

1 ELIZABETH A. STRANGE
2 First Assistant United States Attorney
3 District of Arizona
4 Angela W. Woolridge
5 Assistant U.S. Attorney
6 Arizona State Bar No. 022079
7 United States Courthouse
8 405 W. Congress Street, Suite 4800
9 Tucson, Arizona 85701
10 Telephone: 520-620-7300
11 Email: angela.woolridge@usdoj.gov
12 Attorneys for Plaintiff

FILED

2019 FEB -6 PM 4: 46

CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR19-00338 TUC-JGZ(JR)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

INDICTMENT

10 United States of America,
11 Plaintiff,
12 vs.
13 Marco Antonio Peralta-Vega,
14 Defendant.

Violation:

18 U.S.C. § 554(a), 22 U.S.C. § 2778, and
22 C.F.R. §§ 121.1 and 123.1
(Smuggling Goods From the United
States)
Count 1

18 U.S.C. §§ 924(d) and 981(a)(1)(C)
Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT ONE

19 Between on or about March 2016 and December 2018, at or near Nogales, Tucson,
20 Phoenix, and elsewhere within the District of Arizona, MARCO ANTONIO PERALTA-
21 VEGA knowingly exported and sent from the United States, and attempted to export and
22 send from the United States, any merchandise, article, or object contrary to any law or
23 regulation of the United States, and received, concealed, bought, sold, and in any manner
24 facilitated the transportation, concealment, and sale of such merchandise, article or object,
25 to wit: two Colt .38 caliber handguns, one Ceska Zbrojovka 9 mm handgun, 2,649 high
26 capacity rifle magazines, 120 Ballistic Body Armor plates, 100 rounds of .50 caliber BMG
27 ammunition, 3,500 rounds of 5.7mm ammunition, 8,000 rounds of 7.62 caliber
28 ammunition, 4,000 rounds of 5.56 caliber ammunition; 6,000 rounds of 2.23 caliber

1 ammunition, 3,100 rounds of .38 Super ammunition, 3,000 rounds of 9mm ammunition,
2 1,500 rounds of 10mm ammunition, 2,000 rounds of 380 Auto ammunition, 2,000 rounds
3 of 5.45 caliber ammunition, 3,000 rounds of .45 ACP caliber ammunition, and 1,000
4 rounds of .357 caliber ammunition; knowing the same to be intended for exportation
5 contrary to any law or regulation of the United States, to wit: Title 22, United States Code,
6 Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of
7 Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section
8 554(a).

9 **FORFEITURE ALLEGATION**

10 Upon conviction of Count One of this Indictment, the defendant, MARCO
11 ANTONIO PERALTA-VEGA, shall forfeit to the United States pursuant to Title 18,
12 United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any
13 firearms and ammunition involved in the commission of the offense, including, but not
14 limited to: two Colt .38 caliber handguns, one Ceska Zbrojovka 9 mm handgun, 100 rounds
15 of .50 caliber BMG ammunition, 3,500 rounds of 5.7mm ammunition, 8,000 rounds of 7.62
16 caliber ammunition, 4,000 rounds of 5.56 caliber ammunition; 6,000 rounds of 2.23 caliber
17 ammunition, 3,100 rounds of .38 Super ammunition, 3,000 rounds of 9mm ammunition,
18 1,500 rounds of 10mm ammunition, 2,000 rounds of 380 Auto ammunition, 2,000 rounds
19 of 5.45 caliber ammunition, 3,000 rounds of .45 ACP caliber ammunition, and 1,000
20 rounds of .357 caliber ammunition.

21 Upon conviction of Count One of this Indictment, the defendant, MARCO
22 ANTONIO PERALTA-VEGA, shall forfeit to the United States pursuant to Title 18,
23 United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section
24 2461(c), any property, real or personal, which constitutes or is derived from proceeds
25 traceable to the violation, including but not limited to: \$9,538 in U.S. currency and \$24,620
26 in Mexican pesos.

27 If any of the property described above, as a result of any act or omission of the
28 defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred

1 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of
2 the court; d) has been substantially diminished in value; or e) has been commingled with
3 other property which cannot be divided without difficulty, it is the intent of the United
4 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title
5 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said
6 defendant up to the value of the above forfeitable property, including, but not limited to,
7 all property, both real and personal, owned by the defendant.

8 All pursuant to Title 18, United States Code, Sections 924(d) and 981(a)(1)(C); Title
9 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal
10 Procedure.

11
12 A TRUE BILL

13 / s /

14
15 _____
Presiding Juror

16 ELIZABETH A. STRANGE
17 First Assistant United States Attorney
District of Arizona

**REDACTED FOR
PUBLIC DISCLOSURE**

18 / s /

19 Assistant U.S. Attorney

20 Dated: February 6, 2019
21
22
23
24
25
26
27
28