

NS:KDE/KCB  
F.#2015R00270

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ADRIAL LOPEZ,  
also known as “Adriel Lopez” and  
“Andrew Lopeck,”

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

AMY E. CAMPANARO, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

In or about and between 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ADRIAL LOPEZ, also known as “Adriel Lopez” and “Andrew Lopeck,” together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from an individual whose identity is known to the undersigned and who is described below as the “CW,” and to punish the CW for the nonrepayment thereof.

(Title 18, United States Code, Section 894(a))

**TO BE FILED UNDER SEAL**

COMPLAINT IN SUPPORT  
OF APPLICATION FOR AN  
ARREST WARRANT

(T. 18, U.S.C., § 894(a))

No. 19-MJ-1126

The source of your deponent's information and the grounds for her belief are as follows:

I. Background

1. I am an FBI Special Agent, duly appointed according to law and acting as such. I have been a Special Agent for approximately twelve years and am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for racketeering and other crimes associated with organized crime, and, in particular, the organized crime families collectively known as "La Cosa Nostra." These investigations are conducted both overtly and covertly. During my tenure with the FBI, I have participated in numerous investigations of organized crime, including La Cosa Nostra, during which I have (a) conducted physical surveillance, (b) executed search warrants, (c) debriefed cooperating witnesses and victims, (d) reviewed and analyzed numerous taped conversations of those engaged in organized crime activities and (e) monitored wiretapped conversations and reviewed line sheets prepared by wiretap monitors. As a result of my training and experience, I am familiar with the activities of members and associates of La Cosa Nostra ("LCN") and the methods and means by which they carry out various criminal offenses, including extortionate extension and collection of credit.<sup>1</sup>

2. The FBI, together with the United States Attorney's Office for the Eastern District of New York and the Internal Revenue Service – Criminal Investigation, is

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. Where specific recorded conversations are described, they are set forth in in part and substance and are in draft (not final) form and subject to revision and correction.

conducting an investigation into, among other things, various offenses committed by members and associates of the Gambino organized crime family of La Cosa Nostra (the “Gambino crime family”). The investigation has revealed, among other things, the defendant ADRIAL LOPEZ’s extortionate extension and collection of credit from a debtor who later became a cooperating witness (the “CW”<sup>2</sup>).

## II. LOPEZ’s Extortionate Extensions and Collection of Credit

### A. Background of the Loans

3. According to the CW, beginning in approximately 2006, before the CW began cooperating with the government, and on multiple occasions thereafter, the CW has borrowed money from the defendant ADRIAL LOPEZ, a former professional boxer and loanshark who extends and collects credit from numerous individuals using acts and threats of violence. The CW has advised that LOPEZ has required him to make weekly interest payments, which did not detract from the principal owed.

4. Over time, the amount the CW owed to the defendant ADRIAL LOPEZ reached \$45,000, for which LOPEZ required the CW to pay two “points,” or two percent, per week in interest payments that did not reduce the principal owed. The CW has advised that he made these weekly interest payments, with some exceptions, until

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<sup>2</sup> The CW began cooperating with the government in or about October 2018 and has pleaded guilty to multiple federal crimes. The CW is cooperating with the government in the hopes of receiving leniency at sentencing and assistance with his physical safety. The CW’s criminal history includes tax evasion, money laundering, conspiracy to make false statements, bankruptcy fraud, vehicular assault, possession of a forged instrument and attempted grand larceny. Law enforcement agents have found the CW to be reliable based on, among other things, the statements of others made on consensual recordings, information provided by other witnesses and documentary evidence.

approximately 2018. At that time, a captain in the Gambino crime family of LCN (the “Captain”) paid CW’s debt to LOPEZ and then, together with others, collected the money from the CW using extortionate means.

5. After the Captain paid off the CW’s debt, the CW borrowed more money from the defendant ADRIAL LOPEZ. For example, the CW borrowed approximately \$12,000 from LOPEZ but agreed to pay back a total of \$15,000. In addition, LOPEZ demanded that the CW pay LOPEZ a total of approximately \$40,000 because LOPEZ claimed he should have earned money as part of a construction project operated by the CW that never materialized.<sup>3</sup> LOPEZ demanded that the CW pay interest payments of \$900 every two weeks, which payments would not reduce the amount purportedly owed.

6. The CW has stated that LOPEZ believes that the CW presently owes him approximately \$28,000 in principal (in addition to the weekly interest payments). LOPEZ also collects money using extortionate means from the CW on behalf of another individual (“Individual-1”) from whom the CW has borrowed money on different occasions beginning in approximately 2015.

