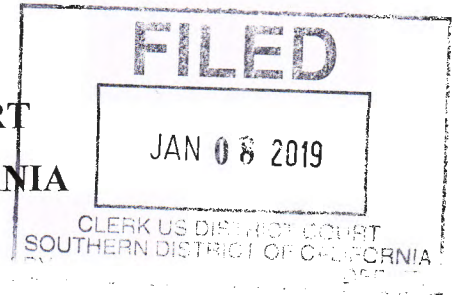


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



UNITED STATES OF AMERICA,
Plaintiff,

vs.

Felix Inzunza-Dominguez, Jr. (1)
Norma Macias-Dominguez (2)
Dianna Dominguez (3)
Tanairi Ponce (4)
Defendants.

Case No.

COMPLAINT FOR VIOLATION OF:
Title 21 U.S.C. § 841(a)(1) and Title 18
U.S.C. §2 (Possession With Intent To
Distribute Fentanyl)

19MJ0071

The undersigned complainant being duly sworn states:

COUNT ONE

On or about January 7, 2019, within the Southern District of California, defendants Felix Inzunza-Dominguez, Jr., Norma Macias-Dominguez, and Dianna Dominguez, did knowingly and intentionally possess with intent to distribute approximately 400 grams and more of fentanyl, to wit: approximately 4,000 pills containing a mixture and substance containing a detectable amount of fentanyl, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and Title 18, United States Code, Section 2.

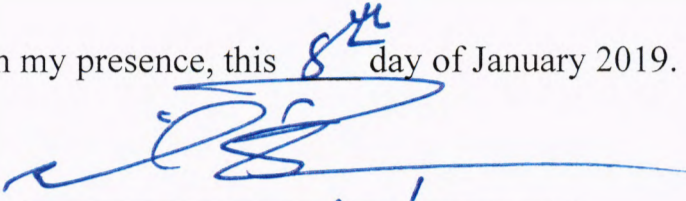
COUNT TWO

On or about January 7, 2019, within the Southern District of California, defendant Tanairi Ponce did knowingly and intentionally possess with intent to distribute approximately 40 grams and more of fentanyl, to wit: approximately 2,000 pills containing a mixture and substance containing a detectable amount of fentanyl, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and Title 18, United States Code, Section 2.

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

3 
4 JOHNATHAN WILLIS, SPECIAL AGENT
HOMELAND SECURITY INVESTIGATIONS

5 Sworn to before me and subscribed in my presence, this 8th day of January 2019.

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8 HONORABLE MICHAEL S. BERG
9 UNITED STATES MAGISTRATE JUDGE
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Statement of Facts

Federal agents, acting in undercover capacity, negotiated with a known drug trafficker (hereinafter “DT”) based in Tijuana to purchase counterfeit oxycodone containing fentanyl (known as “pressed blues” and hereinafter referred to as “fentanyl pills”). During the course of the undercover operations, agents acquired over 10,000 fentanyl pills that were smuggled through the Ports of Entry in San Diego by the DT and his criminal associates.

In December 2018, undercover agents negotiated with DT to purchase approximately 4,000 fentanyl pills for \$24,000 cash and DT arranged for his criminal associates to smuggle fentanyl pills through the San Diego Ports of Entry. On January 7, 2019, agents observed three occupants in one vehicle driven by defendant Dianna Dominguez and defendants Felix Inzunza-Dominguez, Jr. and Norma Macias-Dominguez as passengers. At one point, defendant Norma Macias-Dominguez exited the vehicle and walked away and defendant Felix Inzunza-Dominguez exited the vehicle and walked away and defendant Felix Inzunza-Dominguez, Jr. left the vehicle with a bag. Defendant Felix Inzunza-Dominguez, Jr., then walked with the bag to the nearby Frye’s parking lot to meet with the undercover agent. Defendant Felix Inzunza-Dominguez, Jr., who was wearing a San Diego Padres jersey, delivered the bag to the undercover agent. The bag contained approximately 4,000 fentanyl pills (weight approximately 546 grams). The bag also contained two condoms, believed to be how the smugglers concealed the fentanyl as they entered the United States. The condoms were inside the bag delivered to the agent. The undercover agent was supposed to give \$24,000 cash to defendant Felix Inzunza-Dominguez for the 4,000 fentanyl pills. Prior to their arrest, the undercover agent communicated directly with Dianna Dominguez, who reported to the undercover agent that he (Felix Inzunza-Dominguez, Jr.) was on his way and described the man as wearing a San Diego Padres jersey. Defendant Norma Macias-Dominguez remained in the Walmart parking lot outside Dianna Dominguez’s

vehicle. Agents confirmed that Norma Macias-Dominguez, Felix Inzunza-Dominguez, Jr., and Dianna Dominguez had crossed into the United States at the San Ysidro Port of Entry earlier that morning.

