

JUDGE FAILLA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
PURIFICACION CRISTOBAL, :  
:  
Defendant. :  
:  
----- X

INDICTMENT

20 Cr.

**20 CRIM 463**

COUNT ONE

**(Narcotics Conspiracy)**

The Grand Jury charges:

1. From at least in or about June 2019 up to and including at least in or about June 2020, in the Southern District of New York and elsewhere, PURIFICACION CRISTOBAL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that PURIFICACION CRISTOBAL, the defendant, and others known and unknown, would and did distribute, dispense, possess with intent to distribute and dispense, and cause to be distributed and dispensed, a controlled substance outside the scope of professional practice and not for a legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that PURIFICACION CRISTOBAL, the defendant, conspired to distribute and dispense, possess with intent to distribute and dispense, and cause to be distributed and dispensed, outside the scope of professional practice and not for a legitimate medical purpose, was a quantity of mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATIONS**

4. As a result of committing the offense alleged in Count One of this Indictment, PURIFICACION CRISTOBAL, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Asset Provision**

5. If any of the above-described forfeitable property, 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 Title 21, United States Code, Section 853(p) and 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 forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
AUDREY STRAUSS  
Acting United States Attorney

9/3/20

FD Inv This case is assigned to  
Judge Failla for all purposes.

My Tube Moves