

CRIMINAL COMPLAINT

<p>United States District Court</p> <p>United States of America v. AMBROCIO RUIZ-ANGULO DOB: 1995; Citizen of Mexico (Counts 1-3) and JERRY CORTES-HEREDIA DOB: 2000; U.S. Citizen (Count 2)</p>	<p>DISTRICT of ARIZONA</p> <p>DOCKET NO.</p> <hr/> <p>MAGISTRATE'S CASE NO.</p> <p style="font-size: 24pt; font-weight: bold;">24-03118MJ</p>
<p>Complaint for violations of Title 18, United States Code, Section 554(a) and 2; and Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C)</p>	
<p>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</p> <p>Count 1: On or about January 20, 2024, in the District of Arizona, the defendant, AMBROCIO RUIZ-ANGULO, knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: 2,200 rounds of .50 caliber ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Sections 554(a) and 2.</p> <p>Count 2: Beginning at a time unknown, and continuing to on or about April 11, 2024, in the District of Arizona, defendants AMBROCIO RUIZ-ANGULO and JERRY CORTES-HEREDIA, did knowingly and intentionally combine, conspire, confederate and agree with each other and persons known and unknown, to possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C). All in violation of Title 21, United States Code, Section 846.</p> <p>Count 3: On or about April 11, 2024, in the District of Arizona, AMBROCIO RUIZ-ANGULO did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</p> <p>On January 20, 2024, a vehicle was stopped attempting to enter Mexico at the Mariposa Port of Entry in Nogales, Arizona. The vehicle contained 2,200 rounds of .50 caliber ammunition. The driver of the vehicle provided agents with the phone number of the person who gave her directions to the stash house where she received the ammunition. The driver provided agents with the location of the stash house. The phone number returned to an Ambrocio RUIZ-</p> <p>[Continued on the back.]</p>	
<p>MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A</p>	
<p>DETENTION REQUESTED</p> <p>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</p>	<p>SIGNATURE OF COMPLAINANT</p> <p>KEITH J GRIJALVA <small>Digitally signed by KEITH J GRIJALVA Date: 2024.04.12 09:55:10 -07'00'</small></p> <hr/> <p>OFFICIAL TITLE:</p> <p>HSI SA Keith Grijalva</p>
<p>Sworn to telephonically.</p>	
<p>SIGNATURE OF MAGISTRATE JUDGE¹⁾</p> <p><i>Joseph M. [Signature]</i></p>	<p>DATE</p> <p>April 12, 2024</p>

¹⁾ See Federal Rules of Criminal Procedure Rules 5 and 54
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Angulo. The ammunition found qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. Neither the driver nor RUIZ-Angulo possesses a valid license to export firearms or magazines from the United States into Mexico.

On April 11, 2024, Homeland Security Investigations Nogales along with El Mirage Police Department conducted surveillance operations in El Mirage, Arizona. HSI identified Ambrocio RUIZ-Angulo as a subject associated with a seizure at the Nogales Port of Entry in January of 2024. A vehicle registered to RUIZ-Angulo was identified as a silver Hyundai bearing license plate AZ/TKA8P. At approximately 1640 hours HSI was contacted by El Mirage Police Department and informed HSI that EL Mirage Police Department had conducted a vehicle stop on TKA81P and recovered a black satchel belonging to Ambrocio RUIZ-Angulo during the encounter. Inside the satchel was a Smith & Wesson M&P Shield 9mm pistol (reported stolen 11/13/23), approximately 30 grams of cocaine, and \$6,000.00 in US currency, and documents belonging to RUIZ-Angulo. El Mirage Police Department identified Ambrocio RUIZ-Angulo as the passenger, but the registered owner of the vehicle. The driver of the vehicle was identified as Jerry CORTES-Heredia. Homeland Security Investigations (HSI) was notified and responded to investigate.

In a post-*Miranda* interview, CORTES-Heredia stated he works with RUIZ-Angulo to help recover and deliver narcotics and undocumented non-citizen migrants. CORTES-Heredia stated that he stays with RUIZ-Angulo on occasion. CORTES-Heredia stated that he has run "point" for RUIZ-Angulo when they were moving undocumented no-citizen migrants. CORTES-Heredia stated that he was aware of the weapon RUIZ-Angulo was in possession of and that he had accompanied RUIZ-Angulo to a house to deliver cocaine for a "guia" (foot guide) earlier in the day and that he had been with RUIZ-Angulo the entire day. CORTES-Heredia stated that he knew that he and RUIZ-Angulo were involved in illegal activities and that he had been asked by RUIZ-Angulo as recently as April 10, 2024.

In a post-*Miranda* interview, RUIZ-Angulo admitted that he was the caretaker for the stash house where the driver had picked up the ammunition in January of 2024. He also admitted to currently possessing additional ammunition in the stash house that was to be smuggled into Mexico. He admitted that the firearm and cocaine found in the vehicle on April 11, 2024, were his. RUIZ-Angulo stated that CORTES-Heredia was his partner and that they would work together to run loads of narcotics and undocumented non-citizen migrants to the stash house. RUIZ-Angulo stated that CORTES-Heredia is also a caretaker for the same stash house. RUIZ-Angulo stated that he had previously smuggled undocumented non-citizen migrants and narcotics before and as recently as two days ago. RUIZ-Angulo admitted to being previously deported from the United States in 2023.