

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :  
 :  
 v. : Criminal No. 13- (JHR)  
 :  
 SHAMERIA SMITH : 18 U.S.C. § 924(c) and (j)  
 : 18 U.S.C. § 2

**INFORMATION**

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

**COUNT 1**

**[18 U.S.C. § 924(c)(1)(A) and (j) - Possession/Use of a Firearm During a Crime of Violence]**

**The Defendant and Other Individuals**

1. At all times relevant to this Information:
  - a. Defendant SHAMERIA SMITH was a resident of Atlantic City, New Jersey and was related to I.R.
  - b. Aziz Sanders, who is named as an accomplice but not as a defendant herein, was a resident of Atlantic City, New Jersey and was related to I.R.
  - c. Deshawn Hicks, who is named as an accomplice but not as a defendant herein, was a resident of Atlantic City, New Jersey and Hicks knew, and was friendly with, I.R.
  - d. I.R. was a resident of Atlantic City, New Jersey. I.R. was related to defendant SHAMERIA SMITH and accomplice Aziz Sanders.

e. Victim #1 was a resident of Atlantic City, New Jersey and had a child with D.H. At various times, Victim #1 sold an illicit/illegal street narcotic called “woki,” that is, embalming fluid that is applied to cigarettes or marijuana and then smoked.

f. Victim #4 was a resident of Atlantic City, New Jersey. At various times, Victim #4 sold an illicit/illegal narcotic, that is, marijuana.

g. Victim #5 was a resident of Atlantic City, New Jersey.

### The Assault

2. On or about March 23, 2011, D.H. met with I.R. in the courtyard area of the housing complex on North Maryland Avenue, Atlantic City, New Jersey, known as the “Back Maryland” area of Atlantic City, to talk to I.R. about a dispute between I.R. and Victim #1. After a brief conversation, D.H. viciously assaulted I.R., knocking I.R. unconscious and robbing I.R. of United States currency. When I.R. regained consciousness, D.H. assaulted I.R. again. As a result of the assault, I.R. was treated at the Atlantic City Medical Center for a possible concussion and facial lacerations.

3. After I.R. was released from the hospital, defendant SHAMERIA SMITH and accomplice Aziz Sanders visited I.R. During the visit, I.R. told defendant SMITH that D.H. assaulted him.

### The Retaliation

4. To retaliate for the vicious assault on I.R., defendant SHAMERIA SMITH planned to enter Victim #1's house and assault and rob Victim #1 of illegal drugs and money, some of which Victim #1 earned from distributing illegal drugs.

5. On or about March 26, 2011, defendant SHAMERIA SMITH and accomplices Aziz Sanders and Deshawn Hicks entered Victim #1's house and duct-taped Victim #1 and four other women who were present, identified herein as Victims #2, #3, #4 and #5.

6. While in the house, defendant SHAMERIA SMITH and accomplices Aziz Sanders and Deshawn Hicks took money from Victim #1, some of which Victim #1 earned from selling woki, and took money from Victim #4, some of which Victim #4 earned from selling marijuana, as well as marijuana which Victim #4 was planning to sell.

7. During the robbery, Victim #5 recognized defendant SHAMERIA SMITH's voice. As a result, defendant SMITH and accomplices Aziz Sanders and Deshawn Hicks took Victim #5 from the residence in Atlantic City, New Jersey.

8. Defendant SHAMERIA SMITH and accomplices Aziz Sanders and Deshawn Hicks drove Victim #5 to Philadelphia, Pennsylvania where Sanders shot Victim #5 in the head and killed her. After being shot, Victim #5's body was dumped in the Schuylkill River.

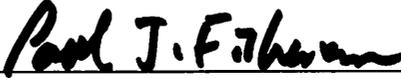
9. On or about March 26, 2011, in the District of New Jersey and elsewhere, defendant

SHAMERIA SMITH

did knowingly and willfully use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, that is, Hobbs Act robbery, contrary to Title 18, United States Code, Section 1951(a), and kidnaping, contrary to Title 18, United States Code, Section 1201, and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did

unlawfully kill Victim #5 by shooting her with the firearm willfully, deliberately, maliciously, and with premeditation and did knowingly and willfully aid, abet, counsel and induce another in the commission of these offenses.

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

  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

v.

**SHAMERIA SMITH**

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**INFORMATION FOR**

**18 U.S.C. §§ 924(c)(1)(A) and 924(j)  
18 U.S.C. § 2**

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY NEWARK, NEW JERSEY*

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