

2017R00795/FJN

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 18- <i>CR-21(KM)</i>
	:	
JESSE TULLIES and	:	18 U.S.C. § 922
EUGENE WILLIAMS	:	18 U.S.C. § 924
	:	21 U.S.C. § 841
	:	21 U.S.C. § 846
	:	
	:	<u>INDICTMENT</u>

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

COUNT ONE
(Conspiracy to Distribute Heroin)

On or about October 4, 2017, in Essex County, in the District of New Jersey and elsewhere, defendants

JESSE TULLIES and
EUGENE WILLIAMS

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

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

COUNT TWO
(Distribution of Heroin)

On or about October 4, 2017, in Essex County, in the District of New Jersey and elsewhere, the defendants

JESSE TULLIES and
EUGENE WILLIAMS

did knowingly and intentionally distribute and possess with 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) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE
(Distribution of Cocaine Base)

On or about October 4, 2017, in Essex County, in the District of New Jersey and elsewhere, the defendants

JESSE TULLIES and
EUGENE WILLIAMS

did knowingly and intentionally distribute and possess with intent to distribute 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) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR
(Felon in Possession of Firearm)

On or about October 4, 2017, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JESSE TULLIES

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 interstate commerce three firearms, namely a 9 millimeter FEG Model PA-63 semi-automatic pistol bearing serial number AG0726 loaded with four rounds of ammunition, a 9 millimeter Taurus Millennium PT111 G2 semi-automatic pistol bearing serial number TGU47188 loaded with 12 rounds of ammunition, and a 9 millimeter Beretta BU9 Nano semi-automatic pistol bearing serial number NU068181 loaded with 2 rounds of ammunition.

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

COUNT FIVE
(Felon in Possession of Firearm)

On or about October 4, 2017, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

EUGENE WILLIAMS

having each 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 interstate commerce three firearms, namely a 9 millimeter FEG Model PA-63 semi-automatic pistol bearing serial number AG0726 loaded with four rounds of ammunition, a 9 millimeter Taurus Millennium PT111 G2 semi-automatic pistol bearing serial number TGU47188 loaded with 12 rounds of ammunition, and a 9 millimeter Beretta BU9 Nano semi-automatic pistol bearing serial number NU068181 loaded with 2 rounds of ammunition.

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

COUNT SIX
**(Use and Carrying of a Firearm in Furtherance of a Drug Trafficking
Crime)**

On or about October 4, 2017, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JESSE TULLIES

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute, and possess with intent to distribute, heroin and crack cocaine charged in Count One of this Indictment, and the distribution and possession with intent to distribute, heroin and cocaine base, charged in Counts Two and Three of this Indictment, did knowingly use and carry a firearm, and, in furtherance of those crimes, did possess a firearm.

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

COUNT SEVEN
(Use and Carrying of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about October 4, 2017, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

EUGENE WILLIAMS

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute, and possess with intent to distribute, heroin and crack cocaine charged in Count One of this Indictment, and the distribution and possession with intent to distribute, heroin and cocaine base, charged in Counts Two and Three of this Indictment, did knowingly use and carry a firearm, and, in furtherance of those crimes, did possess a firearm.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture 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 this Indictment, the defendants,

JESSE TULLIES and
EUGENE WILLIAMS,

shall forfeit to the United States any firearm and ammunition involved in or used in the commission of that offense.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL,

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-*CR-21(KM)*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

JESSE TULLIES and
EUGENE WILLIAMS

INDICTMENT FOR

18 U.S.C. § 922
18 U.S.C. § 924
21 U.S.C. § 841
21 U.S.C. § 846

A True Bill.

Foreperson

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NEWARK, NEW JERSEY

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ASSISTANT UNITED STATES ATTORNEY
973-645-2515
