UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 18- \hat{a} lb (ω N ω)
	:	
QUADIR ALLEN	:	18 U.S.C. §§ 922(g)(1) and
	:	924(c)(1)(A)(i)
	:	21 U.S.C. §§ 841(a)(1) and
	:	(b)(1)(B)

INDICTMENT

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

COUNT ONE

(Possession of a Firearm by a Convicted Felon)

On or about January 31, 2018, in Union County, in the District of New Jersey and elsewhere, the defendant,

QUADIR ALLEN,

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce two firearms, namely a Glock 19 9mm pistol, bearing serial number UNR477, loaded with ten (10) 9mm luger bullets and three (3) 9mm luger hollow point bullets; and a Smith & Wesson M&P .40 caliber pistol, bearing serial number MPB2202, loaded with six (6) Federal 40 caliber hollow point bullets and nine (9) regular tip Federal .40 caliber bullets.

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

COUNT TWO

(Possession with Intent to Distribute Heroin)

On or about January 31, 2018, in Union County, in the District of New Jersey and elsewhere, the defendant,

QUADIR ALLEN,

did knowingly and intentionally possess with the intent to distribute 100 grams or more of 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 (b)(1)(B).

COUNT THREE

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

On or about January 31, 2018, in Union County, in the District of New Jersey and elsewhere, the defendant,

QUADIR ALLEN,

did knowingly possess two firearms, namely a Glock 19 9mm pistol, bearing serial number UNR477, and a Smith & Wesson M&P .40 caliber pistol, bearing serial number MPB2202, in furtherance of the drug trafficking crime charged in Count Two of this Indictment.

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

FORFEITURE ALLEGATION AS TO COUNTS ONE AND THREE

As a result of committing the firearms offense in violation of 18 U.S.C. §§ 922(g)(1) and 924(c)(1)(A)(i), as charged in Counts One and Three of this Indictment, the defendant,

QUADIR ALLEN,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of such offense, including, but not limited to, the following:

- a Glock 19 9mm pistol, bearing serial number UNR477, loaded with ten (10) 9mm luger bullets and three (3) 9mm luger hollow point bullets, and
- (2) a Smith & Wesson M&P .40 caliber pistol, bearing serial number MPB2202, loaded with six (6) Federal .40 caliber hollow point bullets and nine (9) regular tip Federal .40 caliber bullets.

FORFEITURE ALLEGATION AS TO COUNT TWO

As a result of committing the controlled substance offense in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), as charged in Count Two of this Indictment, the defendant,

QUADIR ALLEN,

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Count Two of this Indictment.

Substitute Assets Provision

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,

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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 the defendant up to the value of the above forfeitable property.

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CRAIG CARPENITO United States Attorney

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CASE NUMBER: 18-

United States District Court District of New Jersey

UNITED STATES OF AMERICA

V.

GUADIR AUDEN

INDICTMENT FOR

18 U.S.C. §§ 922(g)(1) and 924(c)(1)(A)(i) 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

A True Bill.

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CRAIG CARPENTTO

UNITED STATES ATTORNEY Newark, New Jersey

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