

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
v.	:	Criminal No. 20-185
	:	
CARL BROWN,	:	21 U.S.C. § 846
a/k/a "C Dub,"	:	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
a/k/a "Dub"	:	

SUPERSEDING INFORMATION

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

COUNT ONE
(Drug Conspiracy)

From on or about September 1, 2018 through on or about October 1, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**CARL BROWN,
a/k/a "C Dub,"
a/k/a "Dub,"**

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 heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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

COUNT TWO
(Distribution of Heroin)

On or about January 23, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

**CARL BROWN,
a/k/a "C Dub,"
a/k/a "Dub,"**

did knowingly and intentionally possess with 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).

FORFEITURE ALLEGATION

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

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of the offense in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846, as charged in Counts One and Two of this Superseding Information, the defendant,

**CARL BROWN,
a/k/a "C Dub,"
a/k/a "Dub,"**

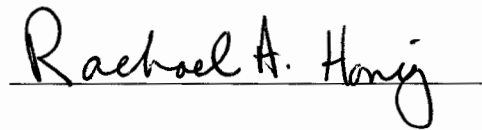
shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in this Superseding Information.

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 handwritten signature in black ink, reading "Rachael A. Honig", is written over a horizontal line.

RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 20-185

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

UNITED STATES OF AMERICA

v.

**CARL BROWN,
a/k/a "C Dub,"
a/k/a "Dub"**

**SUPERSEDING INFORMATION
FOR**

**21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)**

RACHAEL A. HONIG
*ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY*

FRANCESCA A. LIQUORI
*ASSISTANT U.S. ATTORNEY
973-297-4373*
