

2019R01492/TA&CC

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. John Michael Vazquez
	:	
	:	Crim. No. 20-236
	:	
v.	:	
	:	18 U.S.C. § 922(g)(1)
GARY SHAHID,	:	18 U.S.C. § 924(c)
a/k/a "Sha,"	:	18 U.S.C. § 924(j)
JOSE LORA,	:	21 U.S.C. § 841
a/k/a "Wakka,"	:	21 U.S.C. § 846
CHARLES MELLS,	:	21 U.S.C. § 856
a/k/a "AD,"	:	
RAQUAN RAWLS,	:	
a/k/a "Bandz,"	:	
JAMES WICKER,	:	
a/k/a "JP,"	:	
DAYQUAN JORDAN,	:	
a/k/a "Day Day"	:	
MICHAEL MAYSE, and	:	
DAYANA VALDERRAMA	:	

SUPERSEDING INDICTMENT

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

COUNT ONE
**(Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Substances)**

From at least in or around February 2019 through in or around February
2020, in Essex County, in the District of New Jersey, and elsewhere, the
defendants,

**GARY SHAHID,
a/k/a "Sha,"
JOSE LORA,
a/k/a "Wakka,"
CHARLES MELLS,
a/k/a "AD,"**

**RAQUAN RAWLS,
a/k/a "Bandz,"
JAMES WICKER,
a/k/a "JP,"
DAYQUAN JORDAN,
a/k/a "Day Day," and
MICHAEL MAYSE,**

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

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

COUNT TWO

(Distribution and Possession with Intent to Distribute Heroin)

On or about January 29, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**DAYQUAN JORDAN,
a/k/a “Day Day,”**

did knowingly and intentionally distribute, and possess with the 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).

COUNTS THREE THROUGH FIVE
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about the dates set forth in the chart below, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES MELLS
a/k/a, "AD,"

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, as set forth in the chart below.

COUNT	DATE	CONTROLLED SUBSTANCE
Three	February 14, 2019	Cocaine Base
Four	February 19, 2019	Cocaine Base
Five	March 4, 2019	Heroin

Each in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNTS SIX AND SEVEN
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about the dates set forth in the chart below, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

GARY SHAHID,
a/k/a “Sha,”
RAQUAN RAWLS,
a/k/a “Bandz,” and
JOSE LORA,
a/k/a “Wakka,”

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, as set forth in the chart below.

COUNT	DATE	CONTROLLED SUBSTANCE
6	October 24, 2019	Fentanyl and Cocaine Base
7	November 13, 2019	Heroin and Cocaine Base

Each 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 EIGHT
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about November 21, 2019, in the District of New Jersey and elsewhere, the defendants,

**RAQUAN RAWLS,
a/k/a “Bandz,”
DAYQUAN JORDAN,
a/k/a “Day Day,” and
MICHAEL MAYSE,**

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity 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)(C), and Title 18, United States Code, Section 2.

COUNT NINE

(Distribution and Possession with Intent to Distribute Heroin)

On or about December 13, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**RAQUAN RAWLS,
a/k/a "Bandz,"**

did knowingly and intentionally distribute, and possess with the 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).

COUNTS TEN THROUGH SEVENTEEN
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about the dates set forth in the chart below, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

GARY SHAHID
a/k/a, "Sha,"

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, as set forth in the chart below.

COUNT	DATE	CONTROLLED SUBSTANCE
TEN	February 14, 2019	Cocaine Base
ELEVEN	March 4, 2019	Heroin
TWELVE	March 21, 2019	Fentanyl
THIRTEEN	April 11, 2019	Heroin
FOURTEEN	May 21, 2019	Fentanyl

FIFTEEN	July 9, 2019	Fentanyl and Cocaine Base
SIXTEEN	October 30, 2019	Heroin
SEVENTEEN	December 3, 2019	Heroin and Cocaine Base

Each in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHTEEN
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about December 20, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

GARY SHAHID
a/k/a, "Sha,"

did knowingly and intentionally distribute, and possess with the intent to distribute, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and 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), (b)(1)(B), and (b)(1)(C).

COUNTS NINETEEN THROUGH TWENTY-FOUR
(Distribution and Possession with Intent to Distribute Controlled Substances)

On or about the dates set forth in the chart below, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JOSE LORA,
a/k/a “Wakka,”

did knowingly and intentionally distribute, and possess with the intent to distribute, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, as set forth in the chart below.

