

UNITED STATES DISTRICT COURT **FILED**

for the
Northern District of Texas

February 2, 2023

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

United States of America)
v.)
LUIS NAVARRETE (1))
MAGALY MEJIA CANO (2))
)
)
)
)
)

Defendant(s)

Case No.
3:23-MJ-121-BK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January - February 2023 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 846	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance.

This criminal complaint is based on these facts:

See attached Affidavit of DEA Task Force Officer Bert Ingram.

Continued on the attached sheet.

Bert Ingram
Complainant's signature

Bert Ingram, DEA TFO
Printed name and title

Agent sworn and his facsimile signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: February 2, 2023

Renée Harris Toliver
Judge's signature

City and state: Dallas, Texas

RENÉE HARRIS TOLIVER, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A CRIMINAL COMPLAINT

I, Bert Ingram, being duly sworn, depose and state as follows:

1. I am a Task Force Officer with the Drug Enforcement Administration and have been since August 2018. I have been a sworn Texas Peace Officer since May 2007 and possess a Master Peace Officer Certification. I previously worked for the Carrollton Police Department as a patrol officer, gang officer, and was a Carrollton Narcotics Detective April 2010 – October 2021. I honorably retired from the Carrollton Police Department in October 2021. In the same month, October 2021, I was sworn in as an Investigator/Task Force Officer for the Hickory Creek Police Department where I continue to serve and perform my duties as a full-time sworn DEA Task Force Officer assigned to the High Intensity Drug Trafficking Area Group #1 within the DEA Dallas Field Division. During my law enforcement career, I have received training in all the normal methods of investigation, including, but not limited to, electronic and visual surveillance, general questioning of witnesses, confidential informants, pen registers, the use of mobile tracking devices, the use of cellular telephone Global Positioning Satellite (GPS) information to locate individuals, the use of undercover agents, and the use and execution of search warrants. I have participated as a law enforcement officer in investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and

electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

2. During my career, I have participated in narcotics investigations. I have also participated in the debriefing of defendants, informants, and witnesses who had personal knowledge regarding narcotics trafficking organizations. The investigations that I have conducted and participated in have been for the unlawful importation of, possession with intent to distribute, and distribution of controlled substances, as well as the related laundering of monetary instruments, the conducting of monetary transactions involving the proceeds of specified unlawful activities and conspiracies associated with criminal narcotics offenses. As a result, I am familiar with how person(s) and/or groups, who illegally import, traffic, distribute, and sell narcotics use various criminal enterprise schemes to conduct their activities. Additionally, I am familiar with and have personally worked multiple cases involving overdoses of controlled substance and investigating offenses related to the delivery of a controlled substance(s) which have resulted in serious bodily injury and/or death. Based

on this experience, I have become well-versed in the methodology utilized in narcotics trafficking operations, the unique trafficking patterns employed by narcotics organizations, and their patterns of drug distribution.

3. I am familiar with blue “M30” pills based on my training, work related experience, and my numerous cases investigating the trafficking, distribution, and overdose cases involving “M30” pills. I know the original, actual prescription pills were originally popular amongst opiate abusers when “Percocet” was a popular abused opiate. Later, international drug trafficking organizations started producing and trafficking a highly potent and addictive synthetic opiate known as fentanyl. The raw fentanyl would commonly be mixed with acetaminophen and other binder type substances and pressed into various tablets/pills. Criminal organizations and distributors would use pill press machines and press the fentanyl powder mixture into tablets/pills with the most common in my experience being a small round blue pill with a “M30” imprinted on the tablets. These “M30” pills are sold by criminal organizations such as Mexico based drug trafficking organizations (DTO’s) for one dollar (\$1) to two dollars (\$2) per pill when buying large bulk amounts. The US based distribution cells of these DTO’s then distribute them to US street level dealers for three dollars (\$3) to five dollars (\$5) per “M30” pill. The street level dealers then sell them to consumers for ten dollars (\$10) per “M30” pill. These “M30” pills are commonly referred to as “percs”, “yerks”, “yerky”,

“blues”, and “M30’s”. I know through training and work-related experience, users will commonly crush up the “M30” pill and snort it into the nasal cavities.

