
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Edward S. Kiel
 :
 JUAN CARLOS : Mag. No. 21-15049
 MERCED MORENO, :
 a/k/a "Samuel," :
 :
 ANTONIO HIDALGO, :
 a/k/a "Cacona," :
 :
 JOSE MIGUEL ABREU, :
 a/k/a "Pelu," :

I, Anthony M. Maida, 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 Task Force Officer with Homeland Security Investigations and that this complaint is based on the following facts:

SEE ATTACHMENT B

Anthony Maida

Anthony M. Maida, Task Force Officer
Homeland Security Investigations

Task Force Officer Maida attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on February 5, 2021 in the District of New Jersey

Honorable Edward S. Kiel
United States Magistrate Judge

Edward S. Kiel

Signature of Judicial Officer

ATTACHMENT A

(Conspiracy to Distribute Controlled Substances)

From at least in or around November 2020 through in or around January 2021, in the District of New Jersey and elsewhere, defendants,

**JUAN CARLOS MERCED MORENO,
a/k/a “Samuel,”
ANTONIO HIDALGO,
a/k/a “Cacona,” and
JOSE MIGUEL ABREU,
a/k/a “Pelu,”**

did knowingly and intentionally conspire and agree with each other and with 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, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

ATTACHMENT B

I, Anthony M. Maida, am a Task Force Officer with Homeland Security Investigations. 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, 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. In or around February 2019, law enforcement began investigating a drug trafficking organization based in Hudson County, New Jersey (the “DTO-NJ”). The DTO-NJ engaged in trafficking fentanyl and cocaine, among other illegal narcotics, in New Jersey. During the course of the investigation into the DTO-NJ, law enforcement began to lawfully intercept telephone calls made by members of the DTO-NJ. From the calls, law enforcement learned about a fentanyl pill press based in the Washington Heights neighborhood of Manhattan being operated by a drug trafficking organization in Manhattan (the “DTO-NY”). Based on intercepted telephone calls and contemporaneous surveillance on several dates between November 2020 and January 2021, law enforcement learned that the DTO-NY supplied fentanyl pills to the DTO-NJ, which subsequently distributed them throughout New Jersey. To date, law enforcement believes that the DTO-NY supplied approximately at least 25,000 fentanyl pills to the DTO-NJ.

2. Thereafter, law enforcement began to lawfully intercept the telephone calls made and received by Juan Carlos Merced Moreno, a/k/a “Samuel” (“MORENO”), as well the telephone calls that were made and received by Antonio Hidalgo, a/k/a “Cacona” (“HIDALGO”). Both MORENO and HIDALGO are members of the DTO-NY. During the investigation, law enforcement learned that MORENO was the primary contact between the DTO-NY and the DTO-NJ for the purpose of supplying the DTO-NJ with fentanyl pills.

3. For example, on or about January 12, 2021, law enforcement intercepted a telephone call between MORENO and one of the leaders of the DTO-NJ (“Individual-1”). On that telephone call, MORENO stated to Individual-1, in substance and in part, to go to 173rd Street in Manhattan to meet HIDALGO, who would be at that location, for the purpose of providing narcotics to Individual-1. Law enforcement conducted contemporaneous surveillance and observed HIDALGO enter Individual-1’s car for a short amount of time. After HIDALGO got out of Individual-1’s car, law enforcement watched Individual-1’s car drive from Manhattan into New Jersey.

4. Law enforcement also intercepted calls between MORENO and

HIDALGO, and between MORENO and Jose Miguel Abreu, a/k/a “Pelu” (“ABREU”), another member of the DTO-NY, in furtherance of the conspiracy to distribute controlled substances. Those calls include the following examples, among others:

- a. On or about December 7, 2020, law enforcement intercepted a telephone call between MORENO and ABREU where they discussed MORENO’s need to acquire a hydraulic pill press to complete the manufacturing of fentanyl pills. ABREU stated to MORENO, in substance and in part, that ABREU would be able to provide MORENO with a hydraulic pill press.
- b. On or about December 29, 2020, law enforcement intercepted a telephone call between MORENO and HIDALGO where MORENO instructed HIDALGO to bring what law enforcement believed to be a quantity of fentanyl pills to an unidentified man.

5. During the course of the investigation into the DTO-NY, law enforcement identified various residences and stash locations in Manhattan associated with the DTO-NY.

6. Law enforcement conducted extensive surveillance of MORENO and, on many occasions, observed MORENO exit an apartment building on Ellwood Street in Manhattan (the “Ellwood Street Residence”). On several intercepted telephone calls, MORENO referred to the Ellwood Street Residence as his residence, and MORENO also listed the Ellwood Street Residence as his residence on a government document.

