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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 17-6620  
 :  
 v. : Hon. Joseph A. Dickson  
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 ABRAHAM CASTRO, and :  
 HECTOR LEONEL LUCAS-RAMOS : **CRIMINAL COMPLAINT**

I, Robert Fernandez, 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 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:

\_\_\_\_\_  
Robert Fernandez, Task Force Officer  
U.S. Drug Enforcement Administration

Sworn to and subscribed in my presence,  
This 28<sup>th</sup> day of August 2017 in New Jersey

HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

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

ABRAHAM CASTRO, and  
HECTOR LEONEL LUCAS-RAMOS

did knowingly and intentionally conspire and agree with each other and with others to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 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, Robert Fernandez, am a Task Force Officer 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 August 27, 2017, law enforcement observed a tractor trailer (the “Tractor Trailer”) traveling Northbound on the New Jersey Turnpike. After the driver of Tractor Trailer, defendant Abraham Castro (“CASTRO”), committed several traffic violations, including failure to maintain lane and failure to signal while switching lanes, law enforcement conducted a motor vehicle stop.

2. When law enforcement approached the driver of the Tractor Trailer, (CASTRO), they observed the passenger of the Tractor Trailer, defendant Hector Leonel Lucas-Ramos (“LUCAS-RAMOS”) run to the back cabin-area of the Tractor Trailer. Because law enforcement was concerned for their safety and that defendant LUCAS-RAMOS may have a weapon, they entered the Tractor Trailer and asked defendant LUCAS-RAMOS to raise his hands above his head. As they did this, law enforcement observed defendant LUCAS-RAMOS attempting to zip up a large bag, which contained numerous packages that were in plain view. These packages appeared to contain a white powdery substance, and were packaged in a manner consistent with the manner in which cocaine and heroin are packaged for distribution. Law enforcement also observed several other large bags in the cabin-area of the Tractor Trailer.

3. As a result, law enforcement Mirandized both defendant CASTRO and defendant LUCAS-RAMOS. Defendant CASTRO admitted that he knew the bag contained narcotics. Defendant LUCAS-RAMOS admitted that he had made a previous trip with defendant CASTRO and during that trip picked up a quantity of U.S. currency.

4. Thereafter, defendant CASTRO provided written consent for law enforcement to search the Tractor Trailer. During the search of the Tractor Trailer, law enforcement recovered approximately five (5) large duffle bags that in total contained approximately 141 packages, all of which were packaged in a manner consistent with the manner in which cocaine and heroin are packaged for distribution. The packages were brought to a DEA laboratory for preliminary testing, which showed that the packages contained substances that field tested positive for cocaine and heroin.

