

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 1408**

UNITED STATES OF AMERICA

v.

JUAN MOISES PEREZ MENDEZ,  
a/k/a “Caballero,” and  
ODALIS EUSEBIO PERALTA BAUTISTA,  
a/k/a “Luis Collazo Santos,”

Defendants.

**COMPLAINT**

Violations of 21 U.S.C. §§ 841, 846; 18  
U.S.C. § 2

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEPHANIE RICHMAN, being duly sworn, deposes and says that she is a Special Agent with Drug Enforcement Administration (“DEA”), and charges as follows:

**COUNT ONE**  
**(Conspiracy to Distribute Narcotics)**

1. From at least in or about September 2022 through at least in or about April 2024, in the Southern District of New York and elsewhere, JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” and ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” and ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Possession with Intent to Distribute Narcotics)**

4. On or about April 6, 2024, in the Southern District of New York and elsewhere, JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” and ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendants, knowingly and intentionally distributed and possessed with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

5. The controlled substances involved in the offense were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A);  
Title 18, United States Code, Section 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

6. I am a Special Agent with DEA, currently assigned to the El Dorado Task Force, which focuses on combatting drug trafficking and money laundering. I have been a Special Agent with DEA for approximately five years. I have been personally involved in this investigation. This affidavit is based on my involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**Background**

7. This case concerns a network of drug traffickers operating industrial-scale illegal narcotics pill pressing operations in multiple locations throughout New York City. As part of those operations, the traffickers have converted spaces in residential buildings to press large quantities of powder narcotics, including fentanyl and methamphetamine, into pill form for wholesale distribution. At these locations, drug traffickers have manufactured millions of pills for further distribution, sometimes manufacturing hundreds of thousands of pills in a single session.

8. On or about April 6, 2024, members of law enforcement searched another such location: a storage room in the basement of a residential apartment building in the Bronx used by the drug traffickers to store powdered narcotics, combine the narcotics with other fillers, use dyes to color the combined powders, and then use large industrial-scale pill presses, which press powdered material into tablets, to create hundreds of thousands of deadly pills. Many of the pills appear to have been manufactured to be indistinguishable from prescription medications such as

Xanax, Adderall, and OxyContin, though in fact they contain, among other things, varying quantities of fentanyl.

9. As described in greater detail below, inside the Bronx storage room, investigators found two industrial-scale pill presses, approximately 130,000 pills, the vast majority of which field tested positive for the presence of fentanyl (the remainder of which field tested positive for the presence of methamphetamine), approximately three kilograms of a powder in zip lock bags that tested positive for the presence of fentanyl, a bucket containing approximately 20 pounds of powdered narcotics, which field tested positive for the presence of methamphetamine, and approximately 3.5 pounds of suspected crystalized methamphetamine.

### **PEREZ MENDEZ Conspires to Operate Pill Mills Throughout the City**

#### *The Washington Heights Pill Mill*

10. Based on my participation in this investigation and my review of court records, I have learned the following:

a. On or about May 31, 2023, law enforcement officers conducted a consent search (the “May 31, 2023 Search”) of the basement in a particular building in Washington Heights (the “Washington Heights Building”), where they found large quantities of narcotics, as well as the materials and equipment necessary to press narcotics into pill form, including commercial-grade pill presses. A photograph of the narcotics recovered is below:



b. In connection with the May 31, 2023 Search, law enforcement officers arrested Juan Efren Paulino (“Paulino”), who was found in the basement of the Washington Heights Building with the narcotics.

11. Based on my review of surveillance video footage from the Washington Heights Building, I know that a person who appears to be JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant, appeared to enter the basement of the Washington Heights Building in the days leading up to the May 31, 2023 Search.

12. Based on my personal involvement in this investigation and discussions with other law enforcement officers involved in this investigation, I know that law enforcement officers recovered Paulino’s phone (“Paulino Cellphone-1”) incident to his arrest and conducted a search of its contents. From my participation in the search of Paulino Cellphone-1 and discussions with other law enforcement officers involved in searching Paulino Cellphone-1, I have learned the following:

a. Paulino had a number of message exchanges with a phone number ending in 9908. That number (the “Perez Mendez Number”) is saved as a contact in Paulino Cellphone-1 as “Caballero Ringo” and the WhatsApp user profile photograph associated with it appears to be JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant.

