

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED:** \_\_\_\_\_

**ANGEL CINTRON** : **VIOLATIONS:**

: **21 U.S.C. § 841(a)(1) (distribution of**

: **cocaine - 1 count)**

: **21 U.S.C. § 841(a)(1) (possession with**

: **intent to distribute 28 grams or more of**

: **cocaine base (“crack”) - 1 count)**

: **18 U.S.C. § 924(c)(1) (possession of a**

: **firearm in furtherance of drug**

: **trafficking - 1 count)**

: **Notices of forfeiture**

**COUNT ONE**

On or about August 4, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 23, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANGEL CINTRON**

knowingly and intentionally possessed with intent to distribute 28 grams or more, that is, approximately 50.7 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 23, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANGEL CINTRON**

knowingly possessed a firearm, that is, one Ruger 9mm semi-automatic pistol, Model P89, serial number 315-93820, loaded with 14 rounds, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1).

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

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

#### **ANGEL CINTRON**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property, subject to forfeiture, 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 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendant

**ANGEL CINTRON**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, that is:

1. one Ruger 9mm semi-automatic pistol, Model P89, serial number 315-93820 loaded with 14 rounds;

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

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
United States Attorney