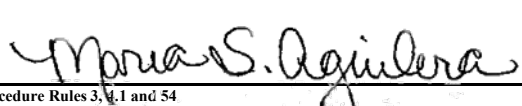


CRIMINAL COMPLAINT
(Submitted electronically)

United States District Court	DISTRICT of ARIZONA
United States of America v. Jesus Olivarez-Martinez DOB: 1992; Mexican Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 25-12224MJ
Complaint for violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about October 13, 2025, at or near Nogales, in the District of Arizona, Jesus Olivarez-Martinez did knowingly and intentionally possess with intent to distribute 400 grams or more of a mixture or 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 841(b)(1)(A)(vi).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On October 13, 2025, at approximately 11:00 a.m., Jesus OLIVAREZ-Martinez attempted to enter the United States (U.S.) from the Republic of Mexico at the DeConcini Port of Entry in Nogales, Arizona. OLIVAREZ-Martinez was the driver and sole occupant of a tan 2007 Chevrolet Suburban bearing a Mexican license plate. OLIVAREZ-Martinez claimed he owned the vehicle. During the primary inspection, a Customs and Border Protection (CBP) officer referred OLIVAREZ-Martinez for a secondary inspection after observing the vehicle's gas tank "tapped hard." A CBP canine, trained to detect the odor of narcotics, alerted to a trained odor emanating from the area of the vehicle near the spare tire. Officers x-rayed the vehicle and observed abnormalities within the vehicle images. Officers inspected the vehicle and discovered 92 packages containing small, blue pills concealed inside the gas tank and within the spare tire. A representative sample of the blue pills was field tested and yielded positive results for the properties of fentanyl. The packages of fentanyl weighed approximately 68.16 kilograms. Officers also found an aftermarket GPS monitoring system attached to the vehicle. After waiving his <i>Miranda</i> rights, OLIVAREZ-Martinez acknowledged he knows it is illegal to cross controlled substances into the U.S. OLIVAREZ-Martinez advised he works for an individual who he communicates with through WhatsApp. OLIVAREZ-Martinez claimed he was instructed to leave his vehicle parked with the keys placed on the tire at the Walmart in Nogales, Arizona. OLIVAREZ-Martinez admitted he knew his vehicle was loaded but was unsure what was concealed within the vehicle. OLIVAREZ-Martinez advised he believed he was going to be paid \$3,000 USD once he returned to Mexico. OLIVAREZ-Martinez said that during the last two months, he has crossed approximately seven to eight times at the request of the same individual, and that he was paid \$3,000 USD on three to four of those occasions. OLIVAREZ-Martinez explained he believed the vehicle was loaded with unknown contraband when he was paid.	
CONTINUED ON NEXT PAGE	
MATERIAL WITNESSES IN RELATION TO THE CHARGE:	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT (official title) NICHOLAS G STATHAKIS Digitally signed by NICHOLAS G STATHAKIS Date: 2025.10.14 10:33:45 -07'00' OFFICIAL TITLE Special Agent Nicholas Stathakis Homeland Security Investigations
Sworn to telephonically.	
SIGNATURE OF MAGISTRATE JUDGE¹⁾ 	DATE October 14, 2025

¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4, 1 and 54

Reviewed by AUSA Berman

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:

