

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

FILED

for the

Eastern District of California

OCT 25 2019

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY [Signature] DEPUTY CLERK

United States of America )

v. )

Juan Carlos Vasquez )

Case No. )

2:19 MJ - 177 - DB

Defendant(s)

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 July 1, 2019 - October 23, 2019 in the county of El Dorado in the Eastern District of California, the defendant(s) violated:

Code Section	Offense Description
21 U.S.C. §§ 846(a)(1), 841(a)(1)	Conspiracy to Manufacture at least 50 Marijuana Plants
21 U.S.C. § 841(a)(1)	Manufacture at least 50 Marijuana Plants
18 U.S.C. § 924(c)	Possession of a Firearm in Furtherance of a Drug Trafficking Offense

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF DEA TASK FORCE OFFICER DAVE STEVENSON

Continued on the attached sheet.

[Signature]

Complainant's signature

Dave Stevenson, DEA Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/25/2019

[Signature]

Judge's signature

City and state: Sacramento, California

United States Magistrate Judge Deborah Barnes

Printed name and title

**AFFIDAVIT OF DEA TASK FORCE OFFICER**  
**DAVE STEVENSON**

I, Dave Stevenson, being duly sworn, hereby depose and state:

**Purpose**

1. This Affidavit is made in support of a criminal complaint and arrest warrant for Christopher Garry Ross, Juan Carlos Vasquez, and Ramiro Bravo Morales for:

**COUNT ONE:** Conspiracy to Manufacture at least 50 Marijuana Plants, in violation of 21 U.S.C. §§ 846 and 841(a)(1)

**COUNT TWO:** Manufacture at least 50 Marijuana Plants, in violation of 21 U.S.C. § 841(a)(1)

**COUNT THREE:** Possession of a Firearm in Furtherance of a Drug Trafficking Offense, in violation of 18 U.S.C. § 924(c)

**Agent Background**

2. I am a Task Force Officer with the Drug Enforcement Administration. I have been a DEA TFO since 2017. I have 23 years of experience as a Sheriff's deputy with the El Dorado County Sheriff's Office and 6 years of experience as an investigator for the El Dorado County District Attorney's Office.
3. I am an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.
4. Because this affidavit is submitted for the limited purpose of establishing probable cause for the requested arrest warrant, I have not included each and every fact known to me about this case. Rather, I have set forth only the facts that I believe are necessary to support probable cause.

5. This affidavit is based upon my own personal knowledge but also the knowledge of other law enforcement officers involved in this investigation. Where I describe statements made by other people (including other special agents and law enforcement officers), the statements are described in sum, substance, and relevant part. Similarly, where I describe information contained in reports and other documents or records in this affidavit, this information is also described in sum, substance, and relevant part.

### **Statement of Probable Cause**

#### ***Defendants conspired to grow marijuana.***

6. On July 1, 2019, Christopher Ross entered into a marijuana cultivation agreement with an individual he knew as "Jaime." As part of the agreement, Ross allowed "Jaime" and his associates to grow marijuana on Ross's property at 4740 Sand Ridge Road in Placerville, California. In exchange, Jaime promised to pay Ross \$13,000. As some point, "Jaime" gave \$2,000 in cash and a Jeep Cherokee valued at \$8,000 to Ross. The balance of \$3,000 was to be paid at the end of the marijuana cultivation season.
7. Beginning in September 2019, Juan Carlos Vasquez (aka "Paco") began living on the Sand Ridge Road property in a tent near the marijuana garden. Vasquez was in charge of cultivating the marijuana and maintaining security of the marijuana garden.
8. In early October, Ross saw Vasquez in the marijuana garden in possession of a firearm and became aware that Vasquez fired two rounds from the firearm while in the marijuana garden.

#### ***Ross becomes concerned that his co-conspirators will not pay him.***

9. In mid-October, Ross, recognizing that the marijuana in the marijuana garden was nearly ready to harvest, became concerned that "Jaime" and his associates would not pay him the remaining \$3,000 balance. Ross noticed that some of the marijuana tops had already been removed.
10. On October 20, 2019, Ross observed that a Hispanic male (later identified as Ramiro Morales) arrived on the property to assist with the cultivation and

harvesting of the marijuana. Like Vasquez, Morales began living on the Sand Ridge Road property near the marijuana garden.

***Defendant called 911 and provided false information.***

11. On October 23, 2019, at 12:25 a.m., Ross called 911 to report a “robbery”. Ross told the 911 operator that, “I am a farmer . . . I grow marijuana.” Ross claimed five people were up in “my grow site” taking his marijuana. Ross said that the people were also going onto his neighbor’s property. While talking with the 911 operator, Ross claimed that the people were actively in his marijuana grow with flashlights.
12. At no point did Ross tell the 911 operator that he knew that two people were living in the grow and that he had a business agreement with them. At no point did Ross tell the 911 operator that the people living in the grow were armed.
13. Approximately 45 minutes later, Ross called back to 911. At this point, Sheriff’s deputies from the El Dorado County Sheriff’s Office had arrived on scene. Ross told the 911 operator that it sounds like someone had tried to get into his house and that he had heard “probably like 50 shots” fired.
14. At no point during this second call to 911 did Ross inform the 911 operator that he knew that two people were living in the grow and that he had a business agreement with them. And, at no point during this second call to 911 did Ross tell the 911 operator that the people living in the grow were armed.

***Law enforcement officers respond to the false 911 call.***

15. In response to the 911 call, law enforcement officers from the El Dorado Sheriff’s Office responded to Ross’s property. Sheriff’s deputies located the marijuana grow on Ross’s property and identified themselves. Upon Sheriff’s deputies identifying themselves as law enforcement officers, the Sheriff’s deputies came under fire. One of the Sheriff’s deputies was shot and killed. Another deputy was shot and wounded.
16. Morales was taken into custody while fleeing away from the marijuana garden. Morales was interviewed and admitted to arriving on the property

on October 20, 2019, to help cultivate and harvest the marijuana. Morales told law enforcement that he had seen lights in the early morning of October 23, 2019 and told Vasquez that people were coming. Morales gave Vasquez a firearm that Vasquez then fired at the Sheriff's deputies. During the gun fight, Vasquez suffered a gunshot wound. Morales assisted Vasquez to flee from the marijuana garden. Morales admitted to hiding the gun during their flight.

17. Vasquez was taken into custody while fleeing away from the marijuana garden. Vasquez was interviewed and admitted that he was hired in September to cultivate marijuana and protect the marijuana garden. Vasquez admitted that he saw lights approaching the marijuana grow in the early morning of October 23, 2019, and fired at least 15 rounds during the gun fight. Vasquez said that he believed the lights belonged to people coming to rob him.

***Law enforcement officers search the Sand Ridge Road property.***

18. Law enforcement officers identified approximately 75 large marijuana plants in the Sand Ridge Road marijuana garden. Marijuana is a Schedule I controlled substance.
19. Law enforcement officers found a loaded, black Smith & Wesson Model 59 9mm pistol gun hidden in dense brush. The magazine contained four rounds of ammunition.

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**Conclusion**

20. Based on the above information, I believe that Christopher Garry Ross, Juan Carlos Vasquez, and Ramiro Bravo Morales has committed the following violations of federal law:

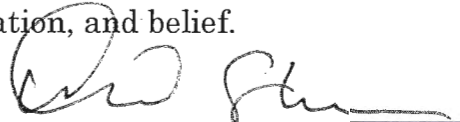
**COUNT ONE:** Conspiracy to Manufacture at least 50 Marijuana Plants, in violation of 21 U.S.C. §§ 846 and 841(a)(1)

**COUNT TWO:** Manufacture at least 50 Marijuana Plants, in violation of 21 U.S.C. § 841(a)(1)

**COUNT THREE:** Possession of a Firearm in Furtherance of a Drug Trafficking Offense, in violation of 18 U.S.C. § 924(c)

21. I hereby request that a criminal complaint and arrest warrant be issued for Christopher Garry Ross, Juan Carlos Vasquez, and Ramiro Bravo Morales based on the aforementioned facts.

I swear, under the penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.



Dave Stevenson  
Task Force Officer, DEA

Sworn and Subscribed to me  
on October 25, 2019,

  
HON. DEBORAH BARNES  
United States Magistrate Judge

Approved as to form:

  
JUSTIN L. LEE  
Assistant United States Attorney

**PENALTY SLIP**

**United States v. Christopher Garry Ross**  
**Juan Carlos Vasquez**  
**Ramiro Bravo Morales**

**COUNT ONE:** 21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to Manufacture at least 50 Marijuana Plants

Imprisonment of up to 20 years; and  
Fine of up to \$1,000,000  
Term of Supervised Release of at least 3 years and up to life

**COUNT TWO:** 21 U.S.C. § 841(a)(1) – Manufacture at least 50 Marijuana Plants

Imprisonment of up to 20 years; and  
Fine of up to \$1,000,000  
Term of Supervised Release of at least 3 years and up to life

**COUNT THREE:** 18 U.S.C. § 924(c) – Possession of a Firearm in Furtherance of a Drug Trafficking Offense

Mandatory Minimum of 5 years in prison and a maximum of up to life in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of up to 5 years

**COURT ASSESSMENT:** \$100 (mandatory on each count)