

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

MISAEL PERLA, a/k/a "Irving" (1)

HUGO SANCHEZ, a/k/a "Juice" (2)

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§  
§  
§

Criminal No.:

**3 - 1 2 C R - 4 3 8 - N**

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Commit a Drug Offense  
(Violation of 21 U.S.C. § 846)

From on or about July 2012, and continuing to on or about September 13, 2012, in the Fort Worth and Dallas Divisions of the Northern District of Texas and elsewhere, the defendants, **Misael Perla, a/k/a "Irving,"** and **Hugo Sanchez, a/k/a "Juice,"** knowingly and intentionally combined, conspired, confederated and agreed together and with other persons known and unknown to the Grand Jury, to commit one or more of the following offenses against the United States:

(a) to possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B);

(b) to possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B); and

(c) to possess with intent distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B).

In violation of 21 U.S.C. § 846.

Count Two  
Possession of Heroin with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about July 16, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Misael Perla, a/k/a "Irving,"** knowingly possessed and distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and the use of such substance resulted in the death and serious bodily injury of Alexandra Julia Moreno.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C).

Count Three  
Possession of Heroin with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about August 27, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Misael Perla, a/k/a "Irving,"** knowingly possessed and distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and the use of such substances resulted in the death and serious bodily injury of Cassidy Seward.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C).

Count Four  
Possession of Heroin with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about September 11, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a "Juice,"** a person at least 18 years of age, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and did distribute said controlled substance to a person under twenty-one years of age.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C) and 21 U.S.C. § 859.

Count Five  
Possession of Cocaine with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about September 13, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a "Juice,"** knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C).

Count Six  
Possession of Heroin with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about September 13, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a "Juice,"** knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C).

Count Seven  
Possession of Methamphetamine with Intent to Distribute  
(Violation of 21 U.S.C. § 841)

On or about September 13, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a "Juice,"** knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C).



Count Eight  
Possession of a Firearm by a Prohibited Person  
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about September 13, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a "Juice,"** having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, including: a Norinco model SKS 7.62x39 caliber rifle (Serial Number 022095, and marked "70[0223]20" and "C19"); a CN Romarm SA/Cugir model GP WASR-10 7.62x39 caliber rifle (Serial Number AM-1347-82, and marked "IN ROMANIA"); a Beretta model PX4 Storm .40 caliber pistol (Serial Number LBY34406, also marked "Made in Italy"); and an Interdynamic model KG99 9mm pistol (Serial Number 09673, also marked "Miami, FL").

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Nine  
Using and Carrying a Firearm During and in  
Relation to, and Possessing a Firearm in Furtherance of,  
a Drug Trafficking Offense  
(Violation of 18 U.S.C. § 924 (c)(1)(A)(iii))

On or about September 13, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant, **Hugo Sanchez, a/k/a “Juice,”** during and in relation to a drug trafficking crime, possession with intent to distribute a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), as alleged in Counts Five, Six, and Seven of this Indictment, for which he may be prosecuted in a court of the United States, did knowingly possess a firearm in furtherance of the commission of this offense, to wit: a Norinco model SKS 7.62x39 caliber rifle (Serial Number 022095, and marked “70[0223]20” and “C19”); a CN Romarm SA/Cugir model GP WASR-10 7.62x39 caliber rifle (Serial Number AM-1347-82, and marked “IN ROMANIA”); a Beretta model PX4 Storm .40 caliber pistol (Serial Number LBY34406, also marked “Made in Italy”); and an Interdynamic model KG99 9mm pistol (Serial Number 09673, also marked “Miami, FL”).

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Forfeiture Notice  
[21 U.S.C. § 853(a)]

Upon conviction for either of the offenses alleged in Counts One, Two, Three, Four, Five, Six, or Seven of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **Misael Perla, a/k/a “Irving,”** and **Hugo Sanchez, a/k/a “Juice,”** shall forfeit to the United States of America any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the respective offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the respective offense.

Upon conviction for any of the offenses alleged in Counts Eight and Nine of this Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendant, **Hugo Sanchez, a/k/a “Juice,”** shall forfeit to the United States of America all firearms and ammunition involved or used in the respective offense.

The above-reference property includes, but is not limited to, the following:

1. A Norinco model SKS 7.62x39 caliber rifle (Serial Number 022095, and marked “70[0223]20” and “C19”);
2. A CN Romarm SA/Cugir model GP WASR-10 7.62x39 caliber rifle (Serial Number AM-1347-82, and marked “IN ROMANIA”);
3. A Beretta model PX4 Storm .40 caliber pistol (Serial Number LBY34406, also marked “Made in Italy”); and

4. An Interdynamic model KG99 9mm pistol (Serial Number 09673, also marked "Miami, Fl").

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JASON D. SCHALL  
Assistant United States Attorney  
Texas State Bar No. 24051295  
1100 Commerce Street, Suite 300  
Dallas, Texas 75242  
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Facsimile: 214.659.8805  
E-mail: Jason.Schall@usdoj.gov

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FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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v.

MISAEEL PERLA, a.k.a. "Irving"(1)  
HUGO SANCHEZ, a.k.a. "Juice"(2)

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INDICTMENT

21 U.S.C. § 846  
Conspiracy to Commit a Drug Offense

21 U.S.C. § 841  
Possession of Cocaine with Intent to Distribute

21 U.S.C. §§ 922(g)(1) and 924(a)(2)  
Possession of a Firearm by a Prohibited Person

21 U.S.C. § 841  
Possession of Cocaine with Intent to Distribute

21 U.S.C. § 841  
Possession of Methamphetamine with Intent to Distribute

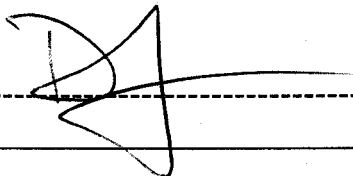
18 U.S.C. §§ 924(c)(1)(A)(iii)  
Using and Carrying a Firearm During and in Relation to, and  
Possessing a Firearm in Furtherance of, a Drug Trafficking Offense

21 U.S.C. § 853(a)  
Forfeiture Notice

10 Counts

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A true bill rendered

A handwritten signature in black ink, appearing to be a stylized 'D' or similar character, written over a horizontal dashed line.

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DALLAS

FOREPERSON

Filed in open court this \_\_\_\_\_ day of December, A.D. 2012.

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Warrant to be Issued for **MISAEL PERLA and HUGO SANCHEZ**  
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 12/19/12  
UNITED STATES ~~DISTRICT~~/MAGISTRATE JUDGE

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No Magistrate Complaint Pending