

USAO#2019R01147/SPB

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

|                          |   |                          |
|--------------------------|---|--------------------------|
| UNITED STATES OF AMERICA | : | Hon. Brian R. Martinotti |
|                          | : |                          |
| v.                       | : | Crim. No. 20-736         |
|                          | : |                          |
| ADRIAN VARGAS ARROYO     | : | 21 U.S.C. §§ 841(a)(1)   |
|                          | : | & (b)(1)(A)              |
|                          | : |                          |

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

On or about October 21, 2019, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

ADRIAN VARGAS ARROYO,

did knowingly and intentionally distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.

2. Upon conviction of the controlled dangerous substance offense alleged in Count One of this Indictment, the defendant,

ADRIAN VARGAS ARROYO,

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offense, 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 offense alleged in this Indictment.

Substitute Assets Provision

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 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 intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON

  
CRAIG CARPENITO  
United States Attorney

**CASE NUMBER: 20-736 (BRM)**

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

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**UNITED STATES OF AMERICA**

**v.**

**ADRIAN VARGAS ARROYO**

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**INDICTMENT FOR**  
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)

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**A True Bill,**

  
**Foreperson**

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**CRAIG CARPENITO**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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SHAWN P. BARNES  
*ASSISTANT U.S. ATTORNEY*  
973-645-2848

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