

AO 91 (Rev. 8/01) Criminal Complaint

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO
10 OCT 20 AM 9:43
CLERK - LAS CRUCES

UNITED STATES DISTRICT COURT

State and

DISTRICT OF

New Mexico - LAS CRUCES

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Case Number: 10-2735 MJ

McKnabb, Michael Nolan

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief On or about October 18, 2010 in Dona Ana County, in the State and District of New Mexico defendant(s) did,

Attempt to conduct a financial transaction involving proceeds of a specified unlawful activity knowing that the property involved in the financial transaction represents the proceeds on an unlawful activity.

in violation of Title 18 United States Code, Section(s) 1956(a)

I further state that I am a(n) U.S. Immigration and Customs Enforcement Special Agent and that this complaint is based on the following facts:
Official Title

See attached Affidavit

Continued on the attached sheet and made a part of this complaint:

Yes No

Brian Koch
Signature of Complainant

Brian Koch, Senior Special Agent (I.C.E)
Printed Name of Complainant

Sworn to before me and signed in my presence,

October 20, 2010
Date

at Las Cruces, NM
City and State

U.S. Magistrate Judge William P. Lynch
Name and Title of Judicial Officer

William P. Lynch
Signature of Judicial Officer

AFFIDAVIT

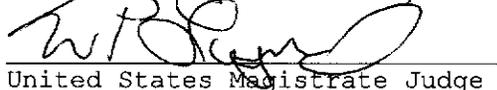
McKnabb, Michael Nolan

On October 18, 2010, at approximately 0820 hrs, United States Border Patrol (USBP) agents manning the USBP checkpoint located on Interstate 10, West of Las Cruces, New Mexico, encountered a 2004 Jeep Cherokee. The driver was identified as April Delridge and the lone passenger was identified as Michael McKnabb. The vehicle was bearing Texas registration that listed the owner as Mary Ann McKnabb. During the initial citizenship questioning of McKnabb and Delridge, USBP Agents were notified by the preprimary canine handler that his canine had alerted to the Jeep. The vehicle was referred to the secondary inspection area and upon examination the canine alerted specifically to a black suitcase that was McKnabb's and a second alert to the rear of the vehicle. The suitcase was opened and inside the suitcase was a metal beverage container that when opened contained \$12,230.00. When the USBP searched the rear of the vehicle, they discovered an elaborate false compartment that was accessible by a motor driven trap door. On the same date, Immigration and Customs Enforcement (ICE) Agent Brian Koch and ICE Task Force Officer Tom Ferguson arrived at the checkpoint to conduct interviews of McKnabb and Delridge. McKnabb was administered his Miranda Rights and willingly made a statement. McKnabb stated that the currency was his brothers and that the currency was proceeds from marijuana sales. McKnabb then stated that he was reroute to Placerville, California to purchase four pounds of high grade marijuana for \$12,000.00. Upon arrival in Placerville, McKnabb would obtain the marijuana and he would then transport the marijuana hidden in the false compartment back to the Austin, Texas area. McKnabb stated that he had previously made four trips to Placerville to purchase marijuana. McKnabb stated that his brother was going to pay him one thousand dollars for the trip. When further questioned with regards to his involvement with the transportation of marijuana, McKnabb stated that he was currently on State of Texas probation (5 years) for a marijuana arrest that occurred on October 13, 2009. Upon the completion of the interview of McKnabb, SA Koch notified the on-duty Assistant United States Attorney and received approval to charge McKnabb with Title 18 USC 1956- Laundering of monetary instruments.



Special Agent Brian Koch
Imm. & Customs Enforcement

Sworn and subscribed to before
Me this 20 day of October, 2010



United States Magistrate Judge

William P. Lynch