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UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Crim. No. 19-134 (FLW)

v.

21 U.S.C. § 846 21 U.S.C. § 841

JAKIR TAYLOR,

18 U.S.C. § 924(c)(1)(A) 18 U.S.C. § 922(g)(1)

a/k/a "Jak," JEROME ROBERTS,

18 U.S.C. § 2

a/k/a "Righteous,"

DAVID ANTONIO, a/k/a "Papi,"

a/k/a "Victor Arias,"

WAYNE K. BUSH, BRIAN PHELPS,

TIMOTHY WIMBUSH.

a/k/a "Young Money,"

TAQUAN WILLIAMS, JUBRI WEST, and MAJOR ANDERSON,

a/k/a "Maj"

SUPERSEDING INDICTMENT

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

COUNT ONE

(Conspiracy to Distribute and Possess With Intent to Distribute One Kilogram or More of Heroin)

From in or around January 2018 to in or around October 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendants,

JAKIR TAYLOR, a/k/a "Jak,"

JEROME ROBERTS, a/k/a "Righteous,"

DAVID ANTONIO, a/k/a "Papi," a/k/a "Victor Arias,"

WAYNE K. BUSH,

BRIAN PHELPS,

TIMOTHY WIMBUSH, a/k/a "Young Money,"

TAQUAN WILLIAMS,

JUBRI WEST, and

MAJOR ANDERSON, a/k/a "Mai,"

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

COUNT TWO

(Distribution and Possession With Intent to Distribute a Controlled Substance)

On or about January 16, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

BRIAN PHELPS,

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

COUNT THREE

(Distribution and Possession With Intent to Distribute Controlled Substances)

On or about January 18, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

BRIAN PHELPS,

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

COUNT FOUR

(Distribution and Possession With Intent to Distribute a Controlled Substance)

On or about June 11, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

MAJOR ANDERSON, a/k/a "Maj,"

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

COUNT FIVE

(Distribution and Possession With Intent to Distribute Controlled Substances)

On or about June 19, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

MAJOR ANDERSON, a/k/a "Maj,"

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

COUNT SIX

(Possession With Intent to Distribute Controlled Substances)

On or about September 6, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendants,

TIMOTHY WIMBUSH, a/k/a "Young Money,"
TAQUAN WILLIAMS, and
JUBRI WEST,

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

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

COUNT SEVEN

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

From in or around August 2018 to October 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JAKIR TAYLOR, a/k/a "Jak,"

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute and possess with intent to distribute heroin, as charged in Count One of this Superseding Indictment, did knowingly and intentionally possess, and conspire to possess, one or more firearms.

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

COUNT EIGHT

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)
On or about September 6, 2018, in Mercer County, in the District of
New Jersey, and elsewhere, the defendants,

TIMOTHY WIMBUSH, a/k/a "Young Money,"
TAQUAN WILLIAMS, and
JUBRI WEST,

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, conspiracy to distribute and possess with intent to distribute heroin and possession with intent to distribute heroin, as charged in Counts One and Six of this Superseding Indictment, did knowingly and intentionally possess, and conspire to possess, firearms, namely, (i) a .223 caliber semi-automatic assault rifle bearing no serial number or markings as to manufacturer; (ii) a Glock .45 caliber semi-automatic firearm, model 30, bearing serial number GBE230; (iii) a Smith & Wesson .40 caliber semi-automatic firearm, model SD40VE, bearing serial number FZF7665; and (iv) a Glock nine-millimeter semi-automatic firearm, model 19, bearing serial number FDF181.

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

COUNT NINE

(Possession of Firearms by Convicted Felons)

On or about September 6, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendants,

TIMOTHY WIMBUSH, a/k/a "Young Money," and TAQUAN WILLIAMS,

each having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Mercer County, did knowingly possess in and affecting interstate commerce firearms, namely, (i) a Glock .45 caliber semi-automatic firearm, model 30, bearing serial number GBE230; (ii) a Smith & Wesson .40 caliber semi-automatic firearm, model SD40VE, bearing serial number FZF7665; and (iii) a Glock nine-millimeter semi-automatic firearm, model 19, bearing serial number FDF181.

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

FORFEITURE ALLEGATIONS AS TO COUNTS ONE THROUGH SIX

- 1. The allegations contained in this Superseding Indictment are incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.
- As a result of committing the controlled substance offenses in violation of Title 21, United States Code, Sections 841 and 846, as charged in Counts One through Six of this Superseding Indictment, the defendants,

JAKIR TAYLOR, a/k/a "Jak,"

JEROME ROBERTS, a/k/a "Righteous,"

DAVID ANTONIO, a/k/a "Papi," a/k/a "Victor Arias," and

WAYNE K. BUSH,

BRIAN PHELPS,

TIMOTHY WIMBUSH, a/k/a "Young Money,"

TAQUAN WILLIAMS,

JUBRI WEST, and

MAJOR ANDERSON, a/k/a "Maj,"

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 this Superseding Indictment.

The property to be forfeited includes, but is not limited to:

A sum of money equal to \$100,000.00 in United States
 currency, representing the proceeds of the offense charged in
 Count One of this Superseding Indictment;

- approximately \$5,069.00 in United States currency seized from defendant JAKIR TAYLOR on or about February 27,
 2018;
- c. approximately \$3,692.00 in United States currency seized from 820 Chambers Street in Trenton, New Jersey, on or about October 25, 2018;
- d. approximately \$1,800.00 in United States currency seized by law enforcement on or about October 10, 2018;

FORFEITURE ALLEGATIONS AS TO COUNTS SEVEN THROUGH NINE

3. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g)(1), 924(c)(1)(A), and 2 as charged in Counts Seven through Nine of this Superseding Indictment, the defendants,

JAKIR TAYLOR, a/k/a "Jak,"
TIMOTHY WIMBUSH, a/k/a "Young Money,"
TAQUAN WILLIAMS, and
JUBRI WEST,

shall forfeit to the United States any firearm and ammunition involved in or used in the commission of that offense, including the following:

- a. a .223 caliber semi-automatic assault rifle bearing no apparent serial number or markings as to manufacturer;
- a Glock .45 caliber semi-automatic firearm, model 30,
 bearing serial number GBE230;
- c. a Smith & Wesson .40 caliber semi-automatic firearm, model SD40VE, bearing serial number FZF7665;

- d. a Glock nine-millimeter semi-automatic firearm, model 19,
 bearing serial number FDF181; and
- e. approximately 357 rounds of .223, .45, .40, and nine-millimeter caliber ammunition.

<u>SUBSTITUTE ASSETS PROVISION</u> (Applicable to All Forfeiture Allegations)

- 4. If by any act or omission of the defendant any of the property subject to forfeiture described above:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred of 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 shall be entitled, pursuant to 21 U.S.C. § 853(p), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-134 (FLW)

United States District Court District of New Jersey

UNITED STATES OF AMERICA

V.

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SUPERSEDING INDICTMENT FOR

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

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