
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Cathy L. Waldor
 :
 ERNESTO ADON MARTINEZ, : Mag. No. 24-9199
 LUIS ARISMEDY GOMEZ TORRES, :
 and :
 DEURY LUIS GOMEZ TORRES :
 :
 :

I, Tiffany Shakro, the undersigned complainant 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 Drug Enforcement Administration (“DEA”), and that this complaint is based on the following facts:

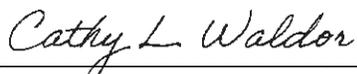
SEE ATTACHMENT B



Tiffany Shakro, Special Agent
Drug Enforcement Administration

Special Agent Tiffany Shakro attested to this Complaint by telephone pursuant to Fed. R. Crim. P. Rule 4.1(b)(2)(A), on May 3, 2024.

Hon. Cathy L. Waldor
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

From at least in or around October 2023 through in or around May 2024, in the District of New Jersey and elsewhere, the defendants,

**ERNESTO ADON MARTINEZ,
LUIS ARISMEDY GOMEZ TORRES, and
DEURY LUIS GOMEZ TORRES,**

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Tiffany Shakro, am a Special Agent with the 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, videos, and photographs of the 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. Since in or around October 2023, the DEA, along with state and local law enforcement agencies, have been investigating a drug trafficking organization (the “DTO”) which operates in and around Bergen County, New Jersey, and New York, New York, and its members and associates which include Ernesto Adon Martinez (“MARTINEZ”), Luis Arismedy Gomez Torres (“L. TORRES”), and Deury Luis Gomez Torres (“D. TORRES”) (collectively, the “Conspirators”). The investigation has shown that the DTO trafficked controlled substances including, but not limited to, fentanyl, methamphetamine, and heroin. The investigation has also shown that the DTO maintains a fentanyl and heroin packaging and distribution location in New York, New York.

2. During the investigation, law enforcement extensively surveilled the area in which the DTO operates including an apartment in Fort Lee, New Jersey (the “Fort Lee Apartment”) where the Conspirators reside together, and an apartment on Ellwood Street in New York, New York (the “Stash Apartment”). Law enforcement has utilized physical and fixed surveillance; and conducted controlled purchases of narcotics in New Jersey and New York, for substances that tested positive for the presence of fentanyl, methamphetamine, and heroin. Analysis of telephone records between the Conspirators, among other lawful means of investigation, has shown frequent communications among the Conspirators and their associates. The investigation revealed that the DTO is affiliated with, and the Conspirators are members and/or associates of, the Trinitarios criminal street gang.

3. The investigation has shown that MARTINEZ, L. TORRES and D. TORRES agreed with each other and others to distribute large quantities of fentanyl, heroin, and methamphetamine in New Jersey and New York. Since in or around October 2023, through physical and fixed surveillance, law enforcement has observed the Conspirators travelling back and forth together, on a near-daily basis, from the Fort Lee Apartment across the George Washington Bridge to the Stash Apartment, where controlled substances would be packaged and distributed. As described in more detail below, during the course of this investigation, law enforcement has used a confidential informant, to purchase fentanyl, methamphetamine and heroin from members of the DTO

on numerous occasions.

4. During the timeframe of the conspiracy, video footage captured, among other evidence, narcotics transactions involving the Conspirators, daily interactions between members of the conspiracy; regular travel of the Conspirators between the Fort Lee Apartment and Stash Apartment; and the Conspirators access and use of the Stash Apartment for the distribution of narcotics. Specifically, law enforcement has observed MARTINEZ, L. TORRES and D. TORRES regularly travel together between the Fort Lee Apartment and the Stash Apartment to facilitate the drug trafficking of the DTO.

5. Between in or around March 2024 and in or around May 2024, law enforcement used a confidential source (“CS-1”) to purchase fentanyl, methamphetamine, and heroin from the DTO. Each transaction was conducted in the area surrounding the Fort Lee Apartment or the Stash Apartment. In each transaction the Conspirators either originated from, or returned to, the Fort Lee Apartment. Prior to each controlled purchase, CS-1 contacted L. TORRES via cellular telephone to arrange the narcotics purchase. Prior to each controlled purchase, law enforcement ensured that CS-1 did not have any unauthorized contraband or currency. Each controlled transaction was monitored by law enforcement through physical or fixed surveillance.

6. Those controlled purchases are outlined and described below:

Buy No.	On or about the Week of	Defendant	Substances Purchased	Location
1	March 17, 2024	L. TORRES	Fentanyl/ Heroin	Stash Apartment
2	March 31, 2024	D. TORRES L. TORRES	Fentanyl	Stash Apartment
3	April 7, 2024	L. TORRES MARTINEZ	Methamphetamine	Fort Lee Apartment
4	April 28, 2024	L. TORRES	Fentanyl ¹	Stash Apartment

7. During the week of March 17, 2024, CS-1 contacted L. TORRES via cellular telephone to arrange a fentanyl purchase. L.TORRES directed CS-1 to the Stash Apartment. In advance of the transaction, law enforcement observed L. TORRES travel from the Fort Lee Apartment to the Stash Apartment. After

¹ Laboratory testing remains pending.

greeting CS-1, L. TORRES retrieved fentanyl from the Stash Apartment which was provided to CS-1 in exchange for U.S. currency. L. TORRES indicated he also had heroin at the Stash Apartment available for purchase and provided CS-1 with a sample.

8. During the week of March 31, 2024, CS-1 contacted L. TORRES via cellular telephone to arrange a fentanyl purchase. L. TORRES directed CS-1 to the Stash Apartment. Upon CS-1's arrival, D. TORRES exited the Stash Apartment and met with CS-1, at which time D. TORRES provided several hundred fentanyl pills to CS-1, matching the order placed with L. TORRES, in exchange for U. S. currency.

9. During the week of April 7, 2024, CS-1 contacted L. TORRES via cellular telephone to arrange a fentanyl purchase. L. TORRES directed CS-1 to a location near the Fort Lee Apartment. Law enforcement observed L. TORRES travel with MARTINEZ from the Fort Lee Apartment to the prearranged location. MARTINEZ entered a nearby building and waited as L. TORRES met with CS-1 and provided CS-1 with over 50 grams of methamphetamine in exchange for U.S. currency. Following the transaction, L. TORRES and MARTINEZ left the area together.

10. During the week of April 28, 2024, CS-1 contacted L. TORRES via cellular telephone to arrange a fentanyl purchase. L. TORRES informed CS-1 that they could meet in New Jersey or New York. Ultimately L. TORRES directed CS-1 to the Stash Apartment. L. TORRES exited the Stash Apartment and met with CS-1, at which time L. TORRES provided suspected fentanyl in exchange for U.S. currency.

11. The investigation has revealed that the DTO distributed in excess of 400 grams of fentanyl, a Schedule II controlled substance; and more than 50 grams of methamphetamine, a Schedule II controlled substance.