

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

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 24-
DEION NANCE : 18 U.S.C. § 2119(1)
: 18 U.S.C. § 924(c)(1)(A)(i)
: 18 U.S.C. § 1951(a)

I N F O R M A T I O N

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

COUNT ONE
(Carjacking)

On or about December 30, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DEION NANCE,

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a 2016 Toyota Corolla, from the person and presence of another, namely, Victim-1, by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119(1).

COUNT TWO
(Using and Carrying a Firearm During a Crime of Violence)

On or about December 30, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DEION NANCE,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the carjacking charged in Count One of this Information, did knowingly use and carry a firearm, that is, a loaded Smith & Wesson .380-caliber revolver, bearing serial number BRJ2859.

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

COUNT THREE
(Hobbs Act Robbery)

On or about January 4, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

DEION NANCE,

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, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of Victim-2, an employee of Restaurant-1, located in Newark, New Jersey.

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

COUNT FOUR
(Using and Carrying Firearm During a Crime of Violence)

On or about January 4, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

DEION NANCE,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery charged in Count Three of this Information, did knowingly use and carry a firearm that is, a loaded Smith & Wesson .380-caliber revolver, bearing serial number BRJ2859.

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

COUNT FIVE
(Hobbs Act Robbery)

On or about January 4, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

DEION NANCE,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of Victim-3, an employee of Restaurant-2, located in Newark, New Jersey.

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

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the carjacking offense charged in Count One, of this Information, the defendant,

DEION NANCE,

shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offense, and (ii) pursuant to 18 U.S.C. § 924 and 28 U.S.C. §2461(c), any firearms and ammunition involved in or used in the commission of such offense.

FORFEITURE ALLEGATION AS TO COUNTS TWO AND FOUR

2. As a result of committing the firearms offenses in violation of 18 U.S.C. § 924(c)(1)(A)(i), as charged in Counts Two and Four of this Information, the defendant,

DEION NANCE,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including but not limited to:

- (1) A Smith & Wesson .380-caliber revolver, bearing serial number BRJ2859; and
- (2) Five .380-caliber rounds of ammunition.

FORFEITURE ALLEGATION AS TO COUNTS THREE AND FIVE

3. As a result of committing the Hobbs Act robbery offenses charged in Counts Three and Five, of this Information, the defendant,

DEION NANCE,


shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense, and (ii) pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461, any firearm and ammunition involved in or used in the commission of such offense.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

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
- 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), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.


PHILIP R. SELLINGER
United States Attorney