

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 19-
 :
 ROLFI FERREIRA-CRUZ : 21 U.S.C. § 846
 : 21 U.S.C. §§ 841(a)(1), (b)(1)(B), and (b)(1)(C)
 : 18 U.S.C. § 924(c)(1)(A)(i)
 : 18 U.S.C. § 2

INDICTMENT

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

COUNT ONE
(Conspiracy to Distribute Heroin and Cocaine)

On or about January 22, 2019, in Passaic County, in the District of New
Jersey, and elsewhere, defendant

ROLFI FERREIRA-CRUZ

did knowingly and intentionally conspire and agree with others to distribute
and possess with intent to distribute 100 grams or more of a mixture and
substance containing a detectable amount of heroin, a Schedule I controlled
substance, contrary to Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(B), and a quantity 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)(C).

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

COUNT TWO

(Possession with Intent to Distribute Heroin and Cocaine)

On or about January 22, 2019, in Passaic County, in the District of New Jersey, and elsewhere, defendant

ROLFI FERREIRA-CRUZ

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity 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), (b)(1)(B), and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

(Carrying a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 22, 2019, in Passaic County, in the District of New Jersey, and elsewhere, defendant

ROLFI FERREIRA-CRUZ

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute heroin and cocaine, as charged in Count Two of this Indictment, did knowingly possess a loaded firearm, namely, a .40 caliber Glock 23 handgun, bearing serial number TYZ577, with an extended magazine.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and Section 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

As a result of committing the controlled substance offenses in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), (b)(1)(C), and 846, as charged in Counts One and Two of this Indictment, defendant

ROLFI FERREIRA-CRUZ

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 said offense, 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 Counts One and Two of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT THREE

As a result of committing the firearms offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), as charged in Count Three of this Indictment, defendant

ROLFI FERREIRA-CRUZ

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of such offense, including, but not limited to, the following:

- (1) A .40 caliber Glock 23 handgun, bearing serial number TYZ577;
- (2) Forty-two rounds of .40 caliber ammunition; and

- (3) Ninety-two rounds of .380 caliber ammunition.

Substitute Assets Provision
(As To All Forfeiture Allegations)

If by any act or omission of the defendant any of the property subject to forfeiture described above:

- 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), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-

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

UNITED STATES OF AMERICA

v.

ROLFI FERREIRA-CRUZ

INDICTMENT FOR

21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1), (b)(1)(B), (b)(1)(C)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 2

A True Bill,

Foreperson

CRAIG CARPENITO

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