

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 19 -
 :
 RAJERI CURRY : 21 U.S.C. § 846
 : 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

INDICTMENT

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

COUNT ONE
(Conspiracy to Distribute Heroin and Fentanyl)

From at least in or around March 2018 through in or around June 2018,
in Atlantic and Essex Counties, in the District of New Jersey and elsewhere,
the defendant,

RAJERI CURRY,

did knowingly and intentionally conspire and agree with others to distribute,
and possess with the intent to distribute, a mixture and substance containing
detectable amounts of heroin, a Schedule I controlled substance, and fentanyl,
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)

On or about January 17, 2018, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RAJERI CURRY,

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

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

COUNT THREE
**(Distribution and Possession with Intent to Distribute
Heroin and Fentanyl)**

On or about June 1, 2018, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

RAJERI CURRY,

did knowingly and intentionally distribute, and possess with the intent to distribute, a mixture and substance containing detectable amounts of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and serious bodily injury to, and the death of, a person resulted from the use of such mixture and substance distributed by the defendant.

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

FORFEITURE ALLEGATION

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of the offenses alleged in this Indictment in violation of Title 21, United States Code, Sections 841 and 846, the defendant,

RAJERI CURRY,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and any 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 Indictment.

Substitute Assets Provision

2. If any of the property described in the forfeiture allegation as to Counts One, Two, and Three 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 21 U.S.C. § 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.

RAJERI CURRY

INDICTMENT FOR

21 U.S.C. § 846

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

A True Bill.

Foreperson

CRAIG CARPENITO

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