

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA : SEALED INDICTMENT
- v. - : 15 Cr. 467
MICHAEL HUGHES JR., :
Defendant. :
- - - - - x

COUNT ONE

The Grand Jury charges:

1. On or about January 10, 2015, in the Southern District of New York, MICHAEL HUGHES JR., the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

COUNT TWO

The Grand Jury further charges:

2. On or about February 6, 2015, in the Southern District of New York, MICHAEL HUGHES JR., the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, to wit, mixtures and

substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

COUNT THREE

The Grand Jury further charges:

3. On or about February 6, 2015, in the Southern District of New York, MICHAEL HUGHES JR., the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count Two of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, MICHAEL HUGHES JR., the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Counts One and Two of this Indictment,

including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

5. If any of the property described above as being subject to forfeiture, 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 person;
- 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 subdivided 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 defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841 and 853.)



FOREPERSON


PREET BHARARA
United States Attorney

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Defendant.

SEALED INDICTMENT


15 Cr.

(18 U.S.C. § 924(c),
21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.
