

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 24cr10225
	)	
v.	)	Violations:
	)	
SAMUEL JEAN-BAPTISTE,	)	<u>Count One</u> : Conspiracy to Distribute and
	)	Possess with the Intent to Distribute Controlled
Defendant.	)	Substances (21 U.S.C. § 846)
	)	
	)	<u>Count Two</u> : Possession with the Intent to
	)	Distribute More than 50 Grams of
	)	Methamphetamine (21 U.S.C. § 841(a)(1),
	)	(b)(1)(A)(viii))
	)	
	)	<u>Drug Forfeiture Allegation</u> :
	)	(21 U.S.C. § 853)
	)	

INDICTMENT

COUNT ONE

Conspiracy to Distribute and to Possess with Intent to Distribute  
Controlled Substances  
(21 U.S.C. § 846)

The Grand Jury charges:

Beginning on or about August 28, 2023 and continuing through on or about May 29, 2024,  
in the District of Massachusetts, and elsewhere, the defendant,

SAMUEL JEAN-BAPTISTE,

conspired with other persons known and unknown to the Grand Jury, to knowingly and  
intentionally distribute and possess with intent to distribute controlled substances, in violation of  
Title 21, United States Code, Section 841(a)(1).

It is further alleged that the offense charged in Count One involved 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N- [1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vi) is applicable to this Count.

It is further alleged that, with respect to Count One, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N- [1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, were reasonably foreseeable by, and are attributable to defendant SAMUEL JEAN-BAPTISTE. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vi) is applicable to defendant SAMUEL JEAN-BAPTISTE.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Possession with Intent to Distribute More than 50 Grams of Methamphetamine  
(21 U.S.C. § 841(a)(1), (b)(1)(A)(viii))

The Grand Jury charges:

On or about May 29, 2024, in the District of Massachusetts, the defendant,

SAMUEL JEAN-BAPTISTE,

did knowingly and intentionally distribute and possess with intent to distribute more than 50 grams of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1)(A)(viii).

DRUG FORFEITURE ALLEGATION  
(21 U.S.C. § 853)

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Section 846 and Section 841, set forth in Counts One and Two, the defendant,

SAMUEL JEAN-BAPTISTE,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, 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 intention 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 property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

  
FOREPERSON



EVAN D. PANICH  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: July<sup>31</sup>, 2024  
Returned into the District Court by the Grand Jurors and filed.



07/31/2024  
DEPUTY CLERK