UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DANIEL LECLAIR and
JEAN ARCOS,

Defendants.

SEALED INDICTMENT

26 Cr. 518

COUNT ONE
(Conspiracy to Distribute Controlled Substances)

The Grand Jury charges:

1. From at least in or around July 2026 through at least in or around November 2026, in the Southern District of New York and elsewhere, DANIEL LECLAIR and JEAN ARCOS, the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that DANIEL LECLAIR and JEAN ARCOS, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1).

3. The controlled substances involved in the offense were (i) 50 grams and more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) mixtures and substances containing a detectable amount of 3,4-methylenedioxymethamphetamine ("MDMA"), in violation of Title 21, United States Code, Section 841(b)(1)(C); (iii) mixtures and substances containing a detectable amount of γ-

Butyrolactone (gamma-Butyrolactone or "GBL"), in violation of Title 21, United States Code, Sections 841(b)(1)(C) and 813(a); and (iv) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Possession of Controlled Substances with Intent to Distribute)

The Grand Jury further charges:

4. On or about July 9, 2026, in the Southern District of New York and elsewhere, DANIEL LECLAIR and JEAN ARCOS, the defendants, knowingly and intentionally distributed and possessed with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substances involved in the offense were (i) 50 grams and more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) mixtures and substances containing a detectable amount of 3,4-methylenedioxymethamphetamine ("MDMA"), in violation of Title 21, United States Code, Section 841(b)(1)(C); (iii) mixtures and substances containing a detectable amount of γ-Butyrolactone (gamma-Butyrolactone or "GBL"), in violation of Title 21, United States Code, Sections 841(b)(1)(C) and 813(a); and (iv) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

(Title 21, United States Code, Sections 812, 813(a), 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 841(b)(1)(E).)

COUNT THREE
(Possession of Child Pornography)

The Grand Jury further charges:

6. In or around July 2026, in the Southern District of New York and elsewhere, JEAN ARCOS, the defendant, knowingly possessed and accessed with intent to view a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, ARCOS possessed sexually explicit images of minors, including images of prepubescent minors and minors who had not attained 12 years of age, in his residence in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).)

FORFEITURE ALLEGATION

7. As a result of committing the offenses alleged in Count One and Count Two of this Indictment, DANIEL LECLAIR and JEAN ARCOS, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

8. As a result of committing the offense alleged in Count Three of this Indictment, JEAN ARCOS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross

profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property: (i) one silver Sandisk thumb drive maintained under SDNY Evidence No. 11935; (ii) one silver 128GB thumb drive maintained under SDNY Evidence No. 11936; (iii) one black Sandisk thumb drive maintained under SDNY Evidence No. 11937; and (iv) one orange CMF cellphone maintained under SDNY Evidence No. 11927.

Substitute Assets Provision

9. 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 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) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[redacted]

November 4, 2024

JAMES M. MCDONALD
United States Attorney