COUNT	DATE	CONTROLLED SUBSTANCE
NINETEEN	April 3, 2019	Cocaine Base
TWENTY	April 11, 2019	Heroin
TWENTY-ONE	May 6, 2019	Heroin and Cocaine Base
TWENTY-TWO	August 22, 2019	Heroin and Cocaine Base
TWENTY-THREE	October 9, 2019	Cocaine Base

TWENTY-FOUR	January 30, 2020	Fentanyl
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Each 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 TWENTY-FIVE
**(Distribution and Possession with Intent to Distribute Controlled
Substances)**

On or about January 22, 2020, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JOSE LORA,
a/k/a “Wakka,”

did knowingly and intentionally distribute, and possess with the intent to distribute, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT TWENTY-SIX
(Causing Death Through Use of a Firearm)

On or about December 15, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL MAYSE,

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, did knowingly and intentionally use and carry a firearm, and in doing so, knowingly and purposely caused the death of Victim-1.

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

COUNT TWENTY-SEVEN
(Possession of a Firearm and Ammunition by a Convicted Felon)

Between on or about December 15, 2019 and on or about December 16, 2019, in Essex County, the District of New Jersey, and elsewhere, the defendant,

MICHAEL MAYSE,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a loaded firearm, namely a SCCY CPX-1 9-millimeter handgun, bearing serial number 191320.

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

COUNT TWENTY-EIGHT
(Possession of a Firearm by a Convicted Felon)

On or about December 16, 2019, in Essex County, the District of New Jersey, and elsewhere, the defendant,

MICHAEL MAYSE,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce one firearm, namely a Hi-Point C9 9-millimeter handgun, bearing serial number P1800803.

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

COUNT TWENTY-NINE
(Maintaining a Drug-Involved Premises)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

GARY SHAHID,
a/k/a “Sha,”

did manage and control a place, whether permanently or temporarily, either as an owner, lessee, agent, employee, occupant, and mortgagee, and did knowingly and intentionally rent, lease, and profit from the place for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance.

In violation of Title 21, United States Code, Section 856.

COUNT THIRTY
(Possession with Intent to Distribute Controlled Substances)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

GARY SHAHID,
a/k/a “Sha,

did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT THIRTY-ONE
(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

GARY SHAHID,
a/k/a “Sha,”

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a loaded firearm and ammunition, namely (1) an Armscor/Rock Island Armory model M1911-A1 .45 caliber pistol, bearing serial number RIA1194632, loaded with 7 rounds of .45 caliber ammunition, and (2) 311 rounds of assorted ammunition.

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

COUNT THIRTY-TWO
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

GARY SHAHID,
a/k/a “Sha,”

did knowingly possess a firearm, that is an Armscor/Rock Island Armory model M1911-A1 .45 caliber pistol, bearing serial number RIA1194632, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is the possession with intent to distribute fentanyl, heroin, and cocaine base charged in Count Thirty of this Indictment.

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

COUNT THIRTY-THREE
(Possession with Intent to Distribute Controlled Substances)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JOSE LORA,
a/k/a “Wakka,”

did knowingly and intentionally possess with the intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity 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), (b)(1)(B), and (b)(1)(C).

COUNT THIRTY-FOUR
(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about February 25, 2020, in Union County, in the District of New Jersey, and elsewhere, the defendants,

JOSE LORA,
a/k/a “Wakka,” and
DAYANA VALDERRAMA,

knowing that they had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce three firearms and ammunition, namely (1) a Smith & Wesson handgun, bearing serial number HPA0885, loaded with 8 rounds of ammunition, (2) a Smith & Wesson handgun, bearing serial number UEA1615, loaded with 10 rounds of ammunition, (3) a Ruger revolver, bearing serial number 57443042, and (4) 305 rounds of assorted ammunition.

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

COUNT THIRTY-FIVE
(Possession of a Firearm by a Convicted Felon)

On or about February 25, 2020, in Essex County, the District of New Jersey, and elsewhere, the defendant,

JOSE LORA,
a/k/a “Wakka,”

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, namely a .40 caliber Hi-Point handgun, with no visible serial number, and one round of .40 caliber ammunition.

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

COUNT THIRTY-SIX
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JOSE LORA,
a/k/a “Wakka,”

did knowingly possess a firearm, that is a Hi-Point .40 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is the possession with intent to distribute heroin and cocaine base charged in Count Thirty-Three of this Indictment.

