

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO LOPEZ,

Defendant.

Case No. 19CR151

[21 U.S.C. § § 846 and
841(b)(1)(B).]

Green Bay Division

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Beginning in approximately May 2017, and continuing until on or about August 2, 2019, in the State and Eastern District of Wisconsin and elsewhere,

ALEJANDRO NMI LOPEZ,

knowingly and intentionally conspired with persons known and unknown to the grand jury, to distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The quantity of drugs involved in the conspiracy involved 1 kilogram or more of a mixture and substance containing heroin, a Schedule I controlled substance; 5 kilograms or more of a mixture and substance containing cocaine, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule I controlled substance; and a mixture and substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about June 17, 2019, at XXXX Elm Street, Green Bay, in the State and Eastern District of Wisconsin,

ALEJANDRO LOPEZ

knowing he was an unlawful user of a controlled substance, that is, cocaine, knowingly possessed firearms, that, prior to his possession, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as one Smith and Wesson handgun, model number PPK/S-1, serial number 8516BAT; one Anderson manufacturing AM-15 rifle, serial number 18262043; and one Remington 12 gauge shotgun, model number 870 Express, serial number RS13293-G.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).


NOTICE OF FORFEITURE

1. Upon conviction of any of the controlled substance offenses, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offenses.

The property subject to forfeiture includes:

- a. Approximately \$13,701.00 in U.S. currency seized on June 17, 2019, from
XXX Elm Street, Green Bay, Wisconsin, the residence of Alejandro Lopez.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

for 

RICHARD G. FROHLING
Acting United States Attorney

8/31/2021
Date