

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Susan D. Wigenton, U.S.D.J.
 :
 v. : Criminal No. 21-
 :
 CARTER WILKERSON : 18 U.S.C. § 371
 :

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

(Conspiracy to Unlawfully Sell Firearms)

From at least in or around April 2021 through on or about May 18, 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

CARTER WILKERSON,

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, namely, not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, to willfully transfer, sell, trade, give, transport, and deliver firearms to another person, knowing, or having reasonable cause to believe, such person did not reside in South Carolina, the defendant's state of residence, contrary to Title 18, United States Code, Section 922(a)(5).

In violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

1. The allegations contained in Count One of the Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense contrary to Title 18, United States Code, Section 922(a)(5), in violation of Title 18, United States Code, Section 371, set forth in this Information, the defendant,

CARTER WILKERSON,

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of such offense, including, but not limited to, the following:

- (1) One Taurus Millennium PT Pro .40 caliber pistol, bearing serial number SBU30592;
- (2) One 9mm Zigana Px-9 pistol, bearing serial number T062021BM00363;
- (3) One Taurus Millennium PT 140 Pro .40 caliber handgun, bearing serial number SAV23640;
- (4) One Radical Firearms LLC Model RF15 multicaliber rifle, bearing serial number 20-070043;
- (5) One SCCY Model CPX-2 9mm pistol, bearing serial number C054331;
- (6) One 9mm FN Model 503 handgun, bearing serial number CV004938;
- (7) Approximately 50 rounds of .38 caliber ammunition;
- (8) Approximately 40 rounds of .40 caliber Smith & Wesson ammunition;

- (9) Approximately six ballpoint 9mm rounds of ammunition, stamped "Luger;"
- (10) Approximately two rounds of .40 caliber ammunition;
- (11) Approximately 14 rounds of 9mm ammunition; and
- (12) Approximately 16 rounds of .233 caliber ammunition.

Substitute Assets Provision

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 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.


RACHAEL A. HONIG
Acting United States Attorney