
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Cari Fais
 :
 RAMON SUERO, and : Mag. No. 26-9090
 FRANKLIN MAMBRU :

I, James Bice, 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 Department of Homeland Security, Homeland Security Investigations ("HSI"), and that this complaint is based on the following facts:

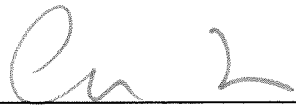
SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.



James Bice, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence on this 14th day of July, 2026 in Newark, New Jersey.



Hon. Cari Fais
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Substances)

From at least in or around June 2026 through on or about July 14, 2026, in
Essex County, in the District of New Jersey and elsewhere, the defendants,

**RAMON SUERO, and
FRANKLIN MAMBRU**

did knowingly and intentionally conspire and agree 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),
and 500 grams or more of a mixture and substance containing a detectable amount
of cocaine, a Schedule II controlled substance, contrary to Title 21, United States
Code, Sections 841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

(Possession with Intent to Distribute Fentanyl and Cocaine)

On or about July 14, 2026, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**RAMON SUERO, and
FRANKLIN MAMBRU**

did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

COUNT THREE

(Maintaining a Drug-Involved Premises)

On or about July 14, 2026, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**RAMON SUERO and
FRANKLIN MAMBRU**

did knowingly open, lease, rent, use, or maintain any place, whether permanently or temporarily, for the purpose of manufacturing, distributing, or using any controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

COUNT FOUR

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about July 14, 2026, in Essex County, in the District of New Jersey and elsewhere, the defendant,

RAMON SUERO,

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely, a Taurus P-T111 G2 9-millimeter handgun bearing serial number TJ062297, equipped with a large capacity magazine loaded with approximately 51 rounds of 9-millimeter ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about July 14, 2026, in Essex County, in the District of New Jersey and elsewhere, the defendant,

RAMON SUERO,

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute controlled substances, as charged in Counts One and Two of this Complaint, did knowingly possess a firearm, namely, a Taurus P-T111 G2 9-millimeter handgun bearing serial number TJ062297, equipped with a large capacity magazine, loaded with approximately 51 rounds of 9-millimeter ammunition.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ATTACHMENT B

I, James Bice, am a Special Agent with the Homeland Security Investigations ("HSI"). 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, 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. Since in or around June 2026, HSI has been investigating a drug trafficking organization (the "DTO") which operates in and around Essex County, New Jersey, and its members and associates including Ramon Suero ("SUERO") and Franklin Mambru ("MAMBRU") (collectively, the "Conspirators"). The investigation has shown that the DTO maintains a fentanyl and cocaine packaging and distribution location in Newark, New Jersey.

2. During the investigation, law enforcement extensively surveilled the area in which the DTO operates including a residence in Newark, New Jersey (the "Stash House"). Law enforcement has utilized physical and fixed surveillance and analyzed telephone records between the Conspirators. Analysis of telephone records between the Conspirators, among other lawful means of investigation, has shown frequent communications among the Conspirators and their associates.

3. Law enforcement has also used a confidential source ("CS-1") to communicate with SUERO. CS-1's reliability has been established through law enforcement operations and corroboration of information supplied by CS-1. On or about June 2026 through on or about July 14, 2026, SUERO has communicated with CS-1. SUERO informed CS-1 that he was in possession of large quantities of controlled substances. Through surveillance, law enforcement was able to confirm that SUERO was at the Stash House at the time he communicated to CS-1 that he was in physical possession of controlled substances. On or about the week of July 1, 2026, SUERO informed CS-1 that SUERO would receive a large load of narcotics that week.

4. On or about July 6, 2026, law enforcement observed SUERO leaving the Stash House with a large bag. He then drove approximately seven blocks away from the Stash House and met an individual who law enforcement knows to have prior narcotics related criminal convictions ("Individual-1"). Law enforcement then observed SUERO hand the large bag to Individual-1 and engage in a suspected hand-to-hand narcotics transaction. Upon completion of the hand-to-hand transaction, SUERO then returned to the Stash House.

5. On multiple occasions on or around June 2026 through on or around July 2026, law enforcement observed MAMBRU assisting SUERO with the transportation of large, weighted bags containing suspected narcotics into the Stash House. An analysis of telephone records between MAMBRU and SUERO revealed they maintained close contact throughout the course of the investigation.

6. On or about July 14, 2026, law enforcement executed a judicially authorized search warrant on the Stash House. The Stash House was comprised of two apartments. SUERO was arrested in the first floor apartment and MAMBRU was arrested in the second floor apartment. Narcotics were found throughout the Stash House. In the first floor kitchen, law enforcement located a hidden trap compartment operated by a key fob that contained fentanyl. A second key fob that operated the hidden trap on the first floor was also found in the second floor apartment.

7. Through the execution of the search warrant of the Stash House, law enforcement recovered approximately sixteen (16) kilograms of suspected fentanyl and approximately 900 grams of suspected cocaine. The packaging of the kilograms of suspected fentanyl found on the first floor of the Stash House matched the heat-sealed bags that were found on both floors of the Stash House. Law enforcement field tested a representative sample of each of the drug types and determined that they contained a detectable amount of fentanyl and cocaine, respectively. Also located throughout the Stash House were paraphernalia consistent with that used to package illegal drugs, including a "kilo brick" press, drug ledger, vacuum sealer bags, and packaging materials including glassine envelopes and a large quantity of rubber bands.

8. Additionally, law enforcement located a firearm hidden in the headboard of SUERO's bed, namely, a Taurus P-T111 G2 9mm pistol, bearing serial number TJ062297 (the "Firearm"), equipped with a large capacity magazine containing approximately 51 rounds of 9-millimeter ammunition (the "Ammunition").

9. The Firearm and Ammunition seized from the Stash House were manufactured outside the State of New Jersey and thus necessarily traveled in interstate or foreign commerce prior to SUERO's possession of them on or about July 14, 2026.

10. On or about August 10, 2009, SUERO was convicted in Superior Court of New Jersey, Middlesex County, of possession of controlled substances, in violation of N.J.S.A. 2C:35-10(A)(1), a crime punishable by a term of imprisonment exceeding one year.