

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. § 843(b)
JEROME ROBERTS,	:	21 U.S.C. § 841
a/k/a "Righteous,"	:	18 U.S.C. § 924(c)(1)(A)
DAVID ANTONIO,	:	18 U.S.C. § 922(g)(1)
a/k/a "Papi,"	:	18 U.S.C. § 2
a/k/a "Pop,"	:	
a/k/a "Santiago Ramirez,"	:	<u>THIRD SUPERSEDING</u>
TIMOTHY WIMBUSH,	:	<u>INDICTMENT</u>
a/k/a "Young Money,"	:	
TAQUAN WILLIAMS,	:	
a/k/a "Trip,"	:	
JUBRI WEST,	:	
DENNIS CHESTON, JR.,	:	
a/k/a "Beans," and	:	
WAYNE K. BUSH	:	

RECEIVED

FEB 27 2020
AT 8:00 2:15 P.M.
WILLIAM T. WALSH
CLERK

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)

1. At all times relevant to this Third Superseding Indictment:
 - a. Defendant JEROME ROBERTS, a/k/a “Righteous,” resided in or around Delran, New Jersey, and distributed heroin for profit.
 - b. Defendant DAVID ANTONIO, a/k/a “Papi,” a/k/a “Pop,” a/k/a “Santiago Ramirez,” resided in or around Trenton, New Jersey, and distributed heroin for profit.
 - c. Defendant TIMOTHY WIMBUSH, a/k/a “Young Money,” resided in or around Trenton, New Jersey, and distributed heroin for profit.
 - d. Defendant TAQUAN WILLIAMS, a/k/a “Trip,” resided in or around Trenton, New Jersey, and distributed heroin for profit.
 - e. Defendant JUBRI WEST resided in or around Trenton, New Jersey, and distributed heroin for profit.
 - f. Defendant DENNIS CHESTON, JR., a/k/a “Beans,” resided in or around Raleigh, North Carolina, and distributed heroin and firearms.
 - g. Defendant WAYNE K. BUSH was incarcerated at Bayside State Prison in Leesburg, New Jersey.
 - h. Co-conspirator 1 (“CC-1”), a co-conspirator not charged as a defendant herein, resided in or around Trenton, New Jersey, and distributed heroin for profit.

i. Co-conspirator 2 ("CC-2"), a co-conspirator not charged as a defendant herein, resided in or around Trenton, New Jersey, and distributed heroin for profit.

2. From at least as early as January 2018 to in or around October 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendants,

JEROME ROBERTS,
a/k/a "Righteous,"
DAVID ANTONIO,
a/k/a "Papi,"
a/k/a "Pop,"
a/k/a "Santiago Ramirez,"
TIMOTHY WIMBUSH,
a/k/a "Young Money,"
TAQUAN WILLIAMS,
a/k/a "Trip,"
JUBRI WEST,
DENNIS CHESTON, JR.,
a/k/a "Beans," and
WAYNE K. BUSH,

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 detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to distribute heroin, for profit, in and around Trenton, New Jersey, and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

4. The manner and means by which defendants ROBERTS, ANTONIO, WIMBUSH, WILLIAMS, WEST, CHESTON, and BUSH, and other co-conspirators not named as defendants herein, sought to accomplish the conspiracy included, among other things, the following:

a. It was part of the conspiracy that defendant ANTONIO maintained a residence located on Chambers Street in or around Trenton, New Jersey, at which he stored and packaged large quantities of heroin for re-distribution.

b. It further was part of the conspiracy that defendant ANTONIO supplied defendant ROBERTS, CC-1, CC-2, and others, with large quantities of heroin to re-distribute for profit.

c. It further was part of the conspiracy that, after defendant ANTONIO supplied heroin to members of the conspiracy, defendant ROBERTS, CC-1, CC-2, and other members of the conspiracy, would re-sell that heroin, for profit, to other drug dealers (including their co-conspirators) and end users in and around Trenton, New Jersey, and elsewhere.

d. It further was part of the conspiracy that, when supplying defendant ROBERTS, CC-1, CC-2, and others, with heroin, defendant

ANTONIO often “fronted” the supplies, meaning that he did not require up-front payment.

e. It further was part of the conspiracy that defendants ANTONIO and ROBERTS, and CC-1, discussed “cutting” supplies of heroin with fentanyl to make the heroin more potent, and that defendant ANTONIO did, in fact, add fentanyl to the supplies of heroin that he distributed to members of the conspiracy.