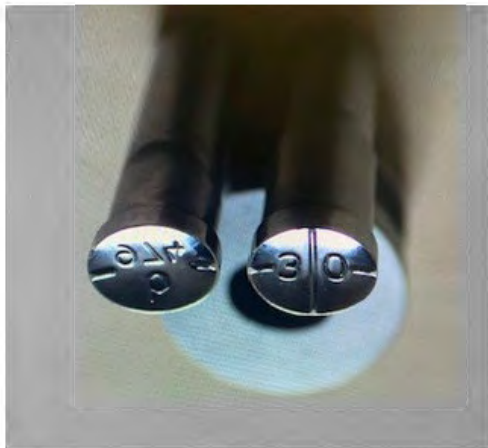
b. The Perez Mendez Number exchanged a number of messages with Paulino Cellphone-1 that are, based on my training and experience, indicative of narcotics trafficking. For example:

i. On or about September 5, 2022, the Perez Mendez Number sent a link to a website to order a pill press machine.

ii. On or about January 8, 2023, Paulino Cellphone-1 sent the Perez Mendez Number the following photograph of a small bag of colorful pills:



iii. On or about January 14, 2023, the Perez Mendez Number sent Paulino Cellphone-1 an audio<sup>1</sup> note stating, in sum and substance, that only “one” came in. The Perez Mendez Number followed up with the following photographs of what I know to be, from my training and experience, a die mold and two rings, which are materials used in connection with shaping powder narcotics into pill form on pill press machines. The die mold photograph is below:



iv. On or about March 8, 2023, Paulino Cellphone-1 sent the Perez Mendez Number an audio note stating, in sum and substance, that he was currently working “down here using the new one.” In the background can be heard what I believe to be, from my training and experience, an active pill press machine.

v. On or about May 30, 2023, the Perez Mendez Number sent Paulino Cellphone-1 an audio note stating, in sum and substance, that someone’s location had been “ransacked” resulting in the user of the Perez Mendez Number having lost one of his bags of “medicine.”

#### *The Beaumont Pill Mill*

13. Based on my participation in this investigation and my review of court records, I have learned the following:

a. On or about October 5, 2023, law enforcement officers searched the basement of a building located on Beaumont Avenue in the Bronx (the “Beaumont Building”), pursuant to a search warrant. In that basement, law enforcement officers encountered a large-scale pill pressing operation. In particular, during the course of the search, law enforcement officers found hundreds of thousands of pills and over 20 kilograms of narcotics, along with three industrial pill press machines, one disassembled pill press, a kilogram press, and narcotics mixing and repackaging materials including blenders, dyes, jars of calcium citrate (frequently used as a narcotics cutting agent), and industrial-grade gas masks (used for protection when handling narcotic powders intended for pill pressing). A photograph of the narcotics recovered is below:

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<sup>1</sup> These and other voice notes and messages were in Spanish. I do not speak Spanish, but had the notes and messages translated to me by members of law enforcement fluent in the Spanish language. These translations are drafts and remain subject to change.



b. In connection with that search, law enforcement officers arrested four individuals, all of whom were present in the Beaumont Building at the time of the search.

14. Based on my participation in surveillance of the Beaumont Building, and discussions I have had with other law enforcement officers who participated in surveillance of the Beaumont Building, I know that, in or about August 2023 law enforcement officers observed an individual who appeared to be JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant, enter and exit the Beaumont Building.

### **The Calcium Purchases**

15. Based on information provided to law enforcement officers by a particular retail chain of consumer products (the “Retailer”) and my discussions with other law enforcement officers, I have learned the following:

a. From on or about June 10, 2023, to on or about March 3, 2024, JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant, and his girlfriend purchased approximately 1,274 bottles of calcium pills from the Retailer. This amounts to approximately 356,720 calcium pills.

b. Based on my training and experience as a law enforcement officer, I know that narcotics traffickers often use pulverized calcium pills as a mixing agent to combine with illegal narcotics. Narcotics traffickers do this both to dilute the narcotics and to generate a greater volume of mixtures and substances containing narcotics—thus creating a greater volume of product to sell—before packaging the narcotics for further distribution.

### **Surveillance of the Storage Room**

16. In light of JUAN MOISES PEREZ MENDEZ’s, a/k/a “Caballero,” the defendant’s, involvement in the above-described pill mills at the Washington Heights Building and the Beaumont Building, law enforcement officers began conducting surveillance of PEREZ MENDEZ. During the course of that surveillance, law enforcement officers identified a storage

room (the “Storage Room”) located in the basement of a particular building located on Gerard Avenue in the Bronx (the “Gerard Avenue Building”) that was frequented by PEREZ MENDEZ.

17. Based on my review of surveillance footage obtained from cameras located in and around the Gerard Avenue Building, I have learned, among other things, the following about events that occurred there between on or about April 3, 2024, and on or about April 6, 2024:

a. On or about April 3, 2024, at approximately 5:00 p.m., JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant, appeared to enter the Storage Room, pushing a cart containing what appeared to be a case of water, a case of soup, and a case of juice or soda. Approximately 10 minutes later, a person that appeared to be ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendant, joined PEREZ MENDEZ in the Storage Room.

b. PEREZ MENDEZ and PERALTA BAUTISTA remained in the Storage Room until early in the morning on or about April 4, 2024. At approximately 1:30 a.m., as depicted in part below, PEREZ MENDEZ left the Storage Room wearing a dark colored short sleeved shirt. A white, powdery residue appears to be on his shirt.



