

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

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi
: :
: Crim. No. 22-563
v. : :
: 21 U.S.C. § 846
JUAN CARLOS MERCED MORENO, :
a/k/a "Samuel" :

S U P E R S E D I N G 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 at least in or around November 2020 through on or about January 29, 2021, in the District of New Jersey and elsewhere, the defendant,

**JUAN CARLOS MERCED MORENO,
a/k/a "Samuel,"**

did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

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

FORFEITURE ALLEGATION

As a result of committing the controlled substance offense alleged in this Superseding Information, the defendant, JUAN CARLOS MERCED MORENO, a/k/a “Samuel,” shall forfeit to the United States, 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 Superseding Information.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the above described forfeitable property, 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 person;
- (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 subdivided 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 described forfeitable property.

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney