

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 19-_____
 :
 v. : 21 U.S.C. § 846
 : 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)
 HERBERT MAYS, : 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
 a/k/a "Unc," : 18 U.S.C. § 924(c)(1)(A)(i)
 a/k/a "Uncle," : 18 U.S.C. § 922(g)(1)
 a/k/a "Old Head," :
 a/k/a "Gene," : SUPERSEDING INDICTMENT
 ANDRE MORTON, :
 a/k/a "Fat Dre," :
 a/k/a "Fat Boy;" :
 RONNIE DAWSON,
 a/k/a "Boo;"
 TERON HUGGINS,
 a/k/a/ "Goog;"
 RUFUS WILLIAMS,
 a/k/a "Truck,"
 a/k/a "Nappy Head;"
 GURNSEY FLAGG,
 a/k/a "Smitty;"
 RONIFFE GAINES,
 a/k/a "Neif;"
 JOHN PETROVICH,
 a/k/a "White John,"
 a/k/a "Johnny;"
 LINFORD JOHNSON,
 a/k/a "Juice;"
 NATHANIEL MCCOY,
 ANTHONY PRUITT,
 a/k/a "Tone;"
 SHAMEKE FOWLER,
 a/k/a "Murder;"
 JULIUS THIGPEN III,
 a/k/a "June;"
 ANDRE PERKINS,
 a/k/a "Onnie;"
 BRANDON WATTS,
 CRAIG MOORE,
 a/k/a "Forty;"
 TRACY WILLIAMS;
 SAMANTHA BOHLERT,
 a/k/a "Sam;"

MECCA GRANT,
a/k/a "Mecca;" and
APRIL BRANSON

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 Five Kilograms or More of Cocaine)

From in or around July 2019 to in or around September 2019, in
Burlington County, in the District of New Jersey, and elsewhere, the defendants,

HERBERT MAYS, a/k/a "Unc," a/k/a "Uncle", a/k/a "Old Head," a/k/a "Gene;"
ANDRE MORTON, a/k/a "Fat Dre," a/k/a "Fat Boy;"
RONNIE DAWSON, a/k/a "Boo;"
TERON HUGGINS, a/k/a/ "Goog;"
RUFUS WILLIAMS, a/k/a "Truck," a/k/a "Nappy Head;"
GURNSEY FLAGG, a/k/a "Smitty;"
RONIFFE GAINES, a/k/a "Neif;"
JOHN PETROVICH, a/k/a "White John," a/k/a "Johnny;"
LINFORD JOHNSON, a/k/a "Juice;"
NATHANIEL MCCOY;
ANTHONY PRUITT, a/k/a "Tone;"
SHAMEKE FOWLER, a/k/a "Murder;"
JULIUS THIGPEN III, a/k/a "June;"
ANDRE PERKINS, a/k/a "Onnie;" and
BRANDON WATTS,

did knowingly and intentionally conspire and agree with each other and with
others, known and unknown, to distribute and possess with intent to distribute
five kilograms or more of a mixture and substance containing a detectable amount
of cocaine, a Schedule II 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

(Conspiracy to Distribute and Possess With Intent to
Distribute 280 Grams or More of Cocaine Base)

From in or around July 2019 to in or around September 2019, in
Burlington County, in the District of New Jersey, and elsewhere, the defendants,

HERBERT MAYS, a/k/a "Unc," a/k/a "Uncle", a/k/a "Old Head," a/k/a "Gene;"
ANDRE MORTON, a/k/a "Fat Dre," a/k/a "Fat Boy;"
RONNIE DAWSON, a/k/a "Boo;"
CRAIG MOORE, a/k/a "Forty;"
GURNSEY FLAGG, a/k/a "Smitty;"
RONIFFE GAINES, a/k/a "Neif;"
JOHN PETROVICH, a/k/a "White John," a/k/a "Johnny;"
TRACY WILLIAMS;
SAMANTHA BOHLERT, a/k/a "Sam;"
LINFORD JOHNSON, a/k/a "Juice;"
SHAMEKE FOWLER, a/k/a "Murder;"
MECCA GRANT, a/k/a "Mecca;"
APRIL BRANSON; and
ANDRE PERKINS, a/k/a "Onnie,"

did knowingly and intentionally conspire and agree with each other and with
others, known and unknown, to distribute and to possess with intent to distribute
280 grams or more of a mixture or 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).

