

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2016 JUL -6 PM 3:06

CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

SHAQUANA QUENELLA BROOKINS

a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

CASE NO. 3:16-cr-68(S1)-J-32JRK  
Cts. 1 & 2: 18 U.S.C. § 1591  
Ct. 3: 21 U.S.C. §§ 841(a),  
841(b)(1)(B), & 846  
Ct. 4: 21 U.S.C. § 856 &  
18 U.S.C. § 2  
Cts. 5 & 6: 18 U.S.C. §§ 922(g)(1) &  
924(a)(2)  
Forfeiture: 18 U.S.C. § 1594  
21 U.S.C. § 853  
18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)

**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**(Sex Trafficking by Force, Fraud, or Coercion)**

Between in or about March 2014 through on or about June 18, 2015, in

Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, a female whose initials are D.C., while knowing and in

reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause that person to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591.

**COUNT TWO**  
**(Sex Trafficking by Force, Fraud, or Coercion)**

Between in or about March 2015 through in or about late 2015, in Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, a female whose initials are J.V., while knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause that person to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591.

**COUNT THREE**  
**(Conspiracy to Manufacture and Distribute Cocaine Base)**

From in or about October 2014, through in or about February 2015, in Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, did knowingly, willfully, and intentionally combine, conspire, confederate, and agree with other persons who are known and unknown to the grand jury to manufacture and distribute cocaine base, a schedule II controlled substance, the amount of cocaine base being 28 grams or more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

It was part of the conspiracy that the defendant would perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of Title 21, United States Code, Section 846.

**COUNT FOUR**  
**(Maintaining a Drug-Involved Premises)**

From on or about May 1, 2015, through on or about May 8, 2015, in Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, did knowingly use and maintain, cause the use and maintaining, and aid and abet in the use and maintaining of a place, that is, Room 106 of the EconoLodge located at 2401 Mayport Rd. A1A, Atlantic Beach, Florida

32233, whether permanently or temporarily, for the purpose of manufacturing, distributing, and using any controlled substance, that is, cocaine, cocaine base, and heroin.

In violation of Title 21, United States Code, Section 856 and Title 18, United States Code, Section 2.

**COUNT FIVE**  
**(Possession of a Firearm by a Convicted Felon)**

In or about January 2015, in Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, did knowingly possess, in and affecting commerce, a firearm, that is, a Smith & Wesson Model 66-1 .357 Magnum revolver with serial number 74K3156, after having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is:

1. Grand Theft Auto, in case number 16-2003-CF-011547-AXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about June 8, 2004;
2. Count One, Sale or Delivery of Cocaine, in case number 16-2006-CF-006831-BXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about October 5, 2006;
3. Count One, Possession of a Firearm By a Convicted Felon, in case number 16-2008-CF-006246-AXXX-MA, in the Circuit Court, Fourth

Judicial Circuit, in and for Duval County, Florida, on or about February 20, 2009; and

4. Count One, Possession of a Firearm By a Convicted Felon, in case number 16-2009-CF-000468-AXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about February 20, 2009;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT SIX**  
**(Possession of a Firearm by a Convicted Felon)**

On or about February 2, 2015, in Duval County, in the Middle District of Florida, and elsewhere,

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

the defendant herein, did knowingly possess, in and affecting commerce, firearms, that is, a Fegarmy Arms Factory Ltd. (FEG) Model SA85 7.62mm rifle with serial number SL04599 and a Fabrique Nationale D'Armes (FN) Model FAL-G1 7.62mm machinegun with serial number 30914C, after having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is:

1. Grand Theft Auto, in case number 16-2003-CF-011547-AXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about June 8, 2004;
2. Count One, Sale or Delivery of Cocaine, in case number 16-2006-CF-006831-BXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about October 5, 2006;

3. Count One, Possession of a Firearm By a Convicted Felon, in case number 16-2008-CF-006246-AXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about February 20, 2009; and
4. Count One, Possession of a Firearm By a Convicted Felon, in case number 16-2009-CF-000468-AXXX-MA, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, on or about February 20, 2009;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

### FORFEITURE

1. The allegations contained in Counts One through Six of this Superseding Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594, Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of Title 18, United States Code, Section 1591, the defendant

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly,

as a result of the offense.

3. Upon conviction of a violation of Title 21, United States Code, Section 846, the defendant

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

4. Upon conviction of a violation of Title 18, United States Code, Section 924, the defendant

SHAQUANA QUENELLA BROOKINS,  
a/k/a Shaquan Gamble  
a/k/a Lorde Flaquan Gamble  
a/k/a Que  
a/k/a Quana

shall forfeit to the United States, under Title 18, United States Code, Section 924(d) and Title 28, United States Code, section 2461(c), any firearms and ammunition involved in the commission of the offense.

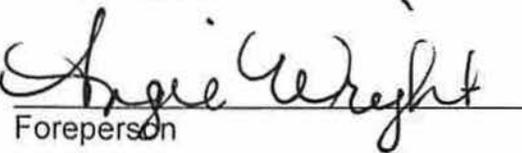
5. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred 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,

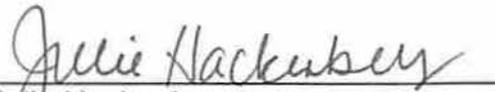
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

  
Foreperson

A. LEE BENTLEY, III  
United States Attorney

By:   
LAURA COFER TAYLOR  
Assistant United States Attorney

By:   
Julie Hackenberry  
Assistant United States Attorney  
Chief, Jacksonville Division

FORM OBD-34  
APR 1991

No. 3:16-cr-68(S1)-J-32JRK

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

SHAQUANA QUENELLA BROOKINS

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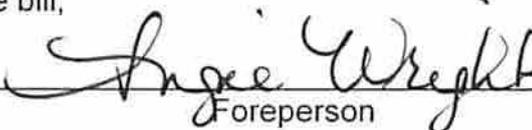
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**INDICTMENT**

Violations:

- 18 U.S.C. § 1591
  - 21 U.S.C. §§ 841(a), 841(b)(1)(B), and 846
  - 21 U.S.C. § 856 and 18 U.S.C. § 2
  - 18 U.S.C. §§ 922(g)(1) and 924(a)(2)
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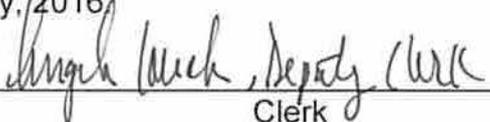
A true bill,

  
\_\_\_\_\_  
Foreperson

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Filed in open court this 6<sup>th</sup> day

of July, 2016,  
  
\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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