

2012R01310-13/NPG

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

RECEIVED

UNITED STATES OF AMERICA : Hon. **APR 29 2014**  
:   
v. : Crim. No. AT 8:30 \_\_\_\_\_M  
: WILLIAM T. WALSH, CLERK  
:   
DAQUAAN VAUGHN and : 18 U.S.C. §§ 1951(a),  
LAVELL JONES : 924(c)(i)(A)(ii) & 2

I N D I C T M E N T

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

COUNT ONE  
(Hobbs Act Robbery)

1. At all times material to this Indictment, Target was a commercial establishment with a store located at 2235 Springfield Avenue, Union, New Jersey (the "Target") and was engaged in selling merchandise that moved in, was transferred in, and affected interstate and foreign commerce.

2. On or about November 23, 2012, in Union County, in the District of New Jersey, and elsewhere, the defendants,

DAQUAAN VAUGHN and  
LAVELL JONES,  
did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take

and obtain property consisting of United States currency from the Target in the presence of its employees, and committed and threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT TWO

(Brandishing a Firearm During a Crime of Violence)

On or about November 23, 2012, in Union County, in the District of New Jersey, and elsewhere, the defendant,

DAQUAAN VAUGHN,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Count One of this Indictment, did knowingly use and carry a firearm, which was brandished, and did aid and abet the same.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendants that, upon conviction of Count One of this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including but not limited to, a 2002 Grey Lincoln LS, vehicle identification number 1LNHM87A62Y602308 (the "Vehicle").

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;

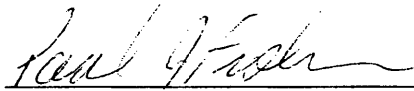
b. has been transferred or sold to, or deposited with, a third party;

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;  
it is the intent of the United States, pursuant to Title 21,  
United States Code, Section 853(p), as incorporated by Title 28,  
United States Code, Section 2461(c), to seek forfeiture of any  
other property of the defendants up to the value of the above-  
described forfeitable property.

A TRUE BILL



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 14-

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

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UNITED STATES OF AMERICA

v.

DAQUAAN VAUGHN and  
LAVELL JONES

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**INDICTMENT FOR**

18 U.S.C. §§ 1951(a), 924(c)(1)(A)(ii) & 2

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PAUL J. FISHMAN  
UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY

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NICHOLAS P. GRIPPO  
ASSISTANT U.S. ATTORNEY  
(973) 645-2915

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