

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
NELSON SANTOS MUNOZ and	:	21 U.S.C. § 846
AMAUROS SANTOS MUNOZ	:	21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

**I N D I C T M E N T**

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

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine)

From in or around November 2022 through in or around January 2023,  
in Middlesex County, in the District of New Jersey, and elsewhere, the  
defendants,

**NELSON SANTOS MUNOZ and  
AMAUROS SANTOS MUNOZ,**

did knowingly and intentionally conspire and agree with others to distribute and  
possess with intent to distribute 5 kilograms or more of a mixture and substance  
containing a detectable amount of cocaine, a Schedule II controlled substance,  
contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

(Possession with Intent to Distribute Cocaine)

On or about January 26, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

**NELSON SANTOS MUNOZ and  
AMAUROS SANTOS MUNOZ,**

did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**FORFEITURE ALLEGATION AS TO ALL COUNTS**

1. Upon conviction of the controlled substance offenses charged in this Indictment, the defendants,

**NELSON SANTOS MUNOZ and  
AMAUROS SANTOS MUNOZ,**

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the offenses charged in this Indictment, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses charged in this Indictment.

**Substitute Assets Provision**

2. If any of the property described above, as a result of any act or omission of the defendants:


- 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

A True Bill,

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Foreperson

  
PHILIP R. SELLINGER  
United States Attorney