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ORIGINAL

Approved:

Rachel Maimin

RACHEL MAIMIN

Assistant United States Attorney

Before:

THE HONORABLE HENRY PITMAN
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: COMPLAINT

- v. -

: Violations of

21 U.S.C. §§ 812,

-JAVION CAMACHO,

: 841(a)(1), (b)(1)(A) & 846;

a/k/a "Jay,"

18 U.S.C. §§ 1951,

a/k/a "King Kong,"

: 924(c)(1)(A)(i) & 2

-JULIO CAMACHO,

a/k/a "King Honesty,"

: COUNTY OF OFFENSE:

-ALEX CESPEDES,

BRONX

GARY SANCHEZ,

-MANUEL PIMENTEO,

DOMINGO VASQUEZ,

-BENJAMIN JIMINEZ,

-RAFAEL HUERTA,

OSCAR NORIEGA,

-VICTOR JOSE GOMEZ,

-JOSHUA ROMAN,

-VICTOR E. MORAL,

-RAMON JIMINEZ,

ALI A. HUSAIN,

LOUIS BORRERO, and

-OLIVER F. FLORES,

Defendants.

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SOUTHERN DISTRICT OF NEW YORK, ss.:

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

COUNT ONE

1. From at least in or about December 2012, up to and including on or about January 9, 2013, in the Southern District of New York and elsewhere, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree 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 JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

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

COUNT TWO

4. From at least in or about December 2012, up to and including on or about January 9, 2013, in the Southern District of New York and elsewhere, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, JAVION

CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, and others agreed to commit an armed robbery of individuals believed to be engaged in narcotics trafficking.

OVERT ACT

5. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about January 9, 2013, in the Bronx, New York, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, in the guise of police officers, and in possession of 6 firearms, attempted to rob individuals believed to be in possession of heroin.

(Title 18, United States Code, Section 1951.)

COUNT THREE

6. On or about January 9, 2013, in the Southern District of New York, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

The bases for deponent's knowledge and for the foregoing charges are, in part, as follows:

7. I am a Special Agent with the DEA and am one of the agents with primary responsibility for this investigation. This affidavit is based upon my own observations, my conversations with other law enforcement agents and others, 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.

8. During the course of this investigation, law enforcement agents, including myself, have worked with a witness who is proffering with the Government in anticipation of entering into a cooperation agreement and receiving a sentence reduction in connection with narcotics charges pending in this District (the "CW"). The CW has proven reliable and trustworthy and information the CW has provided has been corroborated by independent evidence.

9. In addition, during the course of this investigation, law enforcement agents, including myself, have worked with two confidential informants who are paid for their work with law enforcement ("CI-1" and "CI-2"). CI-1 and CI-2 have proven reliable and trustworthy and information they have provided has been corroborated by independent evidence in this and other investigations.

10. On or about December 14, 2012, at my direction, the CW met with an individual who was previously known to the CW as part of a crew of individuals who rob narcotics traffickers ("CC-1"). Law enforcement officers, including myself, surveilled the meeting.¹ From speaking to the CW and surveilling the meeting, I learned, in substance and in part, that, during the meeting:

a. The CW told CC-1, in substance and in part, that the CW knew an individual who had information about the locations of narcotics stashes and wanted to be introduced to CC-1's crew. (The CW made this statement at my direction, and was referring to CI-1.)

b. CC-1 told the CW, in substance and in part, that "Jay," later identified as JAVION CAMACHO, a/k/a "Jay, a/k/a "King Kong," the defendant, would be interested in meeting with CI-1.

¹ The CW had been equipped with a recording device, but it malfunctioned.

c. CC-1 told the CW, in substance and in part, that CAMACHO's robbery crew impersonates police officers, and may include actual police officers.

d. CC-1 told the CW, in substance and in part, that CC-1 would contact the CW to set up a meeting with CAMACHO.

11. Later in the day, on or about December 14, 2012, the CW told me that CC-1 had called the CW and said, in substance and in part, that "the wolves were hungry" and liked the sound of "the job." The CW told me that the CW understood this to mean that JAVION CAMACHO, a/k/a "Jay," the defendant, was interested in working with CI-1 on a robbery of narcotics dealers.

