

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
) Criminal No. 15-300\_\_\_\_-MGM  
)  
V. )  
) 18 U.S.C. §922(g)(1)(Felon in  
) Possession of Firearms and  
) Ammunition)  
) (Counts One through Four)  
)  
1) ERIC LOPEZ, and )  
2) FRANCISCO FIGUEROA, ) 18 U.S.C. § 2 (Aiding and  
Defendants. ) Abetting)(Counts One through  
) Four)  
)  
) 18 U.S.C. § 924(d) and 28  
) U.S.C. § 2461(c)(Firearm  
) Forfeiture Allegation)

INDICTMENT

The Grand Jury charges that:

COUNT ONE: (Title 18, United States Code, Section 922(g)(1):  
Possession of a Firearm and Ammunition in  
Interstate Commerce by a Previously Convicted  
Felon; Title 18, United States Code, Section 2:  
Aiding and Abetting)

On or about November 12, 2014, in Hampden County, in the  
District of Massachusetts,

1) ERIC LOPEZ,

the defendant herein, did knowingly possess firearms and  
ammunition, to wit:

a Zastava, model SKS(M59/66A1), 7.62mm rifle, bearing  
serial number F127139;

a CZ, model CZ527M Carbine, 7.62mm rifle, bearing  
serial number A679728;  
approximately 140 rounds of .45 caliber ammunition;  
and,  
approximately 65 rounds of 7.62mm ammunition;

in and affecting commerce, after having been convicted in a  
court of a crime punishable by imprisonment for a term in excess  
of one year.

All in violation of Title 18, United States Code, Section  
922(g)(1) and Title 18, United States Code, Section 2.

COUNT TWO: (Title 18, United States Code, Section 922(g)(1):  
Possession of a Firearm in Interstate Commerce by  
a Previously Convicted Felon; Title 18, United  
States Code, Section 2: Aiding and Abetting)

On or about November 12, 2014, in Hampden County, in the  
District of Massachusetts,

2) FRANCISCO FIGUEROA,

the defendant herein, did knowingly possess firearms, to wit:

a Zastava, model SKS(M59/66A1), 7.62mm rifle, bearing  
serial number F127139; and

a CZ, model CZ527M Carbine, 7.62mm rifle, bearing  
serial number A679728;

in and affecting commerce, after having been convicted in a  
court of a crime punishable by imprisonment for a term in excess  
of one year.

All in violation of Title 18, United States Code, Section  
922(g)(1) and Title 18, United States Code, Section 2.

COUNT THREE: (Title 18, United States Code, Section 922(g)(1):  
Possession of a Firearm and Ammunition in  
Interstate Commerce by a Previously Convicted  
Felon)

On or about November 14, 2014, in Hampden County, in the  
District of Massachusetts,

1) ERIC LOPEZ,

the defendant herein, did knowingly possess firearms and  
ammunition, to wit:

a Marlin, model 1894CB, .45 caliber rifle, bearing  
serial number 92206474;

a Sturm Ruger, .22 caliber handgun, bearing serial  
number 284729; and

approximately 8 rounds of .22 caliber ammunition;

in and affecting commerce, after having been convicted in a  
court of a crime punishable by imprisonment for a term in excess  
of one year.

All in violation of Title 18, United States Code, Section  
922(g)(1).

COUNT FOUR: (Title 18, United States Code, Section 922(g)(1):  
Possession of a Firearm and Ammunition in  
Interstate Commerce by a Previously Convicted  
Felon)

On or about January 5, 2015, in Hampden County, in the  
District of Massachusetts,

1) ERIC LOPEZ,

the defendant herein, did knowingly possess a firearm and  
ammunition, to wit:

an Arsenal, model SLR-105R, 5.45mm rifle, bearing  
serial number KG440965; and

approximately 23 rounds of 5.45mm ammunition;

in and affecting commerce, after having been convicted in a  
court of a crime punishable by imprisonment for a term in excess  
of one year.

All in violation of Title 18, United States Code, Section  
922(g)(1).

FIREARM FORFEITURE ALLEGATION  
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses alleged in Counts One through Four of this Indictment,

- 1) ERIC LOPEZ, and
- 2) FRANCISCO FIGUEROA,

defendants herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offenses.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated in Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendants up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

\_\_\_\_\_  
\_\_\_\_\_  
Foreperson of the Grand Jury

\_\_\_\_\_  
\_\_\_\_\_  
Todd E. Newhouse  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the  
Grand Jurors and filed on November            ,  
2015.

\_\_\_\_\_  
Deputy Clerk of Court