

Approved: \_\_\_\_\_  
JONATHAN E. REBOLD  
Assistant United States Attorney

Before: HONORABLE KEVIN NATHANIEL FOX  
United States Magistrate Judge  
Southern District of New York

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: **COMPLAINT**  
UNITED STATES OF AMERICA :  
: Violation of  
- v. - : 21 U.S.C. §§ 841(a)(1),  
: 841(b)(1)(A), and 846  
AGUSTIN ZAMORA-VEGA, :  
a/k/a "Julio Cesar," : COUNTY OF OFFENSE:  
ORLANDO ALCANTARA, : NEW YORK  
CINDY CARRILLO, :  
SANTOS MINJAREZ, :  
JOSE LUIS GONZALEZ-SOLIS, :  
:   
:   
Defendants. :  
:  
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

KEVIN BUTT, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration, and charges as follows:

**COUNT ONE**

1. From at least in or about August 13, 2017, up to and including at least on or about August 29, 2017, in the Southern District of New York and elsewhere, AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," ORLANDO ALCANTARA, CINDY CARRILLO, SANTOS MINJAREZ, and JOSE LUIS GONZALEZ-SOLIS, 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 part and an object of the conspiracy that AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," ORLANDO ALCANTARA, CINDY CARRILLO, SANTOS MINJAREZ, and JOSE LUIS GONZALEZ-SOLIS,

the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," ORLANDO ALCANTARA, CINDY CARRILLO, SANTOS MINJAREZ, and JOSE LUIS GONZALEZ-SOLIS, the defendants, conspired to distribute and possess with the intent to distribute was 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846.)

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

4. I am a Special Agent with the Drug Enforcement Administration (the "DEA"), and have been so employed for over five years.

5. I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records prepared by law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of 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.

6. On or about August 13, 2017, agents with the DEA, the New York City Police Department ("NYPD") and the Department of Homeland Security, Homeland Security Investigations ("HSI") received information that AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," the defendant, was in Manhattan and interested in finding a facility to store and convert a large quantity of methamphetamine into crystal form ("crystal meth").

7. As part of this investigation, I and other law enforcement agents worked with an Undercover Officer with HSI (the "UC"). Based on my conversations with the UC, and my own observations, I have learned the following, in substance and in part:

a. On or about August 16, 2017, the UC and another individual ("Individual-1") met with AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," near ZAMORA-VEGA's hotel in New York, New York (the "Manhattan Hotel") for the purpose of showing ZAMORA-VEGA property that ZAMORA-VEGA could use to store and convert methamphetamine to crystal meth. During this conversation, which was recorded, ZAMORA-VEGA and the UC discussed that in exchange for use of the property, ZAMORA-VEGA would provide a quantity of crystal meth to the UC at a discounted rate. The UC then drove with ZAMORA-VEGA to Yonkers, New York, where the UC showed ZAMORA-VEGA an apartment (the "Yonkers Apartment") that the UC proposed ZAMORA-VEGA use to store and convert methamphetamine to crystal meth. ZAMORA-VEGA indicated that he was not interested in using the Yonkers Apartment for this purpose, in part because ZAMORA-VEGA was dissatisfied with the ventilation in the Yonkers Apartment and in part because ZAMORA-VEGA wanted to use a property that ZAMORA-VEGA could drive into.

b. On or about August 17, 2017, the UC and Individual-1 once again met with ZAMORA-VEGA in the vicinity of the Manhattan Hotel. The UC and ZAMORA-VEGA then drove to New Jersey where the UC showed ZAMORA-VEGA a warehouse (the "NJ Warehouse") that the UC proposed ZAMORA-VEGA use to store and convert methamphetamine to crystal meth. ZAMORA-VEGA subsequently indicated that he was interested in using the NJ Warehouse for those purposes.

c. In the days following August 17, 2017, in recorded phone conversations, ZAMORA-VEGA indicated to the UC that ZAMORA-VEGA was expecting a large shipment of methamphetamine to arrive in the New York area in the coming days, and that ZAMORA-VEGA intended to transport the methamphetamine to the NJ Warehouse where ZAMORA-VEGA would convert it to crystal meth.

