

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

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	Crim. No. 19-
	:	
KAREN ARMSTRONG	:	21 U.S.C. § 846

I N F O R M A T I O N

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

COUNT ONE
(Conspiracy to Distribute Cocaine Base and Heroin)

From at least in or around December 2017 through on or about October 11, 2018, in the District of New Jersey and elsewhere, the defendant,

KAREN ARMSTRONG,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a quantity 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)(C).

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

FORFEITURE ALLEGATION AS TO COUNT ONE

1. The allegations set forth in this Information are hereby re-alleged 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. § 846, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) as charged in Count One of this Information, the defendant,

KAREN ARMSTRONG,

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 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 offense alleged in this Information.

Substitute Assets Provision

3. 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 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.

CRAIG CARPENITO
United States Attorney