

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
MICHAEL JONES, :
:
Defendant. :
----- X

SEALED INDICTMENT

18 Cr.

18 CRIM 662

COUNT ONE

The Grand Jury charges:

1. On or about December 5, 2017, in the Southern District of New York and elsewhere, MICHAEL JONES, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of heroin and fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

3. The use of such controlled substance resulted in the serious bodily injury and death of Diana Haikova on or about

December 5, 2017 in Manhattan, New York, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Section 2.)

COUNT TWO

The Grand Jury further charges:

4. On or about February 14, 2018, in the Southern District of New York and elsewhere, MICHAEL JONES, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, MICHAEL JONES, the defendant, 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 the defendant obtained directly or indirectly as a result of the 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 and Two of this Indictment.

Substitute Assets Provision

7. 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;

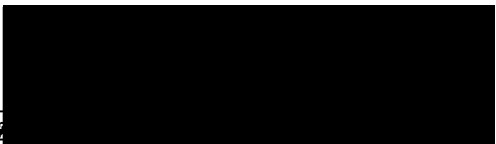
c) has been placed beyond the jurisdiction of the Court;

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), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



Geoffrey Berman
GEOFFREY S. BERMAN
United States Attorney

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(21 U.S.C. §§ 841(a) (1)
and 841(b) (1) (C),
18 U.S.C. § 2)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL



Foreperson.