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

COUNT THIRTY-SEVEN
(Possession with Intent to Distribute Controlled Substances)

On or about February 25, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JAMES WICKER,
a/k/a “JP,”

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

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

FIRST FORFEITURE ALLEGATION

Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Twenty-Five, Thirty, Thirty-Three, and Thirty-Seven of this Superseding Indictment, the respective defendants named in each such count 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 such controlled substance offense(s), 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 such offense(s).

The property to be forfeited includes, but is not limited to, all right, title, and interest of the defendants named below in the following, and all property traceable to such property:

COUNT	DEFENDANT	PROPERTY TO BE FORFEITED
TWENTY-NINE	GARY SHAHID	Approximately \$800 in cash seized from the defendant, Gary Shahid, on or about February 25, 2020
THIRTY	GARY SHAHID	Approximately \$800 in cash seized from the defendant, Gary Shahid, on or about February 25, 2020
THIRTY-THREE	JOSE LORA	Approximately \$5,556 in cash seized from the defendant, Jose Lora, on or about February 25, 2020

THIRTY-SEVEN	JAMES WICKER	Approximately \$1,500 in cash seized from the defendant, James Wicker, on or about February 25, 2020
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SECOND FORFEITURE ALLEGATION

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g)(1), 924(c), and 924(j) as charged in Counts Twenty-Six through Twenty-Eight, Thirty-One, Thirty-Two, and Thirty-Four through Thirty-Six of this Superseding Indictment, the defendants named below shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of each such offense.

The property to be forfeited includes, but is not limited to, all right, title, and interest of the defendants named below in the following:

COUNT	DEFENDANT	PROPERTY TO BE FORFEITED
TWENTY-SIX	MICHAEL MAYSE	SCCY CPX-1 9-millimeter handgun bearing serial number 191320
TWENTY-SEVEN	MICHAEL MAYSE	SCCY CPX-1 9-millimeter handgun bearing serial number 191320; and Seven rounds of 9-millimeter ammunition

TWENTY-EIGHT	MICHAEL MAYSE	Hi-Point C9 9-millimeter handgun bearing serial number P1800803
THIRTY-ONE	GARY SHAHID	Armstrong/Rock Island Armory model M1911-A1 .45 caliber pistol bearing serial number RIA1194632 and loaded with 7 rounds of .45 caliber ammunition; and 311 rounds of assorted ammunition
THIRTY-TWO	GARY SHAHID	Armstrong/Rock Island Armory model M1911-A1 .45 caliber pistol bearing serial number RIA1194632 and loaded with 7 rounds of .45 caliber ammunition; and 311 rounds of assorted ammunition
THIRTY-FOUR	JOSE LORA and DAYANA VALDERRAMA	Smith & Wesson handgun, bearing serial number HPA0885 and loaded with 8 rounds of ammunition; Smith & Wesson handgun bearing serial number UEA1615 loaded with 10 rounds of ammunition; Ruger revolver bearing serial number 57443042; and 305 rounds of assorted ammunition
THIRTY-FIVE	JOSE LORA	Hi-Point .40 caliber handgun with no visible serial number and one

		round of .40 caliber ammunition
THIRTY-SIX	JOSE LORA	Hi-Point .40 caliber handgun with no visible serial number and one round of .40 caliber ammunition

SUBSTITUTE ASSETS PROVISION
(APPLICABLE TO ALL FORFEITURE COUNTS)

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,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

A large black rectangular redaction box covers the signature area, with the words "A TRUE BILL" printed in white text over the top portion of the redaction.


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 20-236

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

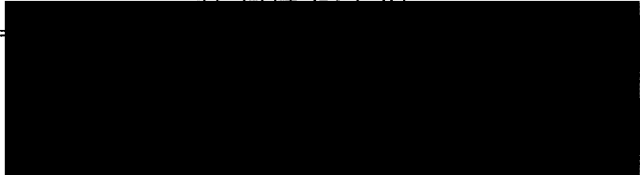
**GARY SHAHID,
a/k/a "Sha," et al.**

**SUPERSEDING INDICTMENT
FOR**

**18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)
18 U.S.C. § 924(j)
21 U.S.C. § 841
21 U.S.C. § 846
21 U.S.C. § 856**

RACHAEL A. HONIG
ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

TRACEY A. AGNEW
CASSYE COLE
ASSISTANT U.S. ATTORNEYS
973-645-2730



P. STEINER