

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable Michael A. Hammer, U.S.M.J.
 :
 v. : Mag. No. 16-4062
 :
 CHARLIE RODRIGUEZ, : **CRIMINAL COMPLAINT**
 a/k/a "Money," :
 a/k/a "Moyo," :
 a/k/a "Goon"; : **UNDER SEAL**
 :
 REINALDO RODRIGUEZ, :
 a/k/a "Money," :
 a/k/a "Mimo"; :
 :
 VICTOR ALFONSO ALVAREZ :
 MARTINEZ; :
 :
 EDWARD M. STANEL; and :
 :
 JOSEPH TRIMARCO :

I, Robert Orozco, 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 Task Force Officer with the Drug Enforcement Administration and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Robert Orozco
Task Force Officer
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
May 11, 2016 at New Jersey

THE HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer



THE UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM FOR THE DIRECTOR, FBI

DATE: 10-10-66

TO: SAC, NEW YORK

FROM: SAC, NEW YORK

SUBJECT: [Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

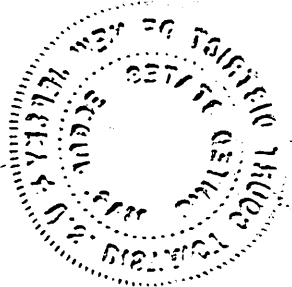
SEE ATTACHED REPORT

[Illegible]

SEE ATTACHED REPORT

[Illegible]

[Illegible]



[Illegible]

ATTACHMENT A

From in or about June 2015 through in or about April 2016, in Passaic County, in the District of New Jersey and elsewhere, defendants

CHARLIE RODRIGUEZ,
a/k/a "Money,"
a/k/a "Moyo,"
a/k/a "Goon";

REINALDO RODRIGUEZ,
a/k/a "Money,"
a/k/a "Mimo";

VICTOR ALFONSO ALVAREZ MARTINEZ;

EDWARD M. STANEL; and

JOSEPH TRIMARCO

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I 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, ROBERT OROZCO, have been a Task Force Officer with the Drug Enforcement Administration ("DEA") since 2014 and am a detective with the Paterson Police Department, where I have been employed since 2003. I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and on information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly-available information relating to the defendants; (c) my review of business records, other documents, and evidence obtained through court orders, subpoenas, and other sources; and (d) my review of audio and video recordings, photographs, and court-authorized wiretaps. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part, and the content of statements and meetings are based on partial, non-verbatim summaries of the conversations based on descriptions of the conversations prepared by monitors. All dates and times are approximate.

OVERVIEW AND INDIVIDUAL ROLES

1. From in or about June 2015 through on or about May 2016, law enforcement has been involved in an investigation into a drug trafficking organization ("DTO") operating in Paterson, New Jersey and elsewhere. Based on court-authorized wiretaps, physical surveillance, and other investigative techniques, law enforcement uncovered the operational structure of the DTO and the method and means by which it carried out the narcotics-trafficking conspiracy. Among other things, the DTO:
 - a. Amassed wholesale quantities of heroin at multiple locations in and around Bronx, New York;
 - b. Used couriers to deliver large quantities of that heroin to mid-level drug dealer(s) who operate in and around Paterson, New Jersey;
 - c. Re-distributed portions of that heroin to street-level drug dealers in and around Paterson, New Jersey who then sold the heroin in and around Paterson, New Jersey;
 - d. Re-distributed portions of that heroin to street-level drug dealers from suburban areas, including but not limited to, Morris County, New Jersey and Rockland County, New York.

2. As the investigation progressed through, among other techniques, physical and electronic surveillance and the use of confidential sources, law enforcement identified VICTOR ALFONSO ALVAREZ MARTINEZ ("MARTINEZ") and CAROLINA ALMONTE ("ALMONTE"), as a Bronx-area-based distributors of heroin and associates of JUAN PABLO GORIS-CASTELLANO, a/k/a "Jose," a/k/a "Pablito," a/k/a "Pablo" ("GORIS"), who would travel from Bronx, New York to deliver heroin to EDWIN LOPEZ, a/k/a "E," a/k/a "Pan" ("LOPEZ"), and others in Paterson, New Jersey. While in Paterson, New Jersey, MARTINEZ would pick up United States currency from LOPEZ and others in exchange for the heroin and return to Bronx, New York, to deliver that currency to GORIS.¹

3. Law enforcement identified CHARLIE RODRIGUEZ, a/k/a "Money," a/k/a "Moyo," a/k/a "Goon" ("C-RODRIGUEZ"), as a mid-level retail distributor of heroin who operated in the Paterson, New Jersey area. C-RODRIGUEZ obtained heroin for distribution from LOPEZ.

