
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Mag. No. 22-16045
	:	
v.	:	Hon. José R. Almonte
	:	
CARLOS GONZALEZ SABINO,	:	CRIMINAL COMPLAINT
MARCOS RIVAS CRUZ,	:	
JUAN JOSE FLORES NOLASCO, and	:	
JEFFREY SENA	:	

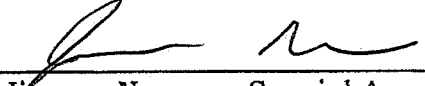
I, Jimena Noonan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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

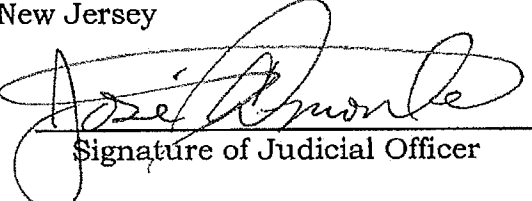
Continued on the attached page and made a part hereof:



Jimena Noonan, Special Agent
Federal Bureau of Investigation

Special Agent Noonan attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A), on May 12, 2022 in the District of New Jersey

HONORABLE JOSÉ R. ALMONTE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Interstate Transportation of Stolen Property)

On or about May 11, 2022, in Union County, in the District of New Jersey and elsewhere, the defendants,

CARLOS GONZALEZ SABINO,
MARCOS RIVAS CRUZ,
JUAN JOSE FLORES NOLASCO, and
JEFFREY SENA

did unlawfully transport, transmit, and transfer in interstate commerce from, Union County and elsewhere in the State of New Jersey, to New York County, in the State of New York, stolen goods, wares and merchandise, that is, catalytic converters, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Sections 2314 and 2.

ATTACHMENT B

I, Jimena Noonan, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged.

1. Since in or around January 2022, law enforcement in New Jersey has been investigating catalytic converter thefts in Union County and elsewhere in New Jersey. This investigation has involved, among other things, the use of physical surveillance and records obtained from law enforcement databases and other sources.

2. In or around May 2022, the FBI learned that a white BMW bearing New York registration plates (the "BMW") had been identified in connection with approximately 15 catalytic converter thefts in New Jersey from January 2022 through May 2022.

3. On or about May 11, 2022, at approximately 7:00 a.m., an individual ("Individual-1") reported a catalytic converter theft to law enforcement in or around East Windsor, New Jersey. Individual-1 reported that he observed approximately two men near a 2003 Honda Odyssey ("Odyssey-1"), he heard a drill-like noise coming from underneath Odyssey-1, and then observed the men drive away in a vehicle matching the description of the BMW. Individual-1 further informed law enforcement that he suspected the men had stolen the catalytic converter from Odyssey-1. Law enforcement inspected Odyssey-1 and observed that the exhaust system had a cut mark on it and the catalytic converter was missing.

4. As law enforcement was investigating the catalytic converter theft involving Odyssey-1, a second individual ("Individual-2") reported that she observed approximately two men underneath a second vehicle in or around East Windsor, New Jersey, around the time Individual-1 reported the catalytic converter theft. Individual-2 further reported that she confronted the men, who returned to their BMW and drove away. Individual-2 captured a photograph of the BMW in which the men fled. Upon review of the photograph, law enforcement determined that the men fled in the BMW.

5. Later that same day, on or about May 11, 2022, at approximately 11:00 a.m., an off-duty law enforcement officer ("Officer-1") reported a catalytic converter theft in progress in or around Roselle, New Jersey. Officer-1 reported

that he observed four men, later identified as CARLOS GONZALEZ SABINO ("SABINO"), MARCOS RIVAS CRUZ ("CRUZ"), JUAN JOSE FLORES NOLASCO ("NOLASCO"), and JEFFREY SENA ("SENA") (collectively, the "Defendants"), in a vehicle matching the description of the BMW. Officer-1 further reported that he observed two of the Defendants raise a 2002 Honda Odyssey (the "Odyssey-2") off the ground using a jack and remove the catalytic converter from the Odyssey-2, while one of the Defendants stood watch nearby and one of the Defendants remained in the BMW. Law enforcement responded to the area of the theft, identified the BMW and attempted to stop the BMW. The BMW traveled at a high rate of speed, failed to adhere to traffic signals and conducted other dangerous motor vehicle maneuvers, which caused law enforcement to stop its pursuit of the BMW.

6. Based on a review of law enforcement data, the FBI determined that the Defendants would likely travel from New Jersey to New York, via the George Washington Bridge, in the BMW with the stolen catalytic converters. On or about May 11, 2022, law enforcement established physical surveillance on vehicles traveling northbound on the George Washington Bridge. At approximately 12:30 p.m., law enforcement observed the BMW traveling from New Jersey into New York via the George Washington Bridge. Law enforcement stopped the BMW when it arrived at New York on the George Washington Bridge. The Defendants fled the BMW on foot, and law enforcement apprehended the Defendants after a brief foot chase.

7. Law enforcement obtained verbal and written consent to search the BMW. Among other items, law enforcement discovered approximately seven catalytic converters in the trunk of the BMW and a jack and other vehicle equipment in the backseat of the BMW. Based on a review of repair estimates and other valuation data, law enforcement further determined that the stolen catalytic converters discovered in the BMW are collectively worth approximately \$5,600.

8. After law enforcement advised each Defendant of his Miranda rights, SABINO, NOLASCO, and SENA admitted that they stole the catalytic converters discovered in the BMW in New Jersey.

9. Surveillance conducted by law enforcement on May 11, 2022, corroborated that the BMW was in the locations described by Individual-1, Individual-2, and Officer-1, and in a number of other locations at which catalytic converter thefts were reported to law enforcement.