12. On or about December 17, 2012, at my direction, the CW and CI-1 met with CC-1 and JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, at a restaurant in the vicinity of 10th Avenue and 34th Street in New York, New York ("Restaurant-1"). CI-1 was equipped with a recording device, and law enforcement officers, including myself, surveilled the meeting. From listening to the recording, surveilling the meeting, speaking to the CW, and reviewing video surveillance from Restaurant-1's camera, I learned, in substance and in part, that, during the meeting:

a. CI-1 told CAMACHO, in substance and in part, that a shipment of heroin - a minimum of 10 kilograms - was going to be arriving in New York City after the holidays (the "Shipment") and CI-1 wanted CAMACHO to rob the Shipment using force.

b. CAMACHO told CI-1, in substance and in part, that CAMACHO had a robbery crew of police impersonators who would be able to carry out the robbery.

c. CAMACHO told CI-1, in substance and in part, that CAMACHO expected to be able to sell the heroin contained in the Shipment for a certain price.

d. CAMACHO gave CI-1 a telephone number and told CI-1, in substance and in part, to keep CAMACHO posted on the shipment of heroin by calling CAMACHO.

13. On or about December 31, 2012, I reviewed text messages that CI-1 and JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, exchanged that day. In the course of these messages, in substance and in part, CI-1 and CAMACHO agreed to meet on January 2, 2013.

14. On or about January 2, 2013, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, CI-1, an individual later identified as CAMACHO's brother, JULIO CAMACHO, a/k/a "King Honesty," the defendant, and CC-1 met at Restaurant-1. CI-1 was equipped with a recording device, and law enforcement officers, including myself, surveilled the meeting. From listening to the recording, surveilling the meeting, speaking to CI-1, and reviewing video surveillance from Restaurant-1's camera, I learned, in substance and in part, that, during the meeting:

a. CI-1 told JAVION CAMACHO, JULIO CAMACHO, and CC-1, in substance and in part, that the Shipment was expected to contain between 20 and 40 kilograms of heroin. JAVION CAMACHO responded, in substance and in part, that the crew could "take over Jersey City" with that quantity of heroin.

b. JULIO CAMACHO asked CI-1 whether CI-1 would mind if the traffickers expecting the Shipment (the "Targets") got "laid out" during the robbery. CI-1 told me that CI-1 understood "laid out" to mean "killed."

c. CI-1 told JAVION CAMACHO, JULIO CAMACHO, and CC-1, in substance and in part, that the next time CI-1 contacted the crew, it would be to conduct the robbery.

15. On or about January 8, 2013, I reviewed text messages that CI-1 and JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, exchanged that day. In the course of these messages, in substance and in part:

a. CI-1 told JAVION CAMACHO that they would be "going out to the party tomorrow," and "it's a for sure thing."

b. JAVION CAMACHO responded: "So tomorrow is the day," and "Say no more, what time do you want to meet up?"

c. CI-1 told JAVION CAMACHO: "Tomorro[w] they'll give me an idea of where it'll be, and I'll meet you there around 7. From there the party pops off quick and then we party?"

d. JAVION CAMACHO responded: "[S]o at night we should be ready to party right?"

16. On or about January 9, 2013, I reviewed text messages that CI-1 and JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, exchanged that day. In the course of these messages, in substance and in part:

a. JAVION CAMACHO told CI-1: "As soon as you get the directions to the bar let me know asap."

b. At approximately 5:37 p.m., CI-1 told JAVION CAMACHO: "I just got home from work it shouldn't be more than an hour from now as soon as they hit me up I'm gonna tell you where to meet up."

c. JAVION CAMACHO told CI-1: "We about to shoot to the city and be on standby."

d. At approximately 7 p.m., the CI told JAVION CAMACHO, in substance and in part, to be ready.

e. JAVION CAMACHO told CI-1: "We good just need the info and I do the rest." JAVION CAMACHO further asked CI-1: "U think we should do it after u go in so we know how many niggas in there?"

f. CI-1 responded: "Nah because if they see me it's a wrap on my people down there. Follow me to the block and I'll point it out. Then do yo thing."

g. At approximately 7:28 p.m., CI-1 told JAVION CAMACHO, in substance and in part, to meet CI-1 at a restaurant in the vicinity of West 251st Street and Broadway in the Bronx, New York ("Restaurant-2").

