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

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UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	Mag. No. 21-9001
	:	
PEREZ OMAR GIBBS	:	<b><u>CRIMINAL COMPLAINT</u></b>

I, Thomas Roldan, 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.

by phone

\_\_\_\_\_  
Thomas Roldan, Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

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

\_\_\_\_\_  
January 11, 2021  
Date

Honorable Cathy L. Waldor  
\_\_\_\_\_  
United States Magistrate Judge  
Name and Title of Judicial Officer

\_\_\_\_\_  
District of New Jersey  
Location

/s Cathy L. Waldor  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

(Importation of Controlled Substances)

On or about January 9, 2021, at Newark International Airport, in Essex County, in the District of New Jersey and elsewhere, defendant

PEREZ OMAR GIBBS

did knowingly, intentionally and unlawfully import into the United States from a place outside thereof, namely Jamaica, 500 grams or more of a mixture or substance containing 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, Thomas Roldan, am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (“HSI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including photographs, documents, audio recordings, and physical 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 the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. 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 January 9, 2021, at approximately 6:40 p.m., defendant PEREZ OMAR GIBBS (“GIBBS”) arrived at Newark Liberty International Airport in Newark, New Jersey (“Newark Airport”) on an inbound flight originating from an airport in Montego Bay, Jamaica.

2. Upon his arrival at Newark Airport, defendant GIBBS was stopped by officers of United States Customs and Border Protection (“CBP”) for an inbound screening that included a search of the luggage that was in his possession.

3. During the screening, law enforcement discovered that defendant GIBBS possessed approximately 1.0 kilograms of a substance that field tested positive for the presence of cocaine. The cocaine was contained inside approximately two bags of coffee and four picture frames.

4. During a subsequent voluntary interview with law enforcement agents, and after being advised of and waiving his Miranda rights, defendant GIBBS admitted that he knew that the substance in his possession was cocaine.