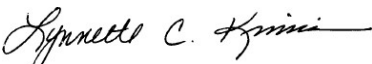


CRIMINAL COMPLAINT
(Submitted electronically)

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| United States District Court | DISTRICT of ARIZONA |
| United States of America v. Teddy Joseph VON NUKEM DOB: 1978; U.S. Citizen | DOCKET NO. |
| | MAGISTRATE'S CASE NO. 21-05706MJ |
| Complaint for violation of Title 21, United States Code, Section 846 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi), and Title 18 United States Code, Section 2 | |
| COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: <u>Count One:</u> Beginning at a time unknown, and continuing to on March 17, 2021, at or near Lukeville, in the District of Arizona, Teddy Joseph VON NUKEM did knowingly and intentionally combine, conspire, confederate and agree with persons known and unknown, to possess with intent to distribute 400 grams or more of fentanyl or a mixture containing a detectable amount of fentanyl, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi). All in violation of Title 21, United States Code, Section 846. <u>Count Two:</u> On March 17, 2021, at or near Lukeville, in the District of Arizona, Teddy Joseph VON NUKEM did knowingly and intentionally possess with intent to distribute, and did aid, abet, counsel, command, induce and procure the possession with intent to deliver approximately 400 grams or more 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) and Title 18 United States Code, Section 2. | |
| BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On March 17, 2021, Teddy Joseph VON NUKEM applied for entry at the Lukeville Port of Entry in Lukeville, Arizona. VON NUKEM was the driver and sole occupant of a 2019 Nissan Pathfinder. During the primary inspection with Customs and Border Protection (CBP), VON NUKEM denied bringing in any plants, meats, vegetables, monetary instruments over \$10,000.00 USD, commercial merchandise, and/or contraband in the 2019 Nissan Pathfinder. VON NUKEM and the vehicle were referred for a secondary inspection. During the secondary inspection, a CBP canine alerted to an odor it was trained to detect emanating from the rear passenger third row seat/cargo area of the 2019 Nissan Pathfinder. CBP officers searched the vehicle found 14 packages concealed under the third row seat and cargo floor compartments. The 14 packages contained a white powdery substance which field tested positive for the properties consistent with fentanyl. The packages of fentanyl weighed 15.08 kilograms. After waiving his <i>Miranda</i> rights, VON NUKEM admitted that he agreed to smuggle contraband into the United States. VON NUKEM said he was paid approximately 4,000 Mexican pesos to smuggle the fentanyl. VON NUKEM denied knowing it was fentanyl he was smuggling. | |
| 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. MGE/am AUTHORIZED AUSA <i>Julie A. Sottosanti</i> JULIE SOTTOSANTI <small>Digitally signed by JULIE SOTTOSANTI Date: 2021.03.18 08:54:50 -0700</small> | DIGITAL SIGNATURE OF COMPLAINANT (official title) JORGE A DURAN <small>Digitally signed by JORGE A DURAN Date: 2021.03.18 09:13:15 -0700</small> OFFICIAL TITLE Special Agent Jorge Duran Homeland Security Investigations |
| Sworn to telephonically. | |
| SIGNATURE OF MAGISTRATE JUDGE ¹⁾  | DATE March 18, 2021 |

¹⁾ See Federal rules of Criminal Procedure Rules 3, 4.1 and 54