AUSA: Nicholas D. Pavlis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GLEN CONTRERAS,

Defendant.

26 MAG 4584

AMENDED COMPLAINT

Violation of 21 U.S.C. § 846

COUNTIES OF OFFENSE:
BRONX, NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

Isaiah Benjamin, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE
(Narcotics Trafficking Conspiracy)

1. From at least in or around August 2026 through in or around October 2026, in the Southern District of New York and elsewhere, GLEN CONTRERAS, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that GLEN CONTRERAS, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

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

4. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents, and my examination of various reports, videos, recordings, photographs, communications, and records. Because this affidavit is being submitted for the limited purpose of demonstrating 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.

5. Based on my participation in this investigation, my discussions with other law enforcement officers, my and other law enforcement officers' physical surveillance, my review of

law enforcement reports and other records, video surveillance, and my training and experience, I have learned, among other things, the following:

Overview

a. Since in or around August 2026, the DEA has been investigating a drug trafficking organization (the "DTO") that has been responsible for trafficking bulk loads of cocaine into the New York City-area. As part of that investigation, agents identified GLEN CONTRERAS, the defendant, as one of the DTO members. As set forth below, on or about August 30, 2026, members of the DTO transported boxes by truck from New Jersey and points west through the Southern District of New York, and CONTRERAS and a co-conspirator ("CC-1") then carried those boxes into an apartment that CONTRERAS leases in a high-rise building in Long Island City, New York. A court-authorized search of that apartment later resulted in the recovery of approximately 120 kilograms of suspected cocaine, as well as a firearm with a loaded magazine, including at least some of the same boxes that CONTRERAS carried into the apartment.

August 30, 2026 Delivery of the Boxes

b. On or about August 30, 2026, a tractor-trailer bearing an out-of-state plate (the "Truck") traveled through the Southern District of New York and eventually stopped in a parking lot in Queens, New York (the "Queens Lot"). Surveillance footage then captured the driver of the Truck and another member of the DTO ("CC-2") transfer approximately twelve boxes from the Truck into a sport utility vehicle that CC-2 had arrived in ("Vehicle-1"). Vehicle-1 then traveled to a parking garage adjacent to a high-rise residential building in Long Island City, New York ("Building-1"). Shortly thereafter, surveillance footage from in and around Building-1 shows that a man – later identified as CONTRERAS – and a second man ("CC-1") used a dolly to move approximately eight boxes, consistent in size and appearance with the 12 boxes that the Truck driver and CC-2 removed from the Truck, from the garage into Building-1 and specifically up to the 38th floor, where I know CONTRERAS leases a unit (the "Apartment"). Security personnel from Apartment's building further confirmed that a key fob associated with CONTERAS accessed the Apartment at or around the same time the surveillance footage showed CONTRERAS and CC-1 exiting the elevator on the 38th floor.

c. Two days later, on or about September 1, 2026, the Truck returned to the vicinity of the Queens Lot. Approximately twenty minutes later, Vehicle-1 also arrived on the scene, at which time surveillance footage shows that CC-2 exited the vehicle and handed over a box to the driver of the Truck. Based on my training and experience, the return of a single box to the driver of the Truck approximately two days after the delivery, at the same location, is consistent with payment for narcotics, which traffickers frequently make in bulk cash.

September 15, 2026 Interception of 238 Kilograms of Cocaine from the Truck

d. Approximately two weeks after the events described above, on or about September 14, 2026, the Truck traveled from the Chicago area into Indiana, heading southeast. At approximately 1:00 a.m. on September 15, 2026, a trooper from the Indiana state police conducted a traffic stop of the Target Truck on Interstate-94 in the vicinity of Michigan City, Indiana, after observing the Truck make two unsafe lane movements and speeding in a construction zone. During the trooper's conversation with the driver of the Truck, the driver stated that he had picked up a

load in Chicago and was headed to New York. Shortly thereafter, the driver consented to searches of the tractor and trailer of the Truck. The traffic stop and the driver's consent was recorded using the trooper's body-worn camera.

e. During the search of the tractor section of the Truck, the trooper found a loaded 9mm MR19 handgun. During the search of the trailer section of the Truck, the trooper – as well as DEA agents who later arrived on the scene – recovered approximately 238 kilograms of a substance that field-tested positive for the presence of cocaine. The cocaine was packaged in vacuum-sealed bricks and contained in eleven brown boxes that appeared identical to those that were unloaded by CONTRERAS and into the Apartment on or about August 29, 2026, described above. A photograph of the cocaine that was recovered is pictured below:



f. Also during the search of the Truck, law enforcement observed a GPS navigation device in the Truck. The destination entered into that device at the time of the stop was the Queens Lot, the same location where the Truck made the August 30, 2026 delivery described above.

