

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

FILED

Grand Jury N-18-2

2018 OCT 10 PM 2:47

CRIMINAL NO. DISTRICT COUNTY  
3:18CR241(VAB)

VIOLATIONS:

UNITED STATES OF AMERICA

v.

RAFAEL LOPEZ-MACIAS, a.k.a. "Raffa" and  
"Martin Sanchez,"

JAIME LOPEZ, a.k.a. "Compa," and

JUAN CARLOS FIGUEROA, a.k.a. "Chaito"

21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(ii)  
and 846 (Conspiracy to Distribute, and to  
Possess With Intent to Distribute, 500  
Grams or More of Cocaine)

21 U.S.C. § 841(a)(1) (Possession With  
Intent to Distribute and Distribution of  
Methamphetamine and Cocaine)

18 U.S.C. § 2 (Aiding and Abetting)

21 U.S.C. § 853 (Criminal Forfeiture)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Distribute, and to Possess With Intent to Distribute,  
500 Grams or More of Cocaine)

1. From approximately March 2018 through June 26, 2018, the exact dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, the defendants RAFAEL LOPEZ-MACIAS, a.k.a. "Raffa" and "Martin Sanchez," JAIME LOPEZ, a.k.a. "Compa," and JUAN CARLOS FIGUEROA, a.k.a. "Chaito," together with V.L. and U.L., who are not named as defendants herein but whose identities are known to the Grand Jury, and others known and unknown to the Grand Jury, did knowingly and intentionally conspire together and with one another to distribute, and to possess with intent to distribute a controlled substance, namely,

cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Cocaine Involved in the Conspiracy

2. Defendants RAFAEL LOPEZ-MACIAS, a.k.a. “Raffa” and “Martin Sanchez,” JAIME LOPEZ, a.k.a. “Compa,” and JUAN CARLOS FIGUEROA, a.k.a. “Chaito,” knew and reasonably should have foreseen from their own conduct and that of other members of the narcotics conspiracy charged in Count One that the conspiracy involved 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 841(b)(1)(B)(ii).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

(Possession with Intent to Distribute Methamphetamine)

3. On or about June 26, 2018, in the District of Connecticut, the defendant RAFAEL LOPEZ-MACIAS, a.k.a. “Raffa” and “Martin Sanchez,” knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

COUNT THREE

(Possession with Intent to Distribute and Distribution of Cocaine)

4. On or about June 7, 2018, in the District of Connecticut, the defendant JAIME LOPEZ, a.k.a. “Compa,” knowingly and intentionally possessed with intent to distribute and did distribute a mixture and substance containing a detectable quantity of cocaine, a Schedule II controlled substance.

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

FORFEITURE ALLEGATION  
(Controlled Substance Offenses)

5. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Three of this Indictment, the defendants RAFAEL LOPEZ-MACIA, a.k.a. "Raffa" and "Martin Sanchez," JAIME LOPEZ, a.k.a. "Compa," and JUAN CARLOS FIGUEROA, a.k.a "Chaito," shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations of Title 21, United States Code, Sections 841 and 846, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations and a sum of money equal to the total amount of proceeds obtained as a result of the offenses, including but not limited to: (1) a Volkswagen Jetta bearing CT Registration AC-08584 and VIN 3VWBZ7AJ3BM308761.

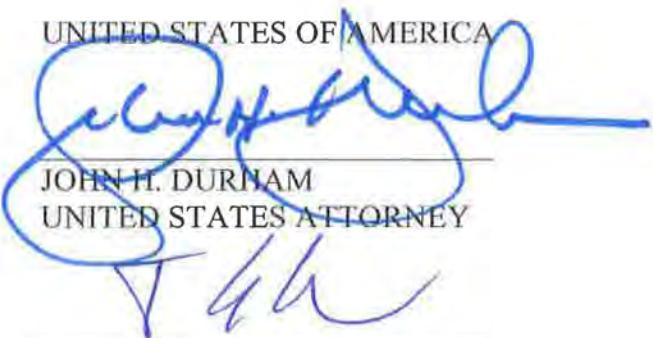
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants named in this Indictment: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or disposed with, a third person; (c) has been placed beyond the jurisdiction of the United States District Court for the District of Connecticut; (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 the defendants, up to the value of the above-described forfeitable property.

All in accordance with Title 21, United States Code, Section 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

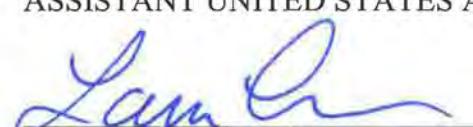
A TRUE BILL

/s/  
FOREPERSON

UNITED STATES OF AMERICA

  
JOHN H. DURHAM  
UNITED STATES ATTORNEY

  
ANTHONY E. KAPLAN  
ASSISTANT UNITED STATES ATTORNEY

  
LAUREN C. CLARK  
ASSISTANT UNITED STATES ATTORNEY