

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	Mag. No. 23-9104
	:	
DENNIS REYES MORA,	:	<b>CRIMINAL COMPLAINT</b>
ALEXANDER CRUZ, and	:	
CINDY ALEMAN FERNANDEZ	:	

I, Special Agent John Havens, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

*/s/ Special Agent John Havens*

Special Agent John Havens  
Federal Bureau of Investigation

Special Agent John Havens attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on March 28, 2023 in New Jersey.

Hon. Cathy L. Waldor  
United States Magistrate Judge

*/s/ Hon. Cathy L. Waldor*  
Signature of Judicial Officer

**ATTACHMENT A**

**Count 1**  
**(Conspiracy to Commit Kidnapping)**

From at least on or about March 18, 2023 through on or about March 23, 2023, in the District of New Jersey and elsewhere, the defendants,

DENNIS REYES MORA,  
ALEXANDER CRUZ, and  
CINDY ALEMAN FERNANDEZ,

knowingly and intentionally conspired and agreed with others, and committed an overt act to effect the object of their conspiracy, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise a person, and the person was willfully transported in interstate and foreign commerce and a means, facility, and instrumentality of interstate or foreign commerce was used in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Section 1201(c).

## ATTACHMENT B

I, John Havens, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. From on or about March 18 to March 21, 2023, defendants DENNIS REYES MORA (“REYES”), ALEXANDER CRUZ (“CRUZ”), and CINDY ALEMAN FERNANDEZ (“ALEMAN”), with each other and others (collectively, the “Kidnappers”), conspired to kidnap and hold Victim-1 for ransom.

2. On or about March 17, 2023, between on or about 10:55pm and on or about 11:22pm, Victim-1 met up with CRUZ and another man (“CC-1”), near Victim-1’s home in Hackensack, New Jersey to discuss a drug deal. CRUZ and CC-1 arrived in a white luxury SUV (the “White Car”), along with ALEMAN and REYES, who arrived separately in a black SUV (the “Black SUV”). After discussing terms with ALEMAN and REYES, Victim-1 left Hackensack in the White Car with CRUZ and CC-1 to conduct the drug transaction.

3. CRUZ drove Victim-1 and CC-1 to the parking lot of a hotel in and around Newark, Delaware (the “Hotel Lot”), where they met up with ALEMAN, REYES, and another individual (“CC-2”), who arrived in the Black Car. Another man separately arrived at the location; he met with the group, and a dispute arose with him over the drug deal.

4. Seemingly in response to the dispute, the Kidnappers kidnapped Victim-1. CC-1 tied up Victim-1 with tape and put him in the back of the White Car with CC-2 while CC-1 threatened to stab and kill Victim-1. CC-1 asked CRUZ to hand him a knife, and CC-1 then stabbed Victim-1 at least twice in the leg while in the backseat of the White Car.

5. CRUZ drove CC-1, CC-2, and Victim-1, who was injured and bleeding, north through New Jersey in the White Car. During the trip, the Kidnappers pulled over and moved Victim-1 to the Black Car, which ALEMAN and REYES had been driving. CRUZ then switched to driving the Black SUV and used it to bring CC-1, CC-2, and Victim-1 to a location in Queens, New York. Once they arrived, Victim-1 was forced to lie on the floor of the Black SUV for a prolonged period of time while CC-1 kept watch.

6. The Kidnappers eventually brought Victim-1, whose eyes were covered with tape, into the basement of a house on 94<sup>th</sup> Street in Queens, New York (the “94<sup>th</sup> Street Address”). They made Victim-1 sit on a green chair and bound his wrists and ankles with tape.

7. While holding Victim-1 captive, the Kidnappers tortured him, including by running a knife on his neck, holding a gasoline-soaked rag against his eyes, burning him with cigarettes, and beating him. At one point, CC-1 racked a gun behind Victim-1’s head and showed him rounds of ammunition to threaten him. ALEMAN was present and laughed while the torture was occurring.

