

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Crim. No. 21-00630
	:	
WIGGINS CADET,	:	18 U.S.C. § 1951(a)
KHALIL BROWN,	:	18 U.S.C. § 2
ZYQUAN MCCRAY, and	:	18 U.S.C. § 924(c)(1)(A)(ii)
TYRONE CRUTCHFIELD-DAVIS	:	18 U.S.C. § 924(o)
	:	18 U.S.C. § 922(g)(1)

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE
(Hobbs Act Robbery)

1. At all times relevant to this Superseding Indictment:
 - a. "Gas Station-1" was a gas station and convenience store located in Cranford, New Jersey. Gas Station 1 sold goods that moved in and affected interstate commerce and engaged in an industry that affected interstate commerce.
 - b. "Victim-1" was an employee of Gas Station-1.

2. On or about December 15, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendants,

**WIGGINS CADET,
KHALIL BROWN,
ZYQUAN MCCRAY, and
TYRONE CRUTCHFIELD-DAVIS,**

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, in that the defendants did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim-1, and did aid and abet the same.

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

COUNT TWO
(Conspiracy to Commit Hobbs Act Robbery)

1. Paragraphs 1(a) and (b) of Count One are re-alleged here.
2. On or about December 15, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendants,

**WIGGINS CADET,
KHALIL BROWN,
ZYQUAN MCCRAY, and
TYRONE CRUTCHFIELD-DAVIS,**

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to 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, in that the defendants did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim-1.

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

COUNT THREE

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 15, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendants,

**WIGGINS CADET,
ZYQUAN MCCRAY, and
TYRONE CRUTCHFIELD-DAVIS,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count One of this Superseding Indictment, 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.

COUNT FOUR

**(Conspiracy to Brandish a Firearm During and in Relation to a Crime of
Violence)**

On or about December 15, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendants,

**WIGGINS CADET,
ZYQUAN MCCRAY, and
TYRONE CRUTCHFIELD-DAVIS,**

did knowingly and intentionally conspire and agree with each other and others, both known and unknown, to use and carry a firearm, which was brandished, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count One of this Superseding Indictment.

In violation of Title 18, United States Code, Section 924(o).

COUNT FIVE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about December 15, 2019, in Union County, in the District of New Jersey and elsewhere, the defendant,

WIGGINS CADET,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely a 9mm Springfield Armory USA model XD-9 handgun, bearing serial number GM719372, loaded with fifteen (15) 9mm rounds of ammunition.

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

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

As a result of committing the Hobbs Act robbery offenses alleged in Counts One and Two of this Superseding Indictment, the defendants,

**WIGGINS CADET,
KHALIL BROWN,
ZYQUAN MCCRAY, and
TYRONE CRUTCHFIELD-DAVIS,**

shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offenses, and (ii) pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offenses.

FORFEITURE ALLEGATION AS TO COUNTS THREE, FOUR, AND FIVE

As a result of committing the firearm offenses alleged in Counts Three, Four, and Five of this Superseding Indictment, the defendants charged in each such count shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offenses, including but not limited to:

- (1) one 9mm Springfield Armory USA model XD-9 handgun, bearing serial number GM719372; and
- (2) fifteen (15) 9mm rounds of ammunition.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the property described above, 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 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 defendants up to the value of the above forfeitable property.

A TRUE BILL



DOUGLAS JOHNSTON
FOREPERSON



PHILIP R. SELLINGER

United States Attorney

CASE NUMBER: 21-cr-00630

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**WIGGINS CADET,
KHALIL BROWN,
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TYRONE CRUTCHFIELD-DAVIS**

SUPERSEDING INDICTMENT FOR

18 U.S.C. § 1951(a)

18 U.S.C. § 2

18 U.S.C. § 924(c)(1)(A)(ii)

18 U.S.C. § 924(o)

18 U.S.C. § 922(g)(1)

A True Bill,

Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**CAMILA A. GARCES
ASSISTANT U.S. ATTORNEY
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