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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Joseph A. Dickson  
 :  
 v. : Mag. No. 16-6651  
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 OSCAR AVALOS-CORTEZ, :  
 WILBUR JONATHON BARAHONA, :  
 BALMORE CARRILLO-IRAHETA, : **Criminal Complaint**  
 GUILLERMO CARRILLO-IRAHETA, :  
 JUAN CHILISEO-VEGA, and :  
 JOSTIN REYES :

I, Chad Eckert, 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 the Federal Bureau of Investigation and that this complaint is based on the following facts:


SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Task Force Officer Chad Eckert  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
October 31, 2016 in Essex County, New Jersey

HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
**(CONSPIRACY TO COMMIT HOBBS ACT ROBBERY)**

On or about December 25, 2015, in Passaic County, in the District of New Jersey and elsewhere, the defendants,

OSCAR AVALOS-CORTEZ,  
WILBUR JONATHON BARAHONA,  
BALMORE CARRILLO-IRAHETA,  
GUILLERMO CARRILLO-IRAHETA,  
JUAN CHILISEO-VEGA, and  
JOSTIN REYES

and others known and unknown, did knowingly and willfully conspire and agree with each other and others to obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed and threatened physical violence to Victim 1 and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**  
**(CARJACKING)**

On or about December 26, 2015, in the District of New Jersey and elsewhere, the defendants,

WILBUR JONATHON BARAHONA,  
GUILLERMO CARRILLO-IRAHETA,  
JUAN CHILISEO-VEGA, and  
JOSTIN REYES

did knowingly with the intent to cause death and serious bodily harm, take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely a 2008 Dodge Caravan, from the person and presence of another, namely Victim 2, by force and violence and by intimidation, which resulted in serious bodily injury.

In violation of Title 18, United States Code, Section 2119(2) and Section 2.

**COUNT THREE**  
**(USE OF A FIREARM DURING AND IN RELATION TO A CRIME OF VIOLENCE)**

On or about December 26, 2015, in the District of New Jersey and elsewhere, the defendants,

WILBUR JONATHON BARAHONA,  
GUILLERMO CARRILLO-IRAHETA,  
JUAN CHILISEO-VEGA, and  
JOSTIN REYES

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, specifically, the carjacking charged in Count Two of this Criminal Complaint, did knowingly use and carry a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and Section 2.

**COUNT FOUR**  
**(KIDNAPPING)**

On or about December 26, 2015, in the District of New Jersey and elsewhere, the defendants,

WILBUR JONATHON BARAHONA,  
GUILLERMO CARRILLO-IRAHETA,  
JUAN CHILISEO-VEGA, and  
JOSTIN REYES

did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away Victim 2, and, in furtherance thereof, did willfully transport Victim 2 in interstate commerce, namely from New Jersey to New York.

In violation of Title 18, United States Code, Section 1201(a)(1) and Section 2.

## **ATTACHMENT B**

I, Chad Eckert, am a Task Force Officer with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversation with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Since 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. Based on an on-going investigation, which has included witness interviews, statements made by at least one cooperating witness, court-authorized cell phone records, and video-surveillance footage, law enforcement has learned that members of the 18<sup>th</sup> Street gang – a multinational criminal organization that started as a street gang in Los Angeles, California – were involved in a string of criminal offenses between on or about December 25, 2015 and on or about December 26, 2015.

### *The Robbery*

2. On or about December 25, 2015 at approximately 7:20 p.m., a group of individuals, including defendants OSCAR AVALOS-CORTEZ ("AVALOS-CORTEZ"), WILBUR JONATHAN BARAHONA ("BARAHONA"), BALMORE CARILLO-IRAHETA ("B. CARILLO-IRAHETA"), GUILLERMO CARILLO-IRAHETA ("G. CARILLO-IRAHETA"), JUAN CHILISEO-VEGA ("CHILISEO-VEGA"), JOSTIN REYES ("REYES"), and at least one other individual, agreed to rob a bar in Hawthorne, New Jersey (the "Bar"). AVALOS-CORTEZ drove the robbers to the Bar and waited in a getaway car -- a white Acura -- while the others approached the Bar.

3. Prior to entering the Bar, B. CARILLO-IRAHETA, G. CARILLO-IRAHETA, CHILISEO-VEGA, and REYES covered their faces to conceal their identities. Upon entering the Bar, the robbers brandished weapons, including at least one firearm and a knife, and told an employee of the Bar ("Victim 1") that he was being robbed. The robbers took approximately \$200 from the cash register along with Victim 1's cellphone (the "December 25 Robbery"). The robbers returned to AVALOS-CORTEZ's vehicle and fled.

4. Video-surveillance footage showed five individuals entering the front door of the Bar and a sixth individual approaching the side door of the Bar around 7:20 PM. The video surveillance footage also showed a white Acura in the area of the Bar at the time of the December 25 Robbery.

5. At all times material to this Complaint, the Bar was a commercial establishment engaged in selling alcohol that moved in, was transferred in, and affected interstate commerce.

### *The Carjacking and Kidnapping*

6. After robbing the Bar, some of the same individuals, including defendants BARAHONA, G. CARILLO-IRAHETA, CHILISEO-VEGA, and REYES (“the Carjackers”), agreed to rob a taxicab driver. In furtherance of the robbery, on or about December 26, 2015 at approximately 3 a.m., the Carjackers hailed a cab in Paterson, New Jersey. While *en route* to a location in New Jersey, the Carjackers brandished weapons and ordered the cabdriver (“Victim 2”) to pull over and step out of the taxicab. One or more of the Carjackers then forced Victim 2 into the back of the vehicle, and one of the Carjackers took over driving the taxi.

7. Victim 2 overheard the Carjackers discussing whether they should kill Victim 2. Eventually, the Carjackers sliced Victim 2’s throat with a knife and hit him in the head with a beer bottle. After sustaining serious bodily injury, the Carjackers left Victim 2 on the side of the New York State Thruway near Woodbury, New York. Victim 2 survived. Victim 2 informed law enforcement that the Carjackers stole approximately \$80.00 in currency, his cellphone, and his watch (the “December 26 Carjacking”).

8. The taxicab driven by Victim 2 was not manufactured in the State of New Jersey.

9. In post-*Miranda* statements to law enforcement, REYES and BARAHONA admitted to their involvement in the December 25 Robbery and the December 26 Carjacking.