UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	: CRIMINAL COMPLAINT
v.	: : Honorable Cathy L. Waldor
JENNY DESIREE ROSARIO- LORENZO	: Mag. No. 24-9202 : :

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

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 8, 2024.

Hon. Cathy L. Waldor United States Magistrate Judge

Cathy L. Waldor Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

On or about May 8, 2024, in the District of New Jersey and elsewhere, the defendant,

JENNY DESIREE ROSARIO-LORENZO,

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

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"). The investigation has shown that the DTO trafficked controlled substances including, but not limited to, fentanyl, methamphetamine, heroin, and cocaine.

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 MARTINEZ, L. TORRES and D. TORRES reside together with Jenny Desiree Rosario-Lorenzo ("ROSARIO-LORENZO"), and an apartment on Ellwood Street in New York, New York (the "Ellwood Street 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.

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 MARTINEZ, L. TORRES and D. TORRES travelling back and forth together, on a near-daily basis, from the Fort Lee Apartment where they reside with ROSARIO-LORENZO, across the George Washington Bridge to the Ellwood Street Apartment, where controlled substances would be packaged and distributed. During the course of this investigation, law enforcement has also used a confidential informant, to purchase fentanyl, methamphetamine and heroin from members of the DTO on numerous occasions.

4. On or about May 3, 2024, MARTINEZ, L. TORRES, and D. TORRES were charged by federal criminal complaint with conspiracy to distribute controlled substances, contrary to Title 21 United States Code Sections 841

(a)(1), (b)(1)(A), and (b)(1)(C), in violation of Title 21 United States Code Section 846.

5. On or about May 8, 2024, pursuant to a court-authorized search warrant, law enforcement conducted a search of the Fort Lee Apartment. Upon execution of the search warrant, law enforcement recovered suspected fentanyl and cocaine in various locations throughout the bedroom shared by L. TORRES and ROSARIO-LORENZO, including approximately 78 grams of cocaine on a nightstand adjacent to the bed, as well as approximately 1.3 kilograms of fentanyl in a closet shared by L. TORRES and ROSARIO-LORENZO. Also located in the bedroom was mail addressed to ROSARIO-LORENZO at the Fort Lee Apartment. The suspected fentanyl and cocaine were field tested and yielded positive results for fentanyl and cocaine.

6. Along with the fentanyl and cocaine, law enforcement also recovered an Aero Precision, Model X15, AR-15 style firearm bearing serial number X157089 with loaded with thirty (30) rounds of .223 caliber ammunition in the bedroom closet shared by L. TORRES and ROSARIO-LORENZO.

7. Located in the living room of the Fort Lee Apartment shared by L. TORRES, D. TORRES, MARTINEZ, and ROSARIO-LORENZO were packaging materials and paraphernalia consistent with those used to package illegal drugs, including a "kilo brick" press, digital scales, grinders, masks and respirators, a vacuum sealer, and sifters. Additional packaging materials including bags and kilo wrappers were also located in the bedroom shared by L. TORRES and ROSARIO-LORENZO.