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★ OCT 09 2019 ★

BROOKLYN OFFICE

Rec'd.
Def. 10/10

MPR:SD
F. #2019R01172

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ANGELINA BARINI,

Defendant.

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 19-428 (S-1)(BMC)
(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C),
853(a) and 853(p); T. 18, U.S.C., §§ 2 and
3551 et seq.)

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Distribution and Possession with Intent to Distribute
Fentanyl, Methamphetamine and Cocaine)

1. On or about and between July 11, 2019 and August 5, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANGELINA BARINI, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; (b) a substance containing methamphetamine, a Schedule II controlled substance; and (c) a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWO

(Distribution of Fentanyl Causing the Death of John Doe #1)

2. On or about July 11, 2019, within the Eastern District of New York and elsewhere, the defendant ANGELINA BARINI, together with others, did knowingly and intentionally distribute a controlled substance, which offense involved a substance containing fentanyl, a Schedule II controlled substance, the use of which resulted in the death of John Doe #1, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

(Distribution of Fentanyl, Methamphetamine and Cocaine
Causing the Death of John Doe #2)

3. On or about August 5, 2019, within the Eastern District of New York and elsewhere, the defendant ANGELINA BARINI, together with others, did knowingly and intentionally distribute one or more controlled substances, which offense involved (a) a substance containing fentanyl, a Schedule II controlled substance; (b) a substance containing methamphetamine, a Schedule II controlled substance; and (c) a substance containing cocaine, a Schedule II controlled substance, the use of which resulted in the death of John Doe #2, an individual whose identity is known to the Grand Jury.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

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 party;
- (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 divided 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 forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2019R01172
FORM DBD-34
JUN. 85

No. 19-428

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

Angelina Barini,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 853(a) and 853(p); T. 18,
U.S.C., §§ 2 and 3551 et seq.

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Soumya Dayananda, Assistant U.S. Attorney (718) 254-7996