7. Law enforcement also surveilled HIDALGO during the investigation and observed HIDALGO exit an apartment building on Manhattan Avenue in Manhattan (the “Manhattan Avenue Residence”) several times.

8. Law enforcement also surveilled ABREU and learned that ABREU lived on West 192nd Street in Manhattan (the “West 192nd Street Residence”). ABREU also listed the West 192nd Street Residence as his residence on a police report in a separate matter. Further, cellular telephone records indicate that the West 192nd Street Residence was ABREU’s address.

9. Based upon the investigation, law enforcement believed that the DTO-NY was using an apartment on West 170th Street in Manhattan (the “West 170th Street Residence”) as a stash location.

10. For example, law enforcement learned through an intercepted phone call that MORENO’s brother rented the West 170th Street Residence for MORENO. After listening to that phone call, law enforcement then observed MORENO enter and exit the West 170th Street Residence. Further, on or about

December 27, 2020, immediately following an intercepted phone call about a narcotics transaction between MORENO and an unidentified narcotics purchaser, law enforcement observed HIDALGO leave the West 170th Street Residence with a bag to meet the unidentified narcotics purchaser. Finally, during the investigation, the DTO-NY requested over intercepted communications that meetings with narcotics purchasers take place outside of the West 170th Street Residence.

11. Through intercepted telephone calls and surveillance, law enforcement also learned that the DTO-NY used a location in the basement of an apartment building on Fort Washington Avenue in Manhattan (the “Fort Washington Avenue basement”) to manufacture and store narcotics. Those phone calls include the following, among others:

- a. On or about December 29, 2020, law enforcement watched MORENO walk up to a black Cadillac and retrieve a bag from the car’s trunk before entering a service entrance that led to the Fort Washington Avenue basement. Law enforcement then intercepted a telephone call (the “December 29th phone call”) between MORENO and HIDALGO during which they discussed meeting in the Fort Washington Avenue basement.
- b. The December 29th phone call followed other recorded telephone conversations where MORENO, HIDALGO and ABREU discussed with each other, in substance and in part, that a pill press in the Fort Washington Avenue basement had broken.

12. On or about January 28, 2021, law enforcement obtained search warrants for the Ellwood Street Residence (MORENO’s residence), the Manhattan Avenue Residence (HIDALGO’s residence), the West 192nd Street Residence (ABREU’s residence), and the West 170th Street Residence (a stash location used by the conspirators).

13. During the search of the Ellwood Street Residence, law enforcement recovered, among other items, the following¹:

- a. 1 pill press²;
- b. approximately \$10,600.00; and
- c. documents associated with MORENO.

¹ MORENO was present inside of the Ellwood Street Residence when the search warrant was executed.

² A pill press is a mechanical device that compresses powder into tablets of uniform size and weight.

14. During the search of the Manhattan Avenue Residence, law enforcement recovered, among other items, the following:

- a. approximately 1.2 kilograms of suspected cocaine;
- b. approximately 654 grams of suspected blue fentanyl pills;
- c. approximately 879 grams of suspected fentanyl pills in various colors;
- d. approximately 788 grams of suspected fentanyl in brick form; and
- e. documents associated with HIDALGO.

15. During the search of the West 192nd Street Residence, law enforcement recovered, among other items, the following:

- a. approximately 93 grams of suspected cocaine;
- b. 2 scales;
- c. approximately \$580.00; and
- d. documents associated with ABREU.

16. During the search of the West 170th Street Residence, law enforcement recovered, among other items, the following³:

- a. approximately 1,687 grams of suspected methamphetamine pills;
- b. approximately 1,773 grams of suspected methamphetamine in a crystalized rock form⁴;
- c. 2 scales; and
- d. a quantity of empty Ziplock bags.

17. During a lawful search of the Fort Washington Avenue basement,

³ HIDALGO was present inside of the West 170th Street Residence when the search warrant was executed.

⁴ Lab reports on the recovered substances are pending. However, the color, texture, packaging and positive field tests for methamphetamine, fentanyl and cocaine strongly suggest that the recovered substances are controlled substances.

law enforcement recovered, among other items, the following:

- a. 1 Ziplock bag that contained approximately 2,934 grams of a suspected combination of methamphetamine and fentanyl;
- b. 1 Ziplock bag that contained approximately 1,406 grams of a suspected combination of methamphetamine and fentanyl;
- c. 1 Ziplock bag that contained approximately 519 grams of a suspected combination of methamphetamine and fentanyl;
- d. 1 Ziplock bag that contained approximately 450 grams of a suspected combination of methamphetamine and fentanyl;
- e. 1 Ziplock bag that contained approximately 145 grams of a suspected combination of methamphetamine and fentanyl;
- f. 1 Ziplock bag that contained approximately 15 grams of a suspected combination of methamphetamine and fentanyl; and
- g. 1 pill press containing residue.