d. On or about August 29, 2017, ZAMORA-VEGA spoke by cellphone with the UC in a conversation that was recorded. ZAMORA-VEGA stated, in substance and in part, that: a large quantity of methamphetamine had arrived at a location in Long Island (the "LI Facility"); the methamphetamine was stored in candle-form (the "Meth Candles"); and ZAMORA-VEGA and a female

associate intended to pick up a large quantity of boxes containing the Meth Candles from the LI Facility, load them onto a truck, and transport them to the NJ Warehouse, so that they could begin converting the methamphetamine to crystal meth. The UC offered to meet ZAMORA-VEGA and ZAMORA-VEGA's female associate at the LI Facility to help them load the truck. ZAMORA-VEGA then placed ZAMORA-VEGA's female associate, who was later identified as CINDY CARRILLO, the defendant, on the phone so that CARRILLO could provide the address of the LI Facility to the UC. The UC indicated that the UC was having difficulty hearing CARRILLO, whereupon CARRILLO indicated that CARRILLO would text the address of the LI Facility to the UC. Thereafter, the two ended the call, and the UC received a text indicating the location of the LI Facility.

e. Thereafter, the UC had another recorded telephone conversation with ZAMORA-VEGA during which the UC indicated that there was a large amount of traffic preventing the UC from meeting ZAMORA-VEGA and CARRILLO at the LI Facility. ZAMORA-VEGA stated that he had recently been staying at a hotel in Saddle Brook, New Jersey (the "NJ Hotel"). ZAMORA-VEGA and the UC agreed to meet at the NJ Hotel.

f. Subsequently, the UC and Individual-1 arrived at the NJ Hotel where the UC met with ZAMORA-VEGA, CARRILLO, ORLANDO ALCANTARA, SANTOS MINJAREZ, and JOSE LUIS GONZALEZ-SOLIS, the defendants. At that time, the UC learned that ZAMORA-VEGA, CARRILLO, ALCANTARA, MINJAREZ and GONZALEZ-SOLIS were all staying at the NJ Hotel. Additionally, the UC observed that ZAMORA-VEGA and CARRILLO had been driving a pickup truck loaded with boxes (the "Pickup Truck"), and that ALCANTARA, MINJAREZ and GONZALEZ-SOLIS had been driving a grey Mazda Sedan with Oklahoma license plates (the "Mazda").

g. While at the NJ Hotel, ZAMORA-VEGA showed the UC that the boxes contained a large quantity of what appeared to be wax candles. ZAMORA-VEGA indicated that the candles actually contained methamphetamine, which could be melted and converted to crystal meth. Thereafter, all of the individuals travelled from the NJ Hotel to the NJ Warehouse, with ZAMORA-VEGA and CARRILLO travelling in the Pickup Truck; ALCANTARA, MINJAREZ and GONZALEZ-SOLIS travelling in the Mazda; and the UC and Individual-1 travelling in a separate vehicle (collectively, the "Vehicles").

h. When the Vehicles arrived at the NJ Warehouse, the Pickup Truck drove inside the NJ Warehouse, while the Mazda continued to drive around the vicinity of the NJ Warehouse in a

manner that, in my training and experience, appeared to me to be an effort to determine whether any law enforcement officers were in the vicinity. Several minutes later, the Mazda parked outside the NJ Warehouse, and its occupants - ALCANTARA, MINJAREZ and GONZALEZ-SOLIS - entered the NJ Warehouse where they met up with ZAMORA-VEGA, CARRILLO and the UC.

i. While inside the NJ Warehouse:

i. At the request of ZAMORA-VEGA, the UC moved a grill into the NJ Warehouse that the UC provided at the request of ZAMORA-VEGA.

ii. ZAMORA-VEGA, CARRILLO, ALCANTARA, MINJAREZ, GONZALEZ-SOLIS engaged in a discussion with the UC the fact that the NJ Warehouse would be used to convert the Meth Candles to crystal meth.