17. At approximately 8:15 p.m. on January 9, 2013, CI-1 went to Restaurant-2 to meet JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant. CI-1 was equipped with a recording device, and law enforcement agents, including myself, surveilled the meeting. From surveilling the meeting, speaking to other law enforcement agents, and speaking to CI-1, I learned the following, in substance and in part:

a. While CI-1 was waiting at Restaurant-2 for JAVION CAMACHO, law enforcement agents, including myself, saw JULIO CAMACHO, a/k/a "King Honesty," the defendant, approach Restaurant-2 on foot, look inside Restaurant-2, and make a phone call. Based upon my training and experience and this investigation, I believe that JULIO CAMACHO was counter-surveilling Restaurant-2 for law enforcement.

b. I subsequently saw a Ford Crown Victoria (the "Crown Victoria"), a Dodge Nitro (the "Nitro"), and a Honda Odyssey (the "Odyssey") pull up to Restaurant-2. Specifically, the Crown Vic

and the Nitro double-parked across the street from Restaurant-2, and the Odyssey parked in front of Restaurant-2.

c. JAVION CAMACHO got out of the Crown Victoria and entered Restaurant-2, along with the driver of the Odyssey, later identified as VICTOR E. MORAL, the defendant.

d. Several of the individuals who had been inside the Crown Victoria, the Nitro, and the Odyssey got out of those cars and stood, chatting, in the street.

e. JULIO CAMACHO, the defendant, and an individual later identified as VICTOR JOSE GOMEZ, the defendant, who were among the individuals chatting in the street, walked toward a Chevy Tahoe that was parked across from Restaurant-2 (the "Tahoe").

f. Inside Restaurant-2, JAVION CAMACHO and MORAL sat next to CI-1. CI-1 told JAVION CAMACHO and MORAL, in substance and in part, that there were approximately 20 kilograms of heroin in the Shipment. JAVION CAMACHO told CI-1, in substance and in part, that there was a police officer on the robbery crew in case they needed to shoot someone. During the course of this conversation, JOSHUA ROMAN, the defendant, entered Restaurant-2 and sat down at an adjacent booth.

g. JAVION CAMACHO, MORAL, and ROMAN left Restaurant-2 and stood outside chatting with certain of the other individuals who had been in the cars.

h. CI-1 left Restaurant-2 and called JAVION CAMACHO on the telephone, who subsequently approached CI-1. At my direction, CI-1 told JAVION CAMACHO to follow CI-1 in CI-1's Mustang, which had been double-parked (the "Mustang"), because CI-1 had just learned where the Targets were.

i. CI-1 got into the Mustang, in which CI-2 was sitting, at my direction, for the purpose of driving CI-1. The Crown Victoria pulled up behind the Mustang. The Odyssey then pulled up behind the Crown Victoria, and the Nitro pulled up behind the Odyssey.

j. The Mustang started driving on Broadway heading north, with the Crown Victoria, Odyssey, and Nitro following behind in tandem. Law enforcement then saw the Tahoe and a Chrysler minivan (the "Minivan") speed up behind the Nitro and similarly follow the line of vehicles.

k. The six cars, still driving in single file, made a left turn onto Lakeview Place. CI-1 then called JAVION CAMACHO and said, in substance and in part, that the "spot" was up on the right, and that CI-1 would pull over just short of the "spot."

l. The Mustang made a right turn onto Post Road, followed in single file by the Crown Victoria, Odyssey, Nitro, Tahoe, and Minivan. The Mustang pulled over to the right on Post Road and stopped. The Crown Victoria, Odyssey, Nitro, Tahoe, and Minivan pulled up and stopped, still in single file, behind the Mustang.

18. Law enforcement officers, including myself, approached the vehicles and placed all of the individuals inside the Crown Victoria, Odyssey, Nitro, Tahoe, and Minivan under arrest. In connection with the arrests, I learned the following:

a. The Crown Victoria was being driven by ALEX CESPEDES, the defendant, and the passenger in the front seat was JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant. OSCAR NORIEGA and ALI A. HUSAIN, the defendants, were sitting in the back seat. Law enforcement agents, including myself, searched the Crown Victoria and found, among other things:

- i. A ski mask;
- ii. A GPS unit similar to those used by law enforcement to track vehicles. Based on my training and experience and this investigation, I believe that the robbers had the GPS unit in order to track vehicles potentially used by narcotics traffickers, *i.e.*, potential victims;
- iii. A firearm holster; and
- iv. Gloves.

In addition, the Crown Victoria was equipped with a mechanized device that, at the direction of the driver, would cover the license plate with a steel plate.

b. The Odyssey was being driven by VICTOR E. MORAL, the defendant, and there were no passengers. Law enforcement agents, including myself, searched the Odyssey and found, among other things, the following, some of which were hidden inside a secret compartment, or "trap" inside the car:

- i. Four shirts bearing the words "police" on them;

- ii. Two tactical vests, similar to those used by law enforcement, that permit the wearer to attach pieces of equipment to the vest, such as firearm magazines, flashlights, and handcuffs;
- iii. A hydraulic ram, similar to those used by law enforcement, in order to break down doors;
- iv. A police scanner;
- v. Two GPS units;
- vi. Two sets of gloves;
- vii. A flashlight;
- viii. Approximately \$10,000 in cash in seven rubber-banded bundles;
- ix. Four walkie-talkies;
- x. One set of handcuffs;
- xi. A law enforcement shield; and
- xii. Two ski masks.