7. For example, on or about November 2, 2019, the CW, who was in Dyker Heights, Brooklyn, spoke with the defendant ADRIAL LOPEZ on the phone. During the conversation, which the CW consensually recorded at law enforcement agents’ direction, the CW asked if LOPEZ wanted to “catch up today, tomorrow?” LOPEZ replied, “I’d say tomorrow would be better because I’m kind of busy” and he and the CW agreed to meet the

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<sup>3</sup> LOPEZ never gave the CW additional money but nonetheless demanded that the CW pay him this amount.

next day. On November 3, 2019, the CW met with LOPEZ at a diner in New Rochelle, New York (the “Diner”) and during the meeting, which the CW consensually recorded at law enforcement agents’ direction, gave LOPEZ a \$900 interest payment and a \$1,000 principal payment for the money owed to LOPEZ.

8. As another example, on December 1, 2019, the CW, who was in Crown Heights, Brooklyn, spoke with the defendant ADRIAL LOPEZ on the phone. During the conversation, which the CW consensually recorded at law enforcement agents’ direction, the CW said he was “40 minutes” away and agreed to meet with LOPEZ at “9 o’clock.” LOPEZ said he would “see you at New Rochelle [i.e., the Diner].”

9. Later that day, the CW met with LOPEZ at the Diner. During the meeting, which the CW consensually recorded at law enforcement agents’ direction, LOPEZ stated, “Phone. Off,” and directed the CW to shut off his cellular telephone. Later in the conversation, the CW told LOPEZ that the CW “need[ed] one favor from you though” and asked to “see you on Thursday afternoon.” The CW stated, “I had 1500 on me for you and [Individual-1] and my daughter hit me up for it in the car. I get paid on Thursday I gotta see you on Thursday.” In response, LOPEZ agreed to permit the CW to delay making a weekly payment but asked, “Are you going to be fucked up for next Sunday?”, i.e., not able to make that week’s required payment after making a payment a few days before. The CW stated, “No, not at all.”

10. Also during the meeting, the defendant ADRIAL LOPEZ discussed the amount of money he claimed the CW still owed him. For example, referring to one of his outstanding loans, the CW asked LOPEZ, “we’re done with that other thing, right?” LOPEZ

said that the CW was not finished as he “mark[s] it down,” i.e., documents the CW’s payments.

B. Examples of LOPEZ’s Acts of Violence

11. The CW has also advised that the defendant ADRIAL LOPEZ has used multiple threats and acts of violence to collect money from the CW, including assaulting him on multiple occasions when the CW missed a payment due to LOPEZ or Individual-1. For instance, in approximately 2013, when the CW missed payments owed to Individual-1, LOPEZ (who is close with Individual-1) came to the CW’s home on multiple occasions unannounced, leaving the CW in fear for his life. On one occasion, LOPEZ rang the doorbell and the CW invited LOPEZ to come inside. LOPEZ refused. Instead, because the CW was late in making a \$300 interest payment, LOPEZ slammed the CW’s head against the doorjamb of the CW’s front door in front of the CW’s wife.

12. As another example, in approximately 2017, the CW was gambling at an illegal poker game operated by an inducted member of LCN with whom the defendant ADRIAL LOPEZ is close. After LOPEZ learned that the CW had won money at the game, LOPEZ became angry that the CW had indicated to LOPEZ that the CW was unable to make certain payments. Thereafter, the CW and LOPEZ met at a diner and LOPEZ punched the CW in the head, leaving him unconscious.

C. LOPEZ’s Recent Threats and Discussions of Violence

13. The defendant ADRIAL LOPEZ has continued to use acts and threats of violence to collect money from the CW. LOPEZ has also made repeated references to his willingness to use violence, including murder, which further illustrates LOPEZ’s use of extortionate means to collect money from the CW.

14. For example, on or about November 10, 2019, the CW met with LOPEZ at the Diner to provide him with money as part of LOPEZ's extortionate collection of credit, specifically, a \$900 interest payment for the money owed to LOPEZ. Near the end of the meeting, which the CW consensually recorded at law enforcement agents' direction, the CW indicated he did not have money the CW owed to Individual-1 (which is collected by LOPEZ), after which the following exchange took place:

CW: Next week, next week though.

LOPEZ: Huh?

CW: Scratch, the last couple of weeks have been rough. You know what it is, I gotta get used – you know what I gotta get used to? Getting paid every two weeks.

LOPEZ: Yeah, but, you gotta take care of that buddy.

CW: I know, I know.

LOPEZ: You know?

CW: I hear you.

LOPEZ: [UI<sup>4</sup>]

CW: Don't, don't be fooled [UI].

LOPEZ: Nah, I don't give a fuck. You, you had plenty of time to do this. You gotta take care of it, you make enough –

CW: I know, I know. I always do.

LOPEZ: No [UI] you don't.