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

COUNT THREE

(Possession with Intent to Distribute Cocaine Base)

On or about September 26, 2019, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

RUFUS WILLIAMS,
a/k/a "Truck,"
a/k/a "Nappy Head,"

did knowingly and intentionally 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) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

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

On or about September 26, 2019, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

RUFUS WILLIAMS,
a/k/a "Truck,"
a/k/a "Nappy Head,"

did knowingly possess firearms, namely: (1) a 12 gauge Mossburg Maverick 88 Shotgun, bearing serial number MV22895G; (2) a black Firefly semi-automatic handgun, with no visible serial number; (3) a black Glock 23 .40 caliber semi-automatic handgun, bearing serial number WEB673; (4) a Ruger GP100 .357 Magnum revolver, with no visible serial number; (5) a black Hi-Point model JHP .45 caliber semi-automatic handgun, with no visible serial number; (6) a black Hi-Point model C9 9mm caliber semi-automatic handgun, with no visible serial number; (7) a black Hi-Point model C9 9mm caliber semi-automatic handgun, where only the letter "P" of the serial number is legible; (8) a F.W. Heym detective model .22 caliber revolver, bearing serial number 2427; (9) a Sentinel revolver Model MKI, bearing serial number 511455; (10) a black Ruger Mini-14 .223 caliber rifle, bearing serial number 185-77378; and (11) a Ruger Range rifle .223 caliber, bearing serial number 187-12670 in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base ("crack cocaine"), as charged in Count Three of this Indictment.

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

COUNT FIVE
(Felon in Possession of Firearms)

On or about September 26, 2019, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

RUFUS WILLIAMS,
a/k/a "Truck,"
a/k/a "Nappy Head,"

knowing that he had previously 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 firearms, namely: (1) a 12 gauge Mossburg Maverick 88 Shotgun, bearing serial number MV22895G; (2) a black Firefly semi-automatic handgun, with no visible serial number; (3) a black Glock 23 .40 caliber semi-automatic handgun, bearing serial number WEB673; (4) a Ruger GP100 .357 Magnum revolver, with no visible serial number; (5) a black Hi-Point model JHP .45 caliber semi-automatic handgun, with no visible serial number; (6) a black Hi-Point model C9 9mm caliber semi-automatic handgun, with no visible serial number; (7) a black Hi-Point model C9 9mm caliber semi-automatic handgun, where only the letter "P" of the serial number is legible; (8) a F.W. Heym detective model .22 caliber revolver, bearing serial number 2427; (9) a Sentinel revolver Model MKI, bearing serial number 511455; (10) a black Ruger Mini-14 .223 caliber rifle, bearing serial number 185-77378; and (11) a Ruger Range rifle .223 caliber, bearing serial number 187-12670, and the firearms were in and affecting commerce.

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

FORFEITURE ALLEGATION

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.

2. As a result of committing the controlled substance offenses in violation of 21 U.S.C. § 846 or 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), as charged in Counts One and Three of this Superseding Indictment, the defendant,

RUFUS WILLIAMS,
a/k/a "Truck,"
a/k/a "Nappy Head,"

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. approximately \$8,800.38 in United States currency seized from defendant RUFUS WILLIAMS on or about September 26, 2019;
- b. one Salvatore Ferragamo watch;
- c. one Versace watch;

3. 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 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,

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.

4. Further, the allegations contained in 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).

5. Upon conviction of the offense contrary to and in violation 18 U.S.C. §§ 922(g)(1) or 924(c), as set forth in Counts Four and Five of the Superseding Indictment, the defendant,

RUFUS WILLIAMS,
a/k/a "Truck,"
a/k/a "Nappy Head,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, magazines, and ammunition involved in or used in the commission of such offense, including, but not limited to, the following:

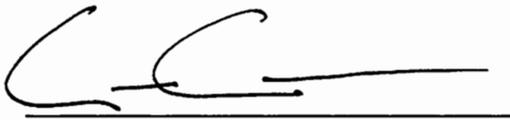
- a. a 12 gauge Mossburg Maverick 88 Shotgun, bearing serial number MV22895G;

- b. a black Firefly semi-automatic handgun, with no visible serial number;
- c. a black Glock 23 .40 caliber semi-automatic handgun, with serial number WEB673;
- d. a Ruger GP100 .357 Magnum revolver, with no visible serial number;
- e. a black Hi-Point model JHP .45 caliber semi-automatic handgun, with no visible serial number;
- f. a black Hi-Point model C9 9mm caliber semi-automatic handgun, with no visible serial number;
- g. a black Hi-Point model C9 9mm caliber semi-automatic handgun, where only the letter "P" of the serial number is legible;
- h. a F.W. Heym detective model .22 caliber revolver, bearing serial number 2427;
- i. a Sentinel revolver Model MKI, bearing serial number 511455;
- j. a black Ruger Mini-14 .223 caliber rifle, bearing serial number 185-77378;
- k. a Ruger Range rifle .223 caliber, bearing serial number 187-12670, where the stock of the rifle has been shortened;
- l. Glock .40 magazine, loaded with 13 rounds;
- m. two black rifle magazines;
- n. one ATN ultra sight;
- o. six .357 rounds;

- p. six red 12-gauge Winchester shotgun shells;
- q. 47 .45 caliber Federal Ammunition American Eagle ball rounds;
- r. six .223 caliber rounds;
- s. one .762 mm round;
- t. one 9 mm round; and
- u. nine .22 caliber rounds.

A TRUE BILL

FOREPERSON



CRAIG CARPENITO
United States Attorney

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

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SUPERSEDING INDICTMENT FOR

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

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