

RECEIVED

201900761 MAR 09 2020

AT 8:30 PM
WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED

MAR - 6 2020

AT 8:30 PM
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
v.	:	Criminal No. 19-588 (ES)
	:	
MARIANO ENRIQUE ARROYO	:	
PEREZ,	:	21 U.S.C. § 846
a/k/a "Humilde,"	:	
a/k/a "Chezina"	:	

SECOND SUPERSEDING
INDICTMENT

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

From in or around 2017 through in or around July 2019, in Bergen
County, in the District of New Jersey, and elsewhere, the defendant,

MARIANO ENRIQUE ARROYO PEREZ,
a/k/a "Humilde,"
a/k/a "Chezina,"

did knowingly and intentionally conspire and agree with others to distribute
and possess with intent to distribute 5 kilograms or more of a mixture and
substance containing a detectable amount 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 set forth in this Second Superseding Indictment 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 violating Title 21, United States Code, Section 846, as charged in this Second Superseding Indictment, the defendant,

MARIANO ENRIQUE ARROYO PEREZ,
a/k/a "Humilde,"
a/k/a "Chezina,"

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation, 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 Second Superseding Indictment.

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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL,

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-588 (ES)

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

UNITED STATES OF AMERICA

v.

**MARIANO ENRIQUE ARROYO PEREZ,
a/k/a "Humilde,"
a/k/a "Chezina"**

**SECOND SUPERSEDING
INDICTMENT FOR**

21 U.S.C. § 846

A True Bill,

CRAIG CARPENITO
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

LAUREN REPOLE
FRANCESCA LIQUORI
ASSISTANT U.S. ATTORNEYS
973-645-2700

USA-48AD 8
(Ed. 1/97)