

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 19-568
	:	
v.	:	Hon. Esther Salas
	:	
JHAN CARLOS CAPELLAN	:	21 U.S.C. § 841(a)(1), (b)(1)(C)
MALDONADO	:	21 U.S.C. § 846
	:	18 U.S.C. § 2

SUPERSEDING INFORMATION

The Defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**COUNT ONE
(Distribution of Fentanyl)**

On or about December 27, 2018, in the District of New Jersey and elsewhere, defendant

JHAN CARLOS CAPELLAN MALDONADO

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a “fentanyl”), a Schedule II controlled substance.

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

COUNT TWO
(Conspiracy to Distribute Fentanyl)

From on or about February 12, 2019, through on or about February 27, 2019,
in the District of New Jersey and elsewhere, defendant

JHAN CARLOS CAPELLAN MALDONADO

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide (a/k/a “fentanyl”), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

1. The allegations set forth in Counts One and Two of this Superseding Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of offenses in violation of Title 21, United States Code, Sections 841 and 846, defendant

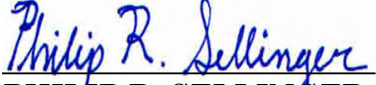
JHAN CARLOS CAPELLAN MALDONADO

shall forfeit to the United States of America any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violations, 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 violations alleged in this Superseding Information. The property to be forfeited includes United States currency.

3. If any of the property described above, 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,
the United States of America shall be entitled to forfeiture of substitute property
pursuant to Title 21, United States Code, Section 853(p).


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 19-568 (ES)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

JHAN CARLOS CAPELLAN MALDONADO

SUPERSEDING INFORMATION FOR

21 U.S.C. § 841(a)(1), (b)(1)(C)

21 U.S.C. § 846

18 U.S.C. § 2

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