2015R00590/SFM

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17-

:

Hon. Esther Salas, U.S.D.J.

: 21 U.S.C. § 846

RHONDA MUSALLAM

v.

:

SUPERSEDING INFORMATION

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

From on or about June 10, 2014 through on or about July 18, 2014, in Hudson County, in the District of New Jersey, and elsewhere, defendant

RHONDA MUSALLAM

did knowingly and intentionally conspire and agree with Victoria Horvath and 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.

FORFEITURE ALLEGATION

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853.

The United States hereby gives notice to Rhonda Musallam that, upon conviction of the offense alleged in this Information, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense up to and including the amount of the proceeds obtained from the offense.

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 the defendants up to the value of the forfeitable property described in this forfeiture allegation.

WILLIAM E. FITZPATRIC

Acting United States Attorney

CASE NUMBER: _	
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United States District Court District of New Jersey

UNITED STATES OF AMERICA

v.

RHONDA MUSALLAM

SUPERSEDING INFORMATION FOR

21 U.S.C. § 846

WILLIAM E. FITZPATRICK

ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

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