UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Stacey D. Adams

:

v. : Magistrate No. 25-8024

magistrate 110. 20 002 1

PABLO SURUY HERNANDEZ and : **AMENDED CRIMINAL COMPLAINT**

GIOVANNI GUZMAN :

I, Alex Charleson, 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 complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Alex Charleson

Alex Charleson, Special Agent Drug Enforcement Administration

Special Agent Alex Charleson attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on this 10th day of February, 2025.

/s/ Stacey D. Adams

Hon. Stacey D. Adams United States Magistrate Judge

ATTACHMENT A

Count One

(Possession of a Firearm with an Obliterated Serial Number)

On or about January 21, 2025, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

PABLO SURUY HERNANDEZ

knowingly possessed a firearm, that is a black and orange Glock 19, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated, as the defendant knew.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

Count Two

(Conspiracy to Distribute Fentanyl)

On or about February 7, 2025, in Hudson County, in the District of New Jersey, and elsewhere, the defendants,

PABLO SURUY HERNANDEZ and GIOVANNI GUZMAN

did knowingly and intentionally conspire with each other and 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, 846.

Count Three

(Possession with Intent to Distribute Fentanyl)

On or about February 7, 2025, in Hudson County, in the District of New Jersey, and elsewhere, the defendants,

PABLO SURUY HERNANDEZ and GIOVANNI GUZMAN

did knowingly and intentionally 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.

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

ATTACHMENT B

- I, Alex Charleson, am a Special Agent with the Drug Enforcement Administration. 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, 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. On or about January 16, 2025, Pablo Suruy Hernandez (HERNANDEZ) met with a Confidential Informant ("CI") in the vicinity of 8201 Bergenline Avenue, North Bergen, New Jersey, to discuss the potential purchase of narcotics and firearms. HERNANDEZ represented to the CI that he had access to fentanyl pills, kilogram amounts of fentanyl and cocaine, and firearms. The CI agreed to purchase a firearm from HERNANDEZ.
- 2. On or about January 21, 2025, the CI met HERNANDEZ in the vicinity of 7801 Tonnelle Avenue, North Bergen, New Jersey (the "Meet Up Location"). HERNANDEZ arrived at the Meet Up Location in a black Chevy Tahoe, bearing New Jersey registration number K78RWZ. A vehicle registration query revealed that the vehicle is registered to HERNANDEZ. HERNANDEZ entered the CI's vehicle and handed the CI one black and orange Glock 19 with a defaced serial number (the "Firearm"). The CI provided HERNANDEZ with \$1,300 in exchange for the Firearm. The meeting between HERNANDEZ and the CI was audio recorded.
- 3. The Firearm was manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to HERNANDEZ's possession of the Firearm in New Jersey on or about January 21, 2025.
- 4. On or about January 27, 2025, the CI met HERNANDEZ and received a sample of blue pills, which HERNANDEZ represented were fentanyl, and two separate bags of off-white powder, which HERNANDEZ represented were samples of fentanyl in two different purities. Following receipt of the sample, the CI requested three kilograms of fentanyl and 60,000 fentanyl pills.
- 5. On or about February 4, 2025, HERNANDEZ told the CI that he had access to the fentanyl pills, but not the kilograms of fentanyl. In response, the CI requested that HERNANDEZ provide 100,000 pills in lieu of the originally requested kilograms, which HERNANDEZ agreed to.
- 6. On or about February 7, 2025, HERNANDEZ picked up the CI in the vicinity of 7801 Tonnelle Avenue, North Bergen, New Jersey. HERNANDEZ then

drove the CI to a nearby parking lot in the vicinity of 7605 Tonnelle Ave, North Bergen, New Jersey, at which point Giovanni Guzman ("GUZMAN") entered the vehicle with a black backpack. The backpack contained plastic bags filled with approximately 100,000 blue pills in total.

- 7. Law enforcement officers field-tested¹ the pills that were seized subsequent to the arrest of HERNANDEZ and GUZMAN and determined that the pills contained a detectable amount of fentanyl and weighed approximately eleven kilograms.
- 8. Pursuant to a lawfully executed search warrant, law enforcement subsequently recovered \$65,000 in cash from HERNANDEZ's residence.

¹ Laboratory testing results remains pending.