15. As another example, on or about November 17, 2019, the CW again met with the defendant ADRIAL LOPEZ at the Diner to provide him with money as part of

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<sup>4</sup> “UI” is an abbreviation for “unintelligible.”

LOPEZ's extortionate collection of credit, specifically, a \$900 interest payment and a \$1,000 principal payment for the money owed to LOPEZ as well as an additional \$1,000 principal payment for the money owed to Individual-1.

16. During the meeting, which the CW consensually recorded at law enforcement agents' direction, the CW recounted to the defendant ADRIAL LOPEZ how an inducted member of the Gambino crime family of LCN (the "Soldier"), at the Captain's direction, had directed the CW to falsely take responsibility for some of the crimes that the Captain, the Soldier and the CW had engaged in together. The CW also stated that if he were arrested for these crimes, he hoped he would be granted bail, after which the following exchange occurred:

LOPEZ: You're a risk.

CW: A risk how, though? I'm not a flight risk. You know what I mean?

LOPEZ: [UI] a death risk. I hate to think that way.

CW: What do you mean, a death risk?

LOPEZ: They're going to clip [i.e., murder] you. [UI] realistically.

CW: Yeah, but, you know what. Do you really, do you even think that's a remote possibility?

LOPEZ: Yeah.

CW: Really?

LOPEZ: That's what I would do. [UI] if you become a defendant, that way--

CW: I can't do that.

LOPEZ: I'm just saying. [UI] they just want to clean things up . . . .



17. As another example, on or about November 24, 2019, the CW met with LOPEZ at the Diner to provide him with money as part of LOPEZ's extortionate collection of credit, specifically, a \$900 interest payment for the money owed to LOPEZ and a \$500 principal payment for the money owed to Individual-1. During the meeting, which the CW consensually recorded at law enforcement agents' direction, the CW and LOPEZ again discussed LOPEZ's belief that the Captain or the Soldier might have the CW killed, and the following exchange occurred:

LOPEZ: Stay away from them isolated places. . . . and if you gotta tell them straight out . . . Tell them, meet me at this diner . . .

CW: Listen, I've always stood up [i.e., not cooperated with law enforcement officers]. You know what I'm saying?

LOPEZ: Mm-hmm. I know. [UI] I wouldn't even be telling you this if I didn't think you would stand up.

CW: You know?

LOPEZ: I would say, fuck it—I wouldn't even warn you.

18. Also during the meeting, the defendant ADRIAL LOPEZ recounted a time in which he was searching for someone from "Eljam," a construction supply company, who had had a financial dispute with LOPEZ and Individual-1. LOPEZ stated that he hit the victim and left his "fucking brain bleeding." Prior to assaulting the victim, LOPEZ stated that previously he could not find him, stating:

He disappeared for two weeks, we couldn't find him. I even went in his house, broke in the window. I sat there from like 5 o'clock to 11 o'clock. . . . I said I'll knock him out as soon as he walk in,

[UI], tie him up and, you know. . . . You won't know [what happened] until you wake up.[<sup>5</sup>]

19. As another example, during the November 3, 2019 meeting described above, the CW stated that he had seen a Gambino crime family associate (the "Associate"). The defendant ADRIAL LOPEZ stated that he did not like the Associate and that "the only reason why I have not given him a beating yet" is because LOPEZ likes the Associate's brother.

20. Further, during the December 1, 2019 meeting at the Diner described above, the defendant ADRIAL LOPEZ recounted an armed robbery he and another associate of La Cosa Nostra committed when LOPEZ was 19 years old. Specifically, referring to the Purple Gang, LOPEZ stated, "I held them all at gunpoint when my buddy was giving one of them a beating."

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<sup>5</sup> According to the CW, "Eljam" is now known as "Marjam" Supply Company, which is located at 2925 Tremont Avenue in the Bronx, New York. According to New York City Police Department records, an individual told officers that on April 22, 2005, he was assaulted outside of 2529 [sic] Tremont Avenue by a professional boxer and that he feared for his safety. Although Individual-1 and the defendant ADRIAL LOPEZ were later arrested for the assault, the case was eventually dropped because the victim did not continue to cooperate with law enforcement officers. During the December 1, 2019 meeting referenced above, LOPEZ stated that he and Individual-1 were acquitted after trial in that case after Individual-1 "brought in two fake witnesses." LOPEZ also stated that he and Individual-1 were not convicted because "the purple guy," i.e., a member of the Purple Gang, and another individual intimidated witnesses. LOPEZ stated that these individuals "went in there" and left "everybody[] afraid" because Joseph Meldish, one of the leaders of the Purple Gang, had "like 60 bodies," i.e., had murdered 60 people.

### III. LOPEZ's Other Demands of the CW

21. In addition to requiring repayment of multiple loans, the defendant ADRIAL LOPEZ has also demanded that the CW provide him with fraudulent identification documents as part of multiple other criminal schemes.

