UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 14-
	:	
QUASIM NICHOLS	:	18 U.S.C. §§ 2119(2), 1951(a), and 2
	:	

INFORMATION

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

COUNT ONE
(Carjacking)

On or about May 28, 2012, in Union County and Essex County in the District of New Jersey and elsewhere, defendant

QUASIM NICHOLS

with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2005 BMW 645, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another by force and violence and by intimidation which resulted in serious bodily injury to another.

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

COUNT TWO
(Hobbs Act)

Introduction

1. At certain times relevant to Count Two of this Information:

a. Defendant QUASIM NICHOLS was a federal pretrial detainee at the Essex County Jail.

b. Darsell Davis ("Davis"), a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.

c. Stephon Solomon ("Solomon"), a co-conspirator not named as a defendant herein, was a Corrections Officer with the Essex County Correctional Facility ("Essex County Jail") in Newark, New Jersey.

d. Dwayne Harper ("Harper"), a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.

e. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant to, a contract or agreement with the United States Attorney General.

The Conspiracy

2. From in or about September 2013 through in or about May 2014, in Essex County, in the District of New Jersey, defendant

QUASIM NICHOLS

did knowingly and intentionally conspire and agree with Davis, Solomon, Harper, and others to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting

and causing to be accepted corrupt payments that were paid and to be paid by another, with that person's consent, in exchange for Solomon's official action and assistance in violation of his official duties at the Essex County Jail as specific opportunities arose.

Object of the Conspiracy

3. The object of the conspiracy was for Solomon to receive payments from Davis in exchange for smuggling contraband, including cellular telephones and marijuana, to defendant QUASIM NICHOLS, inside the Essex County Jail that defendant QUASIM NICHOLS, in part, sold to other inmates at the Essex County Jail.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. Defendant QUASIM NICHOLS placed orders for contraband with Davis, to be delivered by Solomon, and schemed with Davis to deliver bribe payments to Solomon in exchange for this service, on behalf of himself and other inmates at the Essex County Jail.

b. Davis and Harper collected contraband, including a cellular telephone manufactured outside of New Jersey, to be smuggled into the Essex County Jail by Solomon, to defendant QUASIM NICHOLS, in exchange for payment.

c. Davis delivered cellular telephones and marijuana to Solomon, for delivery to defendant QUASIM NICHOLS at the Essex County

Jail.

d. Solomon received cash bribes from Davis for Solomon's assistance in smuggling contraband into the Essex County Jail, to defendant QUASIM NICHOLS, including a cash bribe payment on or about April 17, 2014, in Newark, New Jersey.

e. Defendant QUASIM NICHOLS received the contraband from Solomon, after Solomon smuggled the contraband into the Essex County Jail, including a package containing a cellular telephone on or about April 18, 2014.

f. Defendant QUASIM NICHOLS sold the contraband to other inmates at the Essex County Jail and accepted payments from those inmates via Western Union money transfers.

g. Davis collected the Western Union money transfers sent on behalf of inmates at the Essex County Jail who ordered contraband from defendant QUASIM NICHOLS.

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

FORFEITURE ALLEGATION

1. The allegations contained in Count 2 of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant QUASIM NICHOLS, that upon conviction of the offense charged in Count 2 of this Information, the government will seek forfeiture in the amount of $4,300 in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense in violation of Title 18, United States Code, Section 1951(a), to forfeit any property constituting or derived from proceeds traceable to such offense.

3. If any of the above-described forfeitable property, 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 government, pursuant to Title 21, United

States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant QUASIM NICHOLS up to the value of the forfeitable property described in paragraph 2.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

QUASIM NICHOLS

INFORMATION FOR

18 U.S.C. § 2119(2)
18 U.S.C. § 1951(a)
18 U.S.C. § 2

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