4. Law enforcement identified REINALDO RODRIGUEZ, a/k/a "Money," a/k/a "Mimo" ("R-RODRIGUEZ"), as a mid-level retail distributor of heroin who operated in the Paterson, New Jersey area who worked with C-RODRIGUEZ, among others, to obtain and re-sell heroin.

5. Law enforcement identified EDWARD STANEL ("STANEL"), as a street-level retail distributor of heroin from the Morris County, New Jersey area who obtained distribution-quantities of heroin in the Paterson, New Jersey area from C-RODRIGUEZ and R-RODRIGUEZ.

6. Law enforcement identified JOSEPH TRIMARCO ("TRIMARCO"), as a street-level retail distributor of heroin from the Rockland County, New York area who obtained distribution-quantities of heroin from C-RODRIGUEZ and R-RODRIGUEZ.

THE INVESTIGATION

7. During the course of the investigation, GORIS, LOPEZ, MARTINEZ, C-RODRIGUEZ, R-RODRIGUEZ, STANEL, TRIMARCO, and their co-conspirators utilized cellular telephones and other means to engage in the distribution of, in total, over 1 kilogram of heroin.

8. On or about June 23, 2015, R-RODRIGUEZ spoke to an individual ("Individual-2") via cellular telephone and agreed to meet outside a residential building in Paterson, New Jersey so that Individual-2 could purchase heroin from R-RODRIGUEZ. On or about June 24, 2015, R-RODRIGUEZ approached

¹ GORIS, LOPEZ, and ALMONTE are charged in a separate Federal Criminal Complaint (Mag. No. 16-6560 (JAD)), with conspiring to distribute and possess with intent to distribute one kilogram or more of heroin.

a parked car near the residential building in Paterson, New Jersey while holding a black plastic bag. Individual-2 was sitting in that parked car. R-RODRIGUEZ entered the parked car and provided Individual-2 with the black plastic bag and its contents in exchange for approximately \$1,100 in United States currency. The meeting was surveilled and lawfully recorded by law enforcement. Immediately following the meeting, law enforcement obtained and examined the black plastic bag and determined that it contained 10 bricks of heroin.²

9. On or about September 20, 2015, law enforcement lawfully intercepted text messages and telephone calls between STANEL and C-RODRIGUEZ. At approximately 4:53 p.m., STANEL sent C-RODRIGUEZ a text message stating that he (STANEL) would be done at 9 p.m. and needs 2. Within approximately the same minute, C-RODRIGUEZ responded via text message, "K." At approximately 9:08 p.m., C-RODRIGUEZ texted STANEL to meet him at "26 n 8" and asked what STANEL wanted. At approximately 9:09 p.m., STANEL replied, via text message, asking for 3. Within approximately the same minute, C-RODRIGUEZ replied, agreeing to supply 3. At approximately 9:10 p.m., STANEL then responded via text message that he was on his way with 450. At approximately 9:11 p.m., STANEL sent another text message asking if "it's trans[.]" At approximately 9:49 p.m., C-RODRIGUEZ called STANEL, and STANEL agreed to go to C-RODRIGUEZ's vehicle, which had just pulled into the area. Based on the content of these communications and other interceptions, C-RODRIGUEZ initially agreed to sell 2 bricks of heroin to STANEL and set the meeting location for the sale at East 26th Street and 8th Avenue in Paterson, New Jersey. STANEL then changed the order to three bricks of heroin, for which he agreed to pay \$450. When STANEL asked if the heroin that C-RODRIGUEZ was supplying was "trans[.]" STANEL was referring to heroin that was stamped with the label "Transformers." At approximately 9:49 p.m., C-RODRIGUEZ then met STANEL and sold STANEL the three bricks of heroin.

