
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	COMPLAINT
	:	
v.	:	
	:	Honorable Michael A. Hammer
REYNALDO CRUZ,	:	
a/k/a "Bebo"	:	Mag. No. 24-10116

I, Nicholas Jentz, 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 Drug Enforcement Administration, and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

s/ Nicholas Jentz

Nicholas Jentz, Special Agent
Drug Enforcement Administration

Nicholas Jentz, Special Agent with the Drug Enforcement Administration, attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) this 16th day of May 2024.

s/ Michael A. Hammer

Hon. Michael A. Hammer, U.S.M.J.

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

On or about May 16, 2024, in Essex County, in the District of New Jersey and elsewhere, defendant,

**REYNALDO CRUZ,
a/k/a “Bebo,”**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

In violation of Title 12, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO
**(Conspiracy to Use and Carry a Firearm During and in
Relation to a Drug Trafficking Crime)**

On or about May 16, 2024, in Essex County, in the District of New Jersey and elsewhere, defendant,

REYNALDO CRUZ,
a/k/a “Bebo,”

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the possession with intent to distribute controlled substances offense charged in Count One of this Complaint, did knowingly and intentionally conspire and agree with others to use and carry a firearm, contrary to Title 18, United States Code, Section 924(c)(1)(A)(i).

In violation of Title 18, United States Code, Section 924(o).

ATTACHMENT B

I, Nicholas Jentz, am a Special Agent with the Drug Enforcement Administration (“DEA”). 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, photographs, recordings, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Where I refer to the contents of previously recorded conversations (e.g., consensual recordings or prior wiretap interceptions), quotations and descriptions are based on preliminary draft transcripts and/or translations of those conversations. 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.

BACKGROUND OF THE INVESTIGATION

1. Since in or around September 2023, the DEA, along with state and local law enforcement agencies, has been investigating a drug trafficking organization (the “DTO”) that distributes cocaine, cocaine base (“crack cocaine”), heroin, fentanyl, and methamphetamine among other controlled substances. The DTO includes Reynaldo Cruz a/k/a “Bebo” (the “DEFENDANT”), and others known and unknown to law enforcement. The DTO operates in and around Essex and Union Counties, New Jersey, and elsewhere.

2. During the course of the investigation, law enforcement obtained multiple Court Orders authorizing the interception of wire and electronic communications occurring over multiple cellular telephone devices used in furtherance of the DTO’s unlawful activities.

3. The investigation has revealed that DEFENDANT operates an unlicensed smoke shop on South Orange Avenue in Newark, New Jersey (the “Smoke Shop”), from which DEFENDANT, and other members of the DTO distribute marijuana, cocaine, heroin, and other controlled substances.

4. Over the course of the investigation, law enforcement has observed DEFENDANT and others conduct suspected transactions of controlled substances out of the Smoke Shop. In addition, the investigation has revealed that members and associates of the DTO are known to possess firearms in connection with the activities of the DTO. On or about May 13, 2024, DEFENDANT was captured over a wiretap, stating, in sum and substance, that he is the owner of the Smoke Shop.

5. On or about May 16, 2024, at approximately 5:00 a.m., law enforcement executed a judicially authorized search of the Smoke Shop. At the time of the execution of the search warrant, the Smoke Shop was closed to the public. In the

Smoke Shop, law enforcement recovered approximately 100 grams of suspected cocaine and a quantity of suspected methylenedioxymethamphetamine (MDMA).¹ Law enforcement also recovered a Glock Model 43X 9mm semiautomatic firearm bearing serial number CAPX552.

6. On or about May 16, 2024, at approximately the same time as the search of the Smoke Shop, DEFENDANT consented to a search of his residence in Elizabeth, New Jersey. Within DEFENDANT's residence, law enforcement recovered a Glock-branded storage box and a quantity of 9mm ammunition, which match the firearm found at the Smoke Shop. Law enforcement also recovered approximately \$15,000 in cash in DEFENDANT's residence.

¹ Law enforcement identified these substances based on their training and experience and the appearance and packaging of the substances in the context of the investigation. Laboratory results are pending.