4. This affidavit sets forth facts and suggests reasonable inferences from those facts establishing that there is probable cause to believe that from the fall of 2022 to current and specifically January 27, 2023 in the Dallas Division of the Northern District of Texas, **Luis Eduardo Navarrete** (herein after **Navarrete**) and **Magaly Mejia Cano** (herein referred to as **Mejia Cano**) conspired to distribute a mixture or substance containing a detectable amount of fentanyl in violation of Title 21 U.S.C. 846 – Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance.
5. The information contained in this affidavit is based on my personal knowledge and experience, my personal participation in this investigation, and information obtained from other law enforcement officers and/or agents involved in this investigation. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that a violation of 21 U.S.C. § 846 has been committed by **Navarrete** and **Mejia Cano**.

FACTS AND CIRCUMSTANCES

6. During January 2023, I, along with Carrollton Police Department (CPD) Street

Crimes Unit (SCU) members, Student Resource Officers (SRO) and CPD Patrol Officer have investigated a series of juvenile medical emergencies consistent with fentanyl overdoses. CPD Officers and I have identified ten (10) total juvenile overdoses (three deceased) from September 18, 2022 to present day. The most recent overdose death occurring February 1, 2023. The juvenile overdose victims' range in age from 13 to 17 years of age and are students of RL Turner High School, Dewitt Perry Middle School and Dan F. Long Middle School (Carrollton Farmers Branch Independent School District). Additionally, CPD Officers and I have identified eight (8) juvenile dealers with moderate to significant involvement in the distribution of "M30" pills known to contain fentanyl. The juvenile dealer's range in age from 14 to 16 years of age and are students of RL Turner High School.

7. During the course of the investigation regarding the overdoses and juvenile dealers, CPD Officers and I have identified adults, **Luis Eduardo Navarrete** and **Magaly Mejia Cano** as distributors of "M30" pills containing fentanyl. I have reviewed CPD reporting, case notes, interviews, phone evidence, surveillance notes, photographs, videos, and have conducted my own interviews which is consistent with Navarrete and Mejia Cano distributing "M30" pills containing fentanyl pills to several juveniles in the area near RL Turner High School and Dewitt Perry Middle School, both of Carrollton, Texas – Northern District of Texas.

8. CPD Officers and I have conducted multiple days and hours of surveillance from January 5, 2023 to current day. The surveillance was focused at Navarrete and Mejia Cano's residence located at 1823 Highland Drive, Carrollton, Texas – Northern District of Texas. On multiple occasions, law enforcement members have observed Navarrete and Mejia Cano conduct hand-to-hand transactions with multiple individuals who sometimes arrive on foot and in vehicles. Many of the hand-to-hand transactions were with juvenile students of RL Turner High School.
9. Juvenile overdose victim (hereinafter referred to as JODV#4) is 14-year-old female student at RL Turner HS., who overdosed at her home on or about December 24, 2022, after ingesting a "M30" pill and was transported to the hospital by medics and survived. I reviewed the medical emergency call for service and believe it to be consistent with a fentanyl overdose. JODV#4 and JODV#2 knew each other and were in the same associated within the same social group. I later interviewed JODV#4 who confirmed the details with me. She is documented again as juvenile overdose victim ("JODV#7") because she overdosed again (2nd time) at her home on or about January 16, 2023. She was transported to the hospital by medics where she was hospitalized for multiple days, temporarily partially paralyzed, but survived. I reviewed the medical emergency call for service and believed it to be consistent with a fentanyl overdose. Carrollton SCU Detective Cuellar and I later interviewed her and her

mother at their home where she confirmed she had consumed a “M30” pill, which she reportedly had been supplied by a juvenile dealer (referred to as “JD#2”). She advised me that the first “M30” pill she overdosed from on December 24, 2022 had been supplied by a separate 16-year-old juvenile dealer (referred to as “JD#1”). I reviewed her reported statements with her cellphone messages, specifically associated with Instagram direct chat messaging which reflect she had been previously supplied by “JD#1”.

Carrollton SCU Detective Cuellar was familiar with her first overdose case and familiar with “JD#1” who had been previously contacted/interviewed by Det. Cuellar. I observed messages from “JD#1” consistent with “M30” distribution. Furthermore, the female (JODV#4/7) stated she was familiar with **Luis Navarrete** and stated she had previously purchased multiple “M30” pills from **Navarrete** and described his address which was accurate.

