

FILED

11/4/2021

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 21 CR 683

v.

SEBASTIAN VAZQUEZ-GAMEZ and
RODRIGO ALEXIS JIMENEZ-PEREZ

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 November 3, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

Offense Description

Title 21, United States Code, Section 841(a)(1)

knowingly and intentionally possessing with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

RYAN PARKER Digitally signed by RYAN PARKER
Date: 2021.11.04 13:41:43 -05'00'

RYAN S. PARKER
Special Agent, Drug Enforcement Administration
(DEA)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: November 4, 2021


Judge's signature

City and state: Chicago, Illinois

GABRIEL A. FUENTES, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Ryan S. Parker, being duly sworn, state as follows:

1. I am a Special Agent with the Drug Enforcement Administration (DEA).

I have been so employed since approximately July 2018. Previously, I was a Task Force Officer with the DEA between approximately July 2015 and July 2018. My current responsibilities include the investigation of drug trafficking offenses.

2. This affidavit is submitted in support of a criminal complaint alleging that SEBASTIAN VAZQUEZ-GAMEZ and RODRIGO ALEXIS JIMENEZ-PEREZ have violated Title 21, United States Code, Section 841(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging VAZQUEZ-GAMEZ and JIMENEZ-PEREZ with possession with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, physical surveillance, my training and experience, and the training and experience of other law enforcement agents.

FACTS IN SUPPORT OF PROBABLE CAUSE

I. Background Regarding Bombardier CL-600 Plane

4. On or about the afternoon of November 3, 2021, law enforcement established physical surveillance at and around the Gary/Chicago International Airport in Gary, Indiana, in anticipation of the arrival of a Bombardier CL-600-2B16 Challenger 601-3A aircraft assigned tail number XA-UFF. According to open-source information, on or about November 2, 2021, the plane had departed from Lic. Adolfo López Mateos International Airport, in Toluca, Mexico, and traveled to William P. Hobby Airport in Houston, Texas. According to flight-plan information from the Air & Marine Operations Center (AMOC), the same plane was scheduled to depart from Gary, Indiana to Toluca, Mexico the evening of November 3, 2021.

5. The flight manifest listed SEBASTIAN VAZQUEZ-GAMEZ among the three passengers on the plane who had traveled to Houston, Texas, on or about November 2, 2021. During prior physical surveillance of the same plane, on or about October 19, 2021, law enforcement had observed VAZQUEZ-GAMEZ arrive in Gary, Indiana (from Toluca, Mexico, with a prior stop in Houston, Texas, according to the flight plan).¹ According to the October 19, 2021 flight records, the plane departed later that same day for Toluca, Mexico, with VAZQUEZ-GAMEZ again onboard, per the manifest. However, a review of surveillance footage revealed that VAZQUEZ-

¹ Law enforcement identified VAZQUEZ-GAMEZ based on comparison to known photos of VAZQUEZ-GAMEZ.

GAMEZ had remained in the Chicago area after the time that the plane had departed for Mexico.

II. November 3, 2021 Surveillance

6. On November 3, 2021, at approximately 6:43 p.m., law enforcement observed the plane land at the Gary/Chicago International Airport. After the plane parked on the tarmac, at approximately 6:50 p.m., law enforcement observed an individual on the plane (“Individual A”) open the aircraft’s door and speak with a Gary Airport employee, who was waiting on the tarmac.

7. Shortly thereafter, law enforcement observed the airport employee retrieve two black duffel bags, one with a white “PUMA” logo, and one with a white Nike logo, from the plane and hang them on a waiting dolly cart. The employee then returned to the plane and retrieved a dark gray patterned suitcase and a silver suitcase from the plane. As the employee placed those bags on the dolly, SEBASTIAN VAZQUEZ-GAMEZ² and two other passengers (Individuals B and C) exited the plane. VAZQUEZ-GAMEZ then turned around and, with the assistance of the Gary Airport employee and Individuals A, B, and C, slid an approximately four-foot long piece of luggage (hereinafter referred to as “the tall suitcase”) out of the plane and down the stairs to the tarmac. Based on the manner in which the tall suitcase was

² Law enforcement identified VAZQUEZ-GAMEZ based on comparison to prior physical surveillance as well as based on his Mexico identification card upon VAZQUEZ-GAMEZ’s arrest.

handled, it appeared to be significantly weighed down. The airport employee then maneuvered the tall suitcase towards the dolly.



