

SEALED
United States District Court

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED FEB 17 2017 TEXAS CLERK, U.S. DISTRICT COURT By: 

NORTHERN DISTRICT OF

UNITED STATES OF AMERICA

V.

COMPLAINT

JOSE LUIS MARTINEZ-MARTINEZ

CASE NUMBER: 3:17-MJ-127-BA

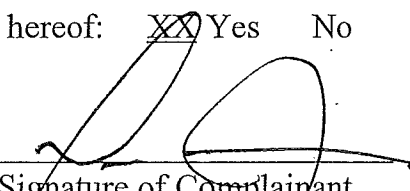
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 16, 2017, in the Dallas Division of the Northern District of Texas, defendant(s) did,

Intentionally and knowingly Possessed a Controlled Substance with Intent to Distribute, in violation of Title 21, United States Code, Section(s) 841(a)(1).

I further state that I am a(n) Task Force Officer with the Drug Enforcement Administration (DEA) and that this complaint is based on the following facts:

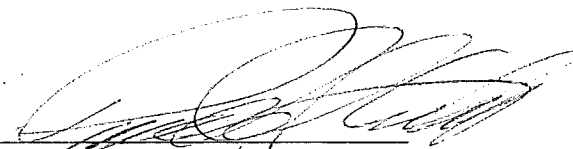
See attached Affidavit of Task Force Officer Gregory Jones, DEA which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant
GREGORY JONES
Task Force Officer, DEA

Sworn to before me and subscribed in my presence, on this 17 day of February, 2017, at Dallas, Texas.

PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

Affiant, Officer Gregory Jones, is a Fort Worth Police Officer that is currently assigned to the Drug Enforcement Administration (DEA) Task Force. Affiant is a DEA Task Force Officer (TFO) who primarily investigates drug offenses. Affiant has been a Fort Worth Police officer for eighteen years. Through training and experience, Affiant knows what heroin looks like.

This affidavit is made in support of a criminal complaint against Jose Luis Martinez-Martinez, [REDACTED] for a violation of 21 U.S.C. § 841(a)(1), Possession of a Controlled Substance with the Intent to Distribute.

This affidavit is based on my personal knowledge and information provided to me by other law enforcement agents and officers who participated in this investigation. Since this affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of a violation of 21 U.S.C. § 841(a)(1), Possession of a Controlled Substance with the Intent to Distribute. The following statements set forth in the affidavit are true and correct to the best of my knowledge.

1. In the month of February 2017, your affiant received information from a DEA Confidential Source (herein after referred to as CS) that a Hispanic male later identified as Jose Luis Martinez-Martinez using cellular phone number [REDACTED] was involved in the distribution of kilogram quantities of heroin in the Dallas metroplex. Based on this

information, at approximately 11:00 a.m. on February 16, 2017, TFO Johnny Sosa who was acting in an undercover capacity contacted Martinez-Martinez by cellular phone and placed an order for three (3) kilograms of heroin. Martinez-Martinez agreed to supply TFO Sosa with the three (3) kilograms of heroin and they agreed to meet at Flying J Truck stop located at 7425 Bonnie View Road, Dallas, Texas, Dallas County around 12:00 p.m. This location is in the Dallas Division of the Northern District of Texas.

2. At approximately 12:30 p.m. TFO Sosa was contacted by Martinez-Martinez who stated that he was arriving at the agreed upon meet location and was driving a black Chrysler 300 vehicle. Martinez-Martinez further stated that he was in possession of the heroin. Members of the surveillance team observed a black Chrysler 300 vehicle bearing Texas license plate BBK5978 being driven and solely occupied by Martinez-Martinez arrive in the parking lot of the Flying J Truck stop. Based on the aforementioned information investigators requested that deputies with the Dallas County Sheriff's Office who were in full uniform and marked patrol units make contact with Martinez-Martinez to investigate.

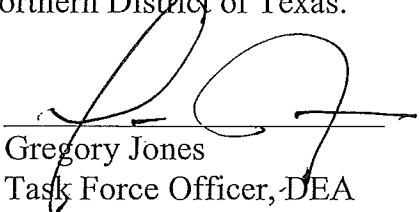
3. During the traffic stop DCSO Deputy Jones observed a small gift style bag with an open top sitting in the front right passenger seat. Deputy Jones observed in plain view a black tar like substance inside the bag believed to be heroin based on his training and experience. Inside the bag, investigators recovered two black tar like bundles believed to be heroin. The combined field weight of the bundles was approximately 3024.8 grams. Martinez-Martinez was then placed under arrest. During a post Miranda

interview Martinez-Martinez stated that he was at the location to deliver the heroin to an individual. Martinez-Martinez stated that he had an additional 2.5 kilograms of heroin concealed at his residence located at [REDACTED] Desoto, Texas, [REDACTED]

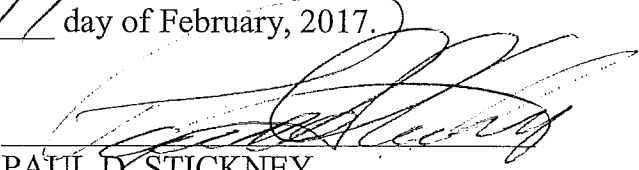
[REDACTED]. This residence is in the Dallas Division of the Northern District of Texas.

Martinez-Martinez provided both verbal and written consent to allow investigators to search the aforementioned residence and provided the specific location of where the heroin was concealed within the residence. During a search of the residence investigators recovered an additional 3,042.3 grams of heroin. Investigators performed a field test of the black tar like substance using a Narco Pouch 924, which tested presumptive positive for heroin.

4. Based on the forgoing facts and circumstances, Affiant believes that probable cause exists to find that Jose Luis Martinez-Martinez intentionally and knowingly committed a violation of 21 U.S.C. § 841(a)(1), Possession of a Controlled Substance with the Intent to Distribute, in Dallas, Northern District of Texas.


Gregory Jones
Task Force Officer, DEA

Sworn to and subscribed before me this 17 day of February, 2017.


PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS