

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2019 OCT 18 P 2:50

WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR VIOLATION OF
THE CONTROLLED SUBSTANCES ACT

UNITED STATES OF AMERICA

*

CRIMINAL NO.

19-00216

v.

*

SECTION:

SECT. M MAG. 3

WILSON ROMERO

*

VIOLATION: 21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)

*

* * *

The Grand Jury charges that:

COUNT 1

(Possession with the Intent to Distribute 100 Grams or More of Heroin)

On or about May 6, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **WILSON ROMERO**, knowingly and intentionally possessed with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

NOTICE OF FORFEITURE

1. The allegation in Count 1 is realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

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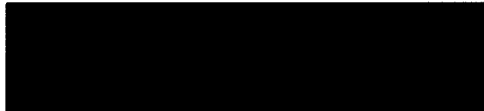
2. As a result of the offense alleged in Count 1, the defendant, **WILSON ROMERO**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense.

4. If any of the above-described property, as a result of any act or omission of the defendant:

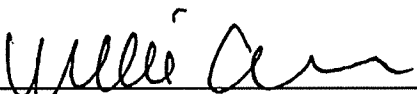
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



PETER G. STRASSER
UNITED STATES ATTORNEY



MARIA M. CARBONI
JONATHAN L. SHIH
Assistant United States Attorneys

New Orleans, Louisiana
October 18, 2019