

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	<u>SEALED SUPERSEDING</u>
UNITED STATES OF AMERICA	:	<u>INDICTMENT</u>
	:	
-v.-	:	S1 17 Cr. 219
	:	
ANTHONY DODAJ, and	:	
DUANE MARTINEZ,	:	
	:	
Defendants.	:	
	:	
- - - - -	x	

COUNT ONE

The Grand Jury charges:

1. From at least in or about September 2016 through in or about March 2017, in the Southern District of New York and elsewhere, ANTHONY DODAJ and DUANE MARTINEZ, 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 ANTHONY DODAJ and DUANE MARTINEZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ANTHONY DODAJ and DUANE MARTINEZ, the defendants, conspired to distribute and possess with the intent to distribute was mixtures and

substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

4. The use of such controlled substance on or about January 1, 2017 resulted in the serious bodily injury and death of Ivy Katz in New York, New York.

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

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, ANTHONY DODAJ and DUANE MARTINEZ, 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 the defendants obtained directly or indirectly as a result of the offense 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 offense alleged in Count One of this Indictment.

Substitute Assets Provision

6. 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;

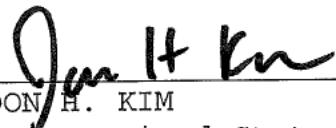
c) has been placed beyond the jurisdiction of
the Court;

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.)


FOREPERSON


JOON H. KIM
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANTHONY DODAJ, and
DUANE MARTINEZ,

Defendants.

SEALED SUPERSEDING INDICTMENT

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(21 U.S.C. § 846)

JOON H. KIM

Acting United States Attorney

[REDACTED]
[REDACTED]
Foldeperson
[REDACTED]
