

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. As a result of committing controlled substance offenses as charged in this Indictment, the defendants,

JHAN CARLOS CAPELLAN MALDONADO,
JOSE ANTONIO VAZQUEZ PENA, a/k/a "Tono,"
REIMON GENAO ROSARIO, and
DAURY CONTRERAS ULERIO, a/k/a "Majimbou"

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such 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 violation alleged in this Indictment.

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).

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-cr-568-ES

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

JHAN CARLOS CAPELLAN MALDONADO,
JOSE ANTONIO VAZQUEZ PENA, a/k/a "Tono,"
REIMON GENAO ROSARIO, and
DAURY CONTRERAS ULERIO, a/k/a "Majimbou"

INDICTMENT FOR

21 U.S.C. § 846

A True Bill,

CRAIG CARPENTO
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(Ed. 1/97)

FILED

AUG 15 2019

AFB
WILLIAM T. WALSH
CLERK

12:50 PM

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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