The October 29, 2026 Removal of the Tracking Device

g. On or about October 11, 2026, the Honorable Henry J. Ricardo, United States Magistrate Judge, Southern District of New York, authorized the installation of a GPS tracking device on a sport utility vehicle used by CONTRERAS ("Vehicle-2"), based on a finding of probable cause to believe that Vehicle-2 was being used in connection with narcotics trafficking, including that on multiple occasions agents saw CONTRERAS and/or surveillance footage captured CONTRERAS utilizing Vehicle-2 to drive up to and then CONTREAS brought large suitcases into Building-1, which is consistent with CONTRERAS bringing more narcotics into the Apartment.

h. On or about October 29, 2026, law enforcement observed CONTRERAS take Vehicle-2 to an auto-body shop in the Bronx. Later on or about October 29, 2026, after tracking data showed Vehicle-2 traveling over the George Washington Bridge from Manhattan into New Jersey, law enforcement observed that the device abruptly stopped producing new location information. A separate agent following CONTRERAS in Vehicle-2 observed at around the same time CONTRERAS toss a plastic bag out the window of Vehicle-2. Later that evening, agents recovered the tracking device on the side of Interstate-95 in the Fort Lee, New Jersey area, indicating that CONTRERAS had the device removed and then threw it out of Vehicle-2.

CONTRERAS's Arrest and the Search of the Apartment

i. Shortly thereafter, on or about October 29, 2026, law enforcement officers arrested CONTRERAS outside of his residence in New Jersey; agents then conducted a consent search of CONTRERAS' residence and found approximately $40,000 in cash as well as a money counter that is consistent with the counting of narcotics proceeds.

j. Later that same night, on or about October 29, 2026, the Honorable Joseph A. Marutollo, United States Magistrate Judge, Eastern District of New York, issued a warrant authorizing a search of the Apartment (the "Search Warrant"). Law enforcement agents then executed the Search Warrant and recovered from the Apartment, among other things, the following: (i) approximately six empty boxes, consistent in appearance with the boxes CONTRERAS and CC-1 were depicted moving into Building-1 on or about August 30, 2026; (ii) numerous brick-shaped packages containing a white powdery substance suspected to be cocaine and weighing approximately 120 kilograms in total, including packaging; and (iii) a Taurus handgun with a loaded magazine. A photograph of the brick-shaped packages and the gun found in the Apartment is shown below:



k. After CONTRERAS was arrested, CONTRERAS waived his *Miranda* rights and agreed to be interviewed by law enforcement. During the subsequent interview, CONTRERAS stated, among other things, the following:

i. The boxes that CONTRERAS and CC-1 transported into the Apartment on August 30, 2026 contained cocaine;

ii. That CONTRERAS and another co-conspirator ("CC-3") jointly pay for mass quantities of cocaine;

iii. That CONTRERAS has received at least four loads of large quantities of cocaine prior to the August 30, 2026 events described above; and,

iv. That prior to each of those approximately four loads, CONTRERAS coordinated directly with CC-2 about the quantity of cocaine that CC-2 would be able to deliver to him.

WHEREFORE, I respectfully request that GLEN CONTRERAS, the defendant, be imprisoned or bailed, as the case may be.[1]

Isaiah Benjamin
Special Agent
Drug Enforcement Administration

Sworn to before me
this 30th day of October, 2026

THE HONORABLE ROBERT W. LEHRBURGER
United States Magistrate Judge
Southern District of New York

[1] On or about October 30, 2026, CONTRERAS was rearrested after this Court found an initial complaint charging CONTRERAS lacked probable cause for his October 29, 2026 arrest described above, leading to this Amended Complaint.