f. It further was part of the conspiracy that, to identify and differentiate various supplies of heroin, defendants ANTONIO and ROBERTS, CC-1, CC-2, and other members of the conspiracy, distributed heroin bearing ink stamps. During the conspiracy, defendants ANTONIO and ROBERTS, CC-1, and other members of the conspiracy, referred to the packages of heroin that they were distributing by the particular ink stamps, including, but not limited to: “EMPIRE,” “GUCCI,” “OBSESSION,” “CAPITAL ONE,” “TOP SECRET,” “REMY MARTIN,” “IRON MAN 2,” “SCARFACE,” “GOLDEN STATE,” “KAWASAKI,” and others.

g. It further was part of the conspiracy that, after defendant ROBERTS and CC-1 re-sold the heroin that defendant ANTONIO had supplied, defendant ANTONIO collected the money owed to him for the supplies of heroin that he had “fronted.”

h. It further was part of the conspiracy that members of the conspiracy, including defendants ANTONIO and ROBERTS, CC-1, CC-2, and others, used cellular telephones to coordinate narcotics transactions and

otherwise communicate with other members of the conspiracy, in furtherance of the conspiracy's unlawful drug-trafficking activities.

i. It further was part of the conspiracy that between on or about August 14, 2018 and on or about August 16, 2018, defendant ANTONIO agreed to supply defendant ROBERTS and CC-1 with a single supply of heroin containing at least 1,000—and up to 1,400—“bricks” of heroin. Defendant ROBERTS referred to this anticipated delivery from defendant ANTONIO as the “big load” and the “motherload.”

j. It further was part of the conspiracy that on numerous occasions between in or about July 2018 and in or about October 2018, defendant ANTONIO in fact supplied large quantities of heroin to defendant ROBERTS, CC-1, and CC-2, to be redistributed for profit. For example:

(i) In or around 2018, defendant ANTONIO supplied CC-2 with approximately 50 bricks of heroin, which CC-2 provided to defendant ROBERTS and CC-1 to redistribute for profit. Thereafter, CC-2 introduced defendant ANTONIO to defendant ROBERTS and CC-1 so that defendant ANTONIO could begin supplying the conspiracy with larger quantities of heroin.

(ii) Thereafter, defendant ANTONIO supplied defendant ROBERTS with approximately 500 bricks of heroin, which defendant ROBERTS and CC-1 re-distributed for profit.

(iii) On or about August 10, 2018, defendant ANTONIO supplied defendant ROBERTS with approximately 200 bricks of heroin, of

which defendant ROBERTS gave CC-1 approximately 100 bricks to re-distribute for profit. On or about the same date, defendant ROBERTS also distributed approximately 50 bricks of the heroin that defendant ANTONIO had supplied to another individual in or around Trenton.

(iv) On or about August 13, 2018, defendant ANTONIO supplied defendant ROBERTS and CC-1 with approximately 200 bricks of heroin, of which defendant ROBERTS gave CC-1 approximately 100 bricks to re-distribute for profit.

(v) On or about August 18, 2018, defendant ANTONIO supplied defendant ROBERTS and CC-1 with approximately 130 bricks of heroin to re-distribute for profit.

(vi) On or about September 18, 2018, defendant ANTONIO supplied another individual with approximately 58 bricks of heroin near his residence on Chambers Street in Trenton.

k. It further was part of the conspiracy that, in or around late August or early September 2018, CC-1 distributed supplies of heroin that CC-1 obtained from defendant ANTONIO to another co-conspirator, who in turn re-distributed those supplies to defendants WIMBUSH, WILLIAMS, and WEST, or their associates.

l. It further was part of the conspiracy that, on or about September 6, 2018, defendants WIMBUSH, WILLIAMS, and WEST possessed in a secret “trap” compartment—installed in a vehicle registered to defendant WIMBUSH—the following items, among other things: (i) approximately 57

bricks of heroin bearing ink stamps that read "CAPITAL ONE," "REMY MARTIN," "KAWASAKI," and "GOLDEN STATE"; (ii) a .223 caliber semi-automatic assault rifle bearing no apparent serial number or markings as to manufacturer; (iii) a Glock .45 caliber semi-automatic firearm, model 30, bearing serial number GBE230; (iv) a Smith & Wesson .40 caliber semi-automatic firearm, model SD40VE, bearing serial number FZF7665; (v) a Glock nine-millimeter semi-automatic firearm, model 19, bearing serial number FDF181; and (vi) approximately 357 rounds of .223, .45, .40, and nine-millimeter caliber ammunition.

m. It further was part of the conspiracy that defendants ANTONIO and ROBERTS, CC-1, CC-2, and other members of the conspiracy, discussed the quality and popularity of the heroin that defendant ANTONIO had supplied.

