

RECEIVED

By Lorraine McNerney at 4:28 pm, Mar 12, 2021

2020R00508/HMB

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
v.	:	Criminal No. 21- 217-BRM
	:	
	:	
NAOMI HERNANDEZ	:	21 U.S.C. § 846,
	:	21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)
	:	

INDICTMENT

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

COUNT ONE
(Conspiracy to Distribute Fentanyl)

From in or around April 2020 through on or about May 13, 2020, in
Passaic County, in the District of New Jersey, and elsewhere, the defendant,

NAOMI HERNANDEZ,

did knowingly and intentionally conspire and agree with others to distribute
and possess with intent to distribute 400 grams or more of a mixture and
substance containing a detectable amount of fentanyl, a Schedule II controlled
substance, contrary to Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(A).

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

COUNT TWO
(Possession with Intent to Distribute Fentanyl)

On or about May 13, 2020, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

NAOMI HERNANDEZ,

did knowingly and intentionally possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

FORFEITURE ALLEGATION

1. The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of violating Title 21, United States Code, Sections 841 and 846, as charged in Counts One and Two of this Indictment, the defendant,

NAOMI HERNANDEZ,

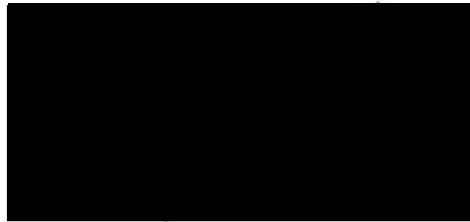
shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in this Information.

3. 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).



Rachael A. Honig
RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 21- 217-BRM

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

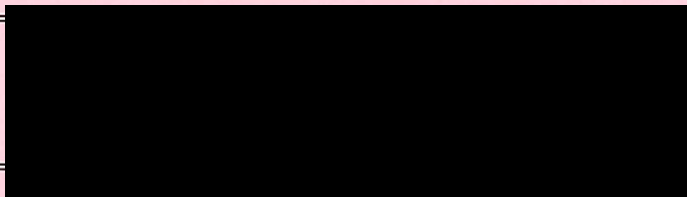
UNITED STATES OF AMERICA

v.

NAOMI HERNANDEZ

INDICTMENT FOR

**21 U.S.C. § 846,
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)**



RACHAEL A. HONIG
ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

HAYDEN M BROCKETT
ASSISTANT U.S. ATTORNEY
973-645-3883
