

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 21-
 :
 WILLIAM T. BOUZA : 21 U.S.C. § 846
 : 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)
 : 21 U.S.C. §§ 841(a)(1) & (b)(1)(C)
 : 18 U.S.C. § 1956(h)

INDICTMENT

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

COUNT ONE
(Conspiracy to Distribute Controlled Substances)

From at least as early as in or around February 2019 through on or about
November 5, 2019, in the District of New Jersey and elsewhere, the defendant,

WILLIAM T. BOUZA,

did knowingly and intentionally conspire and agree with others, to distribute and
possess with intent to distribute 1 kilogram or more of heroin, a Schedule I
controlled substance, and 400 grams or more of fentanyl, a Schedule II
controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1)
and (b)(1)(A).

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

COUNT TWO

(Possession with Intent to Distribute Controlled Substances)

On or about October 30, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

WILLIAM T. BOUZA,

did knowingly and intentionally possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT THREE
(Possession with Intent to Distribute Heroin)

On or about October 30, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

WILLIAM T. BOUZA,

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).

COUNT FOUR
(Conspiracy to Commit Money Laundering)

From at least as early as in or around September 2018 through on or about November 5, 2019, in the District of New Jersey and elsewhere, the defendant,

WILLIAM T. BOUZA,

did knowingly and intentionally conspire and agree with others to knowingly conduct and attempt to conduct financial transactions, which in fact involved the proceeds of a specified unlawful activity, that is, the manufacture, importation, and distribution of a controlled substance, with the intent to promote the carrying on of such specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i).

In violation of Title 18, United States Code, Section 1956(h), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH THREE

As a result of committing the controlled substance offenses in violation of 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A), and (b)(1)(C), as charged in Counts One through Three of this Indictment, the defendant,

WILLIAM T. BOUZA,

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 offenses, 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 offenses alleged in Counts One through Three of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT FOUR

As a result of committing the money laundering offense charged in Count Four of this Indictment, the defendant,

WILLIAM T. BOUZA,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real or personal, involved in such money laundering offense, and all property traceable to such property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

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 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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON



RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: 21-

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

UNITED STATES OF AMERICA

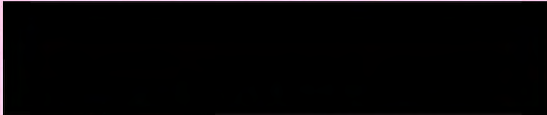
v.

WILLIAM T. BOUZA

INDICTMENT FOR

21 U.S.C. § 846
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)
21 U.S.C. §§ 841(a)(1) & (b)(1)(C)
18 U.S.C. 1956(h)

A True Bill,


Foreperson

RACHAEL A. HONIG

*ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY*

SHAWN P. BARNES
ASSISTANT U.S. ATTORNEY
973-645-2848
