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2022R00460/ES

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Michael A. Shipp
:
v. : Criminal No. 23-466-01 (MAS)
:
JINNIE HERNANDEZ : 21 U.S.C. § 843(a)(3)

INFORMATION

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

On or about the dates listed below, in the counties listed below, within the District of New Jersey, the defendant,

JINNIE HERNANDEZ,

did knowingly and intentionally acquire and obtain possession of a controlled substance, namely, Tramadol, a Schedule IV controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, as referenced in the table below, each constituting a separate count in this Information.

Count	Date	Pharmacy	County
1	September 19, 2019	Pharmacy-1	Bergen
2	September 30, 2019	Pharmacy-2	Hudson
3	June 17, 2022	Pharmacy-3	Bergen
4	August 13, 2022	Pharmacy-4	Hudson

In violation of Title 21, United States Code, Section 843(a)(3).

FORFEITURE ALLEGATION

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

2. As a result of committing the controlled substance offenses as charged in Counts One through Four of this Information, the defendant,

JINNIE HERNANDEZ,


shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, 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 Indictment.

Substitute Assets Provision

3. 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,

the United States shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b).


PHILIP R. SELLINGER
United States Attorney