

R E C E I V E D

2013R00240/PCA

NOV 10 2015

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

UNITED STATES OF AMERICA

V.

TYRONE ELLIS,

a/k/a "Rome"

Criminal No. 14-87(AE1)-03

21 U.S.C. § 846  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(d)(1)  
28 U.S.C. § 2461(c)

SUPERSEDING INFORMATION

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

## COUNT 1

(Drug Trafficking Conspiracy)

From at least in or about October 2012 through in or about March 2013, in Atlantic County, in the District of New Jersey and elsewhere, defendant

TYRONE ELLIS,  
a/k/a "Rome,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

COUNT 2

(Possession of a Firearm by a Previously Convicted Felon)

On or about March 26, 2013, in Cumberland County, in the District of New Jersey and elsewhere, defendant

TYRONE ELLIS,  
a/k/a "Rome,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Atlantic County, New Jersey, did knowingly possess in and affecting interstate commerce, the following: a Glock .40 caliber handgun, Model 22, with serial number PZC124, and 13 rounds of ammunition found in the firearm.

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

**FORFEITURE ALLEGATIONS**

1. The allegations set forth above are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 922(g), alleged in this Superseding Information, defendant

TYRONE ELLIS,  
a/k/a "Rome,"

shall forfeit to the United States any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as a result of the commission of an offense in violation of Title 21, United States Code, Section 846; and any property, including any firearms and ammunition, involved in or used, or intended to be used, to commit or to facilitate the commission of those offenses, including but not limited to the following:

a. a sum of \$37,190 in U.S. currency;

b. a Glock .40 caliber handgun, Model 22, with serial number PZC124, and 13 rounds of ammunition found in that firearm.

  
PAUL J. FISHMAN  
United States Attorney