10. Juvenile Dealer #6 (JD#6), who is a 16-year-old male student at RL Turner HS. On January 12, 2023, Carrollton SCU Detective Pool was on surveillance at 1823 Highland Drive and observed **Navarrete** conduct and hand to hand transaction with JD#6 in front of his (**Navarrete**) residence. JD#6 then appeared to crush up a pill and snort it on the front porch area of the residence. JD#6 then appeared to manipulate small pieces of paper and possibly package drugs. JD#6 departed **Navarrete**'s residence and walked towards RL Turner HS. RL Turner HS SRO Stefanovik was notified and attempted to located

JD#6. SRO Stefanovik reported entering a bathroom in the school and hearing the sole occupant of the bathroom, JD#6 making a “snorting sound” in a bathroom stall. JD#6 appeared to be intoxicated and was in the possession of a razor blade and “snort straw” with residue. JD#6 admitted the paraphernalia was used to ingest a “perc pill” (commonly referred to which is a “M30” pill). SRO Stefanovik later conducted a consent search with JD#6 and JD#6 mother present in which he (SRO Stefanovik) observed messages between JD#6 and Instagram user “Luis.214” which is **Navarrete**’s known Instagram handle. The message confirmed JD#6 had been supplied by **Navarrete** as observed on surveillance.

11. Also, while conducting surveillance on or about January 27, 2023, CPD Detective Mark Pool observed a subject (hereinafter referred to as “CCS”) arrive and conducted a hand-to-hand transaction at the front door of the residence. CCS departed the location and was contacted by Carrollton Patrol Officers and subsequently arrested for a traffic related warrant. CCS was transported to the Carrollton Jail and searched where two (2) “M30” fentanyl pills were located on CCS’s person. The pills later showed a presumptive positive field test for fentanyl. Carrollton Detectives Mark Pool and Fernando Cuellar contacted CCS. CCS was provided their Miranda Warnings which was understood by CCS. CCS was not promised anything or guaranteed anything, but CCS agreed to cooperated with law enforcement and immediately started

talking about Navarrete. CCS voluntarily showed phone messages which Navarrete instructed CCS to go to his (Navarrete) house and CCS would be available to get the pills from a female at the house, later identified as Mejia Cano and consistent with Detective Pool's surveillance observations. CCS later identified a photograph of **Magaly Mejia Cano** as the same female who sold CCS the two (2) "M30" pills seized by law enforcement. Later the same day (01/27/2023), CCS and Carrollton SCU members conducted a recorded controlled purchase operation at the residence. CCS went to the front of the residence and was met by Navarrete. Navarrete provided CCS multiple "M30" fentanyl pills in exchange for Carrollton Police Department controlled U.S. Currency. SCU members debriefed CCS and retrieved the purchased evidence. A field test of the purchased pills showed a presumptive positive for fentanyl.

12. **Luis Navarrete and Magaly Mejia Cano's** residence is located almost directly in between RL Turner High School and Dewitt Perry Middle School. I used Google earth and conducted a check of 1823 Highland Drive, Carrollton, Texas, which Navarrete and Mejia Cano reside and sell deadly fentanyl pills to juveniles. Their residence is approximately five (5) blocks (approx. 1,355 feet) to the north of RL Turner High School and two (2) blocks (approx. 1,200 feet) to the southeast of Dewitt Perry Middle School.
13. Based on the investigation to date involving sworn officers' observations, reporting, surveillance, cooperating sources, TFO Ingram believes **Luis**

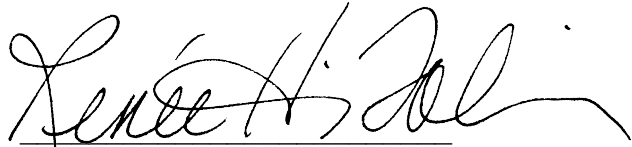
Eduardo Navarrete and Magaly Mejia Cano are actively distributing deadly fentanyl pills to juveniles within the Northern District of Texas.

14. Based on the aforementioned facts and circumstances, together with my training and experience, I believe that there is sufficient probable cause to believe that since the fall of 2022 to current and specifically, January 27, 2023, **Navarrete and Mejia Cano** conspired to distribute a mixture or substance containing a detectable amount of fentanyl, in violation of Title 21 U.S.C. 846 –Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance, namely fentanyl.

Bert Ingram

Bert M. Ingram
Task Force Officer - DEA

Agent sworn and confirmed his facsimile signatures and the veracity of the foregoing, all via reliable electronic means, on February 2, 2023, pursuant to Fed. R. Crim. P. 4.1.



RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE