

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. *14-238-01*  
 :  
 v. : 18 U.S.C. §§ 922(a)(1),  
 : 1951(a), 924(c)(i)(A)(ii),  
 DAQUAAN VAUGHN : 924(d), and 2; and 28  
 : U.S.C. § 2461(c)  
 :  
 :  
 : SUPERSEDING INFORMATON

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE  
(Firearms Trafficking)

From in or around April 2012 through in or around June 2012, in Essex County, in the District of New Jersey and elsewhere, defendant,

DAQUAAN VAUGHN

did knowingly and willfully engage in the business of dealing in firearms without being licensed to do so, and in the course of such business, shipped, transported, and received firearms in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(a)(1)(A) and Section 2.

COUNT TWO  
(Hobbs Act Robbery)

1. At all times material to this Superseding Information, Target was a commercial establishment with a store located at 2235 Springfield Avenue, Union, New Jersey (the "Target") and was engaged in selling merchandise that moved in, was transferred in, and affected interstate and foreign commerce.

2. On or about November 23, 2012, in Union County, in the District of New Jersey, and elsewhere, the defendant,

DAQUAAN VAUGHN

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant and others did unlawfully take and obtain property consisting of United States currency from the Target in the presence of its employees, and committed and threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT THREE

(Brandishing a Firearm During a Crime of Violence)

On or about November 23, 2012, in Union County, in the District of New Jersey, and elsewhere, the defendant,

DAQUAAN VAUGHN,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count Two of this Superseding Information, did knowingly use and carry a firearm, which was brandished, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c) (1) (A) (ii) and Section 2.

FORFEITURE ALLEGATION

As the result of committing the offenses in violation of 18 U.S.C. §§ 922(a) and 924(c) alleged in Counts One and Three of this Superseding Information, defendant DAQUAAN VAUGHN shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any and all firearms and ammunition involved in the commission of the said offenses, including but not limited to the following:

1. One MAK 90 7.62 caliber assault rifle bearing serial number 94114177.
2. One Olympic Arms .223 caliber assault rifle, bearing serial number BT 7872.
3. One Taurus PT 92CS 9mm handgun bearing serial number TNG 93736.
4. One Lorcin Model L380 .380 caliber handgun bearing serial number 097368.
5. One Haskell Model JS45 .45 caliber handgun bearing serial number 033538.

Substitute Assets Provision

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

- (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;

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

*Paul J. Fishman*

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PAUL J. FISHMAN  
United States Attorney