

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

UNITED STATES OF AMERICA : Hon. Steven C. Mannion
v. : Mag. No. 19- 6063
JOSE MANUEL JIMENEZ JIMENEZ : **CRIMINAL COMPLAINT**

I, Trevor O'Reilly, 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 United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Trevor O'Reilly, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Agent O'Reilly attested to this Affidavit by telephone pursuant to FRCP 4.1(b)(2)(A).

February 24, 2019
Date

District of New Jersey
Location

Honorable Steven C. Mannion
United States Magistrate Judge
Name and Title of Judicial Officer

Via telephone @ 1523hrs
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Importation of Cocaine)

On or about February 22, 2019, in Essex County, in the District of New Jersey and elsewhere,

JOSE MANUEL JIMENEZ JIMENEZ

did knowingly, intentionally and unlawfully import into the United States from a place outside thereof 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii).

ATTACHMENT B

I, Trevor O'Reilly, am a Special Agent with the United States Department of Homeland Security, 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, 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 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 February 22, 2019, at approximately 3:00 p.m., defendant JOSE MANUEL JIMENEZ JIMENEZ ("JIMENEZ") arrived at Newark Liberty International Airport in Newark, New Jersey ("Newark Airport") on an inbound flight originating from an airport in Santo Domingo, Dominican Republic.

2. Upon his arrival at Newark Airport, defendant JIMENEZ was stopped by officers of United States Customs and Border Protection ("CBP") for an inbound screening that included a pat-down search. During the screening, law enforcement discovered that defendant JIMENEZ possessed approximately 3.0 kilograms of a substance that field tested positive for the presence of cocaine. The cocaine was sewn into the vest that DEFENDANT was wearing.