” a/k/a “Surf,” and Devon Tutton, a/k/a “Joker,” both members of the Rutgers Enterprise, have been charged with this murder in the Superior Court of New Jersey, Hudson County.

20. More recently, on or about July 6, 2020, at approximately 10:34 p.m., Jersey City Police Officers heard multiple gunshots in the area of Sheffield Avenue and Rutgers Avenue. Officers responded to the area and observed a seventeen-year-old girl later identified as Tyeah Garner with a gunshot wound to her right cheek. She was transported to the Jersey City Medical Center, but was subsequently pronounced dead at 4:36 a.m. on Tuesday, July 7, 2020. While the homicide investigation is ongoing, law enforcement is investigating individuals associated with the SaLaf-Wilkinson Alliance.

July 7, 2020 Retaliation

21. On or about July 7, 2020, at approximately 6:03 p.m., three individuals drove to the area of Oak Street and Martin Luther King Drive in Jersey City, New Jersey—an area controlled by SaLaf—armed with two firearms: a Glock 21 .45 caliber handgun and an Intratec AB-10 9mm Luger handgun. The driver, subsequently identified as TATE, drove a Volkswagen sedan (the “Volkswagen”), which had been reported stolen out of Edgewater, New Jersey earlier that day. Upon arrival, the backseat passenger, subsequently identified as BLACKWELL, attempted to fire the Intratec AB-10 9mm Luger handgun through the sunroof, while the front passenger, subsequently identified as TAYLOR, fired numerous rounds from the Glock 21 .45 caliber handgun through the front passenger seat window. A seemingly unintended bystander—a twelve-year-old boy—was shot in the leg. The entire incident was captured on CCTV surveillance video.

22. Law enforcement located the vehicle almost immediately after the shooting, at which time a pursuit ensued. During the course of the pursuit, the Volkswagen was involved in a motor vehicle accident, as a result of which, one of the Volkswagen's tires was damaged. Ultimately, the Volkswagen stopped in the area of Route 1 & 9 and the exit for Route 78 in Newark, New Jersey. TAYLOR, TATE, and BLACKWELL were apprehended inside the vehicle.

23. In addition, law enforcement seized the following from in and around the Volkswagen: (1) the Intratec AB-10 9mm Luger handgun, bearing partially defaced serial number AOC6041; (2) the Glock 21 .45 caliber handgun, bearing serial number ESX122; and (3) one .45 caliber shell casing. Law enforcement also seized a high-capacity magazine belonging to the Intratec AB-10, containing twenty-two 9mm rounds, in BLACKWELL's waistband.

24. Law enforcement recovered two .45 caliber shell casings from the route of the pursuit in the area where the Volkswagen was engaged in the motor vehicle accident. At the scene of the shooting on Oak Street and Martin Luther King Boulevard, law enforcement recovered four shell casings and one projectile.