

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:   
UNITED STATES OF AMERICA : INDICTMENT  
:   
- v. - : 19 Cr.  
:   
JEANLUC JOILES and :   
JAIME ROSARIO JR., :   
:   
Defendants. :   
:   
- - - - - X

**COUNT ONE**  
**(Narcotics Conspiracy)**  
**(As to JEANLUC JOILES and JAIME ROSARIO JR.)**

The Grand Jury charges:

1. From at least in or about June 2019 through in or about October 2019, in the Southern District of New York and elsewhere, JEANLUC JOILES and JAIME ROSARIO JR., the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JEANLUC JOILES and JAIME ROSARIO JR., 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, Section 841(a)(1).

3. The controlled substances that JEANLUC JOILES and JAIME ROSARIO JR., the defendants, conspired to distribute and possess

with intent to distribute were (a) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (b) a quantity of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (c) a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

**COUNT TWO**  
**(Narcotics Distribution)**  
**(As to JEANLUC JOILES)**

The Grand Jury further charges:

4. On or about June 19, 2019, in the Southern District of New York and elsewhere, JEANLUC JOILES, the defendant intentionally and knowingly distributed and possessed with the 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 fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

6. The use of such controlled substance resulted in the death of Rachel Spiteri on or about June 19, 2019 in New York, New York.

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

**COUNT THREE**  
**(Firearms Offense)**  
**(As to JAIME ROSARIO JR.)**

The Grand Jury further charges:

7. On or about October 16, 2019, in the Southern District of New York and elsewhere, JAIME ROSARIO 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 One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code,  
Sections 924(c)(1)(A)(i) and 2.)

**FORFEITURE ALLEGATION**

8. As a result of committing the offense alleged in Count One of this Indictment, JEANLUC JOILES and JAIME ROSARIO JR., 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.

9. As a result of committing the offense alleged in Count Two of this Indictment, JEANLUC JOILES, 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 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.

Substitute Assets Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

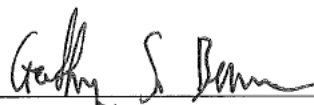
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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 defendants up to the value of the above forfeitable property.

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



FOREPERSON

  
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GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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INDICTMENT

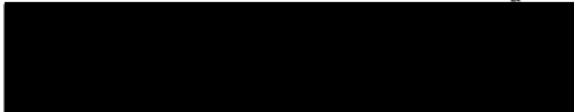
19 Cr.

(21 U.S.C. §§ 846, 841(a)(1),  
841(b)(1)(A), and 841(b)(1)(C);  
18 U.S.C. §§ 924(c) & 2.)

GEOFFREY S. BERMAN

United States Attorney

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Foreperson

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