UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

:

v. : Crim. No. 22-

RICARDO CLAVIJO : 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)

21 U.S.C. § 846 21 U.S.C. § 856

:

INFORMATION

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

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin)

From in or about January 2021 to on or about July 12, 2021, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RICARDO CLAVIJO,

did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and possess with intent to distribute one kilogram or more of a mixture or 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.

COUNT TWO

(Possession with Intent to Distribute Heroin)

On or about July 12, 2021, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RICARDO CLAVIJO,

did knowingly and intentionally possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT THREE

(Maintaining a Drug-Involved Premises)

On or about July 12, 2021, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RICARDO CLAVIJO,

did knowingly use and maintain a place, that is, a building located at 311 Glenn Avenue, Egg Harbor Township, New Jersey, for the purpose of unlawfully storing, manufacturing and distributing heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

FOREFEITURE ALLEGATION

Upon conviction of the offense alleged in this Information, the defendant, RICARDO CLAVIJO, 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, and 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 above forfeitable property, as a result of any act or omission 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;

the United States intends, 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 described forfeitable property.

PHILIP R. SELLINGER UNITED STATES ATTORNEY

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United States District Court District of New Jersey

UNITED STATES OF AMERICA

v.

RICARDO CLAVIJO

INFORMATION FOR

21 U.S.C. §§ 841(a)(1) and (b)(1)(A), 21 U.S.C. § 846, and 21 U.S.C. § 856(a)(1)

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

ANDREW B. JOHNS ASSISTANT U.S. ATTORNEY CAMDEN, NEW JERSEY 856-757-5026