

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : **SEALED**  
 : **INDICTMENT**  
 :  
 - v. - : 11 Cr. 627  
 :  
MICHAEL JONES, :  
 a/k/a "M.I.," :  
 :  
 Defendant. :  
 :  
----- X

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2010, up to and including at least in or about May 2011, in the Southern District of New York and elsewhere, MICHAEL JONES, a/k/a "M.I.," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.
2. It was a part and an object of the conspiracy that MICHAEL JONES, a/k/a "M.I.," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).
3. The controlled substance involved in the offense was 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as

"crack," in violation of Title 21, United States Code, Section 841(b)(1)(B).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. On or about April 26, 2011, MICHAEL JONES, a/k/a "M.I.," the defendant, sold approximately 20 grams of crack cocaine in the vicinity of Woodworth Avenue in Yonkers, New York.

b. On or about May 3, 2011, MICHAEL JONES, a/k/a "M.I.," the defendant, sold approximately 16.5 grams of crack cocaine in the vicinity of Woodworth Avenue in Yonkers, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. On or about April 26, 2011, in the Southern District of New York, MICHAEL JONES, a/k/a "M.I.," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

6. On or about May 3, 2011, in the Southern District of New York, MICHAEL JONES, a/k/a "M.I.," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

7. As a result of committing one or more of the controlled substance offenses alleged in Counts One through Three of this Indictment, MICHAEL JONES, a/k/a "M.I.," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of one or more of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of one or more of the violations alleged in Counts One through Three of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

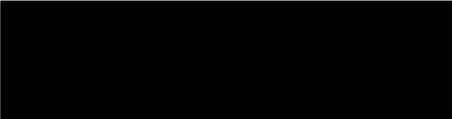
Substitute Assets Provision

8. If any 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 intention 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

  
PREET BHARARA  
United States Attorney