FILED
OCT 28 2026
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. NICOLE LASALLE, MATTHEW NUNEZ, DOMINICK ROTOLO, PATRICIA MANNING, Defendants.	)	SUPERSEDING INDICTMENT JUDGE SOLOMON OLIVER CASE NO. 1:26CR394 Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), (b)(1)(A)(viii), (b)(1)(B)(viii), (b)(1)(C), (b)(1)(E)(i), and 846; and Title 18, United States Code, Section 2.

COUNT 1
(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 846; 841(a)(1), (b)(1)(A)(viii), (b)(1)(A)(ii), (b)(1)(C), and (b)(1)(E)(i))

The Grand Jury charges:

1. From in or around March 2025, until on or about August 4, 2026, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants NICOLE LASALLE, MATTHEW NUNEZ, DOMINICK ROTOLO, PATRICIA MANNING, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with diverse others known and unknown to the Grand Jury, to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance, and a mixture

and substance containing a detectable amount of ketamine, a Schedule III controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1), (b)(1)(A)(viii), (b)(1)(A)(ii), (b)(1)(C), and (b)(1)(E)(i).

COUNT 2
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

2. On or about February 10, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

COUNT 3
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

3. On or about March 13, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii); and Title 18, United States Code, Section 2.

COUNT 4
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

4. On or about May 19, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii); and Title 18, United States Code, Section 2.

COUNT 5
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

5. On or about February 3, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

COUNT 6
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

6. On or about February 11, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

COUNT 7
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

7. On or about May 8, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

COUNT 8
(Distribution of Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

The Grand Jury further charges:

8. On or about June 18, 2026, in the Northern District of Ohio, Eastern Division, Defendants NICOLE LASALLE and MATTHEW NUNEZ did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

9. The allegations contained in Counts 1 through 8 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853. As a result of the foregoing offenses,

Defendants NICOLE LASALLE and MATTHEW NUNEZ shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of the offenses charged herein; and any and all of their property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offenses charged herein; including, but not limited to, the following:

A. $49,904,00 in U.S. Currency, seized on August 4, 2026;

B. Black 9mm handgun, no serial number, seized on August 4, 2026;

C. Black Ruger 357 revolver, serial number 54598716, seized on August 4, 2026; and

D. Miscellaneous ammunition and firearm accessories including magazines, cartridges, and a laser sight, seized on August 4, 2026.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.