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PEBE

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2
3 UNITED STATES DISTRICT COURT
4 SOUTHERN DISTRICT OF CALIFORNIA

5 UNITED STATES OF AMERICA,
6
7 Plaintiff,

Case No.: '22 MJ01680

v.

COMPLAINT FOR VIOLATION OF

8 JUAN CRUZ (1),
9 MARIO JARAMILLO (2),
10 MANUEL PEREZ-HERRERA (3).
11 VANESSA RAMIREZ (4),
12 LUZ DE LUNA OLMOS (5),
13 ADRIAN ENRIQUEZ (6),

Title 21, U.S.C., Secs. 841(a)(1) and 846 –
Conspiracy to Distribute Cocaine,
Methamphetamine, and Heroin (Felony)

14 Defendants.

15 The undersigned complaint being duly sworn states:

COUNT 1

16 Beginning on a date unknown and continuing up to and including May 12, 2022, within the
17 Southern District of California, defendants JUAN CRUZ, MARIO JARAMILLO, MANUEL PEREZ-
18 HERRERA, VANESSA RAMIREZ, LUZ DE LUNA OLMOS, and ADRIAN ENRIQUEZ did combine,
19 conspire, and agree together and with each other, and with other persons known and unknown, to
20 distribute 5 kilograms and more, to wit, approximately 799.3 kilograms (1,762.15 pounds) of cocaine, a
21 Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and
22 846.

COUNT 2


23
24 Beginning on a date unknown and continuing up to and including May 12, 2022, within the
25 Southern District of California, defendants VANESSA RAMIREZ and LUZ DE LUNA OLMOS, did
26 combine, conspire, and agree together and with each other, and with other persons known and
27 unknown, to distribute 500 grams and more, to wit, approximately 74.8 kilograms (164.91 pounds) of
28 methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code,

1 Sections 841(a)(1) and 846.

2 COUNT 3

3 Beginning on a date unknown and continuing up to and including May 12, 2022, within the
4 Southern District of California, defendants VANESSA RAMIREZ and LUZ DE LUNA OLMOS, did
5 combine, conspire, and agree together and with each other, and with other persons known and
6 unknown, to distribute 1 kilogram and more, to wit, approximately 1.6 kilograms (3.53 pounds) of
7 heroin, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections
8 841(a)(1) and 846.

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10 The complainant states that this complaint is based on the attached Statement of Facts
11 incorporated herein by reference

12 
13 _____
14 GUSTAVO VALDIVIA
Special Agent
Homeland Security Investigations

15 Sworn and attested to under oath by telephone, in accordance with Federal Rule of Criminal Procedure
16 4.1, this 14th day of May, 2022.

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18 _____
19 Hon. JILL L. BURKHARDT
20 United States Magistrate Judge

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3 **PROBABLE CAUSE STATEMENT**

4 I, Special Agent Gustavo Valdivia, declare under penalty of perjury, the
5 following is true and correct:

6 On May 12, 2022, law enforcement authorities were conducting surveillance
7 on a residence at 620 E. 4th Street (hereinafter “the residence”) in National City,
8 California, because it was used in a smuggling event on March 2, 2022, which
9 resulted in an arrest of one person and the seizure of 28 kilograms of cocaine.
10

11 At approximately 11:45 AM, two females, later identified as Luz De Luna
12 OLMOS (“OLMOS”) and Vanessa RAMIREZ (“RAMIREZ”) left the residence in
13 a silver Nissan Frontier pickup, (hereinafter “the Frontier”). OLMOS and
14 RAMIREZ drove the Frontier to a Harbor Freight store in Chula Vista, California
15 where they retrieved large cardboard boxes from a dumpster and put them into the
16 Frontier. OLMOS and RAMIREZ then entered the Harbor Freight store and
17 purchased wheeled moving carts that are typically used to move heavy items.
18 OLMOS and RAMIREZ later returned to the residence in the Frontier and removed
19 the boxes from the back of the pick-up bed and carried them inside the residence.
20 At about 1:20 PM, OLMOS left the residence and drove to a Walmart store where
21 she purchased additional cardboard boxes and transported them back to the
22 residence.
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1 At approximately 2:30 PM, RAMIREZ drove the Frontier away from the
2 residence and drove to a warehouse located at 9986 Via De La Amistad, Unit A in
3 San Diego, California, (hereinafter "the warehouse"). The warehouse is
4 approximately 300 feet north of the US/Mexico border fence and half a mile from
5 the Otay Mesa Port of Entry. An unknown male came out the first glass door closest
6 to the street and waved RAMIREZ into the warehouse. He opened the roll-up garage
7 door closest to the street and RAMIREZ drove the Frontier into the bay of the
8 warehouse and the roll-up door was shut immediately after. At approximately 4:40
9 PM, the warehouse door opened. RAMIREZ exited the warehouse in the Frontier
10 and drove back to the residence with law enforcement authorities following her.
11 Within approximately ten minutes of the Frontier departing the warehouse, law
12 enforcement authorities observed a white Ford van (hereinafter "the van") drive out
13 from the same bay door of the warehouse and drive directly to the residence. The
14 van was driven into the garage of the residence at approximately 5:07 PM. Based
15 on my knowledge, training and experience, these facts are indicative of the
16 movement of drugs from a stash location adjacent to the border, likely associated
17 with a cross-border tunnel, to a stash house used to facilitate the further distribution
18 of those drugs away from the border. I have had extensive training and experience
19 in narcotic smuggling specifically in the San Diego area, and more recently, I have
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1 been involved in multiple seizures and arrests involving narcotic smuggling in which
2 I was the case agent.

