
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Honorable Leda Dunn Wettre
	:	
ROBIN PERALTA,	:	Mag. No. 19-13028
LUIS SUSANA-DELOSSANTO, and	:	
RAMON FABIAN-PENA,	:	
a/k/a "Rafael"	:	

I, Dibriana J. Rivas, 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 Task Force Officer 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:

Dibriana J. Rivas, Task Force Officer
Drug Enforcement Administration

Sworn to before me and subscribed in my presence
the 8th day of January, 2020 in Newark, New Jersey

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Cocaine)

On or about January 7, 2020, in the District of New Jersey and elsewhere,
the defendants,

**ROBIN PERALTA,
LUIS SUSANA-DELOSSANTO, and
RAMON FABIAN-PENA,
a/k/a “Rafael”**

knowingly and intentionally possessed with the intent to distribute five kilograms 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 841(a)(1) and (b)(1)(A).

COUNT TWO

(Possession with Intent to Distribute Heroin)

On or about January 7, 2020, in the District of New Jersey and elsewhere,
the defendant,

ROBIN PERALTA

knowingly and intentionally possessed with the intent to distribute one kilogram
or more of a mixture or substance containing a detectable amount of heroin, a
Schedule I controlled substance.

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

COUNT THREE

(Possession with Intent to Distribute Cocaine)

On or about January 7, 2020, in the District of New Jersey and elsewhere,
the defendant,

LUIS SUSANA-DELOSSANTO

knowingly and intentionally possessed with the intent to distribute five kilograms 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 841(a)(1) and (b)(1)(A).

ATTACHMENT B

I, Dibriana J. Rivas, am a Task Force Agent with the 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 and/or time, I am asserting that it took place on or about the date and/or time alleged.

1. In or around June 2018, the DEA learned through, among other means, physical surveillance, analysis of phone records, and court-authorized search warrants, that defendant ROBIN PERALTA (“PERALTA”) was selling narcotics in and throughout the New Jersey area.

2. On or about January 3, 2020, law enforcement was conducting surveillance in a parking lot in the area of Hamilton Township (the “parking lot”). Law enforcement observed PERALTA arrive in a Honda Pilot (the “Pilot”) and a person, later identified as defendant LUIS SUSANA-DELOSSANTO (“DELOSSANTO”) arrive in a Honda Odyssey (the “Odyssey”). PERALTA and DELOSSANTO parked their vehicles close to each other. PERALTA then took a large object from the Pilot and placed it into the backseat of a Mercedes Benz (the “Mercedes Benz”), which is registered to DELOSSANTO. The Mercedes Benz had a cover on it and was surrounded on three sides by tractor-trailers.

3. On or about January 7, 2020, enforcement once again observed PERALTA and DELOSSANTO arrive at the parking lot, in their respective vehicles, and approach the Mercedes Benz. Law enforcement observed DELOSSANTO take a white bag out of the Mercedes Benz and give it to PERALTA who placed it inside his vehicle, the Pilot.¹ Both PERALTA and DELOSSANTO then left in the Pilot and drove to a nearby secluded street. Shortly thereafter, PERALTA and DELOSSANTO returned to the parking lot in the Pilot, at which point, DELOSSANTO got out of the Pilot, and a short while later, departed in the Odyssey.

4. Law enforcement followed PERALTA to a location in or around Passaic, New Jersey, where PERALTA was greeted by several additional individuals. Law enforcement observed PERALTA hand the white bag to a person, later identified as defendant RAMON FABIAN-PENA, a/k/a “Rafael” (“FABIAN”).

¹ Based on the investigation, law enforcement suspects that the Pilot contains a trap, which is a secret compartment often used by narcotics traffickers to hide narcotics and other items.

When law enforcement approached the group and announced their presence, FABIAN ran inside an apartment building and dropped the white bag. Law enforcement followed FABIAN into the apartment building and subsequently recovered the white bag, which contained approximately six (6) kilograms of cocaine. Law enforcement later apprehended FABIAN and placed him under arrest. Law enforcement also apprehended PERRALTA and placed him under arrest.

5. Law enforcement obtained consent from PERALTA to search PERALTA'S residence. A search of that residence revealed approximately \$100,000 in United States currency and approximately three (3) additional kilograms of heroin.

6. Later on or about the same day, after DELOSSANTO left the parking lot, law enforcement surveilled DELOSSANTO'S residence in or around Trenton, New Jersey. Law enforcement approached DELOSSANTO, after observing DELOSSANTO leaving his residence. During the encounter, law enforcement obtained DELOSSANTO'S consent to search DELOSSANTO'S residence. A search of that residence revealed approximately \$5,000 in United States currency and a .40 caliber, Glock handgun, fully loaded with a 15-round extended magazine. Law enforcement apprehended DELOSSANTO and placed him under arrest.

7. Thereafter, a trained law enforcement narcotics detection canine was brought to the parking lot where law enforcement initially observed DELOSSANTO AND PERALTA. The canine alerted to the presence of narcotics inside the Mercedes Benz. A subsequent search of the Mercedes Benz revealed approximately thirty-four (34) kilograms of cocaine.

8. A subsequent field test confirmed that the suspected narcotics recovered in Passaic, New Jersey, were, in fact, cocaine. The suspected narcotics recovered from the Mercedes Benz were packaged and labeled in the same manner as those recovered in Passaic, New Jersey.

9. A subsequent field test confirmed that the suspected narcotics recovered from PERALTA's residence, were, in fact, heroin.