# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
LOLITA PAYNTER,	:	21 U.S.C. § 841
a/k/a "Lo"	:	21 U.S.C. § 846
	:	18 U.S.C. § 2

#### INDICTMENT

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

### COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone)

From at least in or about January 2020 through on or about March 10,

2020, in Camden County, in the District of New Jersey, and elsewhere, defendant

## LOLITA PAYNTER, a/k/a "Lo"

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II 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 2

(Distribution of and Possession with Intent to Distribute Oxycodone, and Attempt So to Do)

On or about January 10, 2020, in Camden County, in the District of New Jersey, and elsewhere, defendant

# LOLITA PAYNTER, a/k/a "Lo"

did knowingly and intentionally distribute and possess with intent to distribute, and attempt so to do, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

## COUNT 3

(Distribution of and Possession with Intent to Distribute Oxycodone, and Attempt So to Do)

On or about February 10, 2020, in Camden County, in the District of New Jersey, and elsewhere, defendant

## LOLITA PAYNTER, a/k/a "Lo"

did knowingly and intentionally distribute and possess with intent to distribute, and attempt so to do, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

### COUNT 4

(Distribution of and Possession with Intent to Distribute Oxycodone, and Attempt So to Do)

On or about March 2, 2020, in Camden County, in the District of New Jersey, and elsewhere, defendant

## LOLITA PAYNTER, a/k/a "Lo"

did knowingly and intentionally distribute and possess with intent to distribute, and attempt so to do, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

#### FORFEITURE ALLEGATION

As a result of committing one or more of the controlled substance offenses in violation of Title 21, Untied States Code, Sections 841(a)(1), 841(b)(1)(C), and 846, as charged in Counts 1 - 4 of this Indictment, the defendant

### LOLITA PAYNTER, a/k/a "Lo"

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting and derived from any proceeds LOLITA PAYNTER obtained directly and indirectly as a result of the said offenses, and any and all of LOLITA PAYNTER's property used and intended to be used in any manner and part to commit and to facilitate the commission of one and more of the offenses alleged in this Indictment.

## SUBSTITUTE ASSETS PROVISION

If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of LOLITA PAYNTER up to the value of the above forfeitable property

A TRUE BILL

FOREPERSON

Rechael A. Heniz

RACHAEL A. HONIG <sup>6</sup> Acting United States Attorney

CASE NUMBER:

# United States District Court District of New Jersey

# UNITED STATES OF AMERICA

v.

# LOLITA PAYNTER

# **INDICTMENT FOR**

21 U.S.C. § 841 21 U.S.C. § 846

A True Bill,

# Foreperson

RACHAEL A. HONIG ACTING UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

GABRIEL J. VIDONI SARA F. MERIN Assistant U.S. Attorneys Camden & Newark, New Jersey (856) 757-5026