

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

UNITED STATES OF AMERICA : Hon. Christine P. O'Hearn
: :
: Crim. No. 24- 399
v. : :
: 21 U.S.C. § 846
: :
MICHAEL PROCOPIO : :

INFORMATION

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

From in or around January 2022, and continuing through in or around February 2024, in Camden County, in the District of New Jersey and elsewhere, defendant

MICHAEL PROCOPIO

knowingly and intentionally conspired and agreed with others to distribute mixtures and substances containing detectable amounts of Schedule II controlled substances, namely oxycodone, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

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

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in this Information, the defendant, MICHAEL PROCOPIO, 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 the defendant obtained directly or indirectly as a result of the offense charged in this Information, 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.

Substitute Assets Provision

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 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 forfeitable property.



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