

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

| | | |
|--------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA | : | Hon. |
| | : | |
| v. | : | Crim. No. 25- |
| | : | |
| DANIELLE MOLINARI | : | 21 U.S.C. § 846 |
| | : | 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) |
| | : | |

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Drug Conspiracy)

Between in and around February 2019 through in and around March 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

DANIELLE MOLINARI,

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

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

COUNT TWO

(Distribution of, and Possession with Intent to Distribute, Oxycodone)

Between in and around February 2019 through in and around March 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

DANIELLE MOLINARI,

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

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

FORFEITURE ALLEGATION

As a result of committing the controlled substance offenses charged in this Information, the defendant,

DANIELLE MOLINARI,

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the charged offenses, 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 alleged in this Information.

SUBSTITUTE ASSETS PROVISION

If any of the property described above, 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,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



ALINA HABBA
United States Attorney

CASE NUMBER: 25-

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UNITED STATES OF AMERICA

v.

DANIELLE MOLINARI

INFORMATION FOR

**21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)**

**ALINA HABBA
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

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