
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable José R. Almonte
 :
 PLINIO JUNIOR PINEDA LOPEZ, : Mag. No. 23-16207
 and :
 LORENDY DIAZ BELTRE DE INOA :

I, Tara Duffy, the undersigned complainant 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 Department of Homeland Security, Homeland Security Investigations (“HSI”), and that this complaint is based on the following facts:

SEE ATTACHMENT B

Tara Duffy

Tara Duffy, Special Agent
Department of Homeland Security
Homeland Security Investigations

Special Agent Tara Duffy attested to this Complaint by telephone pursuant to Fed. R. Crim. P. Rule 4.1(b)(2)(A), on July 11, 2023.

Hon. José R. Almonte
United States Magistrate Judge

José R. Almonte

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

From in or around April 2023 to on or about July 11, 2023, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

PLINIO JUNIOR PINEDA LOPEZ

did knowingly and intentionally conspire with others to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, 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.

COUNT TWO

(Possession with Intent to Distribute Fentanyl)

From in or around April 2023 to on or about July 11, 2023, in Bergen County, in the District of New Jersey, the defendant,

LORENDY DIAZ BELTRE DE INOA

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

ATTACHMENT B

I, Tara Duffy, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). 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, videos, and photographs of the 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. Law enforcement has been investigating a drug trafficking organization (the “DTO”) since at least April 2023. The investigation revealed that defendant Plinio Junior Pineda Lopez (“LOPEZ”), who resides at and owns 29 Hillside Avenue, Oakland, New Jersey (the “Stash Location”), is a member of the DTO who distributes controlled substances, including fentanyl, on behalf of the DTO. The investigation revealed that LOPEZ utilized the Stash Location in connection with the DTO.

2. Under the direction of HSI, a confidential source (the “CS”) has been making consensually recorded telephone calls with LOPEZ discussing the purchase of controlled substances. As set forth in more detail below, on multiple occasions, the CS met with LOPEZ or LOPEZ’s associates for the purposes of conducting illegal drug transactions.

3. Pursuant to HSI standard procedures, prior to and following each of the controlled purchases, law enforcement searched the CS’s vehicle and person for drugs and contraband. In every case, those pre- and post-searches revealed neither drugs nor contraband in the CS’s vehicle or on the CS’s person, other than the drugs obtained during the controlled purchases. Prior to each controlled purchase, the CS was furnished with pre-recorded HSI funds, that is, U.S. currency, with which to purchase the drugs (“HSI Funds”). Each of the controlled purchases were arranged by the CS under the direction of HSI agents through a series of cell phone calls and text messages exchanged between the CS and LOPEZ. All of the controlled purchases were also audio recorded.

4. On or about June 25, 2023, the CS communicated with LOPEZ via cellular phone to arrange a meeting in Paramus, New Jersey later that day. The purpose of the meeting would be for LOPEZ to provide the CS with sample quantities of fentanyl, which the CS could then buy more from LOPEZ at future sales. Law enforcement conducted surveillance of the meeting, during which LOPEZ provided the CS with a quantity of suspected fentanyl powder. LOPEZ expressed his desire to sell larger quantities of fentanyl products to the CS at future sales. LOPEZ and the CS planned another transaction for fentanyl to occur on or about June 26, 2023, for 375 grams of fentanyl. LOPEZ indicated to

the CS that he would be sending his “Uncle” on his behalf to complete the deal the following day. The substance that the CS obtained from LOPEZ on or about June 25, 2023, was subsequently field tested and tested positive for fentanyl.

5. On or about June 26, 2023, LOPEZ communicated via cellular phone with the CS to arrange another meeting in Wallington, New Jersey (the “Wallington Location”), for the sale of 375 grams of fentanyl to the CS. The CS maintained regular cell phone communication with LOPEZ leading up to the deal at the Wallington Location. Additionally, law enforcement conducted surveillance of the Wallington Location and the Stash Location.

6. Shortly before the meeting at the Wallington Location on or about June 26, 2023, law enforcement observed an individual known to law enforcement (“Individual-1”), leaving the Stash Location in a gray Honda CRV and traveling towards the Wallington Location. LOPEZ guided the CS via cellular phone to the location of Individual-1, who was parked and waiting in the gray Honda CRV in the parking lot next to the Wallington Location. Once the CS arrived at the Wallington location, Individual-1 drove up to the CS. The CS then entered the gray Honda CRV and purchased 375 grams of suspected fentanyl from Individual-1 with \$15,000 in HSI Funds. The substance that the CS purchased was subsequently field tested and tested positive for fentanyl.

7. On or about July 11, 2023, LOPEZ communicated via cellular phone with the CS to arrange another meeting at the Wallington Location for the purchase of 1.5 kilograms of fentanyl. The CS maintained regular cell phone communication with LOPEZ leading up to the deal at the Wallington location. Additionally, law enforcement conducted surveillance of the Wallington Location and the Stash Location.

8. Shortly before the deal at the Wallington Location on or about July 11, 2023, law enforcement observed a female individual, later identified as defendant Lorendy Diaz Beltre De Inoa (“DE INOA”) leaving the Stash Location in a white vehicle and traveling towards the Wallington Location. Law enforcement observed LOPEZ leaving the Stash Location minutes later in a red Cadillac and travelling towards the Wallington Location. DE INOA parked at the Wallington Location and LOPEZ parked in an adjacent parking lot. LOPEZ guided the CS via cellular phone to the location of DE INOA.

9. Believing that DE INOA was about to complete an illegal drug transaction facilitated by LOPEZ, law enforcement converged on DE INOA and LOPEZ in their respective locations and placed both under arrest. In a search subsequent to arrest, law enforcement found three (3) bricks of suspected fentanyl on DE INOA’s person totaling approximately 1.5 kilograms. The substances seized from DE INOA were subsequently field tested and tested positive for fentanyl.

10. Following the arrest, and pursuant to a court-authorized search warrant, law enforcement conducted a search of the Stash Location. Upon execution of the search warrant, law enforcement recovered an additional approximately 6.5 kilograms of suspected fentanyl hidden throughout the Stash location. Included in that quantity were three (3) bricks of suspected fentanyl that were packaged in a manner consistent with that which was seized from DE INOA at the Wallington Location. The suspected powder fentanyl was field tested and revealed to be positive for fentanyl.

11. The Stash Location also contained packaging materials and paraphernalia consistent with those used to package illegal drugs, including wraps and a digital scale, as well as several additional wrapped and vacuum sealed brick shaped packages of powder consistent with controlled substances.