

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
THOMAS SHANNON,	:	21 U.S.C. § 846
a/k/a "Cuzzo"	:	21 U.S.C. § 841(a)(1)
	:	18 U.S.C. § 924(c)(1)(A)
	:	18 U.S.C. § 922(g)(1)
	:	18 U.S.C. § 1957

I N D I C T M E N T

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

COUNT ONE

1. From in or about October 2013 through in or about
March 2014, in Monmouth, Hudson and Middlesex Counties, in the
District of New Jersey, and elsewhere, the defendant,

THOMAS SHANNON,
a/k/a "Cuzzo,"

did knowingly and intentionally conspire and agree with others
to distribute and to possess with intent to distribute
controlled substances, specifically: (1) one kilogram or more of
a mixture or substance containing a detectible amount of heroin,
a Schedule I controlled substance, and (2) a mixture or
substance containing a detectable amount of cocaine, a Schedule
II controlled substance, contrary to Title 21, United States
Code, Section 841(a)(1) and (b)(1)(A).

2. At all times relevant to the Indictment, defendant THOMAS SHANNON, a/k/a "Cuzzo" ("SHANNON"), resided in or around Jersey City, New Jersey, and was a supplier of heroin and cocaine to various drug dealers in New Jersey, including a large-scale heroin distribution organization that operated in Monmouth and Ocean Counties (the "DTO").

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to distribute heroin and cocaine in Monmouth County, New Jersey and elsewhere for profit.

MANNER AND MEANS OF THE CONSPIRACY

4. The manner and means by which SHANNON and his co-conspirators sought to accomplish the conspiracy included, among other things, the following:

a. It was part of the conspiracy that SHANNON obtained large quantities of heroin and cocaine from others and then sold those narcotics to individuals located in various parts of New Jersey, including leaders of the DTO.

b. It was further part of the conspiracy that some of the heroin that SHANNON distributed was packaged in small plastic bags that were "stamped" with brand names or markings to distinguish the heroin from other narcotics being sold in or around the Monmouth County area.

c. It was further part of the conspiracy that SHANNON acquired and possessed firearms in furtherance of his drug trafficking operations, including a Smith and Wesson .38 caliber revolver, serial number ACE7516, and a Sturm, Ruger & Co., Inc. .40 caliber handgun, serial number 34004160.

d. It was further part of the conspiracy that SHANNON and his co-conspirators used cellular telephones to communicate, including through text messages, and that they used code language to discuss drug transactions. These communications included requests for specific types of narcotics and quantities of such narcotics, and discussions regarding the dates, times and locations of meetings to transfer narcotics. For example, on or about December 17, 2013, SHANNON exchanged text messages with a co-conspirator and leader of the DTO ("CC 1") in which the two made arrangements for SHANNON to provide CC 1 with cocaine and heroin. CC 1 asked SHANNON "What time u pulling out" and SHANNON replied, "8." CC 1 then stated "B there at 7:45" and added "10 Kristine and 30st," code language for ten grams of cocaine and thirty bricks (i.e., grams) of heroin.

e. It was further part of the conspiracy that SHANNON purchased some of the heroin and cocaine that he sold from co-conspirators in California. The co-conspirators in California sent the heroin and cocaine to Shannon in New Jersey by shipping it in packages through the United States Postal Service (the

"Packages"). The Packages were sent from locations in California to a residence in Perth Amboy, New Jersey (the "Perth Amboy Residence"), and another co-conspirator who resided there accepted each Package and then contacted SHANNON and advised him that a Package had arrived. SHANNON then retrieved the Packages from the Perth Amboy Residence.

f. It was further part of the conspiracy that SHANNON and his co-conspirators used numerous bank accounts, including accounts in the names of third parties (the "Straw Accounts"), to deposit and transfer back to California proceeds of SHANNON's narcotics sales and to disguise the illegal source of these funds. Specifically, SHANNON's co-conspirators in California sent him via text messages and other communications bank account numbers associated with the Straw Accounts, and SHANNON or others acting at his direction deposited the illegal proceeds into those accounts. The co-conspirators in California then withdrew the funds at local bank branch locations in California.

