

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 11-622
v. :
: 18 U.S.C. § 371,
JERMAINE MAY, : 18 U.S.C. § 2119(1),
a/k/a "Jungle" : 18 U.S.C. § 924(c)(1)(A)(i),
: and 18 U.S.C. § 2

SUPERSEDING INFORMATION

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

Count One
(Conspiracy to Commit Carjacking)

At all times relevant to this Information:

1. M.D. was the owner of a gray, two-door 2004 Infiniti G-35, which was manufactured outside of the state of New Jersey and bore a vehicle identification number ending in 8763.

2. On or about January 25, 2011, in the District of New Jersey and elsewhere, the defendant,

JERMAINE MAY,
a/k/a "Jungle,"

and co-conspirators David Jones, Maurice Williams and Alhakim Young, knowingly and intentionally conspired and agreed with each other to commit an offense against the United States,

namely, to take from the person and presence of another, by force, violence, and intimidation, with intent to cause death and serious bodily harm, a motor vehicle that had been transported, shipped and received in interstate commerce, contrary to Title 18, United States Code, Section 2119(1).

Object of the Conspiracy

3. It was the object of the conspiracy for defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirators David Jones, Maurice Williams and Alhakim Young to obtain a car in order to commit retaliatory acts of violence against rival drug dealers.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that the defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirators David Jones, Maurice Williams and Alhakim Young planned to carjack M.D.'s car at gunpoint.

5. It was further part of the conspiracy that defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirator Alhakim Young brandished firearms while carjacking M.D.'s car.

Overt Acts

6. In furtherance of the conspiracy, and to achieve the objects thereof, on or about January 25, 2011, the defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirators David Jones, Maurice Williams and Alhakim Young committed and caused to be

committed the following overt acts, among others, in the District of New Jersey:

a. Defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirators David Jones, Maurice Williams and Alhakim Young drove in a white Jeep Cherokee to the vicinity of Green and Britton Streets in Elizabeth, New Jersey.

b. Co-conspirator Alhakim Young pointed a firearm at M.D., forced M.D. to the ground, and ordered M.D. not to look.

c. Defendant JERMAINE MAY, a/k/a "Jungle," used a firearm to lift up J.M.'s coat sleeves, and then removed a piece of jewelry from J.M.'s wrist.

d. Co-conspirators Maurice Williams and David Jones drove away in M.D.'s 2004 Infiniti, while defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirator Alhakim Young drove away in the white Jeep Cherokee.

e. Defendant JERMAINE MAY, a/k/a "Jungle," and co-conspirator Alhakim Young abandoned the white Jeep Cherokee on the Broad Street off-ramp of Route 21 North.

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

Count Two
(Carjacking)

7. Paragraphs 1 and 3 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

8. On or about January 25, 2011, in the District of New Jersey and elsewhere, the defendant,

JERMAINE MAY,
a/k/a "Jungle,"

and co-conspirators David Jones, Maurice Williams and Alhakim Young, did knowingly with the intent to cause death and serious bodily harm take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce, namely a gray 2004, Infiniti G-35, with a vehicle identification number ending in 8763, from the person and presence of another, namely M.D. and J.M., by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

Count Three

(Use of a Firearm in Furtherance of a Crime of Violence)

9. Paragraphs 1 and 3 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

10. On or about January 25, 2011, in the District of New Jersey and elsewhere, the defendant,

JERMAINE MAY,
a/k/a "Jungle,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically the carjacking set forth in Count Two, did knowingly use, carry, and in furtherance of such crime, possess, a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 11-622

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

UNITED STATES OF AMERICA

v.

JERMAINE MAY, a/k/a "Jungle"

**SUPERSEDING
INFORMATION FOR**

18 U.S.C. § 371, 18 U.S.C. § 2119(1),
18 U.S.C. § 924(c)(1)(A)(ii),
and 18 U.S.C. § 2

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