

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION

United States Courts
Southern District of Texas
FILED

JUN 22 2017

David J. Bradley
Clerk of Court

UNITED STATES OF AMERICA

§
§
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§
§

v.

Criminal No. 6:17-cr-35-S1

MARQ VINCENT PEREZ

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**18 U.S.C. § 247(a)(1) and § 2
Hate Crime – Damage to Religious Property**

On or about January 28, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

MARQ VINCENT PEREZ,

aided, abetted, and assisted by others known and unknown to the Grand Jury, through the use of a dangerous weapon, explosive, and fire, intentionally defaced, damaged, and destroyed religious real property, because of the religious character of the property, to wit: the Victoria Islamic Center, and such offense was in and affected interstate and foreign commerce.

In violation of 18 U.S.C. § 247(a)(1) and § 2.

COUNT TWO

**18 U.S.C. § 844(h) and § 2
Use of Fire to Commit a Federal Felony**

On or about January 28, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

MARQ VINCENT PEREZ,

aided, abetted, and assisted by others known and unknown to the Grand Jury, knowingly used a

fire and explosive to commit a violation of 18 U.S.C. § 247(a)(1), as set forth in Count One of this Superseding Indictment, a felony prosecutable in a court of the United States.

In violation of 18 U.S.C. § 844(h) and § 2.

COUNT THREE

**26 U.S.C. § 5841, § 5845, § 5861(d), § 5871, and 18 U.S.C. § 2
Possession of Unregistered Destructive Device**

On or about January 15, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

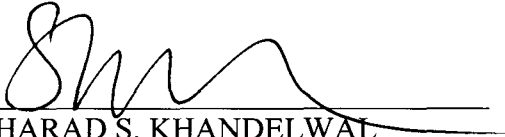
MARQ VINCENT PEREZ,

aided, abetted, and assisted by others known and unknown to the Grand Jury, knowingly received and possessed an unregistered firearm, to wit a destructive device, not registered to him in the National Firearms Registration and Transfer Record.

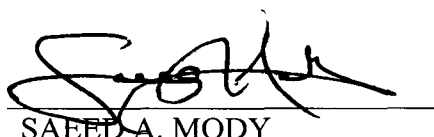
In violation of 26 U.S.C. § 5841, § 5845, § 5861(d), § 5871, and 18 U.S.C. § 2.

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

ABE MARTINEZ
ACTING US ATTORNEY
SOUTHERN DISTRICT OF TEXAS


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SAEED A. MODY
Trial Attorney