10. On or about September 22, 2015, at approximately 5:01 p.m., law enforcement lawfully intercepted a call between LOPEZ and C-RODRIGUEZ. During this call, LOPEZ asked C-RODRIGUEZ if "everybody is good[.]" C-RODRIGUEZ responded, "Yeah, well I got like 18 dollars left, that's it." Based on the content of this conversation and other interceptions, C-RODRIGUEZ thought LOPEZ was calling to inquire as to whether C-RODRIGUEZ needed to be re-supplied with heroin, and told LOPEZ that his (C-RODRIGUEZ's) supply was low – only "18 dollars left," referring to 18 bricks of heroin.

² A "brick" of heroin is street terminology for a package of heroin containing five "bundles." A "bundle" normally contains ten bags or glassine envelopes, each one containing an individual dose of heroin. Thus, a brick normally contains 50 individual doses of heroin.

11. On or about September 25, 2015, law enforcement lawfully intercepted text messages and a telephone call between TRIMARCO and C-RODRIGUEZ. At approximately 4:11 p.m., C-RODRIGUEZ sent a text message to TRIMARCO asking, "Wat u wanted[.]" At approximately 4:12 p.m., the TRIMARCO replied, "3[.]" Approximately within the same minute, C-RODRIGUEZ responded, "Trans?" At approximately 4:33 p.m., C-RODRIGUEZ placed a telephone call to TRIMARCO and directed TRIMARCO as to his (C-RODRIGUEZ) location, namely that C-RODRIGUEZ was straight ahead, "outside the car[.]" Shortly thereafter, at approximately 4:39 p.m., TRIMARCO sent a text message to C-RODRIGUEZ stating "That's 16 it would have to b 23-25." At approximately 4:40 p.m., C-RODRIGUEZ sent a text message to TRIMARCO stating, "Na all i kan do is. 15 man u guna make more bro[.]" Based on the content of these conversations and other interceptions, TRIMARCO ordered 3 bricks of heroin, stamped "Transformers," from C-RODRIGUEZ. The text messages that followed showed that C-RODRIGUEZ met TRIMARCO and provided the heroin. After the heroin transaction was completed, TRIMARCO sent a text message asking C-RODRIGUEZ to sell him 16 bricks of heroin for \$2,325. In a reply text message, C-RODRIGUEZ refused to do this, explaining that he would only sell TRIMARCO 15 bricks of heroin at that price, namely \$155 per brick.

12. On or about October 22, 2015, law enforcement lawfully intercepted text messages and telephone calls between STANEL and C-RODRIGUEZ. At approximately 1:19 p.m., STANEL sent a text message to C-RODRIGUEZ asking C-RODRIGUEZ to "hold me 2 more for tonight??" C-RODRIGUEZ responded, "K." Beginning at approximately 8:49 p.m. that evening, STANEL and C-RODRIGUEZ texted about where and when to meet for the sale, agreeing to meet at or around East 26th Street and 8th Avenue in Paterson, New Jersey. Based on the content of these conversations and other interceptions, C-RODRIGUEZ agreed to sell STANEL two bricks of heroin, and the sale was completed. Moreover, a black Chevrolet Cobalt (the "Cobalt") registered to STANEL arrived at or around East 26th Street and 8th Avenue, and shortly thereafter, at approximately 9:25 p.m., a black Nissan Altima which law enforcement had identified as being used by C-RODRIGUEZ (the "Altima") pulled up alongside the driver's side of the Cobalt. An individual within the Altima handed STANEL small objects in exchange for what appeared to be U.S. currency. The Cobalt and the Altima then left the area. Shortly thereafter, law enforcement stopped the Cobalt. Approximately 100 individual glassine bags (approximately the number of individual doses in two bricks of heroin) of heroin stamped "Transformers" were found in and around the center console of the Cobalt, and STANEL was arrested by the Paterson Police Department.

