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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Gregory Paul MOE,

Defendant.

Case No.: '24 MJ0153

COMPLAINT FOR VIOLATION OF

Title 21 U.S.C. §§ 952 and 960
Importation of a Controlled Substance
(Felony)


The undersigned complainant being duly sworn states:

On or about January 18, 2024, within the Southern District of California, Gregory Paul MOE did knowingly and intentionally import a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent Nicole Caughey
Homeland Security Investigations

Sworn and attested to under oath by telephone, in accordance with Federal Rule of Criminal Procedure 4.1, this 19th day of January 2024.


Hon. Valerie E. Torres
United States Magistrate Judge

STATEMENT OF FACTS

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3 On January 18, 2024, at approximately 8:05 PM, Gregory Paul MOE,
4 (“MOE”), a United States citizen, applied for entry into the United States from
5 Mexico through the Otay Mesa POE in vehicle lane #5. MOE was the driver, sole
6 occupant, and registered owner of a 2012 Hyundai Santa Fe (“the vehicle”) bearing
7 California license plates.
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10 A Customs and Border Protection Officer received two negative Customs
11 declarations from MOE. MOE stated he was crossing the border to go to San Diego,
12 California. When asked if the vehicle had any recent repairs, the CBPO observed
13 that MOE’s voice was trembling, and his hands were shaking. MOE stated the
14 vehicle only had regular maintenance. The vehicle was referred for further
15 inspection.
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18 A CBPO operating the Z-Portal X-Ray machine detected anomalies in the rear
19 quarter panels and both rear doors of the vehicle.
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21 A Canine Enforcement Team was conducting secondary inspection operations
22 when the Human and Narcotic Detection Dog alerted to the passenger side rear
23 quarter panel of the vehicle.
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26 Further inspection of the vehicle resulted in the discovery of 29 packages
27 concealed in the rear quarter panels, rear doors, and tailgate of the vehicle, with a
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1 total approximate weight of 35.02 kgs (77.20 lbs.). A sample of the substance
2 contained within the packages field tested positive for the characteristics of cocaine.

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4 MOE was placed under arrest at approximately 9:03 PM.

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6 During a post-Miranda interview, MOE stated that he thought he was
7 smuggling a person into the United States. MOE stated he was going to be paid
8 approximately \$3,000 USD to smuggle the person into the United States. MOE
9 claimed to be driving to San Diego, California and would await further instructions
10 after crossing into the United States. MOE stated that approximately one week ago
11 he had successfully smuggled one person from Mexico into the United States and
12 had been paid \$3,000. MOE stated approximately two or three months ago, four
13 men took him from his home in Tijuana, drove him to a shopping center, and made
14 a phone call to an individual. MOE stated he was told to continue crossing the border
15 in the vehicle or he would be harmed. MOE denied knowledge of narcotics in the
16 vehicle.
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21 MOE was arrested and charged with a violation of Title 21, United States
22 Code, 952 and 960, importation of a controlled substance.
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