

FILED

17 JAN 27 PM 5:13

UNSEALED PER ORDER OF COURT 11/7/17

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *[Signature]* DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN JOSE PEREZ-VARGAS,  
aka "El Piolin,"

Defendant.

Case No. **17CR0219 CAB**

I N D I C T M E N T

Title 21, U.S.C., Secs. 959, 960  
and 963 - International Conspiracy  
to Distribute Controlled  
Substances; Title 21, U.S.C.,  
Secs. 952, 960, and 963 -  
Conspiracy to Import Controlled  
Substances; Title 21, U.S.C.,  
Sec. 853 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to  
and including January 2017, within the Southern District of California,  
the country of Mexico, and elsewhere, defendant JUAN JOSE PEREZ-VARGAS,  
aka "El Piolin," who will first enter the United States within the  
Southern District of California, did knowingly and intentionally  
conspire with other persons known and unknown to the grand jury, to  
distribute and cause the distribution of a controlled substance, to wit:  
500 grams and more of a mixture and substance containing a detectable  
amount of methamphetamine, and 5 kilograms and more of a mixture and  
substance containing a detectable amount of cocaine, both Schedule II  
Controlled Substances; and 1 kilogram and more of a mixture and substance

1 containing a detectable amount of heroin, and 1000 kilograms and more  
2 of marijuana, both Schedule I Controlled Substances; intending, knowing  
3 and having reasonable cause to believe that such methamphetamine,  
4 cocaine, heroin, and marijuana would be unlawfully imported into the  
5 United States; all in violation of Title 21, United States Code,  
6 Sections 959, 960, and 963.

7 Count 2

8 Beginning at a date unknown to the grand jury and continuing up to  
9 and including January 2017, within the Southern District of California,  
10 and elsewhere, defendant JUAN JOSE PEREZ-VARGAS, aka "El Piolin," did  
11 knowingly and intentionally conspire with other persons, known and  
12 unknown to the grand jury, to import a controlled substance, to wit:  
13 500 grams and more of a mixture and substance containing a detectable  
14 amount of methamphetamine, and 5 kilograms and more of a mixture and  
15 substance containing a detectable amount of cocaine, both Schedule II  
16 Controlled Substances; and 1 kilogram and more of a mixture and substance  
17 containing a detectable amount of heroin, and 1000 kilograms and more  
18 of marijuana, both Schedule I Controlled Substances; into the United  
19 States from a place outside thereof; in violation of Title 21, United  
20 States Code, Sections 952, 960, and 963.

21 Criminal Forfeiture Allegations

22 1. The allegations contained in Counts 1 and 2 are realleged and  
23 by their reference fully incorporated herein for the purpose of alleging  
24 forfeiture to the United States of America pursuant to the provisions  
25 of Title 21, United States Code, Section 853.

26 2. As a result of the commission of the felony offenses alleged  
27 in Counts 1 and 2 of this indictment, said violations being punishable  
28 by imprisonment for more than one year and pursuant to Title 21, United

1 States Code, Sections 853(a)(1) and 853(a)(2), defendant JUAN JOSE  
2 PEREZ-VARGAS, aka "El Piolin," shall, upon conviction, forfeit to the  
3 United States all his rights, title and interest in any and all property  
4 constituting, or derived from, any proceeds the defendant obtained,  
5 directly or indirectly, as the result of the offenses, and any and all  
6 property used or intended to be used in any manner or part to commit and  
7 to facilitate the commission of the violations alleged in this  
8 indictment.

9 3. If any of the above referenced forfeitable property, as a  
10 result of any act or omission of the defendant:

- 11 a. cannot be located upon the exercise of due diligence;
- 12 b. has been transferred or sold to, or deposited with, a  
13 third party;
- 14 c. has been placed beyond the jurisdiction of the Court;
- 15 d. has been substantially diminished in value; or
- 16 e. has been commingled with other property which cannot be  
17 subdivided without difficulty; it is the intent of the United States,  
18 pursuant to Title 21, United States Code, Section 853(p), to seek  
19 forfeiture of any other property of the defendant up to the value of the  
20 said property listed above as being subject to forfeiture.

21 All in violation of Title 21, United States Code, Section 853.

22 DATED: January 27, 2017.

23 A TRUE BILL:

24 María Schoa  
Foreperson

25 ALANA ROBINSON  
26 Acting United States Attorney

27 By: Matthew J. Sutton  
28 MATTHEW J. SUTTON  
Assistant U.S. Attorney