

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EDDIE RUIZ, JR.  
a/k/a "Eddie Ruiz,"

Defendant.

**COMPLAINT**

Violation of 21 U.S.C. § 841(a)(1)

COUNTY OF OFFENSE:  
SULLIVAN

SOUTHERN DISTRICT OF NEW YORK, ss.:

LISA VEGA, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

**COUNT ONE**

**(Possession with Intent to Distribute a Controlled Substance)**

1. On or about August 29, 2025, in the Southern District of New York and elsewhere, EDDIE RUIZ, JR., a/k/a "Eddie Ruiz," the defendant, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

3. I have been a Special Agent with the FBI for approximately five years. In that capacity, I have participated in numerous investigations and surveillance operations. I have spoken with other law enforcement agents who personally participated in the investigation of this matter. I make this Affidavit in part on personal knowledge based on my participation in the investigation; review of reports and other documents prepared by law enforcement agents and others; and physical surveillance.

4. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement officers, and my examination of reports and records, including photographs. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and

conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based upon my participation in this investigation, my review of related law enforcement records, and my conversations with other members of law enforcement, I have learned the following:

a. On or about August 29, 2025, at approximately 3:40 p.m., in the vicinity of Mamakating, New York, a member of New York state law enforcement (“Trooper-1”) observed a white Jeep Grand Cherokee (the “Vehicle”) commit several traffic violations while driving on Route 17, including turning without sufficiently signaling in violation of New York Vehicle and Traffic Law (“VTL”) Section 1163(b), making an unsafe lane change in violation of VTL Section 1128(a), overly tinted windows in violation of VTL Section 375(12-a), and crossing road hazard markings in violation of VTL Section 1128(d). After observing these violations, Trooper-1 pulled the Vehicle over on Route 17 in the vicinity of Mamakating, New York, and initiated a roadside traffic stop based on the foregoing violations of the VTL.

b. After initiating the stop, Trooper-1 asked the driver of the Vehicle, later identified as EDDIE RUIZ, JR., a/k/a “Eddie Ruiz,” the defendant, to exit the Vehicle, at which time Trooper-1 began to question RUIZ, JR. During that questioning, RUIZ, JR. engaged in behavior that, based on Trooper-1’s training and experience, appeared increasingly suspicious, including rubbing his arms, attempting to redirect Trooper-1’s questioning, not answering Trooper-1’s questions directly, and overexplaining many answers to Trooper-1’s questions. For example, in response to questioning from Trooper-1 about his destination, RUIZ, JR. told Trooper-1 that RUIZ, JR. was traveling to Binghamton to stay for a week with his brother. Trooper-1 observed that the Vehicle contained no luggage, which Trooper-1 believed—based on his training and experience—to be inconsistent with RUIZ, JR.’s proffered duration of his travel.

c. During the questioning by Trooper-1, RUIZ, JR. also told Trooper-1 that RUIZ, JR. had not been in Binghamton in approximately three months. This statement was contradicted by New York state license plate reader (“LPR”) data reviewed by Trooper-1 during the traffic stop, which indicated that the Vehicle—which, according to New York state records, is registered in RUIZ, JR.’s name—had traveled from New York City through Binghamton at least three times in the last approximately two months while in route to Buffalo. The LPR data also indicated that RUIZ, JR. had spent very short periods in Buffalo in each of these three instances, before returning to New York City the same day, a travel pattern that—based on Trooper 1’s training and experience—was consistent with narcotics trafficking.

d. Trooper-1 then approached the Vehicle with a drug-detecting canine,<sup>1</sup> which had been on-scene for the traffic stop. After approaching the Vehicle, that canine signaled to Trooper-1 that it had detected the scent of narcotics.

e. Trooper-1 and other law enforcement officers then began a preliminary, search of the Vehicle, which was still roadside. During that search, the officers found a hidden

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<sup>1</sup> Based on my training and experience, I know that canines used in law enforcement are trained to detect various scents, including those of narcotics such as cocaine. Based on my conversations with Trooper-1, I know that the canine used here received such training.

compartment (the “Trap”) in the trunk area of the vehicle, which was covered in non-factory, after-market metalwork, carpeting, and electronics. The officers were able to partially open the Trap and, as depicted in the photograph below, observed what appeared to be multiple tightly wrapped rectangular items, the packaging of which—based on their training and experience—was consistent with kilogram quantities of narcotics such as cocaine.



*The partially opened Trap*

f. RUIZ, JR. was then placed under arrest.

g. The Vehicle was then transported from its roadside location to a secure law enforcement location, where law enforcement officers continued to search the Vehicle. As part of that search, the law enforcement officers fully opened the Trap, which was found to contain approximately fifteen rectangular, tightly wrapped items (the “Cocaine Packages”), which are depicted in the photograph below.



*The Cocaine Packages*

As is reflected in the photograph above, the packaging for approximately five of the Cocaine Packages includes a specific, distinctive sticker placed on them (the “Zenú Cocaine Packages”) while the remaining approximately 10 of the Cocaine Packages (the “Apache Cocaine Packages”) were packaged similarly to the Zenú Cocaine Packages except that they had the word “Apache” written on them in black and lacked the specific, distinctive sticker of the Zenú Cocaine Packages. Law enforcement officers subsequently field tested one each of the Zenú Cocaine Packages and the Apache Cocaine Packages, both of which field tested positive for cocaine.

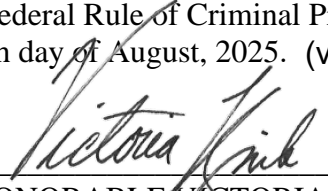
h. In aggregate, the Cocaine Packages weigh approximately 36 pounds, or approximately 16.3 kilograms. Based on my training and experience, I do not believe that the packaging of the Cocaine Packages weighs, in aggregate, 11.3 kilograms or more.

WHEREFORE, I respectfully request that EDDIE RUIZ, JR., a/k/a “Eddie Ruiz,” the defendant, be imprisoned or bailed, as the case may be.

/s/ Lisa Vega (signed by VR with permission)

LISA VEGA  
Special Agent  
Federal Bureau of Investigation

Sworn to me by reliable electronic means,  
under Federal Rule of Criminal Procedure 4.1  
this 30th day of August, 2025. (via Teams)

  
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THE HONORABLE VICTORIA REZNIK  
United States Magistrate Judge  
Southern District of New York