

GV/2016R00646

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED
2018 MAR 14 P 1:26

UNITED STATES OF AMERICA

v.

JOHN GUNTHER,
a.k.a. "Crittty,"
TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"
WILLIAM ROLAND,
a.k.a. "Chill,"
MARK CAMPBELL,
a.k.a. "D" and "Diz,"
MALCOLM MCCOY,
RAJAI GAINES,
a.k.a. "Jigga," and
DAVON LEAK

Crim. No. 17-00488 (RMB)

21 U.S.C. §§ 841 and 846
18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 924(d)(1)
28 U.S.C. § 2461(c)

SECOND SUPERSEDING
INDICTMENT

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

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute
Cocaine Base, Furanyl Fentanyl, and Heroin)

From in or about October 2016 through on or about June 14, 2017, in Camden County, in
the District of New Jersey and elsewhere, the defendants,

JOHN GUNTHER,
a.k.a. "Crittty,"
TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"
WILLIAM ROLAND,
a.k.a. "Chill,"
MARK CAMPBELL,
a.k.a. "D" and "Diz,"
MALCOLM MCCOY,
RAJAI GAINES,
a.k.a. "Jigga," and
DAVON LEAK,

did knowingly and intentionally conspire and agree with each other and with George Williams, Daron Suiter, a.k.a. "Suiter," Latoya Whealton, a.k.a. "Toya," Karim Johnson, a.k.a. "Chicky," and with others, known and unknown, to distribute and to possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and 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 841(b)(1)(C).

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

COUNT 2

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

From in or about October 2016 through on or about June 13, 2017, in Camden County, in the District of New Jersey and elsewhere, the defendant,

TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"

did knowingly possess a firearm, namely a Taurus Model G2 Millennium, 9mm handgun, bearing serial number TIO80613, loaded with approximately eleven (11) rounds of 9mm ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, that is, the conspiracy to distribute and to possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and 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 841(b)(1)(C), in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment.

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

COUNT 3

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about October 17, 2016, in Camden County, in the District of New Jersey and elsewhere, the defendant,

WILLIAM ROLAND,
a.k.a. "Chill,"

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about January 4, 2017, in Camden County, in the District of New Jersey and elsewhere, the defendant,

TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5

(Distribution and Possession with Intent to Distribute Furanyl Fentanyl and Heroin)

On or about February 22, 2017, in Camden County, in the District of New Jersey and elsewhere, the defendants,

TALEAF GUNTHER,
a.k.a. "Leafy" and "L," and
JOHN GUNTHER,
a.k.a. "Crittty,"

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution and Possession with Intent to Distribute Cocaine Base)

On or about June 12, 2017, in Camden County, in the District of New Jersey and elsewhere,
the defendant,

MARK CAMPBELL,
a.k.a. "D" and "Diz,"

did knowingly and intentionally distribute and possess with intent to distribute 280 grams or more
of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a
Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title
18, United States Code, Section 2.

COUNT 7

(Possession with Intent to Distribute Cocaine Base)

On or about June 13, 2017, in Camden County, in the District of New Jersey and elsewhere,
the defendants,

JOHN GUNTHER,
a.k.a. "Citty,"
WILLIAM ROLAND,
a.k.a. "Chill," and
RAJAI GAINES,
a.k.a. "Jigga,"

did knowingly and intentionally possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 8

(Possession of a Firearm by a Convicted Felon)

On or about June 13, 2017, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Taurus Model G2 Millennium, 9mm handgun, bearing serial number TIO80613, loaded with approximately eleven (11) rounds of 9mm ammunition.

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

FORFEITURE ALLEGATION

1. The allegations contained in Count 8 this Superseding Indictment are hereby realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense contrary to and in violation of Title 18, United States Code, Section 922(g)(1), as set forth in Count 8 of the Superseding Indictment, defendant

TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"

shall forfeit to the United States any firearms, magazines, and ammunition involved in or used in the commission of such offense, including, but not limited to, a firearm, namely, a Taurus Model G2 Millennium, 9mm handgun, bearing serial number TIO80613, loaded with approximately eleven (11) rounds of 9mm ammunition.

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 17-00488 (RMB)

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

UNITED STATES OF AMERICA

v.

**JOHN GUNTHER,
a.k.a. "Crittty,"
TALEAF GUNTHER,
a.k.a. "Leafy" and "L,"
WILLIAM ROLAND,
a.k.a. "Chill,"
MARK CAMPBELL,
a.k.a. "D" and "Diz"
MALCOLM MCCOY,
RAJAI GAINES,
a.k.a. "Jigga," and
DAVON LEAK**

SECOND SUPERSEDING INDICTMENT FOR

21 U.S.C. § 846
21 U.S.C. § 841
18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 924(d)(1)
28 U.S.C. § 2461(c)

CRAIG CARPENITO

UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

GABRIEL J. VIDONI
ASSISTANT U.S. ATTORNEY
CAMDEN, NEW JERSEY
856-757-5026
