2024R00838/EJJ

MAR 0 4 2025

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Michael E. Farbiarz

v.

Crim, No. 25-132

GEORGE LOPEZ.

21 U.S.C. § 846

a/k/a "Adrian Torres,"

21 U.S.C. §§ 841(a)(1), (b)(1)(A),

a/k/a "Boog," REINALDO CRUZ, (b)(1)(B), and (b)(1)(C)

a/k/a "CaChito," and

18 U.S.C. § 922(g)(1) 18 U.S.C. § 924(c)(1)(A)(i)

JOEL HERNANDEZ,

a/k/a "Wells"

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges as follows:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

From at least as early as in or around November 2023 through in or around May 2024, in Essex County and Union County, in the District of New Jersey and elsewhere, the defendants,

> GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog," REINALDO CRUZ, a/k/a "CaChito," and JOEL HERNANDEZ, a/k/a "Wells,"

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

(Possession with Intent to Distribute Methamphetamine and Cocaine)

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, the defendant,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog,"

did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

(Possession of Firearms by a Convicted Felon)

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, the defendant,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog,"

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms, namely one 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998; and one .40 caliber Glock 23, bearing serial number WKD971, and the firearms were in and affecting interstate and foreign commerce.

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

COUNT FOUR

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, the defendant,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog,"

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute methamphetamine and cocaine, as charged in Count Two of this Indictment, did knowingly possess firearms, namely a 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998, and a .40 caliber Glock 23, bearing serial number WKD971.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about September 12, 2023, in Union County, in the District of New Jersey and elsewhere, the defendants,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog," and REINALDO CRUZ, a/k/a "CaChito,"

each knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely one 9mm Diamondback FS NINE, bearing an obliterated serial number; and 17 rounds of ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce, and did aid and abet the same.

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

COUNT SIX

(Distribution of and Possession with Intent to Distribute Fentanyl)

On or about December 4, 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

REINALDO CRUZ, a/k/a "CaChito,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SEVEN

(Distribution of and Possession with Intent to Distribute Fentanyl)

On or about December 13, 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

REINALDO CRUZ, a/k/a "CaChito,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHT

(Possession with Intent to Distribute Fentanyl and Cocaine)

On or about May 16, 2024, in Union County, in the District of New Jersey, and elsewhere, the defendant,

REINALDO CRUZ, a/k/a "CaChito,"

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT NINE

(Possession with Intent to Distribute Methamphetamine and Cocaine)

On or about December 26, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

JOEL HERNANDEZ, a/k/a "Wells,"

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did aid and abet the same.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

(Possession with Intent to Distribute Cocaine)

On or about May 16, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JOEL HERNANDEZ, a/k/a "Wells,"

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did aid and abet the same.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT ELEVEN

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about May 16, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JOEL HERNANDEZ, a/k/a "Wells,"

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely one 9mm SCCY CPX-2 semi-automatic handgun, bearing an obliterated serial number, and seven rounds of 9mm ammunition, and the firearm and ammunition were in and affecting interstate commerce, and did aid and abet the same.

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

COUNT TWELVE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 16, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JOEL HERNANDEZ, a/k/a "Wells,"

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, as charged in Count Ten of this Indictment, did knowingly possess a firearm, namely one 9mm SCCY CPX-2 semi-automatic handgun, bearing an obliterated serial number, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and Section 2.

FORFEITURE ALLEGATION ONE

Upon conviction of the offenses in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C) and Title 21, United States Code, Section 846, as charged in Counts One, Two, Six, Seven, Eight, Nine, and Ten, the defendants,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog," REINALDO CRUZ, a/k/a "CaChito," and JOEL HERNANDEZ, a/k/a "Wells,"

shall forfeit, in accordance with Title 21, United States Code, Section 853, any property constituting or derived from any proceeds the defendants obtained, directly or indirectly, as a result of such offenses, and any property used or intended to be used in any manner or part, to commit or to facilitate the commission of such offense, and all property traceable to such property.

The property to be forfeited by GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog," includes, but is not limited to, approximately \$23,888 a sum of money representing the amount of proceeds the defendant obtained as a result of the offenses charged.

The property to be forfeited by REINALDO CRUZ, a/k/a "CaChito," includes, but is not limited to, approximately \$21,783, a sum of money representing the amount of proceeds the defendant obtained as a result of the offenses charged.

The property to be forfeited by JOEL HERNANDEZ, a/k/a "Wells," includes, but is not limited to, approximately \$6,627, a sum of money representing the amount of proceeds the defendant obtained as a result of the offenses charged.

FORFEITURE ALLEGATION TWO

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1)(A)(i), as charged in Counts Three, Four, Five, Eleven, and Twelve, the defendants,

GEORGE LOPEZ, a/k/a "Adrian Torres," a/k/a "Boog," REINALDO CRUZ, a/k/a "CaChito," and JOEL HERNANDEZ, a/k/a "Wells,"

shall forfeit, in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including, but not limited to, the following:

- (i) one 9mm Masterpiece Arms MPA Defender, bearing serial number FX17998;
- (ii) one .40 caliber Glock 23, bearing serial number WKD971;
- (iii) 14 rounds of ammunition;
- (iv) one 9mm Diamondback FS NINE, bearing an obliterated serial number;
- (v) one 9mm semi-automatic handgun, bearing no serial number;
- (vi) 17 rounds of ammunition;
- (vii) one 9mm SCCY CPX-2 semi-automatic handgun, bearing an obliterated serial number, and
- (viii) seven rounds of 9mm ammunition.

SUBSTITUTE ASSETS PROVISION (Applicable to All Forfeiture Allegations)

If any of the above-described forfeitable property, 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 person;
- 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 subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL

United States Attorney

CASE NUMBER: _____25-132 (MEF)

United States District Court District of New Jersey

UNITED STATES OF AMERICA

 \mathbf{v} .

GEORGE LOPEZ, REINALDO CRUZ, and **JOEL HERNANDEZ**

INDICTMENT FOR

21 U.S.C. § 846 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C) 18 U.S.C. § 922(g)(1) 18 U.S.C. § 924(c)(1)(A)(i)

A True Bill,



JOHN GIORDANO UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

> ELI JACOBS ASSISTANT U.S. ATTORNEY NEWARK, NEW JERSEY 973-645-3976