c. Later, on or about April 4, 2024, PEREZ MENDEZ returned to the Storage Room. At approximately 3:20 a.m., PEREZ MENDEZ again left the Storage Room. He then appeared to look at the floor outside of the Storage Room, and then returned to the Storage Room to retrieve a mop, which he then used to clean the floor outside of the Storage Room before leaving the Gerard Avenue Building. Based on my training and experience, I know that individuals who run pill mills will often attempt to clean the areas where they manufacture pills, as the manufacturing of tens of thousands of pills creates a large amount of powdered, airborne detritus.

d. On or about April 5, 2024, at approximately 6:30 p.m., PEREZ MENDEZ appeared to enter the Storage Room accompanied by another individual who appeared to be PERALTA BAUTISTA. PEREZ MENDEZ appeared to be rolling a large suitcase and PERALTA BAUTISTA appeared to be carrying a large blue plastic bag. Over the next several hours, PEREZ MENDEZ and PERALTA BAUTISTA appeared to enter and exit the Storage Room on several occasions.

e. Later, on or about April 5, 2024, at approximately 10:00 p.m., PEREZ MENDEZ appeared to enter Storage Room with a shopping bag, a handful of cash, and keys. He again entered the Storage Room, this time empty-handed, at approximately 12:15 a.m. on April 6, 2024. At approximately 3:05 a.m. on April 6, 2024, PEREZ MENDEZ exited the Storage Room. As depicted in part below, at that time, PEREZ MENDEZ appeared to mop the floor outside of the Storage Room wearing a protective mask. Based on my training and experience as a law enforcement officer, I know that operators of pill mills often use protective masks to protect themselves from the powdered narcotics that they are pressing into pills.



f. At approximately 4:35 a.m. on or about April 6, 2024, PEREZ MENDEZ and PERALTA BAUTISTA left the Storage Room.

g. Later that day, on or about April 6, 2024, at approximately 6:00 p.m., PERALTA BAUTISTA returned to and reentered the Storage Room. Approximately five to ten minutes later, PEREZ MENDEZ returned to and reentered the Storage Room, and then left the Storage Room one hour later, at approximately 7:10 p.m.

### **The Arrest of the Defendants**

18. Based on my participation in this investigation and discussions with other law enforcement officers, I know that, on or about April 6, 2024, at approximately 7:15 p.m., law enforcement officers arrested JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” as he was exiting the Gerard Avenue Building, only minutes after leaving the Storage Room. Law enforcement officers found a key to the Storage Room on his person.

19. Based on my discussions with other law enforcement officers and review of a video taken by law enforcement officers of the door to the Storage Room, I have learned that, after the arrest of JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” the defendant, law enforcement officers approached the door to the Storage Room. A loud pounding sound could be heard emanating from within the Storage Room, which I know, from my training and experience, to be consistent with the operation of a pill press.

20. Based on my personal involvement in this investigation and discussions with other law enforcement officers, I have learned the following:



a. On or about April 6, 2024, at approximately 7:50 p.m., the loud pounding sound emanating from the Storage Room stopped. Shortly thereafter, ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendant, exited the Storage Room. At the time, PERALTA BAUTISTA’s shirt appears to have had white powder on it.

b. As PERALTA BAUTISTA exited the Storage Room, he was placed under arrest.

### **The Search of the Storage Room**

21. Based on my participation in this investigation and discussions I have had with other law enforcement agents, I have learned, among other things, the following:

a. On or about April 6, 2024, law enforcement officers conducted a search of the Storage Room pursuant to a search warrant authorized by the Honorable Robyn F. Tarnofsky, United States Magistrate Judge. In the Storage Room, law enforcement officers found two industrial-scale pill presses, approximately 130,000 pills, the vast majority of which field tested positive for the presence of fentanyl (the remainder of which field tested positive for the presence of methamphetamine), approximately three kilograms of a powder in zip lock bags that tested positive for the presence of fentanyl, a bucket containing approximately 20 pounds of powdered narcotics, which field tested positive for the presence of methamphetamine, and approximately 3.5 pounds of suspected crystalized methamphetamine. The suspected narcotics and pill presses are depicted, in part, below:





b. Additionally, law enforcement officers found materials used to mix powdered narcotics with fillers as well as packaging materials used to package narcotics for further distribution. Those items included mixing bowls, a blender, strainers, dyes, empty bottles of calcium citrate, which appear to be the type of calcium purchased from the Retailer, and thousands of glassine envelopes. Some of those materials and tools are pictured below.




WHEREFORE, I respectfully request that JUAN MOISES PEREZ MENDEZ, a/k/a “Caballero,” and ODALIS EUSEBIO PERALTA BAUTISTA, a/k/a “Luis Collazo Santos,” the defendants, be imprisoned or bailed, as the case may be.

/s authorized electronic signature

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STEPHANIE RICHMAN  
Special Agent  
Drug Enforcement Administration

Sworn to before me by reliable electronic means  
this 8th day of April, 2024



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THE HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York