

FILED
AUG 08 2018
CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

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4 UNITED STATES OF AMERICA,
5
6 Plaintiff,
7
8 v.
9 Fernando Jesus PERAZA,
10 Defendant.

Case No.:
COMPLAINT FOR VIOLATION OF
Title 21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

18MJ4376

11 The undersigned complainant being duly sworn states:

12 COUNT 1

13 On or about August 8, 2018, within the Southern District of California, defendant, Fernando Jesus
14 PERAZA, did knowingly and intentionally import 20,000 and more pills containing fentanyl, a Schedule II
15 Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United
16 States Code, Sections 952 and 960.

17
18 The complainant states that this complaint is based on the attached Statement of Facts incorporated
19 herein by reference.

20 *[Signature]*
21 Special Agent Nicholas A. Brown
22 Homeland Security Investigations

23 SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 8th DAY OF AUGUST,
24 2018.

25 *[Signature]*
26 HON Jill L. Burkhardt
27 U.S. MAGISTRATE JUDGE
28

DOA
8/8

1 UNITED STATES OF AMERICA

v.

2 Fernando Jesus PERAZA

3 PROBABLE CAUSE STATEMENT

4 I, Special Agent Nicholas A. Brown, declare under penalty of perjury that the following is true and
5 correct:

6
7 On August 8, 2018 at about 2:30 am, Fernando Jesus PERAZA (PERAZA), a United States
8 Citizen, attempted to enter the United States at the San Ysidro, California, Port of Entry. PERAZA was the
9 driver and sole occupant of a black Audi TT Quattro bearing a California license plate.

10 While assigned to vehicle preprimary, a U.S. Customs and Border Protection (CBP) Officer made
11 contact with PERAZA and received two negative Customs declarations. Due to the high readings from a
12 K910 Buster device, the vehicle was referred to secondary inspection.

13
14 A CBP Officer was assigned to conduct an x-ray scan of the black Audi TT Quattro and observed
15 anomalies in the passenger side rear quarter panel.

16 A CBP Canine Enforcement Officer (CEO) was assigned to conduct K-9 operations and observed
17 the Narcotics and Human Detection Dog (NHDD) alert to the presence of a trained odor emanating from
18 the black Audi TT Quattro.

19 A CBP Officer was assigned to conduct a secondary inspection of the vehicle. The CBP Officer
20 conducted a 7 - point inspection of the black Audi TT Quattro and found four packages concealed inside
21 the passenger side rear quarter panel. Four packages containing over 20,000 pills containing fentanyl were
22 found.
23

24 On August 8, 2018, at approximately 7:55 a.m., HSI Special Agents interviewed PERAZA.
25 PERAZA agreed to waive his Miranda rights and speak with agents. During the interview, PERAZA made
26 several statements including his admission that he knew there were drugs in his vehicle, but claimed that
27 he participated in the drug smuggling incident because his family was threatened. He claimed that he was
28 getting paid \$1,000 to smuggle the drugs.