UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Madeline Cox Arleo

Crim. No. 21-

:

: 21 U.S.C. § 846

TYRELL WILSON, : 21 U.S.C. §§ 841(a)(1), (b)(1)(A)

a/k/a "Hell Rell"

v.

INFORMATION

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE

(Conspiracy to Distribute Cocaine Base)

On or about September 19, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TYRELL WILSON, a/k/a "Hell Rell,"

did knowingly and intentionally conspire and agree with others 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, 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

(Possession with Intent to Distribute Cocaine Base)

On or about September 19, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TYRELL WILSON, a/k/a "Hell Rell,"

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

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

FORFEITURE ALLEGATION

As a result of committing the controlled substance offenses charged in Counts One and Two of this Information, the defendant,

TYRELL WILSON, a/k/a "Hell Rell,"

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 offense, 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 offense alleged in this Information.

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,

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 forfeitable property.

RACHAEL A. HONIG

Acting United States Attorney