

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No. 13-  
QUAM WILSON : 18 U.S.C. §§ 1951, 924(c),  
924(d), 922(g) and 2 and  
: 28 U.S.C. § 2461(c)

I N D I C T M E N T

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

COUNT 1

On or about November 13, 2012, in Monmouth County, in  
the District of New Jersey, and elsewhere, the defendant,

QUAM WILSON,

did knowingly and wilfully obstruct, delay and affect commerce  
and the movement of articles and commodities in commerce by the  
robbery of a taxi company in Asbury Park, New Jersey, and did  
commit and threaten physical violence to persons and property in  
furtherance thereof.

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

COUNT 2

On or about November 13, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

QUAM WILSON,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is the violation of 18 U.S.C. § 1951(a) and § 2 charged in Count 1 of this Indictment, did knowingly and wilfully use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was discharged.

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

COUNT 3

On or about November 13, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**QUAM WILSON,**

did knowingly and wilfully obstruct, delay and affect commerce and the movement of articles and commodities in commerce by the robbery of a gas station in Ocean Township, New Jersey, and did commit and threaten physical violence to persons and property in furtherance thereof.

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

COUNT 4

On or about November 13, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**QUAM WILSON,**

during and in relation to a crime of violence for he may be prosecuted in a court of the United States, that is the violation of 18 U.S.C. § 1951(a) and § 2 charged in Count 3 of this Indictment, did knowingly and wilfully use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was brandished.

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

COUNT 5

On or about November 13, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**QUAM WILSON,**

did knowingly and wilfully obstruct, delay and affect commerce and the movement of articles and commodities in commerce by the robbery of a taxi company in Long Branch, New Jersey, and did commit and threaten physical violence to persons and property in furtherance thereof.

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

COUNT 6

On or about November 13, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

QUAM WILSON,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is the violation of 18 U.S.C. § 1951(a) and § 2 charged in Count 5 of this Indictment, did knowingly and wilfully use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was brandished.

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

COUNT 7

On or about November 14, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

QUAM WILSON,

did knowingly and wilfully obstruct, delay and affect commerce and the movement of articles and commodities in commerce by the robbery of a gas station in Red Bank, New Jersey, and did commit and threaten physical violence to persons and property in furtherance thereof.

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

COUNT 8

On or about November 14, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**QUAM WILSON,**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is the violation of 18 U.S.C. § 1951(a) and § 2 charged in Count 7 of this Indictment, did knowingly and wilfully use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was brandished.

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



COUNT 9

On or about November 14, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**QUAM WILSON,**

did knowingly and wilfully obstruct, delay and affect commerce and the movement of articles and commodities in commerce by the robbery of a convenience store in Neptune Township, New Jersey, and did commit and threaten physical violence to persons and property in furtherance thereof.

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

COUNT 10

On or about November 14, 2012, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

QUAM WILSON,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is the violations of 18 U.S.C. § 1951(a) and § 2 charged in Count 9 of this Indictment, did knowingly and wilfully use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was brandished.

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

COUNT 11

On or about November 14, 2012, in Monmouth County, in the District of New Jersey and elsewhere, defendant,

QUAM WILSON,

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the State of New Jersey, did knowingly possess in and affecting commerce one or more firearms, namely a Beretta Model 950, .22 caliber handgun, serial number C89024.

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

**FORFEITURE ALLEGATIONS**

1. The allegations contained in Count 11 of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code Section 924(d)(1) and Title 28, United States Code Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1) set forth in Count 11 of this Indictment, the defendant,

**QUAM WILSON,**

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of that offense, including the Beretta Model 950, .22 caliber handgun, serial number C89024.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

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FOREPERSON



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

**v.**

**QUAM WILSON**

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**INDICTMENT FOR**

18 U.S.C. §§ 1951, 924(c), 922(g) and 2

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**A True Bill,**

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**Foreperson**

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**PAUL J. FISHMAN**

*U. S. ATTORNEY*

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**R. JOSEPH GRIBKO**

*ASSISTANT U. S. ATTORNEY*

*609-989-2020*

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