8. Law enforcement began investigating the kidnapping on or about March 18, 2023, when the Hackensack Police Department received a call from Victim-1’s family reporting that Victim-1 had been abducted and that they had received calls demanding \$45,000 in exchange for Victim-1’s return. Victim-1’s family also received a subsequent call from Victim-1’s phone (“Victim-1’s Phone”) later that same morning, during which Victim-1 said that he had been blindfolded and that his kidnappers were demanding \$60,000 in exchange for his return. Victim-1’s family received additional ransom demand calls from a different phone (the “Ransom Phone”).

9. Law enforcement obtained calls records for the Ransom Phone showing that it communicated with a phone belonging and subscribed to ALEMAN (the “Aleman Phone”) approximately 100 times between on or about March 17, 2023 and on or about March 18, 2023. Based on public records, the address associated with the Aleman Phone was on Rockaway Avenue, Brooklyn, New York (the “Rockaway Avenue Address”). In or around 2022, CRUZ was issued a traffic ticket in New Jersey while operating the White Car. At that time, CRUZ provided the Rockaway Avenue Address as his home address.

10. Call records also showed that the Ransom Phone communicated with a phone belonging and subscribed to REYES (the “Reyes Phone”) approximately 29 times between on or about March 17, 2023 and on or about March 18, 2023. Based on public records, the address associated with the Reyes Phone was on Chester Street, Brooklyn, New York (the “Chester Street Address”). The Rockaway Avenue Address is located behind the Chester Street Address, within the same block (generally, the “Suspect Area”).

11. Law enforcement obtained location information for the Ransom Phone, the Aleman Phone, the Reyes Phone, and Victim-1’s Phone. Among other things, that phone location data showed the following.

a. On or about March 17, 2023, at approximately 10:35pm, the Ransom Phone was located in the area of Victim-1’s home in Hackensack.

Surveillance footage from outside Victim-1's Hackensack residence also showed Victim-1 at approximately that same time meeting with CRUZ and CC-1, and eventually entering the White Car. Location data showed that at approximately the same time, the Reyes Phone was also a short distance from Victim-1's home.

b. The Ransom Phone and the Victim's Phone then moved together to the same general area of the New Jersey-Delaware border. Approximately three hours later, on or about March 18, 2023 at approximately 1:36am, an Automated License Plate Reader detected the White Car in the Hotel Lot. Approximately 20 minutes later, the Ransom Phone was also located in the vicinity of the Hotel Lot.

c. At approximately 4:04am, the Ransom Phone began moving back north near Swedesboro, New Jersey. Approximately 39 minutes later, both the Aleman Phone and the Reyes Phone were located in the area of the New Jersey Turnpike near Swedesboro. All four phones continued moving north, and at approximately 9:36am, both the Reyes Phone and the Aleman Phone were located in the vicinity of the Suspect Area.

d. From approximately 11:30am to 12:11pm, Victim-1's Phone and the Reyes Phone appeared to be moving together, pinging in similar locations in Brooklyn. At approximately 2:34pm, both Victim-1's Phone and the Reyes Phone were located in the vicinity of the 94<sup>th</sup> Street Address.

e. At approximately 4:50pm, the Ransom Phone, the Reyes Phone, and Victim-1's Phone were located in the vicinity of the Suspect Area, at which point Victim-1's Phone appeared to be turned off. At approximately the same time, the Aleman Phone was located in the vicinity of the 94<sup>th</sup> Street Address, where it stayed for at least approximately two hours.

### ***The White Car***

12. On or about March 20, 2023, at approximately 6:24pm, a law enforcement surveillance team saw the White Car being loaded onto a flat-bed tow truck around three blocks away from the Rockaway Avenue Address. ALEMAN and CRUZ were there in the Black Car. They were directing the tow truck driver, and CRUZ provided the keys for the White Car to the tow truck driver.

