

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 17-
v.	:	21 U.S.C. § 846
EDUARDO BARRAGAN ZUNINGA, a/k/a "Eduardo Barragan," a/k/a "Bill Scott"	:	<u>INFORMATION</u>

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

Between on or about March 18, 2015 through on or about March
17, 2016, in the District of New Jersey, and elsewhere, the defendant,

EDUARDO BARRAGAN ZUNINGA,
a/k/a "Eduardo Barragan,"
a/k/a "Bill Scott,"

did knowingly and intentionally conspire with others to distribute and possess
with intent to distribute 1 kilogram or more of heroin, a Schedule I controlled
substance, and to distribute and possess with intent to distribute a quantity of
cocaine, 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 contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendant, EDUARDO BARRAGAN ZUNINGA, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense[s] and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following:

- a. \$260,895 in United States currency which was seized on or about March 17, 2016 in Montclair, California (the "Seized Currency");
- b. One 2012 Nissan Sentra, VIN: 3N1AB6AP2CL639195, which was seized on or about March 7, 2016 in Huntingdon Valley, Pennsylvania (the "Seized Vehicle").

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- 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).



William E. Fitzpatrick
WILLIAM E. FITZPATRICK
Acting United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

EDUARDO BARRAGAN ZUNINGA

INFORMATION FOR

21 U.S.C. § 846

WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

MOLLY S. LORBER
ASSISTANT U.S. ATTORNEY
(609) 989-2190
