

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

UNITED STATES OF AMERICA : Hon. James B. Clark, III
: :
v. : Magistrate No. 25-12077
: :
REINALDO RAFAEL : CRIMINAL COMPLAINT
BELISARIOMENDOZA : :

I, Paul Papandrew, 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.

Paul Papandrew, Special Agent
Drug Enforcement Administration

Special Agent Paul Papandrew attested
to this Complaint by telephone pursuant
to Fed. R. Crim. P. 4.1(b)(2)(A),
on this 29th day of May, 2025.

Hon. James B. Clark, III
United States Magistrate Judge

ATTACHMENT A

Count One

(Possession with Intent to Distribute Heroin)

On or about May 28, 2025, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

REINALDO RAFAEL BELISARIO MENDOZA,

did knowingly and intentionally 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.

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

ATTACHMENT B

I, Paul Papandrew, 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, 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. Since in or around May 2025, law enforcement officers investigated Reinaldo Rafael Belisario Mendoza (“MENDOZA”) and other individuals for narcotics trafficking offenses.

2. On or about May 26, 2025, law enforcement learned that MENDOZA was planning to engage in a drug transaction in northern New Jersey. In anticipation of that transaction, on or about May 28, 2025, MENDOZA drove—with an adult family member and two minor family members in the vehicle—to meet with the prospective buyer in the parking lot of a shopping mall in or around Short Hills, New Jersey.

3. When MENDOZA got to the mall, he discussed the drug transaction with the prospective buyer, and then MENDOZA showed the prospective buyer inside the trunk of his vehicle, which contained two wrapped packages and a closed white bag.

4. Law enforcement officers lawfully seized the two wrapped packages and observed what appeared to be, based on their training and experience, two kilograms of narcotics. Law enforcement also lawfully seized the white bag and observed a large quantity of what appeared to be, based on their training and experience, blue fentanyl pills.

5. Law enforcement officers field tested¹ the contents of the wrapped packages and the white bag that were seized from MENDOZA and determined that the wrapped packages contained a detectable amount of heroin and weighed approximately 2.29 kilograms. The substance that field-tested positive for heroin had the sticky consistency of black tar. The field test was inconclusive as to the pills inside the white bag.

¹ Laboratory results remain pending.

6. After waiving his *Miranda* rights, MENDOZA told law enforcement officers, in substance and in part, that he had arranged to sell the seized narcotics to the prospective buyer in exchange for money.