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

UNITED STATES OF AMERICA

: Hon. James B. Clark, III

v.

: Mag. No. 19-30033

YOHAN E. DE JESUS OSORNIO,
RONAL LUIYI HERNANDEZ SEPULVEDA,
& RAUL A. FIGUEROA SANTANA

: **CRIMINAL COMPLAINT**

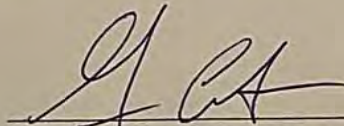
I, Giuliano M. Cristino, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 page and made a part hereof.



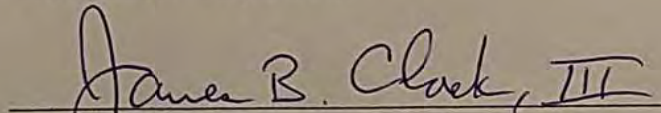
Giuliano M. Cristino

Special Agent

Drug Enforcement Administration

(Special Agent Cristino attested to the
contents herein by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A))

Sworn and subscribed, via telephone,
November 16, 2019:



Honorable James B. Clark, III
United States Magistrate Judge

ATTACHMENT A

On or about November 15, 2019, in Essex County, in the District of New Jersey and elsewhere, defendants,

YOHAN E. DE JESUS OSORNIO,
RONAL LUIYI HERNANDEZ SEPULVEDA, &
RAUL A. FIGUEROA SANTANA,

did knowingly and intentionally conspire and agree with each other and with others to 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, Giuliano M. Cristino, am a Special Agent with the United States 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 other items of evidence. 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 statements of others are related herein, they are related in substance and part. 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 the investigation of a drug trafficking organization ("DTO") that traffics narcotics in the New Jersey area, and elsewhere. The DTO is believed to transport narcotics from Mexico and the West Coast to the East Coast, including New Jersey, and elsewhere, including by tractor trailers. As part of this investigation, law enforcement learned that a tractor trailer might be transporting narcotics from the West Coast to New Jersey.

2. As part of this investigation, on or about November 15, 2019, law enforcement was conducting surveillance near a commercial establishment (the "Commercial Establishment") on Passaic Street in Newark, New Jersey. While conducting surveillance, law enforcement observed a tractor trailer (the "Tractor Trailer") parked on Passaic Street. Law enforcement observed an individual, subsequently identified as Defendant Yohan E. De Jesus Osornio ("DE JESUS OSORNIO") walking around the parking lot of a gas station (the "Gas Station") across from the Commercial Establishment in a suspicious manner, appearing to be looking for something and using his cellular telephone. Shortly thereafter, a white Mazda SUV (the "Mazda") was observed in the parking lot of the Gas Station. DE JESUS OSORNIO entered the back seat of the Mazda. Shortly thereafter, law enforcement observed DE JESUS OSORNIO walking on Passaic Street towards the Tractor Trailer with a weighted-down bag. DE JESUS OSORNIO then entered the passenger-side door of the Tractor Trailer with the weighted-down bag.

3. Around the same time, law enforcement observed a black Mitsubishi SUV (the "Mitsubishi") pull up and park in front of another tractor trailer parked on Passaic Street. An individual subsequently identified as Defendant Raul A. Figueroa Santana ("FIGUEROA SANTANA") was driving the Mitsubishi. Law enforcement observed FIGUEROA SANTANA exit the driver's side door of the Mitsubishi, walk toward the back of the Mitsubishi, and re-enter the driver's side door.

4. Approximately fifteen to twenty minutes later, an individual subsequently identified as Defendant Ronal Luiyi Hernandez Sepulveda

("HERNANDEZ SEPULVEDA") exited the Mitsubishi, walked towards the Tractor Trailer, and appeared to enter the Tractor Trailer. Shortly thereafter, HERNANDEZ SEPULVEDA was observed walking away from the Tractor Trailer with a weighted-down bag. HERNANDEZ SEPULVEDA walked toward the Mitsubishi and appeared to place the bag in the back of the Mitsubishi. Having cause to believe the bag contained narcotics, law enforcement apprehended and secured HERNANDEZ SEPULVEDA and FIGUEROA SANTANA.

5. Concerned for officer safety, law enforcement then approached the Tractor Trailer. At that point, DE JESUS OSORNIO barricaded himself in the Tractor Trailer and would not yield to law enforcement's commands, which were made several times. Law enforcement also activated their emergency vehicle lights and identified themselves as law enforcement. DE JESUS OSORNIO positioned the internal cabin curtains such that law enforcement could not see inside the Tractor Trailer. Believing that DE JESUS OSORNIO had just distributed narcotics and concerned for officer safety, law enforcement forced entry into the Tractor Trailer. Inside the Tractor Trailer, law enforcement observed two bags in plain view in the sleeper area of the Tractor Trailer. One of the bags was partially opened, such that law enforcement was able to observe a rectangular vacuum-sealed package, consistent with narcotics, partially protruding from the bag. Upon a search of this bag, law enforcement found approximately 20 kilograms of a white powdery substance that subsequently field-tested positive for the presence of cocaine. The second bag contained bundles of cash totaling a large undetermined amount of United States Currency. Law enforcement then apprehended DE JESUS OSORNIO.

6. After securing DE JESUS OSORNIO, law enforcement approached HERNANDEZ SEPULVEDA, who provided law enforcement with verbal consent to search the bag in the back of the Mitsubishi. Inside the weighted-down bag, law enforcement found approximately 10 kilograms of a white powdery substance that subsequently field-tested positive for the presence of cocaine.

7. The Defendants were arrested and taken into custody. As a result, law enforcement *Mirandized* each Defendant, DE JESUS OSORNIO, FIGUEROA SANTANA, and HERNANDEZ SEPULVEDA. Each Defendant was interviewed separately. DE JESUS OSORNIO admitted that he knew he was transporting and distributing narcotics. HERNANDEZ SEPULVEDA admitted that he knew he was picking up narcotics to subsequently distribute. FIGUEROA SANTANA denied knowledge of the narcotics, but admitted that he knew HERNANDEZ SEPULVEDA from "the neighborhood."

8. As noted above, as a result of the arrests of the Defendants, in total, law enforcement seized approximately 30 kilograms of a substance that field-tested positive for the presence of cocaine.