13. On or about February 16, 2016, law enforcement lawfully intercepted text messages and telephone calls between C-RODRIGUEZ and TRIMARCO. At approximately 9:20 a.m., C-RODRIGUEZ sent a text message to TRIMARCO that read, "U want 4 at 4[.]" Later that day, at approximately 3:33 p.m., TRIMARCO called C-RODRIGUEZ and informed C-RODRIGUEZ that

he (TRIMARCO) was on his way and should be in Paterson within an hour. At approximately 3:41 p.m., TRIMARCO called C-RODRIGUEZ and asked if C-RODRIGUEZ could give him a better deal if TRIMARCO bought "five" from C-RODRIGUEZ. C-RODRIGUEZ said that he (C-RODRIGUEZ) would call TRIMARCO back. Shortly thereafter, at approximately 3:43 p.m., C-RODRIGUEZ sent a text message to TRIMARCO stating, "Give me 780." Then, at approximately 4:14 p.m., C-RODRIGUEZ sent a text message to R-RODRIGUEZ in which he told R-RODRIGUEZ that he (C-RODRIGUEZ) needed 5. Communications that followed between C-RODRIGUEZ and TRIMARCO indicated that the two met at a location in Paterson, New Jersey that was known to both individuals. Based on the content of this conversation and other interceptions, TRIMARCO was initially going to purchase 4 bricks of heroin from C-RODRIGUEZ but then increased his order to 5 bricks of heroin, which C-RODRIGUEZ agreed to sell TRIMARCO in exchange for \$780. Before meeting TRIMARCO to sell him the heroin, C-RODRIGUEZ sent a text message to R-RODRIGUEZ, who was holding the heroin in a secure location. C-RODRIGUEZ obtained the five bricks of heroin, met TRIMARCO, and sold TRIMARCO the heroin.

14. On or about February 18, 2016, law enforcement lawfully intercepted text messages and telephone calls between LOPEZ, C-RODRIGUEZ, and R-RODRIGUEZ. At approximately 1:14 p.m., LOPEZ and C-RODRIGUEZ spoke on the telephone regarding whether C-RODRIGUEZ had collected all of the money due for heroin previously supplied by LOPEZ, and C-RODRIGUEZ told LOPEZ that C-RODRIGUEZ had to check with R-RODRIGUEZ. At approximately 1:16 p.m., C-RODRIGUEZ called R-RODRIGUEZ. During that call, R-RODRIGUEZ told C-RODRIGUEZ that he (R-RODRIGUEZ) still has 3 or 4 joints left and that someone paid him for the day before. R-RODRIGUEZ then told C-RODRIGUEZ that C-RODRIGUEZ had to bring R-RODRIGUEZ "that bread" so that R-RODRIGUEZ could bring "that shit to him." C-RODRIGUEZ and R-RODRIGUEZ then discussed how much C-RODRIGUEZ had, R-RODRIGUEZ guessed 35 and C-RODRIGUEZ confirmed that amount. C-RODRIGUEZ then told R-RODRIGUEZ that C-RODRIGUEZ would tell "him" too, saying that C-RODRIGUEZ told LOPEZ to "start making it" last night. At approximately 1:17 p.m., C-RODRIGUEZ called LOPEZ and told LOPEZ that R-RODRIGUEZ was waiting for 4. LOPEZ and C-RODRIGUEZ arranged to meet at approximately 2:30 p.m., and C-RODRIGUEZ told LOPEZ that he was going to go, because he had the rest of the money "here." Based on the content of this conversation and other interceptions, LOPEZ called C-RODRIGUEZ to see if C-RODRIGUEZ needed an additional supply of heroin. C-RODRIGUEZ said that he would check to see if R-RODRIGUEZ was finished and would call LOPEZ back with confirmation. C-RODRIGUEZ then called R-RODRIGUEZ, who stated that he still had 3 or 4 joints, and he (R-RODRIGUEZ) needed money from C-RODRIGUEZ so that he (R-RODRIGUEZ) could bring additional heroin to C-RODRIGUEZ. C-RODRIGUEZ and R-RODRIGUEZ then discussed what C-RODRIGUEZ had left in his heroin supply, and they agreed that C-RODRIGUEZ had 35 bricks left. C-RODRIGUEZ then told R-RODRIGUEZ that he had told LOPEZ to start making more heroin last night. C-RODRIGUEZ

then called LOPEZ and told LOPEZ that R-RODRIGUEZ is waiting for \$400, but that C-RODRIGUEZ had the rest of the money. During that call, C-RODRIGUEZ and LOPEZ agreed to meet so that C-RODRIGUEZ could purchase additional heroin from LOPEZ.

