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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 15-6027-01  
 :  
 v. : Hon. Steven C. Mannion  
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 JESUS RAUL IRIBE :

I, David M. Pinto, 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 Task Force Officer with the Drug Enforcement Administration, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:



Task Force Officer David M. Pinto  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,  
February 25, 2015 in Newark, New Jersey

HONORABLE STEVEN C. MANNION  
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**ATTACHMENT A**

On or about February 11, 2013, in Hunterdon County, in the District of New Jersey, and elsewhere, defendant

**JESUS RAUL IRIBE**

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

## ATTACHMENT B

I, David M. Pinto, am a Task Force Officer with the Drug Enforcement Administration. 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 items of 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, I am asserting that it took place on or about the date alleged.

1. On or about February 8, 2013, in or around Montebello, California, defendant Jesus Raul Iribe ("IRIBE") met with two individuals ("Individual 1" and "Individual 2") to discuss the delivery of cocaine from California to New Jersey. This meeting was audio-recorded.
2. Soon thereafter, law enforcement observed the following. IRIBE drove a Nissan sedan (the "Nissan") behind Individual 1 and Individual 2, who were in a white pick-up truck, to a truck yard nearby, where Individual 1's tractor trailer (the "Trailer") was parked. At the truck yard, IRIBE waited outside in the Nissan while Individual 2 drove the white pick-up truck into the truck yard, retrieved a produce box (the "Produce Box") from the Trailer, put the Produce Box in the pick-up truck, and went back outside the truck yard to where IRIBE was waiting. Individual 2 then placed the Produce Box on or around the rear seat of IRIBE's Nissan. IRIBE then drove away in the Nissan and Individual 1 and Individual 2 remained at the truck yard.
3. Approximately four hours later, law enforcement observed IRIBE return to the truck yard in his car. IRIBE was closely followed by another individual ("Individual 3") who was driving a grey Jeep SUV (the "SUV"). Individual 2 met IRIBE and Individual 3 outside the truck yard and then drove the SUV into the truck yard. Individual 1 and Individual 2 then retrieved the Produce Box from the SUV and placed it inside the Trailer. Individual 2 then drove the SUV to IRIBE and Individual 3, who were waiting just outside the truck yard. In addition to law enforcement's surveillance, surveillance video footage from the truck yard captured much of this activity.
4. IRIBE then gave Individual 2 a cellular telephone, meant for Individual 1 to use to communicate with IRIBE. IRIBE also gave Individual 2 money to cover Individual 1's travel expenses. In turn, Individual 2 gave the cellular telephone and money to Individual 1.
5. On or about February 11, 2013, law enforcement located the Trailer at a truck rest stop off of Interstate 78 East in the District of New Jersey. Law enforcement followed the Trailer to a Home Depot parking lot in Paterson, New Jersey. In the parking lot, law

enforcement observed Individual 1 and Individual 2 enter the rear cab of the Trailer and observed Individual 2 holding the Produce Box.

6. Subsequently, law enforcement followed the Trailer to a desolate industrial street near Hunt's Point in Bronx, New York. Law enforcement observed an individual ("Individual 4") meet Individual 2 near the back of the Trailer and enter the rear of the Trailer. Shortly thereafter, Individual 4 was observed exiting the Trailer carrying the Produce Box.
7. Law enforcement seized approximately 12 kilograms of cocaine hydrochloride from the Produce Box.