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

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UNITED STATES OF AMERICA : Hon. Michael A. Hammer  
: :  
v. : Magistrate. No. 23-10211  
: :  
WILLIAM LONDONO ROJAS, : **CRIMINAL COMPLAINT**  
ANDRES CIFUENTES CADAVID,  
NICOLAS OCHOA ZAMBRANO,  
and JOSE ALEJANDRO CALVO  
OROZCO a/k/a "JOSE  
CALVOOROZCO"

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 pages and made a part hereof.

*/s/ Jimena Noonan*

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Jimena Noonan  
Special Agent  
Federal Bureau of Investigation

Special Agent Jimena Noonan attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on June 7, 2023.

HONORABLE MICHAEL A. HAMMER

*Michael A. Hammer*

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UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

**ATTACHMENT A**

**Count One**  
**(Conspiracy to Transport Property)**

On or about November 30, 2022 to on or about December 2, 2022, in Union County, in the District of New Jersey and elsewhere, the defendants,

**WILLIAM LONDONO ROJAS,  
ANDRES CIFUENTES CADAVID,  
NICOLAS OCHOA ZAMBRANO, and  
JOSE ALEJANDRO CALVO OROZCO a/k/a “JOSE CALVOOROZCO,”**

knowingly and intentionally conspired with each other and others to unlawfully transport, transmit, and transfer in interstate commerce from, Union County and elsewhere in the State of New Jersey, to Queens County, in the State of New York, stolen goods, wares, and merchandise, that is, jewelry, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, contrary to Title 18, United States Code, Section 2314.

In violation of Title 18, United States Code, Section 371.

## **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 witnesses and 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 in 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 November 30, 2022, at approximately 4:53 p.m., law enforcement responded to a burglary at a residence located in Cranford, New Jersey (“the Residence”). The investigation revealed that individuals, later identified as four Colombian nationals by the names of William Londono Rojas (“Londono”), Andrew Cifuentes Cadavid (“Cifuentes”), Nicolas Ochoa Zambrano (“Zambrano”), and Jose Alejandro Calvo Orozco a/k/a Jose Calvoorozco (“Calvo”) (collectively, “the Defendants”), stole a blue-face Rolex watch (the “Rolex”), an antique rifle, a stamp collection, luxury bags, jewelry including a diamond bracelet and earrings, furs, and cash, valued in excesses of \$130,000 (the “Stolen Items”), from the Residence.

2. From its investigation, including the review of electronic historical cell site information, law enforcement learned that the Defendants drove a red Honda Accord (the “Red Honda”) to the Residence for the burglary and then subsequently transported the Stolen Items to a white Toyota Camry (the “White Toyota”). Defendants then drove the White Toyota from New Jersey to New York with the Stolen Items.

3. A few days later, on or about December 1, 2022, while conducting surveillance, law enforcement observed Calvo and Zambrano in the Red Honda, which had an expired registration, and Londono and Cifuentes in a black Honda CR-V (the “Black CR-V”), driving in tandem to New York.

4. At one point, the Red Honda stopped and Calvo opened its trunk to retrieve an item. At that time, law enforcement observed that some of the Stolen Items, including a black Gucci bag, were in the trunk of the Red Honda. Shortly after, law enforcement conducted a motor vehicle stop on the Red Honda in Jersey City, New Jersey. Calvo provided law enforcement with consent to search his phone, which revealed a photograph of the Rolex stolen from the Residence. A subsequent search of Calvo’s home and the Red Honda, which was registered to Calvo’s family member, revealed some of the Stolen Items, including a Black Gucci purse and wallet, gold necklace with hoop, gold rope necklace, gold ring, Gucci watch with black face and gold trim, green Yeti bag, Louis Vuitton purse and wallet, red JBL speaker, and a US Springfield rifle.

5. Law enforcement also observed the Black CR-V stop at a gas station in Jersey City, New Jersey, where Cifuentes and Londono had gone into the mini mart of the gas station. Video recording from the gas station later obtained by law enforcement showed Londono, and then later Cifuentes, enter the men's room in the mini mart with Londono carrying a black duffle bag. Several minutes later, Londono and Cifuentes exited the men's room without the duffle bag. Law enforcement later obtained a black duffle bag containing silverware and jewelry recovered from the mini mart bathroom. Law enforcement determined that most of the items found in the black duffle bag were stolen from the Residence.