
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Hon. Steven C. Mannion

v.

: Mag. No. 19-6022

VICTORIA IRIZARRY,
MARISOL VARGAS,
DANIEL ESTRELLA,
COHEN EASTON,
a/k/a "Power"

: **CRIMINAL COMPLAINT**

: **UNDER SEAL**

I, Michael Patti, 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 Task Force Officer with the U.S. Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Michael Patti
Task Force Officer
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
February 19, 2019 in Newark, New Jersey

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Between in or about August, 2018 through in or about November, 2018, in Essex County, in the District of New Jersey and elsewhere, defendants

VICTORIA IRIZARRY,
MARISOL VARGAS,
DANIEL ESTRELLA, and
COHEN EASTON,
a/k/a "Power"

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 5 kilograms 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)(A).

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

ATTACHMENT B

I, Michael Patti, am a Task Force Officer with the U.S. 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, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, 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. Law enforcement is currently involved in an investigation of the drug trafficking organization of Derik Sanchez (the "Sanchez DTO") currently operating in New Jersey, New York, California, and elsewhere. During the course of that investigation, law enforcement learned that Derik Sanchez ("Sanchez"),¹ and others arranged for at least two shipments of narcotics, namely cocaine, to be shipped from California to the District of New Jersey, via mail. Additionally, during the course of that investigation, law enforcement learned that Sanchez and others sell kilogram quantities of narcotics, namely cocaine, to narcotics distributors in and around the District of New Jersey.

Narcotics Parcel 1

2. On or about September 11, 2018, law enforcement conducted physical surveillance, and observed Sanchez and defendant Victoria Irizarry ("IRIZARRY"), a co-conspirator in the Sanchez DTO, send suspected narcotics proceeds ("Proceeds Box 1") from New Jersey to a corporate address in the Central District of California (the "California Corporate Address 1"). In particular, law enforcement observed Sanchez and IRIZARRY drive together in Sanchez's BMW ("Sanchez Vehicle") from Sanchez's Residence in New Jersey ("Sanchez Residence") to a Staples store in Edgewater, New Jersey, where Sanchez and IRIZARRY purchased a shipping box. Sanchez and IRIZARRY then drove the Sanchez Vehicle back to the residence of IRIZARRY in New Jersey ("Irizarry Residence," which is adjacent to the Sanchez Residence). Sanchez, IRIZARRY, and an unidentified male ("UM1") then drove to a post office in Fort Lee, New Jersey, where IRIZARRY carried Proceeds Box 1 into the post office. A

¹ On or about November 28, 2018, Sanchez was arrested for knowingly and intentionally conspiring and agreeing with others to distribute and possess with intent to distribute 5 kilograms 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)(A), in violation of Title 21, United States Code, Section 846. On the same date, he had an initial appearance before the Honorable Michael A. Hammer, United Magistrate Judge, District of New Jersey and was released on bail.

short time later, IRIZARRY exited the post office without Proceeds Box 1, holding a receipt. IRIZARRY then entered the Sanchez Vehicle, after which the Sanchez Vehicle was driven back to the parking lot of the Irizarry Residence.

3. On or about September 19, 2018, law enforcement observed one of Sanchez's co-conspirators in California, who is a source of narcotics supply to the Sanchez DTO ("Co-Conspirator 1"), pick up another package of suspected narcotics proceeds ("Proceeds Box 2") from a post office in the Central District of California. Proceeds Box 2 was sent from New Jersey to California Corporate Address 1, the same address that Proceeds Box 1 was shipped to on September 11. Proceeds Box 2 had a return address in West New York, New Jersey.

4. The following day, on or about September 20, 2018, a parcel of suspected narcotics ("Narcotics Parcel 1") was shipped from a second corporate address in the Central District of California ("California Corporate Address 2") to IRIZARRY at the Irizarry Residence. On or about September 22, 2018, law enforcement retrieved Narcotics Parcel 1 from a post office in Fort Lee, New Jersey before it was retrieved by a recipient. On or about September 24, 2018, Narcotics Parcel 1 was presented for examination by a trained law enforcement narcotics detection canine, who alerted law enforcement to the odor of a controlled substance.

5. On or about September 24, 2018, Sanchez called United States Parcel Service ("USPS") Customer Care Center, and stated, "A package is being sent to me, but it went to the wrong Fort Lee. It went to Fort Lee, Virginia and it was supposed to come to Fort Lee, New Jersey." Sanchez further stated, "I'm tracking it, and it's just wrong. I want, I wanted to make sure that it's coming back, coming back to New Jersey."

6. Additionally, on or about September 24, 2018, beginning at approximately 1:54 P.M., Sanchez, sent the following text messages to the phone of defendant Daniel Estrella ("ESTRELLA"), who assists the Sanchez DTO by distributing narcotics and collecting narcotics proceeds in and around New Jersey:

Sanchez: They sent it to f**king Virginia

Sanchez: I been on the phone with them all day

Sanchez: I'm trying to stop the delivery before it gets delivered

Sanchez: Shits a dub

7. On or about September 25, 2018, the government requested and obtained an order authorizing a search of Narcotics Parcel 1. Law enforcement executed the search warrant and seized from Narcotics Parcel 1 approximately 2

kilograms of a substance that field-tested positive for cocaine.