13. Law enforcement then observed the tow truck bring the White Car to a body shop in Long Island, New York. On or about March 27, 2023, law enforcement seized the White Car. The rear seat had been removed from the car and cleaned, but contained apparent traces of blood.

### ***The Ransom Payment and Victim-1's Release***

14. In the early morning hours of on or about March 21, 2023, with the

knowledge of law enforcement, Victim-1's family paid approximately \$20,000 cash toward the kidnapper's ransom demand.

15. In the hours before the cash delivery, CRUZ and CC-2 sought to ensure that law enforcement was not in the area of the delivery. Specifically, CC-2 messaged CRUZ: "There was no one I went around the block the only thing I saw was a fully tinted Range Rover . . . it was parked and I couldn't see if there was anyone inside[.]" In addition, at or approximately midnight, a law enforcement agent observed CRUZ near the money drop location. CRUZ appeared to be conducting counter-surveillance by looking in the windows of cars parked in the area.

16. Also around midnight, at the direction of one of the Kidnappers, Victim-1's mother drove the money to a park in the area of Jamaica Avenue and Warwick Street in Brooklyn, New York. The Kidnappers were in touch with Victim-1's mother on her cellular phone, giving her instructions on where to drive and what to do. They instructed her a number of times to make turns and go down various streets, seemingly out of a desire to thwart any potential surveillance.

17. Once Victim-1's mother dropped the money as instructed, a law enforcement air unit followed a dark SUV (the "Dark Car") from the money drop location to the 94<sup>th</sup> Street Address. There, the air unit observed Victim 1 being taken out of the 94<sup>th</sup> Street Address and put back into the Dark Car, which drove on the Jackie Robinson Parkway and released Victim-1. Victim-1 had sustained significant physical injuries, including stab wounds to his leg.

18. After being treated for his injuries, Victim-1 told law enforcement about the circumstances on his kidnapping, discussed above in paragraphs 2 through 7.<sup>1</sup>

### ***Evidence Found Pursuant to Search Warrants***

19. On or about March 27, 2023, pursuant to a search warrant, law enforcement searched the basement of the 94<sup>th</sup> Street Address and found, among other things, ammunition shell casings, a green colored chair matching the description of the chair used in the kidnapping, a can of gasoline, and duct tape. Law enforcement found traces of blood on the green chair by spraying it with a chemical solution capable of detecting blood. In addition, law enforcement found apparent traces of blood on a wall.

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<sup>1</sup> Law enforcement agents showed Victim-1 two photo arrays, each containing six photos. The first array included a dated photograph that law enforcement obtained of REYES and five "fillers," and the second had a dated photograph that law enforcement obtained of CRUZ and five "fillers." Victim-1 did not positively identify any photo in either array. Law enforcement now believes that the photos of REYES and CRUZ included in each array do not clearly resemble what REYES and CRUZ look like today.

20. On or about the same day, pursuant to separate warrants, law enforcement also searched the Rockaway Avenue Apartment and the Chester Street Apartment. ALEMAN, CRUZ, and CC-2 were inside the Rockaway Avenue Apartment, and REYES was inside the Chester Street Apartment, along with a woman who identified herself as REYES's girlfriend. Inside the respective apartments, law enforcement found, among other things, the following.

a. The Rockaway Avenue Apartment: law enforcement found the Aleman Phone and a hat that closely matched and appeared to be the hat that CRUZ was wearing in the surveillance footage near Victim-1's home in Hackensack on or about the evening of March 17, 2023.

b. The Chester Street Apartment: law enforcement located the Reyes Phone; a sneaker with a dark red stain on the toe, which appeared to be dried blood; and approximately \$26,000 in cash. The serial numbers on several bills found in the pocket of a jacket matched serial numbers that were pre-recorded by law enforcement and provided in the ransom drop. Individual-1 told law enforcement that the cash was hers, and that REYES had given it to her.