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

UNITED STATES OF AMERICA	:	Hon. Steven C. Mannion
	:	
v.	:	Mag. No. 17-6082
	:	
PALEMON SILVESTRE SIERRA,	:	
YUNIOR MARTINEZ-JIMENEZ, and	:	
INDHIRA DE LOS SANTOS PADILLA	:	<u>CRIMINAL COMPLAINT</u>

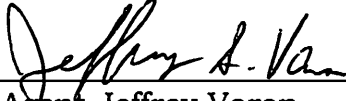
I, Jeffrey Varon, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the 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.



Special Agent Jeffrey Varon
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

June 28, 2017
Date

at Essex County, New Jersey
County and State

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Cocaine)

On or about June 27, 2017, in Middlesex County, in the District of New Jersey and elsewhere, the defendants,

**PALEMON SILVESTRE SIERRA,
YUNIOR MARTINEZ-JIMENEZ, and
INDHIRA DE LOS SANTOS PADILLA**

did knowingly and intentionally conspire and agree with each other and others to distribute and 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, Jeffrey Varon, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI). 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 a limited purpose, 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, I am asserting that it took place on or about the date alleged.

1. In or around June 2017, based on an ongoing investigation, law enforcement learned that defendant YUNIOR MARTINEZ-JIMENEZ was distributing multi-kilogram quantities of cocaine and other controlled substances in and around New Brunswick, New Jersey.

2. On or about June 15, 2017, during a lawfully recorded conversation, MARTINEZ-JIMENEZ offered to sell another individual (the "Buyer") multiple kilograms of cocaine.

3. On or about June 27, 2017, MARTINEZ-JIMENEZ agreed to meet the Buyer and another individual ("Individual 2") at a location in New Brunswick, New Jersey to sell the Buyer approximately two kilograms of cocaine. At approximately 1:30 p.m. on the same date, MARTINEZ-JIMENEZ met with the Buyer and Individual 2 at a location in New Brunswick, New Jersey (the "Remsen Avenue Location"). Defendant INDHIRA DE LOS SANTOS PADILLA was in the car ("Vehicle 1") driven by MARTINEZ-JIMENEZ.

4. MARTINEZ-JIMENEZ asked the Buyer to follow him to a second location to pick up the drugs. The Buyer refused this request, at which point, MARTINEZ-JIMENEZ and DE LOS SANTOS PADILLA traveled in Vehicle 1 to a residence located in New Brunswick, New Jersey (the "Redmond Street Location"). A law enforcement aerial unit maintained surveillance on Vehicle 1 as it traveled from the Remsen Avenue Location to the Redmond Street Location.

5. Law enforcement observed defendant PALEMON SILVESTRE SIERRA exit the Redmond Street Location, go to Vehicle 1, retrieve an empty bag, enter the Redmond Street Location, remain inside the Redmond Street Location for approximately 3 to 5 minutes, and then exit the Redmond Street Location carrying the bag, which now appeared weighted. SIERRA returned the weighted bag to MARTINEZ-JIMENEZ and DE LOS SANTOS PADILLA, who were still inside Vehicle 1. Law enforcement then observed, through aerial surveillance, MARTINEZ-JIMENEZ and DE LOS SANTOS PADILLA drive back to the Remsen Avenue Location.

6. Thereafter, MARTINEZ-JIMENEZ and DE LOS SANTOS PADILLA parked Vehicle 1 in the vicinity of the Remsen Avenue Location. DE LOS SANTOS PADILLA exited Vehicle 1 and met the Buyer and Individual 2 at their car ("Vehicle 2"). DE LOS SANTOS PADILLA handed the weighted bag over through the passenger side window of Vehicle 2. Law enforcement, who were conducting surveillance of the narcotics transaction, converged on Vehicle 1 and Vehicle 2. MARTINEZ-JIMENEZ tried to flee in Vehicle 1 but was apprehended a short distance away. MARTINEZ-JIMENEZ and DE LOS SANTOS PADILLA were arrested.

7. Law enforcement located two packages in the bag that contained what appeared to be approximately 2 kilograms of cocaine. A field test confirmed that the substance in the package was cocaine.

8. In a post-*Miranda* statement, MARTINEZ-JIMENEZ, in sum and substance, admitted to law enforcement that MARTINEZ-JIMENEZ had picked up narcotics from the Redmond Street Location on this and other occasions, and thereafter, returned the proceeds of the sale of the narcotics to the Redmond Street Location.

9. At the direction of law enforcement, MARTINEZ-JIMENEZ, accompanied by an undercover law enforcement officer, delivered the narcotics proceeds to SIERRA at the Redmond Street Location. SIERRA was then arrested.

10. Pursuant to a search warrant, law enforcement searched the Redmond Street Location and seized approximately 6 kilograms of suspected cocaine from SIERRA's bedroom. The substance subsequently field-tested positive for cocaine.

11. In a post-*Miranda* statement, SIERRA admitted that he was in possession of the 6 kilograms of cocaine that were found in his bedroom.