

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

:

- v. -

:

SEALED INDICTMENT

21 Cr. _____

EDWARD NAVEDO,

:

a/k/a "Eddy Bolsas,"

:

Defendant.

- - - - - X

COUNT ONE

(Narcotics Distribution)

The Grand Jury charges:

1. On or about December 19, 2019, in the Southern District of New York and elsewhere, EDWARD NAVEDO, a/k/a "Eddy Bolsas," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

3. The use of such controlled substance resulted in the death of Luis Pereyra on or about December 19, 2019, in New York, New York.

(Title 21, United States Code, Sections 812, 841(a)(1) and
841(b)(1)(C).)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, EDWARD NAVEDO, a/k/a "Eddy Bolsas," 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 Assets Provisions


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 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 above forfeitable property.

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


FOREPERSON


AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

EDWARD NAVEDO,
a/k/a "Eddy Bolas,"

Defendant.

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(21 U.S.C. §§ 812, 841(a)(1),
841(b)(1)(C).)

AUDREY STRAUSS
United States Attorney


Foreperson