n. It further was part of the conspiracy that, between in or around August 2018 and in or around September 2018, defendant CHESTON agreed with CC-1 to supply CC-1 with one or more firearms for CC-1 to use and/or possess in furtherance of the conspiracy's drug-trafficking activities. Pursuant to that agreement, defendant CHESTON traveled to Trenton on multiple occasions and obtained from CC-1 supplies of heroin including, on one occasion, a supply of heroin contained in packages bearing an ink stamp that read "TOP SECRET." Defendant CHESTON also agreed to return to Trenton on a later date to supply CC-1 with one or more firearms and, in

exchange, to obtain additional supplies of heroin from CC-1. Defendant CHESTON and CC-1 also discussed the quality of the heroin that CC-1 supplied and defendant CHESTON indicated that had been popular with customers in North Carolina.

o. It further was part of the conspiracy that, on or about September 8, 2018, pursuant to his agreement with CC-1, defendant CHESTON traveled from North Carolina to Trenton in possession of a nine-millimeter Smith & Wesson semi-automatic firearm, model SD9VE, bearing serial number HFA8598, with the intention of providing it to CC-1 to be used in furtherance of the conspiracy's unlawful drug-trafficking activities, and in exchange for additional supplies of heroin from CC-1.

p. It further was part of the conspiracy that, on or about October 25, 2018, defendant ANTONIO possessed in his residence on Chambers Street in Trenton approximately 1.5 kilograms of heroin, a significant amount of which also contained fentanyl.

q. It further was part of the conspiracy that, on or about October 25, 2018, defendant ANTONIO possessed in his residence on Chambers Street in Trenton numerous ink stamps used to stamp packages of heroin for identification, including stamps that read "EMPIRE," "GUCCI," "VERSACE," "OBSESSION," "CAPITAL ONE," "REMY MARTIN," "OSAMA BIN LADEN," "MCDONALDS," "IRON MAN 2," "GRAND THEFT AUTO," "FRANK LUCAS," "SCARFACE," and others.

r. It further was part of the conspiracy that, on or about September 8, 2018 and October 3, 2018, defendant BUSH communicated with CC-1 regarding defendant BUSH's intent to resume trafficking heroin with CC-1 and other co-conspirators upon his release from prison. During these and other communications between defendant BUSH and CC-1, defendant BUSH agreed with CC-1 to join CC-1 in trafficking large quantities of heroin when he (defendant BUSH) was released from prison. In furtherance of their agreement, defendant BUSH and CC-1 also discussed details of the conspiracy's ongoing and future drug-trafficking operations, and defendant BUSH provided CC-1 advice and recommendations in connection with CC-1's ongoing drug-trafficking activities.

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

COUNT TWO
(Possession With Intent to Distribute
One Kilogram or More of Heroin)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about October 25, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

DAVID ANTONIO,
a/k/a "Papi,"
a/k/a "Pop,"
a/k/a "Santiago Ramirez,"

did knowingly and intentionally possess with intent to distribute one kilogram 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)(A).

COUNT THREE

(Distribution and Possession With Intent to Distribute
100 Grams or More of Heroin)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about August 10, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

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

did knowingly and intentionally distribute and 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.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOUR
(Possession With Intent to Distribute Heroin)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. 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,
a/k/a "Trip," and
JUBRI WEST,

did knowingly and intentionally possess with intent to distribute a quantity 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)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

(Distribution and Possession With Intent
to Distribute Heroin)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. Between in or around August 2018 and on or about September 8, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

DENNIS CHESTON, JR.,
a/k/a "Beans,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity 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)(C).

COUNT SIX
(Possession of Firearms in Furtherance
of a Drug Trafficking Crime)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. 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,
a/k/a "Trip," 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 Four of this Third Superseding Indictment, did knowingly and intentionally possess, conspire to possess, and aid and abet one another in the possession of, firearms, namely, (i) a .223 caliber semi-automatic assault rifle bearing no apparent 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 SEVEN
(Possession of a Firearm in Furtherance
of a Drug Trafficking Crime)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about September 8, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

DENNIS CHESTON, JR.,
a/k/a "Beans,"

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 Third Superseding Indictment, did knowingly and intentionally possess, and conspire to possess, a firearm, namely, a nine-millimeter Smith & Wesson semi-automatic firearm, model SD9VE, bearing serial number HFA8598.

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

COUNT EIGHT

(Possession of Firearms and Ammunition by Convicted Felons)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. 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,
a/k/a "Trip,"

each knowing that they previously had 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 firearms and ammunition, 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; (iii) a Glock nine-millimeter semi-automatic firearm, model 19, bearing serial number FDF181; and (iv) approximately fifty (50) rounds of Fiocchi .45 caliber ammunition, and the firearms and ammunition were in and affecting commerce.

