

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 14-
v.	:	DATE FILED: December 10, 2014
ALEX DELVALLE	:	VIOLATIONS:
JUSTELYN LOPEZ	:	21 U.S.C. § 846 (conspiracy to possess with
JOHNNY SOLIVAN	:	intent to distribute 500 grams or more of
	:	cocaine - 1 count)
	:	21 U.S.C. § 846 (attempted possession with
	:	intent to distribute 500 grams or more of
	:	cocaine - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about November 14, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ALEX DELVALLE,
JUSTELYN LOPEZ, and
JOHNNY SOLIVAN**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 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, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants JUSTELYN LOPEZ and JOHNNY SOLIVAN agreed to pick up a package containing illegal narcotics.

3. After receiving instructions from an unindicted co-conspirator, defendants JUSTELYN LOPEZ and JOHNNY SOLIVAN agreed to deliver the package to ALEX DELVALLE on Palethorp Street in Philadelphia, PA.

4. Defendant ALEX DELVALLE took the package from defendant JOHNNY SOLIVAN.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object the defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. Defendant JUSTELYN LOPEZ drove to 5118 Ditman Street in Philadelphia, PA, with defendant JOHNNY SOLIVAN.

2. At 5118 Ditman Street, Philadelphia, defendant JOHNNY SOLIVAN accepted delivery of a package containing cocaine and sham cocaine, and then re-entered defendant JUSTELYN LOPEZ's car.

3. Defendant JOHNNY SOLIVAN opened the package in defendant JUSTELYN LOPEZ's car, and removed a soft cooler containing approximately one kilogram of a mixture of cocaine and sham cocaine, which he also opened.

4. Subsequently, defendant ALEX DELVALLE took the soft cooler containing the cocaine and sham cocaine from defendant JOHNNY SOLIVAN.

5. Defendant ALEX DELVALLE advised defendant JOHNNY SOLIVAN that there should be more cocaine coming next week.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 14, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ALEX DELVALLE,
JOHNY SOLIVAN, and
JUSTELYN LOPEZ**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 500 grams or more, that is, approximately 1000 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 846(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**