

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

JAMES BAZEMORE, :

a/k/a "TJ," and

JARED EL MUJAAHID, :

a/k/a "Jay,"

x

SEALED INDICTMENT

22 Cr. 234

Defendants.

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**COUNT ONE**  
**(Racketeering Conspiracy)**  
**(All Defendants)**

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, JAMES BAZEMORE, a/k/a "TJ," and JARED EL MUJAAHID, a/k/a "Jay," the defendants, and others known and unknown, were members and associates of Big Paper ("the Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder and narcotics trafficking.

2. Big Paper operates, among other locations, in and around Mount Vernon, New York.

3. Big Paper, including its leadership, membership, and associates, constituted an "enterprise," as that term is defined

in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the Enterprise and participated in the unlawful and other activity in furtherance of the conduct of the Enterprise's affairs.

4. From at least in or about 2017 up to and including in or about 2020, members and associates of Big Paper were engaged in a series of disputes with rival crews and other individuals adverse to the Enterprise (generally, the "Opposing Crews"). During these disputes, members and associates of Big Paper committed shootings and assaults against members and associates of the Opposing Crews.

5. Certain members and associates of Big Paper committed and agreed, attempted, and threatened to commit acts of violence to protect fellow members and associates of the Enterprise. These acts of violence included murder and assaults intended to retaliate against members of Opposing Crews or to otherwise promote the standing and reputation of Big Paper.

6. Certain members and associates of Big Paper also

participated in the sale of controlled substances to enrich themselves and the gang.

Purposes of the Enterprise

7. The purposes of the Enterprise included the following:
  - a. Preserving and protecting the power and profits of the Enterprise through acts involving murder, assault, and other acts of violence and threats of violence.
  - b. Promoting and enhancing the Enterprise and the activities of its members and associates.
  - c. Keeping victims and potential victims in fear of the Enterprise and its members and associates through acts and threats of violence.
  - d. Providing assistance to members and associates who committed crimes for and on behalf of the Enterprise.
  - e. Enriching the members and associates of the Enterprise through, among other things, acts involving the distribution and sale of controlled substances, including phencyclidine ("PCP") and crack cocaine.

Means and Methods of the Enterprise

8. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand the Enterprise's criminal operations, and in connection with the rivalries with members of the Opposing Crews.

b. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and assault, against members of the Opposing Crews.

c. Members and associates of the Enterprise obtained, possessed, and used firearms.

d. Members and associates of the Enterprise distributed controlled substances, including PCP and crack cocaine.

e. Members and associates of the Enterprise engaged in criminal acts to fund the Enterprise and enrich its members, including distribution of controlled substances.

The Racketeering Conspiracy

9. From at least in or about 2017, up to and including at

least in or about 2020, in the Southern District of New York and elsewhere, JAMES BAZEMORE, a/k/a "TJ," and JARED EL MUJAAHID, a/k/a "Jay," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs One through Eight above, namely, Big Paper, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate 18 U.S.C. § 1962(c), to wit, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Sections 1961(1) and 1961(5) of Title 18, United States Code, consisting of:

Multiple acts involving:

a. Murder, in violation of New York Penal Law Sections 20.00, 105.15, 110.00, and 125.25;

Multiple offenses involving:

b. Distribution of narcotics, including crack cocaine and PCP, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

10. It was a part of the conspiracy that the defendants agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Notice of Special Sentencing Factors

Narcotics

11. From at least in or about 2017 up to and including in or about September 2020, in the Southern District of New York and elsewhere, JAMES BAZEMORE, a/k/a "TJ," and JARED EL MUJAAHID, a/k/a "Jay," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

12. The controlled substance that JAMES BAZEMORE, a/k/a "TJ," and JARED EL MUJAAHID, a/k/a "Jay," the defendants, conspired to distribute and to possess with the intent to distribute was two-hundred and eighty grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

Murder

13. On or about April 30, 2018, in the Southern District of New York, JAMES BAZEMORE, a/k/a "TJ," the defendant, with intent to cause the death of another person, caused the death of such person, and aided and abetted the same, in Mount Vernon, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that BAZEMORE acquired a gun from another member of Big Paper and then BAZEMORE stalked and shot Tasheen Williams.

(Title 18, United States Code, Section 1962(d).)

**COUNT TWO**  
**(Murder in Aid of Racketeering Activity)**  
**(BAZEMORE)**

The Grand Jury further charges:

14. At all times relevant to this Indictment, Big Paper, as more fully described in Paragraphs One through Eight of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, including its leadership, its membership, and its associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was 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.

15. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, chargeable under the laws of the State of New York and punishable by imprisonment for more than one year; and offenses involving narcotics distribution in violation of Title 21, United States Code, Sections 841 and 846.

16. On or about April 30, 2018, in the Southern District of New York, JAMES BAZEMORE, a/k/a "TJ," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from Big Paper, and for the purpose of gaining entrance to and maintaining and increasing position in Big Paper, an enterprise engaged in racketeering activity, as described above, knowingly murdered an individual and aided and abetted the same, to wit, BAZEMORE acquired a gun from another member of Big Paper and then BAZEMORE stalked and shot Tasheen Williams in Mount Vernon, New York, in violation of New York Penal Law, Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

**COUNT THREE**  
**(Use of a Firearm Resulting in Death)**  
**(BAZEMORE)**

17. On or about April 30, 2018, in the Southern District of New York, JAMES BAZEMORE, a/k/a "TJ," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the murder charged in Count Two of this Indictment, knowingly did use and carry, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was discharged, and in the course of that crime did cause the death of a person through the use of a



firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, another member of Big Paper provided a gun to BAZEMORE and then BAZEMORE stalked and shot Tasheen Williams in Mount Vernon.

(Title 18, United States Code, Sections 924(j)(1) and 2.)

**COUNT Four**  
**(Assault with a Deadly Weapon in Aid of Racketeering Activity)**

The Grand Jury further charges:

18. At all times relevant to this Indictment, Big Paper, as more fully described in Paragraphs One through Eight of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, including its leadership, its membership, and its associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was 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.

19. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, chargeable under the laws of the State of New

York and punishable by imprisonment for more than one year; and offenses involving narcotics distribution in violation of Title 21, United States Code, Sections 841 and 846.

20. On or about April 30, 2018, in the Southern District of New York, JARED EL MUJAAHID, a/k/a "Jay," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from Big Paper, and for the purpose of gaining entrance to and maintaining and increasing position in Big Paper, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon and aided and abetted the same, to wit, EL MUJAAHID identified Tasheen Williams as a rival of Big Paper and gave another member of Big Paper a gun, and then the other Big Paper member stalked and shot Tasheen Williams in Mount Vernon, New York, in violation of New York Penal Law, Sections 120.10 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

**COUNT FIVE**  
**(Firearms Use, Carrying, and Possession)**

The Grand Jury further charges:

21. On or about April 30, 2018, in the Southern District of New York, JARED EL MUJAAHID, a/k/a "Jay," the defendant, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United

States, namely, the assault charged in Count Four of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (iii) and 2.)

#### **FORFEITURE ALLEGATIONS**

22. As a result of committing the offense alleged in Count One of this Indictment, JAMES BAZEMORE, a/k/a "TJ," and JARED EL MUJAAHID, a/k/a "Jay," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, the offense alleged in Count One of this Indictment, including but not

limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense alleged in Count One.

Substitute Asset Provision

23. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 1963(m), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1963, and Title 21, United States Code, Section 853.)

[Redacted Signature]

FOREPERSON

*Damian Williams*  
DAMIAN WILLIAMS  
United States Attorney

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SEALED  
INDICTMENT

22 Cr. \_\_\_\_

(18 U.S.C. §§ 924, 1959, 1962, 2.)

DAMIAN WILLIAMS  

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United States Attorney