22. For example, the defendant ADRIAL LOPEZ has demanded that the CW procure a fake driver's license with LOPEZ's picture but in the name of "Andrew Lopeck." According to the CW, LOPEZ fraudulently obtains workers' compensation benefits from supposed injuries he suffered while employed as an X-Ray technician at a hospital but is not physically disabled from working.<sup>6</sup> Indeed, LOPEZ has indicated to the CW that he still competes in competitive boxing events and has procured a license from the State of New Jersey in the name of "Andrew Lopeck."<sup>7</sup> Although LOPEZ has already obtained a boxing license in this name, he has demanded that the CW also procure a driver's license in this name.

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<sup>6</sup> Records produced by an insurance company confirm the defendant ADRIAL LOPEZ's workers' compensation fraud scheme. For instance, these records show that LOPEZ has filed a total of five claims, three of which are closed and two of which are active. In the active workers' compensation claims, which were filed on January 8, 2004 and September 1, 2010, LOPEZ claimed he suffered back-related injuries while moving a patient at Montefiore Medical Center in the Bronx, New York. For these claims, LOPEZ receives checks every two weeks, including through November 2019.

<sup>7</sup> For instance, during the meeting on November 3, 2019 described above, the defendant ADRIAL LOPEZ asked the CW about "Andrew Lopeck" and stated that he was trying to fight in New Jersey but was "concerned" about being on YouTube. LOPEZ also stated that he already "has a license under that name" but wants the fake driver's license nonetheless. Similarly, during the meeting on December 1, 2019 described above, LOPEZ asked about "my ID" and complained that the CW "can't tell me it didn't come in yet" because it had been "two months."

23. The defendant ADRIAL LOPEZ has also demanded that the CW procure a “no show” job – i.e., a job that does not require performing any actual work – in the name of another individual (“Individual-2”) at a construction project on which the CW works. As part of this scheme, LOPEZ provided the CW with, among other things, copies of Individual-2’s New York State driver’s license, Individual-2’s Social Security card and an Employment Eligibility Verification form with Individual-2’s information. LOPEZ directed the CW to use this information to procure a false identification document in Individual-2’s name. LOPEZ also directed that, after securing a “job” for Individual-2, the CW is to give LOPEZ the payroll checks made out to Individual-2. LOPEZ also practiced signing Individual-2’s name (as well as the name “Andrew Lopeck”) to be used on the fake identification documents.

#### IV. Conclusion

24. I respectfully request that this Complaint as well as the arrest warrant be filed under seal. The defendant ADRIAL LOPEZ is currently at liberty and is not aware that he is the target of the investigation, which is ongoing.

[REDACTED]

[REDACTED]

WHEREFORE, your deponent respectfully requests that the defendant ADRIAL LOPEZ, also known as "Adriel Lopez" and "Andrew Lopeck," be dealt with according to law and that a warrant be issued for his arrest.

[REDACTED]

AMY E. CAMPANARO  
Special Agent  
Federal Bureau of Investigation

[REDACTED]

Sworn to before me this  
4th day of December, 2019

[REDACTED]

THE HONORABLE RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

ADRIAL LOPEZ,  
also known as "Adriel Lopez" and "Andrew Lopeck"

Case No. 19-MJ-1126

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) ADRIAL LOPEZ, also known as "Adriel Lopez" and "Andrew Lopeck", who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Extortionate collection of credit, in violation of 18 U.S.C. 894(a).

Date: 12/04/2019



Issuing officer's signature

City and state: Brooklyn, New York

Hon. Ramon E. Reyes, Jr., U.S.M.J.

Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_ at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*): \_\_\_\_\_



**TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL**

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United States

-v.-

19-MJ-1126

Docket Number

Adrial Lopez

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SUBMITTED BY: Plaintiff Defendant DOJ

Name: AUSA Keith D. Edelman

Firm Name: US Attorney's Office - Eastern District of New York

Address: 271-A Cadman Plaza East

Brooklyn, New York 11201

Phone Number: 718-254-6328

E-Mail Address: keith.edelman@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO

If yes, state description of document to be entered on docket sheet:

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

**B) If a new application,** the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation with defendant at large.

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE, AND MAY NOT BE UNSEALED UNLESS ORDERED BY THE COURT.**

DATED: Brooklyn  
12/4/2019

**U.S. DISTRICT JUDGE / U.S. MAGISTRATE JUDGE**

RECEIVED IN CLERK'S OFFICE 12/3/2019 \_\_\_\_\_  
DATE

**MANDATORY CERTIFICATION OF SERVICE:**

A.) \_\_\_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.)  This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

12/3/2019 \_\_\_\_\_ /s/ Keith D. Edelman  
DATE SIGNATURE