

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 14-  
 :  
 MARTIN LOPEZ : 18 U.S.C. § 371

**INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. On or about December 2, 2009, a full tractor trailer load of prescription respiratory medicine that originated from Dey L.P. in Allen, Texas was stolen en route to Sandoz, Incorporated, in Mechanicsburg, Pennsylvania (hereinafter "the Sandoz Load"). The wholesale acquisition cost (WAC) of the Sandoz Load was approximately \$1,150,000.

2. The stolen items in the Sandoz Load included DuoNeb, a prescription medication indicated for patients with chronic obstructive pulmonary disease.

**The Conspiracy**

3. From in or about December 2009 through in or about March 2010, in Hudson County, the District of New Jersey, and elsewhere, the defendant,

**MARTIN LOPEZ,**

did knowingly and intentionally conspire and agree with Ernesto Romero-Vidal a/k/a "Bemba," Daniel Diaz-Paez, a/k/a "El Burro," Silvio Ramirez, and others to commit an offense against the United States, namely, to receive, possess, conceal, store, sell, and dispose of goods, namely, prescription respiratory

medicine, having a value of \$5,000 or more, which had crossed a State boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, contrary to Title 18, United States Code, Section 2315.

**Object of the Conspiracy**

4. It was the object of the conspiracy for defendant MARTIN LOPEZ and his co-conspirators to receive stolen goods and to profit from the illicit sale of those stolen goods.

**Manner and Means of the Conspiracy**

5. It was part of the conspiracy that defendant MARTIN LOPEZ and his co-conspirators received stolen goods, namely, the Sandoz Load, which had traveled in interstate commerce after having been stolen.

6. It was further part of the conspiracy that defendant MARTIN LOPEZ and his co-conspirators ultimately sold the stolen goods and profited thereby through their illicit sales.

**Overt Acts**

7. In furtherance of the conspiracy and in order to effect the object thereof, defendant MARTIN LOPEZ and his co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

a. On or about February 17, 2010, co-conspirator Ernesto Romero-Vidal, a/k/a "Bemba," arranged for the sale of a portion of the Sandoz Load to a buyer ("the Buyer").

b. On or about March 2, 2010, defendant MARTIN LOPEZ arranged for the delivery of that portion of the Sandoz Load to the Buyer in New Jersey.

c. On or about March 4, 2010, co-conspirator Silvio Ramirez and co-conspirator Daniel Diaz-Paez, who was driving a white tractor trailer containing a portion of the Sandoz Load, drove to a parking lot in North Bergen, New Jersey, where co-conspirators Silvio Ramirez and Daniel Diaz-Paez met with the Buyer.

d. Upon delivery of this portion of the Sandoz Load, co-conspirator Silvio Ramirez received \$64,000 in cash for himself, defendant MARTIN LOPEZ, and others.

8. The WAC of the portion of the Sandoz Load that defendant MARTIN LOPEZ arranged to be delivered to New Jersey, and which was delivered to New Jersey by defendant MARTIN LOPEZ's co-conspirators on or about March 4, 2010, was approximately \$485,000.

All in violation of Title 18, United States Code, Section 371.

  
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PAUL J. FISHMAN  
UNITED STATES ATTORNEY

CASE NUMBER: 14-

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District of New Jersey**

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**INFORMATION FOR**

Title 18, United States Code, Section 371

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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