

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Date of Arrest: August 13, 2018

UNITED STATES OF AMERICA)	
Plaintiff,)	Magistrate's Case No. 18-1760MJ
)	
Vs.)	COMPLAINT FOR VIOLATION OF
)	21 U.S.C. § 841(a)(1) and
Ivan LOPEZ,)	(b)(1)(A)(viii), Possession of a
Defendant.)	Controlled Substance with Intent
)	to Distribute
YOB: 1979)	Counts One, Two, Three and Four
U.S. Citizen)	
)	
)	
)	
)	

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On or about August 13, 2018, at or near San Luis, Arizona, within the District of Arizona, the defendant, Ivan LOPEZ, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers or salts of its isomers; a Schedule II Controlled Substance, into the U.S. from the Republic of Mexico, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(viii).

COUNT TWO

On or about August 13, 2018, at or near San Luis, Arizona, within the District of Arizona, the defendant, Ivan LOPEZ, did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers; a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii)(II).

COUNT THREE


On or about August 13, 2018, at or near San Luis, Arizona, within the District of Arizona, the defendant, Ivan LOPEZ, did knowingly and intentionally possess with intent to distribute 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 FOUR

On or about August 13, 2018, at or near San Luis, Arizona, within the District of Arizona, the defendant, Ivan LOPEZ, did knowingly and intentionally possess with intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(i).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

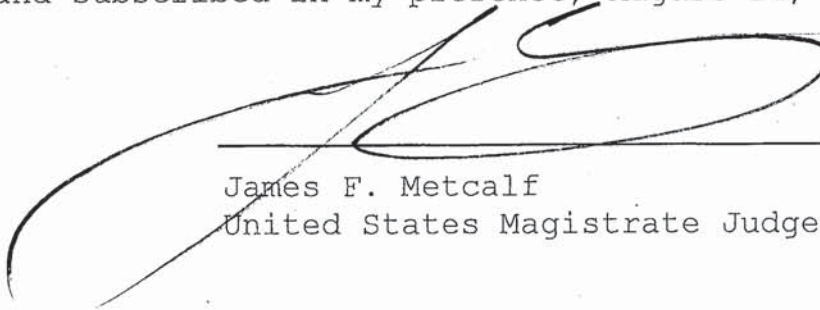
Reviewed by: AUSA Louie Uhl

 USB/D



Frank Flores
Special Agent - Homeland Security
Investigations

Sworn to before me and subscribed in my presence, August 14, 2018, at Yuma, Arizona.



James F. Metcalf
United States Magistrate Judge

UNITED STATES OF AMERICA
Vs.

Ivan LOPEZ

STATEMENT OF FACTS

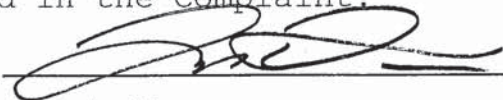
I, Special Agent Frank Flores, being duly sworn do state the following:

On August 13, 2018, at approximately 1745 hours, a San Luis Police Department Officer observed a single occupant operating a white 2015 Chevrolet Silverado pickup truck bearing Arizona license plate CCL5849 with a trailer attached to the hitch traveling eastbound on W County 19th Street, near Somerton, Arizona, within the District of Arizona. The Officer conducted a traffic stop for an equipment violation.

The officer identified himself as such and asked the driver for identification. The driver identified himself as Ivan LOPEZ (LOPEZ), a United States citizen. During the traffic stop a Narcotic Detection Dog (NDD) was utilized and positively alerted to the trailer. The trailer was not covered, and in the back of, were two boxes filled with packages wrapped in plastic. Suspecting the packages to contain narcotics of some sort, the officer called federal Special Agents from Homeland Security Investigations (HSI). At this point, HSI Special Agents assumed responsibility for further investigation.

A total of two-hundred thirty-nine (239) packages were removed from the two boxes in the trailer; Field testing of the packages revealed them to be 118.65 kilograms of methamphetamine, 6.4 kilograms of cocaine, 13.65 kilograms of white heroin, 6.25 kilograms of brown heroin and 3.1 kilograms of fentanyl.

Based on the foregoing, there is probable cause to believe that LOPEZ committed the offenses as alleged in the Complaint.



Frank Flores
Special Agent - Homeland Security
Investigations

Sworn to before me and subscribed in my presence, August 14, 2018, at Yuma, Arizona.



James F. Metcalf
United States Magistrate Judge