iii. ZAMORA-VEGA, CARRILLO, ALCANTARA, MINJAREZ, and GONZALEZ-SOLIS had a conversation about how they intended to begin converting the Meth Candles to crystal meth; that they would stay in the NJ Warehouse until the process was completed; and that they expected it would take them from August 29, 2017 until Saturday, September 2, 2017, to complete the process of converting the Meth Candles to crystal meth. They also asked if the UC was willing to allow the defendants to remain in the warehouse alone (i.e., without the UC) during the days that the defendants converted the Meth Candles to crystal meth.

j. ALCANTARA and GONZALEZ-SOLIS both took a walk around the NJ Warehouse. Upon returning to the NJ Warehouse, they each discussed with the other defendants and the UC the problems with the NJ Warehouse's ventilation. Thereafter, in substance and in part, ALCANTARA stated that two fans, one on each side of the NJ Warehouse, would need to be uncovered before they began converting the Meth Candles to crystal meth. In response, GONZALEZ-SOLIS stated that only one fan needed to be uncovered, since they would only be converting the Meth Candles to crystal meth in that area of the NJ Warehouse.

k. The defendants also discussed the fact that they would need additional materials, not yet present at the NJ Warehouse, in order to effectively convert the Meth Candles to crystal meth. Among other things, ALCANTARA stated that the grill the UC moved into the NJ Warehouse was not satisfactory.

1. Thereafter, MINJAREZ indicated that MINJAREZ would take a drive to pick up the necessary supplies. At that point, CARRILLO provided a credit card to MINJAREZ and told MINJAREZ to charge to the credit card all items purchased to convert the Meth Candles to crystal Meth. Subsequently, MINJAREZ left the NJ Warehouse in the Mazda.

m. Shortly thereafter, ZAMORA-VEGA, ALCANTARA, MINJAREZ, GONZALEZ-SOLIS and the UC unloaded the boxes containing the Meth Candles from the Pickup Truck.

n. ZAMORA-VEGA, CARRILLO, ALCANTARA, and GONZALEZ-SOLIS were subsequently placed under arrest.

8. Agents with the DEA, HSI and NYPD recovered from the NJ Warehouse approximately 27 cardboard boxes each containing a large quantity of candles, with an aggregate weight in excess of 1,300 pounds. A field test of one of the Meth Candles revealed that the Meth Candle contained a detectable amount of methamphetamine.

9. I am informed by an agent with HSI ("Agent-1"), in substance and in part, that Agent-1 subsequently located the Mazda at the NJ Hotel. Agent-1 also learned that SANTOS MINJAREZ, the defendant---who, as described in paragraph m, *supra*, left the NJ Warehouse to pick up supplies---was staying in a particular room at the NJ Hotel. Agent-1 knocked on the door of MINJAREZ's room, whereupon MINJAREZ answered. Among other things, MINJAREZ admitted, in substance and in part, that MINJAREZ had been driving the Mazda. MINJAREZ was subsequently placed under arrest.

10. The Mazda was searched and found to contain, among other things, two propane tanks, multiple gallons of water, at least one "River Grill," pots and pans, metal spoons, and Tupperware. Based on my training and experience, I am aware that these items are commonly used to convert methamphetamine to crystal meth. Furthermore, many of these materials, including the Tupperware, pots, pans, and grill, were consistent with items that were already present inside the NJ Warehouse when the UC and the defendants arrived there on August 29, 2017.

11. Records maintained at the NJ Hotel indicate that two rooms, including the one occupied by MINJAREZ at the time of his apprehension, had been reserved in the name of, and paid for by CINDY CARRILLO, the defendant.

WHEREFORE, the deponent respectfully requests that AGUSTIN ZAMORA-VEGA, a/k/a "Julio Cesar," ORLANDO ALCANTARA, CINDY CARRILLO, SANTOS MINJAREZ, and JOSE LUIS GONZALEZ-SOLIS, the defendants, be imprisoned, or bailed, as the case may be.

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KEVIN BUTT  
Special Agent  
Drug Enforcement Administration

Sworn to before me this  
30th day of August 2017.

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THE HONORABLE KEVIN NATHANIEL FOX  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK