2019R01287/MJP

# FILED

# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

DEC 0 6 2019

Δ AT 8:30 4: 26 γ M

WILLIAM T. WALSH

UNITED STATES OF AMERICA

Hon.

v.

Criminal No. 19- 881 (ES)

NORMA FLORES-FERNANDEZ,

a/k/a "Norma Camarillo," and

21 U.S.C. § 846

OSCAR ALBERTO FLORES-FERNANDEZ

#### INDICTMENT

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

#### <u>COUNT ONE</u> (Conspiracy to Distribute Cocaine)

From in or around March 2018 through on or about December 5, 2019, in the District of New Jersey, and elsewhere, the defendants,

NORMA FLORES-FERNANDEZ, a/k/a "Norma Camarillo," and OSCAR ALBERTO FLORES-FERNANDEZ,

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

#### <u>COUNT TWO</u> (Conspiracy to Distribute Heroin)

From in or around March 2018 through on or about December 5, 2019, in Bergen County, in the District of New Jersey, and elsewhere, the defendants,

NORMA FLORES-FERNANDEZ, a/k/a "Norma Camarillo," and OSCAR ALBERTO FLORES-FERNANDEZ,

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 1 kilogram or more 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)(1) and (b)(1)(A).

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

#### FORFEITURE ALLEGATIONS

- 1. The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.
- 2. Pursuant to Title 21, United States Code, Section 853, upon conviction of violating Title 21, United States Code, Section 846, as charged in this Indictment, the defendants,

## NORMA FLORES-FERNANDEZ, a/k/a "Norma Camarillo," and OSCAR ALBERTO FLORES-FERNANDEZ,

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in this Indictment.

- 3. If any of the property described above, as a result of any act or omission of the defendants:
  - (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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL,

FOREPERSON

United States Attorney

## United States District Court District of New Jersey

### UNITED STATES OF AMERICA

v.

## NORMA FLORES-FERNANDEZ, a/k/a "Norma Camarillo," and OSCAR ALBERTO FLORES-FERNANDEZ

## INDICTMENT FOR

21 U.S.C. § 846

A True Bill,

#### **CRAIG CARPENITO**

UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

Mark J. Pesce Assistant U.S. Attorney 973-645-2793

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