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

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UNITED STATES OF AMERICA : Hon. José R. Almonte, U.S.M.J.  
 :  
 v. : Mag. No. 22-16207  
 :  
 ALEJANDRO NOUEL LAJUD : **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 United States 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.

*sl Luciana Pace*  
\_\_\_\_\_  
Luciana Pace, Special Agent  
Drug Enforcement Administration

SA Pace attested to this Complaint  
by telephone pursuant to FRCP 4.1(b)(2)(A)  
on December 5, 2022 in the District of New Jersey



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HONORABLE JOSÉ R. ALMONTE  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**COUNT ONE**

**(Possession with Intent to Distribute Cocaine and Fentanyl)**

On or about December 5, 2022, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

ALEJANDRO NOUEL LAJUD

did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

## **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. On or about December 5, 2022, on the New Jersey Turnpike in or around East Rutherford, New Jersey, a tractor-trailer (the “Tractor-Trailer”) driven by an individual later identified as defendant Alejandro Nouel Lajud (“NOUEL LAJUD”) repeatedly swerved across highway lanes, without using turn signals. Law enforcement conducted a motor vehicle stop of the Tractor-Trailer.

2. During a lawful search of the Tractor-Trailer that followed, law enforcement located seven (7) duffel bags in the middle area of the Tractor-Trailer’s cab, which were interspersed within cardboard boxes. Inside the duffel bags were approximately 95 brick-shaped packages, each of which weighed approximately one kilogram. Approximately 70 of the packages were wrapped in clear plastic and covered with yellow wrapping (collectively, the “Yellow Wrapped Packages”). Approximately 25 of the packages were wrapped in what appeared to be clear plastic and marked with either the number “10,” the letters “MAX,” or a blue stenciled flower (collectively, the “Clear Wrapped Packages”).

3. A sampling of the Yellow Wrapped Packages field-tested positive for the presence of cocaine, and a sampling of the Clear Wrapped Packages field-tested positive for the presence of fentanyl.