

RML  
6347  
3/5/12

FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

12 MAR -5 AM 10:04

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

12 MJ 0784 alk

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
Eugenio VELAZQUEZ )  
Defendant, )  
\_\_\_\_\_ )

COMPLAINT FOR VIOLATION OF

Title 21, U.S.C., Sections 952 and 960  
Importation of a Controlled Substance

The undersigned complaint being duly sworn states:

On or about March 4, 2012, within the Southern District of California, Eugenio VELAZQUEZ did knowingly and intentionally import approximately 5.80 kilograms of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



B. Trammell, Special Agent  
U.S. Homeland Security  
Investigations

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 5TH DAY OF  
MARCH, 2012.

  
MAGISTRATE JUDGE

DOA 3/4/2012 AEF

**STATEMENT OF FACTS**

I declare under the penalty of perjury, that the following is true and correct:

On March 4, 2012, at approximately 9:00 a.m., Eugenio VELAZQUEZ, a United States citizen, was in the vehicle primary Senti lane, awaiting to applying for admission into the United States from Mexico at the San Ysidro Port of Entry. VELAZQUEZ was the driver, sole occupant and registered owner of a 2004 Nissan Quest, bearing California license plate 5KXP885. A Customs and Border Protection (CBP) Canine Enforcement Officer (CEO) with a Human/Narcotic Detector Dog (H/NDD) alerted to a trained odor, and responded by sitting at the left front headlight of the vehicle. The CBP Officer (CBPO) requested assistance, and other CBPO's responded.

A responding CBPO received two negative Customs declarations from VELAZQUEZ. The CBPO also requested an entry document from VELAZQUEZ, who presented his Senti Fast Pass card. Another responding CBPO inspected the engine compartment of the vehicle and noticed packages inside the battery. VELAZQUEZ was then escorted to the Security Office, and the vehicle was turned over to the Secondary Lot for further processing.

On March 4, 2012, at approximately 9:00 a.m., a CBPO was assigned to conduct an inspection of the 2004 Nissan Quest, bearing California license plate 5KXP885. During the vehicle inspection, the CBPO located a total of five (5) packages in the battery, within the engine compartment. The five (5) packages contained approximately 5.80 kilograms of a white powdery substance that field tested positive for cocaine.

VELAZQUEZ was arrested and charged with violation of Title 21 USC 952, 960, Importation of a Controlled Substance and is pending booking into the Metropolitan Correctional Center, San Diego, California.