UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

:	Hon.
•	
:	Crim. No. 21-
•	
:	21 U.S.C. §§ 841(a)(1), (b)(1)(D)
:	18 U.S.C. § 922(g)(1)
:	18 U.S.C. § 924(c)(1)(A)(i)
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INFORMATION

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

COUNT ONE

(Distribution of Marijuana)

On or about December 4, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SHATUWAN MCCALL,

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 4, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SHATUWAN MCCALL,

did knowingly possess a firearm, namely one .22 caliber Llama revolver, bearing serial number 711797, loaded with six (6) rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the distribution and possession with intent to distribute marijuana charged in Count One of this Information.

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

COUNT THREE

(Possession of a Firearm By a Convicted Felon)

On or about December 4, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SHATUWAN MCCALL,

knowing he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting commerce, namely, one .22 caliber Llama revolver, bearing serial number 711797, and loaded with six (6) rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION AS TO COUNT ONE

As a result of committing the controlled substance offense in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D), as charged in Count One of this Information, the defendant,

SHATUWAN MCCALL,

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Information.

FORFEITURE ALLEGATION AS TO COUNTS TWO AND THREE

As a result of committing the offenses in violation of 18 U.S.C. § 924(c)(1)(A)(i), as charged in Count Two of this Information, and in violation of 18 U.S.C. § 922(g)(1), as charged in Count Three of this Information, the defendant,

SHATUWAN MCCALL,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1), and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including, but not limited to, one .22 caliber Llama revolver, bearing serial number 711797, and six (6) rounds of ammunition.

<u>Substitute Assets Provision</u> (Applicable to All Forfeiture Allegations)

If any of the property described above, 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 party;
- 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 divided 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 the defendant up to the value of the above forfeitable property.

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RACHAEL A. HONIG Acting United States Attorney

CASE NUMBER: 21-

United States District Court District of New Jersey

UNITED STATES OF AMERICA

v.

SHATUWAN MCCALL

INFORMATION FOR

21 U.S.C. §§ 841(a)(1), (b)(1)(D) 18 U.S.C. § 922(g)(1) 18 U.S.C. § 924(c)(1)(A)(i)

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