

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
:   
v. : Criminal No. 18-  
:   
MICHELE CALL : 21 U.S.C. § 846  
:   
: : INFORMATION

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

From in or around April 2016 through in or around December 2017, in  
Hunterdon County, in the District of New Jersey, and elsewhere, the defendant,

MICHELE CALL,

did knowingly and intentionally conspire and agree with Nelida Rios, Marie  
DeJulia, Alicia Balaban, and others to distribute and possess with intent to  
distribute a quantity of a mixture and substance containing a detectable  
amount of oxycontin, 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.

**FORFEITURE ALLEGATION**

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

2. As a result of committing the controlled substance offense in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846, as charged in this Information, the defendant,

MICHELE CALL,

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 the defendant obtained directly or indirectly as a result of the offense charged in Count One of this Information, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense.

3. The property to be forfeited includes, but is not limited to, approximately \$40,000 in United States currency, a sum of money representing the proceeds the defendant obtained as a result of the offense charged in this Information.

**Substitute Assets Provision**

4. 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 said defendant up to the value of the forfeitable property described above.



Craig Carpenito  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER:

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

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**UNITED STATES OF AMERICA**

**v.**

**MICHELE CALL**

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**INFORMATION FOR**  
21 U.S.C. § 846

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**CRAIG CARPENITO**  
*U.S. ATTORNEY*  
*NEWARK, NEW JERSEY*

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**DANIELLE ALFONZO WALSMAN**  
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