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

UNITED STATES OF AMERICA	:	Hon. Joseph A. Dickson
	:	
v.	:	Mag. No. 19-6934
	:	
ANGEL ALFONSO MALDONADO	:	CRIMINAL COMPLAINT

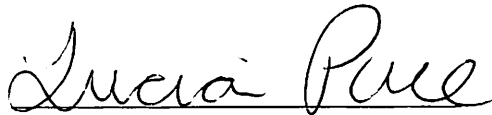
I, Luciana Pace, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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:

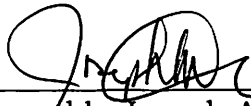
SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Luciana Pace
Special Agent
Drug Enforcement Administration

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



Honorable Joseph A. Dickson
United States Magistrate Judge

ATTACHMENT A

On or about December 15, 2019, in Hunterdon County, in the District of New Jersey and elsewhere, defendant,

ANGEL ALFONSO MALDONADO,

did knowingly and intentionally conspire and agree 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, Luciana Pace, 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 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 ongoing investigation, on or about December 15, 2019, law enforcement conducted surveillance on and around Route 78 Eastbound, in and around the area of Clinton Township, New Jersey. Law enforcement observed a tractor-trailer (the "Tractor-Trailer") pull off the highway into the shoulder. Law enforcement approached the Tractor-Trailer while it was parked on the shoulder.

3. The Defendant, Angel Alfonso Maldonado ("MALDONADO"), who is the owner of the Tractor-Trailer, appeared nervous when law enforcement approached the Tractor-Trailer. MALDONADO provided verbal consent to search the Tractor-Trailer.

4. As law enforcement looked into the cabin, law enforcement observed two cellular telephones in plain view. After law enforcement began searching the Tractor-Trailer, however, MALDONADO revoked consent to search the Tractor-Trailer. Subsequently, a certified narcotics detection canine screened the outside of the Tractor-Trailer and alerted for the presence of narcotics on the side of the cabin of the Tractor-Trailer. The canine was then brought into the cabin of the Tractor-Trailer and alerted for the presence of narcotics in the same area as on the outside of the Tractor-Trailer, as well as other areas in the cabin.

5. Law enforcement subsequently searched the cabin of the Tractor-Trailer and found a hidden compartment ("Hidden Compartment-1") located behind the closet in the cabin area. Inside Hidden Compartment-1, law enforcement found approximately 57 kilograms of suspected narcotics. In a second hidden compartment ("Hidden Compartment-2"), located in an area where the canine alerted for the presence of narcotics, law enforcement found

another approximately 57 kilograms of suspected narcotics. The approximately 114 kilograms, in total, were each plastic wrapped, consistent with narcotics packaging. After discovering the narcotics, law enforcement arrested MALDONADO.

6. In total, law enforcement seized approximately 114 kilograms of suspected narcotics. Law enforcement field-tested some of the kilograms. Each of these kilograms field-tested positive for the presence of cocaine.