# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff.

Case No. 19CR151

v.

[21 U.S.C. § § 846 and

841(b)(1)(B).]

GABIEL Y. BONILLA,

**Green Bay Division** 

Defendant.

#### **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,

# GABIEL Y. BONILLA,

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 more than 100 grams but less than 1 kilogram or more of a mixture and substance containing heroin, a Schedule I controlled substance; and more than 40 grams but less than 400 grams 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.

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

### **NOTICE OF FORFEITURE**

- 1. Upon conviction of the controlled substance offense, the defendant 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.
- 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).

RICHARD G. FROHLING Acting United States Attorney Date

9/11/2021