

**FILED**  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.

**CR 18 - 00444**

★ **AUG 16 2018** ★

AB:JLG  
F. #2018R01658

J.P.  
**BROOKLYN OFFICE**

**GARAUFIS, J.**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**REYES, M.J.**

----- X

UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 813, 841(b)(1)(C),  
846, 853(a) and 853(p); T. 18, U.S.C.,  
§§ 2 and 3551 et seq.)

ALFREDO RODRIGUEZ,

Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute a Controlled Substance Analogue)

1. In or about and between July 2018 and August 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALFREDO RODRIGUEZ, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing *N*-Ethylpentylone, a Schedule I controlled substance analogue, as defined in Title 21, United States Code, Section 802(32)(A), which controlled substance analogue was intended for human consumption, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 813 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

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COUNT TWO

(Attempted Possession with Intent to Distribute a Controlled Substance Analogue)

2. In or about and between July 2018 and August 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALFREDO RODRIGUEZ, together with others, did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, which offense involved a substance containing *N*-Ethylpentylone, a Schedule I controlled substance analogue, as defined in Title 21, United States Code, Section 802(32)(A), which controlled substance analogue was intended for human consumption, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 813 and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. 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;

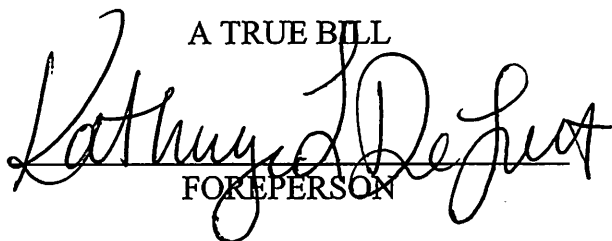
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

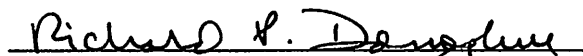
divided without difficulty;

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 forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

  
FOREPERSON

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. #2018R01658  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*ALFREDO RODRIGUEZ,*

Defendant.

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**INDICTMENT**

(T. 21, U.S.C., §§ 813, 841(b)(1)(C), 846, 853(a) and 853(p); T. 18, U.S.C., §§  
2 and 3551 et seq.)

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*A true bill.*

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*Foreperson*

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Filed in open court this ----- day,

of ----- A.D. 20 -----

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*Clerk*

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Bail, \$ -----

*Justina L. Geraci, Assistant U.S. Attorney (718) 254-6224*