

FILED

JUL 24 2023

2023R00560/BL

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30
CLERK, U.S. DISTRICT COURT - DNJ
12:42 P M
SPC.

UNITED STATES OF AMERICA : Hon. Robert Kirsch
 :
 v. : Crim. No. 23-589
 :
 JONATHAN ROSALES : 18 U.S.C. § 1951(a)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges as follows:

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

On or about December 28, 2020, in Middlesex County, in the District of
New Jersey and elsewhere, the defendant,

JONATHAN ROSALES,

did knowingly and willfully conspire and agree with others to obstruct, delay,
and affect, and attempt to obstruct, delay and affect, commerce, and the
movement of articles and commodities in such commerce, by robbery, and did
commit and threaten physical violence to the person and property of another,
namely, Victim 1, an individual engaged in the distribution of marijuana, in
furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

(Attempted Hobbs Act Robbery)

On or about December 28, 2020, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JONATHAN ROSALES,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten physical violence to the person and property of another, namely, Victim 1, an individual engaged in the distribution of marijuana, in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

As a result of committing the Conspiracy to Commit Hobbs Act Robbery and the Attempted Hobbs Act Robbery offenses in violation of 18 U.S.C. § 1951(a), as charged in Counts One and Two this Indictment, the defendant, JONATHAN ROSALES, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offenses.

SUBSTITUTE ASSETS PROVISION

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 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 intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.

A TRUE BILL



FOREPERSON

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23-589 (RK)

**United States District Court
District of New Jersey**


UNITED STATES OF AMERICA

v.

JONATHAN ROSALES

**INDICTMENT FOR
18 U.S.C. § 1951(a)**

A True Bill,


Foreperson

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

BENJAMIN LEVIN
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2762