Both defendant Norma Macias-Dominguez and Felix Inzunza-Dominguez, Jr. previously delivered fentanyl pills to the undercover agent, at the direction of DT in Tijuana. Defendant Norma Macias-Dominguez previously smuggled the fentanyl pills from Mexico into the United States and then delivered 1,000 fentanyl pills to the undercover agents and received \$8,000. Defendant Felix Inzunza-Dominguez, Jr. previously smuggled the fentanyl pills from Mexico into the United States and then delivered 1,000 fentanyl pills to the undercover agent and received \$8,000 in payment.

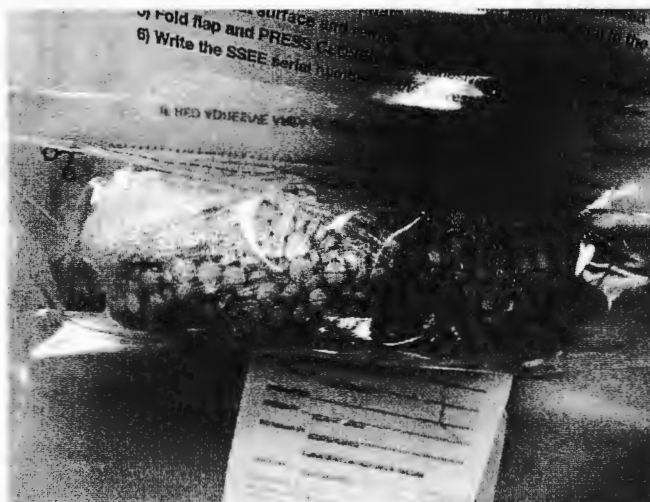


After waiving his Miranda rights, defendant Felix Inzunza-Dominguez, Jr. admitted that codefendant Norma Macias-Dominguez had possession of the pills and then placed several items including the pills into a bag, which she gave to Felix Inzunza-Dominguez, Jr. Felix Inzunza-Dominguez Jr. knew that the pills were in the bag as he walked to meet the person (now identified as the undercover agent).

Defendant Felix Inzunza-Dominguez, Jr. admitted that he was to receive money after delivering the pills. Defendant Felix Inzunza-Dominguez, Jr. also admitted delivering pills on a prior occasion to the same person (undercover) where he picked up \$8,000 in exchange for 1000 pills.

After waiving her Miranda rights, defendant Dianna Dominguez admitted that her father, Felix Inzunza-Dominguez Jr. asked for a ride on January 6, 2019 and defendant Norma Macias-Dominguez gave her some gas money specifically for driving Norma Macias-Dominguez and Felix Inzunza-Dominguez Jr. to the meeting with the person now known to be the undercover agent. Dianna Dominguez knew that they were delivering something illegal in a parking lot. Dianna Dominguez admitted talking to a person (now identified as the undercover agent) to facilitate the delivery of the illegal items. Her seized phone showed communications with the undercover agent. There were multiple text messages suggesting that if she got caught, defendant Dianna Dominguez and her boyfriend would flee.

Following these arrests, the undercover agent continued to communicate with DT explaining that his couriers did not arrive and DT agreed to smuggle another 2,000 fentanyl pills into the United States. At the direction of DT in Tijuana, defendant Tanairi Ponce then arrived with 2000 fentanyl pills to deliver to a person (undercover agent), at which time, she was arrested. Following her Miranda waiver, defendant Tanairi Ponce admitted that she was recruited that day to smuggle the illegal pills into the United States. She smuggled the pills in her bra. There were approximately 2,000 fentanyl pills weighing approximately 298.2 grams. In her possession was a business card with the name of the undercover agent and his phone number.



The Drug Enforcement Administration, Homeland Security Investigations, and the San Diego Sheriff's Office assisted in the investigation.