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2020R01116/DAF

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RECEIVED
JUN 30 2021
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AT THE
WILLIAM T. WALSH CLERK

UNITED STATES OF AMERICA

:

: Hon.

:

v.

:

: Criminal No. 21-523
(RBK)

:

TYQUAN BURRELL

: 18 U.S.C. § 922(g)(1)

: 21 U.S.C. § 841(a)(1) and (b)(1)(A)

: 18 U.S.C. § 924(c)(1)(A)(i)

INDICTMENT

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

COUNT ONE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about October 1, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

TYQUAN BURRELL,

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 a firearm, namely a Taurus PT 24/7 Pro handgun bearing serial number SYL71652, and 15 rounds of ammunition, and the firearm and ammunition were in and affecting commerce.

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

COUNT TWO

(Possession with Intent to Distribute a Controlled Substance)

On or about October 1, 2020, in Camden County, in the District of New Jersey and elsewhere, the defendant,

TYQUAN BURRELL,

knowingly and intentionally did possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenylN-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about October 1, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

TYQUAN BURRELL,

In furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, the possession with intent to distribute a controlled substance as set forth in Count Two of this Indictment, did knowingly possess a firearm, namely a Taurus PT 24/7 Pro handgun bearing serial number SYL71652, and 15 rounds of ammunition.

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

FORFEITURE ALLEGATION AS TO COUNT ONE AND COUNT THREE

Upon conviction of the firearms offenses alleged in Counts One and Three of this Indictment, the defendant,

TYQUAN BURRELL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, magazines, and ammunition involved in or used in the commission of such offenses, including, but not limited to, the Taurus PT 24/7 Pro handgun bearing serial number SYL71652 and 15 rounds of ammunition.

FORFEITURE ALLEGATION AS TO COUNT TWO

Upon conviction of the controlled substance offense alleged in Count Two of this Indictment, the defendant,

TYQUAN BURRELL,

shall forfeit to the United States, 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 offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense, including but not limited to approximately \$40,382 in United States currency that was seized on or about October 1, 2020.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If, as a result of any act or omission of the defendant, any of the above forfeitable property:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

the United States intends, 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 defendant up to the value of the above described forfeitable property.

A TRUE BILL,

FOREPERSON



RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 21 523

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

UNITED STATES OF AMERICA

v.

TYQUAN BURRELL

INDICTMENT FOR

**18 U.S.C. § 922(g)(1)
21 U.S.C. § 841(a)(1) and (b)(1)(A)
18 U.S.C. § 924(c)(1)(A)(i)**

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FOR THE DISTRICT OF NEW JERSEY

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