

JB/2023R00306

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

KIMBERLEE OTERO

Crim. No. 24-411 (CPO)

21 U.S.C. § 846

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 about June 2020 and continuing through in or about July 2022, in Camden County, in the District of New Jersey and elsewhere, the defendant,

KIMBERLEE OTERO,

did knowingly and intentionally conspire and agree with Co-Conspirator 1 and others to distribute and possess with intent to distribute oxycodone, a Schedule II controlled substance, 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, KIMBERLEE OTERO, 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 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

GLENN S. LEON  
Chief  
Criminal Division, Fraud Section  
U.S. Department of Justice