g. For example, on or about February 7, 2014, SHANNON received numerous text messages from a co-conspirator in California who was responsible for sending the Packages to SHANNON ("CC 2"). In the text messages, CC 2 provided information relating to several Straw Accounts that SHANNON used to transfer narcotics proceeds to CC 2. One text message stated, "HEREZ 6 FOR THA \$50, 000," and then subsequent text

messages provided account names and numbers for approximately six different bank accounts, including one in CC 2's name. After these communications, SHANNON deposited cash into the Straw Accounts and CC 2 and others acting at his direction subsequently withdrew the funds from bank locations in California.

h. It was further part of the conspiracy that SHANNON used an apartment in Asbury Park, New Jersey and an apartment in Long Branch, New Jersey as stash houses at which he and other co-conspirators broke down, packaged, and stored heroin and cocaine (the "Asbury Park Stash House" and "Long Branch Stash House"). SHANNON picked up the Packages from the Perth Amboy Residence and brought them to the Asbury Park and Long Branch Stash Houses to prepare the heroin and cocaine for distribution to others.

In violation of Title 21, United States Code, Section 846.

COUNT TWO

1. Paragraphs 1 through 4 of Count One of the Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about March 20, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

THOMAS SHANNON,
a/k/a "Cuzzo,"

did knowingly and intentionally possess with intent to distribute controlled substances, specifically: (1) 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and (2) 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT THREE

1. Paragraphs 1 through 4 of Count One of the Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about March 20, 2014, in Monmouth and Hudson Counties, in the District of New Jersey, and elsewhere, the defendant,

THOMAS SHANNON,
a/k/a "Cuzzo,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Monmouth County, did knowingly possess, in and affecting commerce, firearms; namely a Smith and Wesson .38 caliber revolver, serial number ACE7516, and a Sturm, Ruger & Co., Inc. .40 caliber handgun, serial number 34004160.

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

COUNT FOUR

1. Paragraphs 1 through 4 of Count One of the Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about March 20, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

THOMAS SHANNON,
a/k/a Cuzzo,

during and in relation to a drug trafficking crime, that is, conspiracy to possess with intent to distribute heroin and cocaine, as charged in Count One of this Indictment, did knowingly and intentionally possess a firearm in furtherance of the drug trafficking crime.

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

COUNT FIVE

1. Paragraphs 1 through 4 of Count One of the Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about the date set forth below, in the District of New Jersey, and elsewhere, the defendant,

THOMAS SHANNON,
a/k/a Cuzzo,

knowingly engaged and attempted to engage in a monetary transaction involving criminally derived property of a value greater than \$10,000 that was derived from a specified unlawful activity, namely, possession with intent to distribute heroin and cocaine and conspiracy to possess with intent to distribute heroin and cocaine, contrary to Title 18, United States Code, Sections 841(a)(1) and 846:

Approximate Date	Financial Institution Involved	Approximate Value of Monetary Transaction Exceeding \$10,000
February 7, 2014	Cash deposits into personal bank accounts of third parties as provided to SHANNON by CC 2	\$24,900

In violation of Title 18, United States Code, Section 1957 and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Five of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 924(d), and 28 U.S.C. § 2461.

2. Upon conviction of the offenses set forth in Counts One through Five of this Indictment, the defendant,

THOMAS SHANNON,
a/k/a Cuzzo,

shall forfeit to the United States all property, real or personal, that constitutes or is derived from proceeds traceable to violations of 18 U.S.C. §§ 841(a)(1), 846, 922(g)(1), 924(c)(1)(A), and 1957, which constitute a specified unlawful activity within the meaning of 18 U.S.C. § 981(a)(1)(C), including, but not limited to, the following: \$123,293 in United States currency; a 2006 Mercedes Benz R50, Vehicle Identification Number ("VIN) 4JGCB75E06A002897; a 2005 Acura TSX, VIN JH4CL96885C024556; a Smith and Wesson .38 caliber revolver, serial number ACE7516; and a Sturm Ruger and Co. Model P-91DC .40 caliber handgun, serial number 34004160.

Substitute Assets Provision

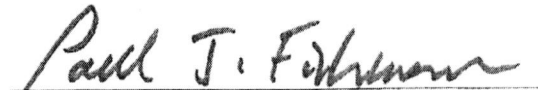
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided 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 said defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

THOMAS SHANNON,
a/k/a "Cuzzo"

INDICTMENT FOR

18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)(1)
18 U.S.C. § 1957
21 U.S.C. § 841(a)(1)
21 U.S.C. § 846

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

NICHOLAS P. GRIPPO
ASSISTANT U.S. ATTORNEY
(973) 645-2915