8. After placing the tall suitcase near the dolly, the airport employee returned to the plane and retrieved a large black suitcase (hereinafter referred to as “the black suitcase”) from Individual A. Based on the manner in which the black suitcase was handled, it also appeared to be significantly weighed down. The airport employee placed the black suitcase on the dolly.

9. At approximately 6:51 p.m., the airport employee pulled the dolly cart containing all the aforementioned luggage towards the Gary Jet Center building. VAZQUEZ-GAMEZ, Individual B, and Individual C followed, with VAZQUEZ-GAMEZ pulling the tall suitcase.

10. At approximately 7:01 p.m., law enforcement observed a black 2020 Lincoln Navigator arrive and park in front of the Gary Jet Center at the Gary Airport.

Approximately two minutes later, law enforcement observed the driver of the Lincoln, Individual D, standing with VAZQUEZ-GAMEZ and two other individuals (believed to be Individual B and Individual C) just outside of the Gary Jet Center entrance/exit doors. A short time later, law enforcement observed the driver of the Lincoln appear to transfer the luggage into the rear tailgate of the Lincoln.

11. At approximately 7:07 p.m., the Lincoln departed the area, and law enforcement initiated mobile surveillance, following the Lincoln as it traveled from the Gary Airport to downtown Chicago.

12. At approximately 7:40 p.m., law enforcement lost visual contact with the Lincoln in the area of North Lake Shore Drive and East Chicago Avenue in downtown Chicago.

13. At approximately 8:31 p.m., law enforcement learned from a Gary Airport employee that the Lincoln had dropped off its passengers at a downtown Chicago hotel ("Hotel A"), located on the 100 block of East Chestnut St. in Chicago.

14. A Hotel A employee confirmed that VAZQUEZ-GAMEZ, Individual B, and Individual C had checked into Hotel A. Law enforcement subsequently established physical surveillance around the vicinity of the hotel.

15. At approximately 9:10 p.m., plain-clothes law enforcement personnel in the lobby of Hotel A observed VAZQUEZ-GAMEZ and Individual B walking through the lobby of the hotel. VAZQUEZ-GAMEZ was pulling the tall suitcase and Individual B was pulling the black suitcase, and they exited the hotel.

16. Surveillance then observed VAZQUEZ-GAMEZ standing on the sidewalk near the front of the hotel in close proximity to the tall suitcase and the black suitcase. Meanwhile, Individual B was observed walking around the area while appearing to use a cell phone to take pictures of the area.

17. At approximately 9:14 p.m., law enforcement observed VAZQUEZ-GAMEZ gesture towards a white 2015 Toyota Highlander bearing temporary Indiana license plate P323612, which had just arrived on the 100 block of East Chestnut Street. The Toyota subsequently pulled over to the north side of Chestnut Street, and VAZQUEZ-GAMEZ approached the Toyota while Individual B reentered Hotel A around the same time.

18. At approximately 9:15 p.m., law enforcement observed the driver of the Toyota, later identified as RODRIGO ALEXIS JIMENEZ-PEREZ,³ standing at the rear of the Toyota with VAZQUEZ-GAMEZ. JIMENEZ-PEREZ and VAZQUEZ-GAMEZ then loaded the tall suitcase into the open hatch of the Toyota. Based on the manner in which they handled the suitcase, it still appeared to be significantly weighted down. Moments later, JIMENEZ-PEREZ also loaded the black suitcase into the rear hatch of the Toyota. Based on the manner in which he handled the black suitcase, it also appeared to be significantly weighted down.

19. A few seconds later, law enforcement observed JIMENEZ-PEREZ enter the driver's seat and VAZQUEZ-GAMEZ enter the front passenger seat of the Toyota.

³ Law enforcement identified RODRIGO ALEXIS JIMENEZ-PEREZ based on his Mexico identification card upon his later arrest.

The Toyota then departed the area, and law enforcement initiated mobile surveillance. Shortly after the Toyota departed Hotel A, it dropped off VAZQUEZ-GAMEZ on the sidewalk in the area of East Superior Street and North Wabash Avenue, while JIMENEZ-PEREZ continued driving.

