

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

2018R00313/JMP

_____	:	Hon.
UNITED STATES OF AMERICA	:	
	:	Crim. No.
v.	:	
	:	21 U.S.C. § 846
KIUNY A. PEREZ	:	
_____	:	

**I N F O R M A T I O N**

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

From in or around April 2017 through in or around November 2017, in Passaic County, in the District of New Jersey and elsewhere, the defendant,  
**KIUNY A. PEREZ,**

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within one thousand feet of the real property comprising a public and private elementary, vocational, and secondary school, contrary to Title 21, United States Code Sections 841(a)(1), 841(b)(1)(A)(ii), and 860(a).

In violation of Title 21, United States Code, Section 846.

## **FORFEITURE ALLEGATION**

1. The allegations set forth on page 1 of 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. Pursuant to Title 21, United States Code, Section 853, upon conviction of the controlled substance offense alleged in this Information, the defendant,

KIUNY A. PEREZ,

shall forfeit to the United States any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the violation alleged in this Information 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 violation alleged in this Information, including but not limited to:

a. The following property seized on or about November 6, 2017 from the person and/or residence of KIUNY A. PEREZ:

- 1) \$348.00 in U.S. currency;
- 2) \$300,400.00 in U.S. currency;
- 3) One Sunbeam digital postal scale;
- 4) One Royal Sovereign money counting machine;
- 5) One 2006 BMW model M5, bearing Vin no. WBSNB93586B58 44934;

b. The following U.S. currency seized from the accounts listed below used or controlled by KIUNY A. PEREZ:

- 1) \$51,313.22 from Valley National Bank account ending 5627; and
- 2) \$28,972.04 from Valley National Bank account ending 6397.

3. If any of the property described above, 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,

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 19-

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

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**UNITED STATES OF AMERICA**

**v.**

**KIUNY A. PEREZ**

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**INFORMATION FOR**

21 U.S.C. § 846

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**CRAIG CARPENITO**  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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**JONATHAN M. PECK**  
ASSISTANT UNITED STATES ATTORNEY

NEWARK, NEW JERSEY  
(973) 645-2700

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