3 At approximately 5:40 PM, an individual, later identified as Manuel PEREZ-
4 Herrera (“PEREZ”), arrived at the residence in a Jeep Cherokee (hereinafter “the
5 Jeep”). PEREZ parked the Jeep on the street and walked into the residence. PEREZ
6 moved the van out of the garage and parked it on the street in front of the residence.
7 PEREZ returned to the residence and drove the Jeep into the garage at approximately
8 5:47 PM. At approximately 5:57 PM, PEREZ exited the garage in the Jeep and
9 drove away from the residence. Law enforcement authorities followed the Jeep and
10 conducted a traffic stop after observing a that the rear license plate was obstructed
11 partially. Law enforcement authorities used a Narcotics Detection Dog (NDD),
12 which alerted to the trunk of the Jeep. PEREZ gave law enforcement authorities
13 consent to search the Jeep. During a search of the Jeep, law enforcement authorities
14 located eight boxes which contained approximately 240 kilogram-sized bricks of
15 suspected narcotics. A presumptive test was conducted on a random brick of the
16 suspected narcotics found in the Jeep. The suspected narcotics tested positive for
17 the presence of cocaine.
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19 At approximately 6:12 PM, a red Toyota Prius (hereinafter “the Prius”) was
20 driven into the alley near the open garage of the residence. Law enforcement
21 authorities saw the hatchback of the Prius open. Only the hatchback door was visible
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1 to agents, as the rest of the Prius was obscured by the garage. The Prius left
2 approximately two minutes later and stopped at a nearby market while law
3 enforcement authorities watched. The driver of the Prius, later identified as Juan
4 CRUZ (“CRUZ”), spoke with an individual, later identified as Mario JARAMILLO
5 (“JARAMILLO”), in a gray Toyota Camry (hereinafter the “Camry”) that was
6 parked near him. CRUZ and JARAMILLO began moving large cardboard boxes
7 from the Prius to the Camry. Law enforcement authorities contacted the drivers of
8 both vehicles because they had knowledge of the discovery of narcotic packages in
9 HERERRA’s vehicle after he left the residence. Approximately 55 bricks of
10 suspected narcotics, similar to those found in the Jeep, were found in five boxes in
11 the Camry. A presumptive test was conducted on a random brick of the suspected
12 narcotics found in the Camry. The suspected narcotics tested positive for the
13 presence of cocaine.
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19 At approximately 6:25 PM, a blue Chevrolet Equinox (hereinafter “the
20 Equinox”) pulled into the garage of the residence for a short amount of time, then
21 exited the garage and drive away from the residence. Law enforcement authorities
22 followed the Equinox and performed a traffic stop after observing that the Equinox
23 did not have a working rear tail light. Law enforcement authorities spoke with the
24 driver, identified as Adrian ENRIQUEZ, who gave consent to search the Equinox.
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26
27 Law enforcement authorities asked ENRIQUEZ if he had specific types of narcotics
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1 including methamphetamine, heroin and cocaine inside the Equinox. ENRIQUEZ
2 replied “no” to heroin and methamphetamine but had a visible reaction when asked
3 about cocaine. Inside the vehicle, law enforcement authorities found five boxes in
4 the trunk and a sixth box in the rear seat. The boxes contained large sized packages
5 wrapped in black tape similar to those found in the Jeep and the Camry. A
6 presumptive test was conducted on a random package of the suspected narcotics
7 found in the Equinox. The suspected narcotics tested positive for the presence of
8 cocaine.
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12 Law enforcement authorities continued surveillance on the residence and
13 observed OLMOS and RAMIREZ walking towards the Frontier, which was parked
14 in front of the residence on the curb. Law enforcement authorities detained both
15 OLMOS and RAMIREZ. Law enforcement authorities read RAMIREZ her
16 Miranda Rights while standing outside the residence. RAMIREZ waived her rights
17 and told law enforcement authorities that she rented the residence through the Airbnb
18 application on her phone. RAMIREZ stated that she drove the Nissan Frontier to
19 the warehouse. She stated that she was at the warehouse when boxes from the
20 warehouse were loaded into the van. RAMIREZ stated that the van was later driven
21 to the residence by someone she did not know. RAMIREZ further stated that there
22 were boxes of narcotics loaded into the Frontier while she was at the warehouse and
23 that those boxes were still in the Frontier.
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1 A state search warrant was sought and authorized for the residence and the
2 warehouse. Pursuant to the warrant, law enforcement authorities searched both
3 locations. Additional packages of narcotics were found in the residence that tested
4 positive for cocaine, methamphetamine, and heroin. In total, law enforcement
5 authorities seized approximately 799.3 kilograms (1,762.15 pounds) of cocaine from
6 the vehicles and residence, 74.8 kilograms (164.91 pounds) of methamphetamine
7 from the residence, and 1.6 kilograms (3.53 pounds) of heroin from the residence.
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10 No additional narcotics were found at the warehouse. However, law
11 enforcement authorities discovered a tunnel that ended in the warehouse and appears
12 to lead south into Mexico.
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14 In a post Miranda statement, JARAMILLO admitted to transporting narcotics
15 to Los Angeles County and stated he was getting paid approximately \$1,200.00 to
16 do so.
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18 OLMOS stated that she helped put boxes together and taped them shut. She
19 further stated that she thought the packages in the boxes contained marijuana.
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21 PEREZ denied knowledge of the narcotics in the boxes that he transported in
22 the Jeep.
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24 ENRIQUEZ denied knowledge of the narcotics in the boxes that he
25 transported in the Equinox. ENRIQUEZ stated he thought he was going to be paid
26 for transporting the boxes but did not know how much.
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1 All six of the above-mentioned subjects were arrested and taken into state
2 custody. Each of these six individuals will be moved to federal custody on or before
3 early morning, May 16, 2022.
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5 Executed on May 14, 2022, at _____ 9:00 AM _____
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7
8 Valdivia
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10 Gustavo Valdivia, HSI Special Agent
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13 On the basis of the facts presented in this probable cause statement consisting
14 of 6 pages, I find probable cause to believe the defendants, Manuel PEREZ Herrera,
15 Mario JARAMILLO, Juan CRUZ, Adrian ENRIQUEZ, Luz de Luna OLMOS and
16 Vanessa RAMIREZ named in this probable cause statement, committed the offense
17 on May 12, 2021, in violation of Title 21 USC 841 and 846, Distribution of a
18 Controlled substance and Conspiracy to Distribute a Controlled Substance.
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24 Jill Burkhardt
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26 JILL. Burkhardt

5/14/22 11:34 am

Date/Time

27 United States Magistrate Judge
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