III. Stop of Toyota Highlander and Seizure of Approximately 80 Kilograms of Suspect Cocaine

20. At approximately 9:23 p.m., law enforcement conducted an investigative stop of the Toyota on the 500 block of North Rush Street, Chicago. Law enforcement approached the vehicle and observed JIMENEZ-PEREZ in the driver's seat. Law enforcement asked JIMENEZ-PEREZ to exit the vehicle, and he complied.⁴ Law enforcement asked JIMENEZ-PEREZ about the suitcases in the car, and he claimed to not know what was inside of them. Law enforcement then requested to look inside the suitcases, and JIMENEZ-PEREZ provided verbal consent.

21. Law enforcement located the tall suitcase and the black suitcase in the trunk of the Toyota. Inside both suitcases, law enforcement found in total approximately 80 brick-shaped packages wrapped in black tape and appearing consistent with kilogram bricks of controlled substances.

⁴ Unbeknownst to law enforcement, when JIMENEZ-PEREZ exited the vehicle, he did not place the vehicle in park. As the vehicle continued to roll forward, a law enforcement agent reached inside the car in order to park the Toyota, and law enforcement handcuffed JIMENEZ-PEREZ during the stop for safety reasons.



IV. Consent Search of VAZQUEZ-GAMEZ's Hotel Room and Seizure of Approximately 20 Kilograms of Suspect Cocaine

22. Meanwhile, law enforcement also approached and detained VAZQUEZ-GAMEZ in the area of East Chicago Street and North Rush Street. Law enforcement and VAZQUEZ-GAMEZ returned to Hotel A and telephonically conferred with a Spanish-speaking law enforcement officer, and VAZQUEZ-GAMEZ verbally consented to law enforcement searching his hotel room at Hotel A and provided his room key to law enforcement.

23. Inside VAZQUEZ-GAMEZ's hotel room, law enforcement found inside the silver suitcase and the black duffel bag with the white Nike logo approximately 20 brick-shaped packages wrapped in black tape, in the same manner as the bricks

recovered from the Toyota, appearing consistent with kilogram bricks of controlled substances. Law enforcement performed a field test of a sample of one of the bricks recovered by law enforcement, and it indicated the presumptive presence of cocaine. Law enforcement also found in VAZQUEZ-GAMEZ's room receipts from retail stores in Houston dated November 3, 2021, for the purchase of "luggage" and another "item" (believed, based on statements by Individual B and Individual C, to be the tall suitcase and another suitcase). Based on VAZQUEZ-GAMEZ's, Individual B's, and Individual C's statements to law enforcement, as well as the items that law enforcement observed inside VAZQUEZ-GAMEZ's hotel room and Individual B's and Individual C's hotel room (also searched by consent), law enforcement believes that VAZQUEZ-GAMEZ was the sole occupant and user of the hotel room in which the suitcases with the additional bricks were found.



V. Post-Detention/Arrest Statements

24. After being advised of his *Miranda* rights and agreeing to waive them, JIMENEZ-PEREZ told law enforcement, in sum and substance, and among other things, as follows: JIMENEZ-PEREZ had hoped that the suitcases would contain only money and marijuana, but that when JIMENEZ-PEREZ handled the suitcases and felt their weight, he believed that they contained other controlled substances.

25. After being separately advised of their *Miranda* rights and agreeing to waive them, Individual B and Individual C told law enforcement, in sum and substance and among other things, and in separate statements, as follows: Upon arriving in Houston, VAZQUEZ-GAMEZ had bought additional suitcases, including the tall suitcase, and had left with a man in a pickup truck. VAZQUEZ-GAMEZ then

met with Individual B and Individual C back at the Houston airport and returned with the tall suitcase, the black suitcase, the silver suitcase, and the full Nike bag to load onto the plane before departing for Gary. Upon arriving in Chicago, VAZQUEZ-GAMEZ had rented his hotel room at Hotel A and brought up the bags to his room, with the assistance of Individual B.

CONCLUSION

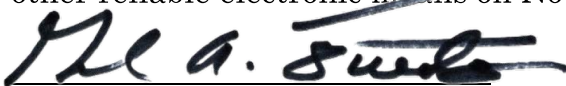
26. Based on the above, I submit that there is probable cause to believe that on November 3, 2021, SEBASTIAN VAZQUEZ-GAMEZ and RODRIGO JIMENEZ-PEREZ knowingly possessed with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

RYAN PARKER Digitally signed by RYAN PARKER
Date: 2021.11.04 13:45:14 -05'00'

RYAN PARKER
Special Agent, Drug Enforcement
Administration

SWORN TO AND AFFIRMED by telephone or other reliable electronic means on November 4, 2021.



Honorable GABRIEL A. FUENTES
United States Magistrate Judge