8. On or about October 3, 2018, defendant Marisol Vargas (“VARGAS”), who has maintained a narcotics stash house in the Central District of California (the “California Stash House”), discussed with Co-Conspirator 1 the fact that Narcotics Parcel 1 had not reached Sanchez in New Jersey. VARGAS sent the following text message to Co-Conspirator 1 in response: “Hey can u call the tustin post office n see if they got a package with the tracking number cuz it’s still hasn’t popped up over on this side.”² On or about October 4, 2018, Co-Conspirator 1 replied, as follows, to VARGAS: “call[e]d the 861 number said other number is where they have they are still looking for package. So don[’t] call ***-0539.”

9. Additionally, following the seizure of Narcotics Parcel 1, other members of the Sanchez DTO, who were expecting to obtain portions of the narcotics in the parcel so that they could sell the cocaine, called Sanchez to discuss whether and when Narcotics Parcel 1 would arrive.

10. On or about October 1, 2018, James Ferrer (“Ferrer”),³ who distributes narcotics for the Sanchez DTO, called to ask whether Sanchez had received Narcotics Parcel 1 by asking “Good news or what?” Sanchez responded, “I called, they still can’t finding it. One of those black guys stoled it pretty much my n***a.” Ferrer explained that he did not like shipping narcotics via USPS because USPS had lost packages of narcotics that he had sent previously: “N***a, I don’t like that company, bro. I hate the n****s, yo. I lost two of them, I lost 30 bags with them n****s. I can’t stand those people yo, like. And I lost it like at separate times, n***a. So my total was 30 but I can’t stand them.” Ferrer further told Sanchez that Sanchez should come collect his money from Ferrer’s prior sale of Sanchez DTO narcotics (“Just come get your money”). Additionally, Ferrer and Sanchez reassured each other that they would continue to work together, as they had in the past, to continue to obtain narcotics that they could sell. Sanchez stated, “so now I gotta work on plan b, you feel me?” Ferrer stated, “I’ll figure whatever the f**k I gotta do.” Sanchez replied, “Both of us, both of us. Don’t worry, I’ll figure it out. Like I always do somehow. So just stay with me

² VARGAS has maintained the California Stash House and also has traveled to, and conducts narcotics transactions in, other states, including New Jersey. During the course of the investigation, VARGAS has traveled to New Jersey, and I believe VARGAS’s reference to “this side” is a reference to New Jersey.

³ On or about February 6, 2019, Ferrer was arrested for knowingly and intentionally conspiring and agreeing with others to distribute and possess with intent to distribute 5 kilograms 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)(A), in violation of Title 21, United States Code, Section 846. On the same date, he had an initial appearance before the Honorable Michael A. Hammer, United Magistrate Judge, District of New Jersey and was released on bail.

bro."

Narcotics Parcel 2

11. On or about October 25, 2018, Sanchez sent a screen shot — of a conversation that I believe to have taken place between Sanchez and a California source of narcotics supply — to ESTRELLA. In the body of the message captured in that screen shot, Speaker 1, who I believe to be Sanchez, stated, "LoL I got n****s fighting over these joints lol." Speaker 2, who I believe to be a California source of narcotics supply working out of the California Stash House stated, "Lol I should be able to send 2 this week. But it might be Saturday."

12. During surveillance on or about October 25, 2018, law enforcement observed Co-Conspirator 2, a narcotics courier who works for VARGAS, and an unknown male ("UM2") walking out of the California Stash House with several boxes that they put into a vehicle parked in the driveway. Law enforcement followed the vehicle to UPS. After lawfully obtaining a search warrant for two of the boxes, law enforcement searched the boxes, and seized approximately 2 kilograms of cocaine from one box, which was addressed to Cliffside Park, New Jersey ("Narcotics Parcel 2"), and seven pounds of marijuana from another box that was addressed to Tulsa, Oklahoma.

13. On or about November 5, 2018, VARGAS (who maintains the California Stash House) had a phone call with Co-Conspirator 2 (who is a courier for VARGAS). During the course of the conversation, VARGAS asked if Co-Conspirator 2 was going to "pass by the house today" because it was time to "pay the rent" on the California Stash House.

14. On or about November 5, 2018, Co-Conspirator 1 (a California source of narcotics supply) called VARGAS and had a conversation with VARGAS. During the course of that conversation, VARGAS asked what their current pricing was for a kilogram of cocaine. Co-Conspirator 1 stated that it was \$26,000. Co-Conspirator 1, referring to defendant Sanchez, then asked, "Hey and what and what's up with Derik? He just gave up now? or what or what [Audio Break]." VARGAS stated that Narcotics Parcel 1 had never reached Sanchez. Co-Conspirator 1 was concerned, and explained that, because he/she felt bad, he/she would provide Sanchez with cocaine "on the arm," meaning on consignment, so that Sanchez would not have to pay for the kilogram until he had a chance to gather the proceeds from selling it.

15. On or about November 12, 2018, Sanchez and VARGAS discussed additional narcotics transactions. Sanchez described to VARGAS a phone call that Sanchez had with a source of narcotics supply ("the plug") in which the plug told Sanchez that "we want to keep working with you," and that "you were paying

the tab.” Sanchez specified that he began by owing the source of narcotics supply \$250,000 for narcotics that Sanchez had purchased, but Sanchez paid off most of the tab, which was now at \$70,000 (“70 bands”).

New Jersey Sales

16. Once Sanchez obtains narcotics from a source of supply, Sanchez sells those narcotics to distributors, including Ferrer and defendant Cohen Easton (“EASTON”), who distributes narcotics in and around New Jersey.

17. On or about September 26, 2018 at around noon, Ferrer and Sanchez spoke on the phone to set up a meeting so that Ferrer could provide narcotics proceeds to Sanchez. Sanchez stated, “I have to go to court in Fairview.” Sanchez further stated, “I wanna get my money. That’s why I been trying to get on you, my brother. So I don’t know if you wanna meet me in Fairview court.” Ferrer stated, “Alright. I’ll pass by. I’ll go bring you the bread, bro.”

18. On or about September 26, 2018, later in the day, law enforcement observed Sanchez and IRIZARRY in the Sanchez Vehicle parked outside a municipal courthouse in Fairview, New Jersey (the “Fairview Courthouse”). Ferrer arrived at the Fairview Courthouse and parked across the street from the Sanchez Vehicle. Sanchez and Ferrer exited their vehicles and met on the sidewalk, where Ferrer handed to Sanchez an object. I believe that Ferrer handed Sanchez the narcotics proceeds discussed in the conversation summarized above.

19. On or about October 4, 2018, Sanchez and Ferrer discussed meeting in person so that Sanchez could sell Ferrer “one” kilogram of narcotics. Ferrer stated, “I’m stuck in some crazy traffic you but I already pulled out enough to, I’m gonna be able to complete for one.” Ferrer further stated, “So I’m gonna bring you the bread just so you can get me one whole one bro and fu***ng I’m gonna get you your bread too man.”

20. On or about the morning of October 30, 2018, EASTON sent a text message to Sanchez requesting that Sanchez bring narcotics to the residence of EASTON in Paterson, New Jersey (the “Easton Residence”). More specifically, EASTON stated, “pull up on me early tomorrow . . . please bring the breakfast ‘food’ wit you I’m gonna be starving”. Later that day, Sanchez spoke with EASTON and Sanchez said that he had to pick up the narcotics from ESTRELLA’s residence in Lyndhurst, New Jersey (the “Estrella Residence”) before selling the narcotics to EASTON. Physical surveillance confirmed that Sanchez left his own residence, and traveled to the Estrella Residence. After stopping at the Estrella residence, Sanchez sent the following text message to EASTON confirming that he had retrieved the narcotics from the Estrella Residence: “Ok I’m with [Estrella] n I got ur lunch in hands.”

21. On or about October 30, 2018, law enforcement continued physical surveillance and observed Sanchez and ESTRELLA meet at the Easton Residence in the Sanchez Vehicle. As Sanchez and EASTON met in the backseat of the Sanchez Vehicle, ESTRELLA stood lookout. Sanchez and EASTON then got out the Sanchez Vehicle, and EASTON was carrying a black bag that appeared to have a rectangular-shaped bottom, consistent with a brick-shaped kilogram of cocaine. EASTON brought the bag into the Easton Residence. Following the transaction, later that evening, Sanchez sent the following text message to EASTON confirming that EASTON had paid \$29,000, which is consistent with the wholesale price of approximately a kilogram of cocaine: "there was 29 there big bro so u already know keep me posted when u ready so I can get u that other side of it no worries."

22. On or about November 12, 2018, Sanchez sent the following text message to EASTON regarding the sale of a "whole" kilogram of cocaine: "I'm going to get the other half for u to give u the whole so pay attention to the phone." Sanchez also texted: "Start counting lol so u can have an exact amount for me lol." A few hours later, Sanchez called EASTON, and stated "I'm on my way" and "I'll be there like in 15 minutes."

23. On or about November 13, 2018, just after midnight, GPS data from Sanchez's phone placed Sanchez in the vicinity of the Easton Residence. Approximately an hour later, Sanchez sent the following text messages to EASTON, relating to EASTON's "pretty high" tab for the kilograms of cocaine that Sanchez sold EASTON that EASTON was paying off with weekly payments ("tickets"):

Sanchez: Thank u bro n try to keep it clock work like that as long as u passing me Some tickets every week we good in my book broski cuz at least I have something to work with

Sanchez: 15500+25000+the new joint lol u up pretty high now so please keep it clock work big bro

19. The communications referenced in the paragraph directly above further revealed that EASTON was paying Sanchez off with weekly payments ("tickets") for cocaine that Sanchez delivered.