In addition, in the "trap," law enforcement agents found the following five loaded firearms: a .45 caliber High Point, a .380 caliber semi-automatic firearm without a readily-discernible model, a .9 mm Beretta, a .45 caliber Glock, and a silver pistol.

c. Inside the Nitro were JOSHUA ROMAN, LOUIS BORRERO, and JULIO CAMACHO, the defendants. CAMACHO was in the front passenger seat. Law enforcement agents, including myself, searched the Nitro, and found, among other things, a ski mask.

d. The Tahoe was being driven by RAMON JIMINEZ, the defendant. RAFAEL HUERTA and VICTOR JOSE GOMEZ, the defendants, were in the back seats. GARY SANCHEZ, the defendant, was in the front passenger seat. Law enforcement agents, including myself, searched the Tahoe, and found, among other things, a ski mask and gloves.

e. The Minivan was being driven by OLIVER F. FLORES, the defendant. The front passenger was MANUEL PIMENTEO, the defendant, and in the backseat were BENJAMIN JIMINEZ and DOMINGO VASQUEZ, the defendants. Law enforcement agents, including myself, searched the Minivan, and found a .380 caliber semi-automatic

firearm without a readily-discernible model inside a "trap," as well as:

- i. A ski mask;
- ii. Zipties, similar to those used by law enforcement to handcuff individuals;
- iii. Bolt cutters;
- iv. A baseball bat;
- v. A crowbar; and
- vi. A "Rabbit pump," which is a tool used by law enforcement to break down doors.

19. After being advised of his *Miranda* rights, JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," the defendant, told me, in substance and in part, that:

- a. He had just finished a sentence for manslaughter; and;
- b. The police had caught him "red-handed."

20. After being advised of his *Miranda* rights, VICTOR E. MOREL, the defendant, told me, in substance and in part, that he had been given 10 grams of heroin to drive the Odyssey, which was also going to be used to transport the stolen narcotics.

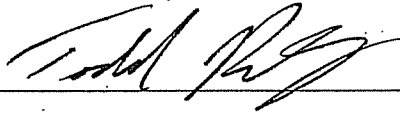
21. After being advised of his *Miranda* rights, ALEX CESPEDES, the defendant, told me, in substance and in part, that he was going to be paid \$1,000 to pick up heroin, and that he had been solicited by NORIEGA to participate.

22. After being advised of his *Miranda* rights, RAFAEL HUERTA, the defendant, told me, in substance and in part, that:

- a. GARY SANCHEZ and RAMON JIMINEZ, the defendants, had picked up HUERTA in Washington Heights that evening to rob a narcotics stash house;
- b. The robbers planned to scout the location and reconvene to hand out assignments; and
- c. HUERTA believed he would act as "security" and patrol the perimeter of the stash house because it was HUERTA's first time with the crew.

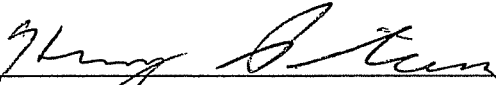
23. A photograph depicting certain of the items seized on January 9, 2013 pursuant to the arrest of JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, is attached hereto as Exhibit A.

24. WHEREFORE, deponent respectfully requests that an arrest warrant issue for JAVION CAMACHO, a/k/a "Jay," a/k/a "King Kong," JULIO CAMACHO, a/k/a "King Honesty," ALEX CESPEDES, GARY SANCHEZ, MANUEL PIMENTEO, DOMINGO VASQUEZ, BENJAMIN JIMINEZ, RAFAEL HUERTA, OSCAR NORIEGA, VICTOR JOSE GOMEZ, JOSHUA ROMAN, VICTOR E. MORAL, RAMON JIMINEZ, ALI A. HUSAIN, LOUIS BORRERO, and OLIVER F. FLORES, the defendants, and that they be imprisoned or bailed, as the case may be.



Todd Riley
Special Agent
Drug Enforcement Administration

Sworn to before me this
10th day of January 2013



THE HONORABLE HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

Exhibit A

11/13

14 ARRESTED

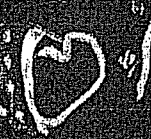
6 HAWKINS SERIES

5 VEHICLES SEIZED

\$10,000 BENCH

POLICE

POLICE



POLICE

POLICE

