

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 21-
 :
 SHAMIR R. WILLIAMS : 21 U.S.C. § 846
 : 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

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
(Drug Conspiracy)

From at least in or around May 2020 through on or about August 13, 2020, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

SHAMIR R. WILLIAMS,

did knowingly and intentionally conspire and agree with others to distribute and possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule II controlled substance, 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.

COUNT TWO

(Distribution of Fentanyl)

On or about June 11, 2020, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

SHAMIR R. WILLIAMS,

did knowingly and intentionally distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] Propanamide), a Schedule II controlled substance.

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

FORFEITURE ALLEGATION

1. The allegations set forth in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of the offenses charged in this Information, the defendant,

SHAMIR R. WILLIAMS,

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations, 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 violations alleged in this Information.

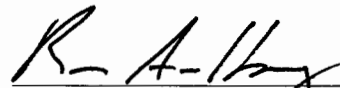
3. If any of the property described above, as a result of any act or omission of the defendant:

- (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

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(e) has been commingled with other property which cannot be
divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute
property pursuant to Title 21, United States Code, Section 853(p).



RACHAEL A. HONG
Acting United States Attorney