

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

UNITED STATES OF AMERICA

v.

GUSTAVO IGNACIO SALAS ORTEGA,
a/k/a "Sabino Alfredo Farfan Ortiz"

: Hon. Jessica S. Allen
:
:
: Magistrate. No. 25-8005
:
:
: **CRIMINAL COMPLAINT**
:
: **Filed Under Seal**
:

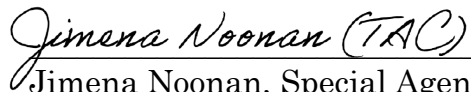
I, Jimena Noonan, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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:

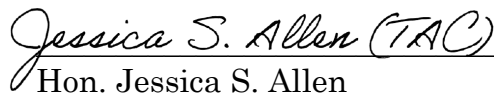
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



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 this 3rd day of February, 2025.



Hon. Jessica S. Allen
United States Magistrate Judge

ATTACHMENT A

Count One

(Conspiracy to Receive Stolen Property)

Between on or about September 30, 2024 and on or about October 14, 2024, in the District of New Jersey, and elsewhere, the defendant,

**GUSTAVO IGNACIO SALAS ORTEGA,
a/k/a “Sabino Alfredo Farfan Ortiz,”**

knowingly and intentionally conspired with others to receive, possess, conceal, store, barter, sell, and dispose of any goods, wares, merchandise, securities, and money, of the value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, contrary to Title 18, United States Code, Section 2315.

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

Count Two
(Receipt of Stolen Property)

Between on or about October 7, 2024 and on or about October 14, 2024, in the District of New Jersey, and elsewhere, the defendant,

**GUSTAVO IGNACIO SALAS ORTEGA,
a/k/a “Sabino Alfredo Farfan Ortiz,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of goods, wares, merchandise, securities, and money, of the value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken.

In violation of Title 18, United States Code, Sections 2315 and 2.

ATTACHMENT B

I, Jimena Noonan, am a Special Agent with the Federal Bureau of Investigation. 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, recorded communications, and photographs and videos 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. On or about October 5, 2024, at approximately 11:13 p.m., law enforcement was dispatched to a shopping mall in or around Millburn, New Jersey to investigate a commercial burglary. Upon arrival, law enforcement reviewed surveillance footage which showed five people wearing masks, gloves, and some wearing reflective vests (collectively, the "Conspirators"). The Conspirators were inside the mall in an area near a jewelry store (the "Victim Store") and were carrying bags and a collapsible ladder, as shown in the images below.



2. Law enforcement responded to the Victim Store where a store manager opened the rear employee entrance and allowed law enforcement into the store. Law enforcement saw a large, square hole cut out of the wall next to the rear employee entrance.

3. Once inside the Victim Store, law enforcement saw that a ceiling tile was ajar, suggesting the Conspirators may have attempted to gain access to the Victim Store through the ceiling.

4. Furthermore, law enforcement saw that many of the glass display cases in the store were shattered, that cabinet drawers were open and ajar, and that many items of jewelry had been taken from the Victim Store. The Victim Store's security room showed signs of tampering by the Conspirators including disabled alarm systems.

5. Additional surveillance footage obtained and reviewed by law enforcement showed the Conspirators exiting the mall and fleeing.

6. Additional surveillance footage reviewed by law enforcement shows some of the Conspirators, including an individual later identified as Gustavo Ignacio Salas Ortega (“SALAS ORTEGA”), surveilling, examining, inspecting, and scouting the location of the Victim Store on both the day of and the day before the burglary. In this video footage, SALAS ORTEGA is not wearing a mask and his face is visible. The Conspirators and SALAS ORTEGA were recorded in an area behind the Victim Store, as shown in the image below.



7. On or about October 14, 2024, law enforcement officers, including personnel from Immigration and Customs Enforcement, Enforcement and Removal Operations, lawfully detained SALAS ORTEGA. Law enforcement officers lawfully searched SALAS ORTEGA and recovered a high-value wristwatch, bearing a specific serial number (the “High-Value Watch”), a false identification card in the name “Sabino Alfredo Farfan Ortiz,” and a bank debit card (the “Bank Card”) in the same name as the false identification card.

8. Law enforcement reviewed records from the bank that had issued the Bank Card, which showed that the account had been opened using the same identity as that on the false identification card recovered from SALAS ORTEGA.

9. On or about October 7, 2024, at approximately 4:09 p.m., and on or about October 9, 2024, at approximately 7:45 p.m., SALAS ORTEGA made deposits into the account associated with the Bank Card at automated teller machines (“ATMs”) in

Mount Vernon, New York and White Plains, New York, respectively. Surveillance video from the ATMs showed SALAS ORTEGA wearing the High-Value Watch on his wrist at both locations, as shown in the images below.



10. Law enforcement officers reviewed records from the original seller of the High-Value Wristwatch, which showed that it was purchased for approximately \$10,800.00 by someone other than SALAS ORTEGA and that the purchaser lived in New Jersey. The records showed that the High-Value Watch had been at the Victim Store on or about October 5, 2024—the day of the burglary—related to maintenance service on the High-Value Watch.