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

COUNT NINE

(Possession of a Firearm by a Convicted Felon)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about September 8, 2018, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

DENNIS CHESTON, JR.,
a/k/a "Beans,"

knowing that he previously had 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 a firearm, namely, a nine-millimeter Smith & Wesson semi-automatic firearm, model SD9VE, bearing serial number HFA8598, and the firearm was in and affecting commerce.

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

COUNT TEN

(Use of a Communications Facility to Facilitate a Drug-Trafficking Offense)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Third Superseding Indictment are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about October 3, 2018, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

WAYNE K. BUSH,

did knowingly and intentionally use a communication facility, namely, a telephone located within Bayside State Prison in Leesburg, New Jersey, to commit, cause, and facilitate the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841 and 846, including the felony drug offense charged in Count One of this Third Superseding Indictment.

In violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATIONS AS TO COUNTS ONE THROUGH FIVE

1. The allegations contained in this Third 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 Title 21, United States Code, Sections 841 and 846, as charged in Counts One through Five of this Third Superseding Indictment, the defendants,

JEROME ROBERTS,
a/k/a "Righteous,"
DAVID ANTONIO,
a/k/a "Papi,"
a/k/a "Pop,"
a/k/a "Santiago Ramirez,"
TIMOTHY WIMBUSH,
a/k/a "Young Money,"
TAQUAN WILLIAMS,
a/k/a "Trip,"
JUBRI WEST,
DENNIS CHESTON, JR.,
a/k/a "Beans," and
WAYNE K. BUSH,

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 Third Superseding Indictment.

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

- a. A sum of money equal to \$250,000.00 in United States currency, representing the approximate proceeds of the

offense charged in Count One of this Third Superseding Indictment;

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

FORFEITURE ALLEGATIONS AS TO COUNTS SIX 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 Six through Nine of this Third Superseding Indictment, the defendants,

TIMOTHY WIMBUSH,
a/k/a "Young Money,"
TAQUAN WILLIAMS,
a/k/a "Trip,"
JUBRI WEST, and
DENNIS CHESTON, JR.,
a/k/a "Beans,"

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;
- b. 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;
- e. a nine-millimeter Smith & Wesson semi-automatic firearm, model SD9VE, bearing serial number HFA8598; and
- f. approximately 357 rounds of .223, .45, .40, and nine-millimeter caliber ammunition.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

4. If by any act or omission of the defendants 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 defendants up to the value of the above-described forfeitable property.

ENHANCED PENALTY ALLEGATION AS TO DEFENDANT DAVID ANTONIO

1. The allegations contained in Count One and Count Two of this Third Superseding Indictment are incorporated by reference as though fully set forth herein for the purpose of alleging eligibility for an enhanced penalty pursuant to 21 U.S.C. § 841(b)(1)(A) as to defendant DAVID ANTONIO, a/k/a “Papi,” a/k/a “Pop,” a/k/a “Santiago Ramirez.”

2. On or about December 1, 2011, defendant ANTONIO pleaded guilty in the United States District Court for the District of New Jersey to a serious drug felony, namely, conspiracy to possess with intent to distribute 100 grams or more of heroin, 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. The statute under which defendant ANTONIO was convicted prescribed a maximum term of imprisonment of 40 years.

3. On or about April 19, 2012, defendant ANTONIO was sentenced to a term of 46 months’ imprisonment on the above-referenced charge.

4. Defendant ANTONIO served more than 12 months of the above-referenced sentence, and was released from prison on or about May 23, 2014. Accordingly, defendant ANTONIO’s commission of the offenses alleged in Counts One and Two of this Third Superseding Indictment occurred within 15 years of his release from prison on the above-referenced conviction.

5. As a result of the prior conviction described herein, upon conviction of Count One or Count Two of this Third Superseding Indictment, defendant ANTONIO will be subject to an enhanced penalty pursuant to Title 21, United States Code, Section 841(b)(1)(A).

A TRUE BILL



FOREPERSON



CRAIG CARPENITO
United States Attorney

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

JEROME ROBERTS, a/k/a "Righteous,"
DAVID ANTONIO, a/k/a "Papi," a/k/a "Pop," a/k/a "Santiago Ramirez,"
TIMOTHY WIMBUSH, a/k/a "Young Money,"
TAQUAN WILLIAMS, a/k/a "Trip,"
JUBRI WEST,
DENNIS CHESTON, JR., a/k/a "Beans," and
WAYNE K. BUSH,

THIRD SUPERSEDING INDICTMENT FOR

21 U.S.C. §§ 841, 843, and 846
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2

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