15. On or about March 22, 2016, law enforcement lawfully intercepted telephone call between LOPEZ, GORIS, and MARTINEZ. During a telephone call at approximately 8:38 p.m., LOPEZ told GORIS that GORIS could send the guy (MARTINEZ) to the hospital. GORIS responded by asking LOPEZ for how much. LOPEZ then told GORIS 200 and stated to GORIS that it was complete. At approximately 8:39 p.m., GORIS called MARTINEZ and instructed MARTINEZ to come to GORIS as quickly as possible, because "he's waiting." At approximately 8:58 p.m., MARTINEZ called GORIS and told GORIS that he was "up here," and GORIS replied, "I'm going." At approximately 9:14 p.m., GORIS called LOPEZ and told him that the "dude" was on the way. At approximately 9:16 p.m., MARTINEZ called LOPEZ and said that he was about 15 minutes away. At approximately 9:31 p.m., MARTINEZ again called LOPEZ, said he (MARTINEZ) was nearby, and LOPEZ and MARTINEZ discussed where they would meet in Paterson, New Jersey. At approximately 9:37 p.m., LOPEZ called MARTINEZ about his whereabouts near the agreed-upon meeting location. Then, at approximately 10:08 p.m., GORIS called MARTINEZ. During that call, GORIS told MARTINEZ "to come up." Shortly thereafter, at approximately 10:14 p.m., MARTINEZ called GORIS and told GORIS that MARTINEZ was "around here." Based on the content of these conversations and other interceptions, LOPEZ told GORIS that GORIS could send a courier with 200 bricks of heroin to the hospital, which refers to an area in Paterson, New Jersey near the intersection of East 31st Street and Broadway. LOPEZ assured GORIS that it was complete, namely that LOPEZ had sufficient money to pay for the heroin. GORIS then sent MARTINEZ to deliver the heroin to LOPEZ and retrieve the money from LOPEZ for payment to GORIS. MARTINEZ delivered the heroin to LOPEZ in Paterson, New Jersey, picked up the money, and then met with GORIS in Bronx, New York, and delivered LOPEZ's money to GORIS.

16. In this manner, law enforcement continued to intercept calls and electronic messages for periods of time between approximately September 2015 and April 2016. Between approximately September 2015 and approximately February 2016, numerous separate calls were intercepted involving C-RODRIGUEZ, R-RODRIGUEZ, LOPEZ, STANEL, TRIMARCO, and unnamed co-conspirators during which transactions involving over one kilogram of heroin were discussed. Between approximately February 2016 and approximately April 2016, numerous separate calls were intercepted involving GORIS, LOPEZ, ALMONTE, MARTINEZ, and unnamed co-conspirators during which transactions involving over one kilogram of heroin were discussed.

17. On or about April 19, 2016, law enforcement lawfully intercepted communications between and amongst GORIS, LOPEZ, and ALMONTE during which the parties discussed a heroin transaction. The communications

indicated that GORIS was sending ALMONTE from Bronx, New York, with approximately 150 bricks of heroin, which she was instructed to deliver to LOPEZ in Paterson, New Jersey.

18. On or about April 19, 2016, at approximately 6:30 p.m., law enforcement officers conducting surveillance in the area of East 31st Street and Broadway in Paterson, New Jersey, observed LOPEZ sitting in the driver's seat of a grey Honda Accord (the "Honda") that was parked in front of a driveway.

19. Shortly thereafter, a jitney-style bus from New York City stopped near the intersection of 31st Avenue and Broadway. Law enforcement observed ALMONTE exit the bus carrying a white plastic grocery-style bag that was rectangular in shape.

20. ALMONTE then walked towards the area where the Honda was parked, approached the Honda, and entered the rear passenger side of the Honda.

21. At this time, law enforcement approached and arrested ALMONTE and LOPEZ.

22. The white plastic grocery-style bag that ALMONTE had been seen carrying into the Honda was found sitting on or around the Honda's front console, next to the driver's seat. The white plastic grocery-style bag contained approximately 125 grams of a substance that field tested positive for heroin. That heroin was packaged into approximately 150 "bricks." Law enforcement also found a black plastic bag on the back seat of the Honda. That bag contained approximately \$13,500 in United States currency.