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UNITED STATES DISTRICT COURT

for the Eastern District of Michigan

United States of America v. Jatinderpal SINGH

Defendant

Case: 2:19-mj-30478 Assigned To : Unassigned Assign. Date : 9/8/2019 Description: CMP USA V. SINGH

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 09/07/2019 in the county of Wayne in the Eastern District of Michigan, the defendant violated 21 U. S. C. § 841(a), an offense described as follows:

Possession with intent to distribute a controlled substance, cocaine.

This criminal complaint is based on these facts: see attached affidavit

Continued on the attached sheet.

Brian Manns Complainant's signature

Brian Manns, Special Agent, HSI Printed name and title

Sworn to before me and signed in my presence.

Date: 09/08/2019

Mona K. Majzoub Judge's signature

City and state: Detroit, Michigan

Hon. Mona K. Majzoub U.S. Magistrate Judge Printed name and title

AFFIDAVIT

I, Brian Manns, being duly sworn, depose and state the following:

- 1) I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) in Detroit, Michigan, which is located in the Eastern District of Michigan and have over 30 years of federal law enforcement experience relating to border enforcement activities. During my tenure with the U.S. Customs Service and the Department of Homeland Security, I have conducted numerous investigations relating to money laundering, contraband smuggling, and drug distribution. The following information is based upon my own investigation and previous experiences as well as investigations conducted by fellow law enforcement officers and their previous experiences.

- 2) I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other law enforcement officers and agents; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the investigation. I have not included details of every aspect of the investigation.

FACTS AND CIRCUMSTANCES IN SUPPORT OF PROBABLE CAUSE:

- 3) On September 7, 2019, HSI Detroit Special Agent Brian Manns was acting as the HSI duty agent relating to the Detroit area of operation. S/A Manns received information from Customs and Border Protection Officers (CBPO) regarding the outbound Customs inspection of commercial truck driver Jatinderpal SINGH, a Canadian citizen and resident.

- 4) According to CBP Officers, SINGH attempted to drive his commercial truck with attached commercial trailer from Detroit, MI to Windsor, Canada using the Detroit Ambassador Bridge on September 7, 2019 at approximately 0030 hours. SINGH was chosen for inspection by CBP Officers while driving in the secure area of the U.S. and Canada international border.

- 5) During this outbound Customs inspection, a CBP Officer made contact with SINGH, who exhibited extreme signs of nervousness during the initial encounter. The inspecting CBP Officer has received numerous training secessions relating to the detection of these indicators and has over 25 years of law enforcement experience, which includes being involved in multiple prior seizures of illegal drugs and arrests. During this Customs Inspection, officers did not detect a language barrier, and SINGH acknowledged that he was the sole driver of his commercial truck, and all of the contents of the truck belonged to him. A certified narcotic detector canine was then deployed to inspect the outside and interior of SINGH's commercial truck/trailer. This canine inspection resulted in a positive alert to the presence of drug odors emanating from multiple locations within SINGH's commercial truck, and the subsequent discovery of multiple plastic wrapped kilogram seized bricks. SINGH was then detained by CBP Officers and SINGH's truck was escorted to the CBP truck x-ray facility for additional scrutiny.

- 6) On September 7, 2019, a CBP x-ray of SINGH's commercial truck disclosed several kilogram quantity brick packages, which were concealed within the factory-built storage cabinets (similar to clothing storage closets) and under the sleeping bunk of SINGH's truck. The areas described in this paragraph are within close proximity (1-5 feet) of SINGH's driver's seat. A physical inspection of SINGH's truck was then preformed which disclosed approximately 120 kilograms of suspected cocaine, and several empty duffle type bags which are known by officers/agents to transport large amounts of drugs. CBP Officers also located used latex style gloves and tape within reach of SINGH's drivers' seat, which officers believe were utilized to handle the suspected cocaine. Officers also located numerous personal items belonging to SINGH within these same areas.

- 7) On September 7, 2019, CBP Officers queried government computer systems relating to SINGH's prior border inspections. This query disclosed that SINGH entered Detroit, Michigan on September 3, 2019 at the Detroit Ambassador Bridge driving the same commercial truck and was subjected to an inbound Customs inspection including a truck x-ray. CBP Officers

subsequently retrieved the x-ray image of SINGH's truck taken on September 3, 2019, which disclosed that the suspected cocaine was not present within SINGH's commercial truck on this date.

- 8) On September 7, 2019, HSI S/A Manns responded to the Detroit Ambassador Bridge and reviewed seized items processed as evidence by CBP Officers. This review disclosed 120 plastic wrapped kilogram sized bricks, with many of bricks containing embossed logo's, and hand drawn characters which are consistent with large scale drug smuggling/distribution. S/A Manns is aware based upon experience that 120 kilograms of suspected cocaine has a retail value of \$6,000,000.00 in the Toronto, Canada areas. S/A Manns is aware through prior investigations, that commercial truck drivers actively involved in smuggling cocaine from the U.S. to Canada are paid \$1,000 per kilogram smuggled as courtering fees. S/A Manns is also aware that commercial truck drivers involved with cocaine smuggling typically receive under 40 kilograms to smuggle per occasion, unless they have completed multiple successful smuggling ventures.

- 9) On September 7, 2019, SINGH received his Miranda warnings, which he subsequently waived and agreed to speak with agents. This interview was conducted in the English language, and agents verified that SINGH spoke English without difficulty. During the interview, agents repeatedly asked SINGH regarding the suspected cocaine found within his truck. SINGH did not acknowledge ownership of the suspected cocaine, but did he deny the presence or knowledge of the suspected cocaine found. In response to court and legal descriptions provided by agents, SINGH inquired if defendants in the U.S. receive a large discount relating to time sentenced as offered to Canadian defendants in Canada. S/A Manns is aware that Canadian defendants are generally incarcerated to significantly lower total sentences provided by Canadian judges. In response to SINGH's inquiry relating to a potential criminal sentence in the United States, SINGH was informed that all sentences were decided upon by a judge.

- 10) On September 7, 2019, S/A Manns completed computer queries relating to SINGH. These queries disclosed that SINGH has been the sole occupant of the truck containing the suspected cocaine during more than 70 U.S. international border entries since 2017.
- 11) SINGH was subsequently escorted to a local police station and detained by agents pending his initial appearance in federal court.
- 12) S/A Manns is aware that this criminal conduct occurred within the Eastern District of Michigan and based upon my training and experience, the drug amount seized is an amount consistent with distribution.

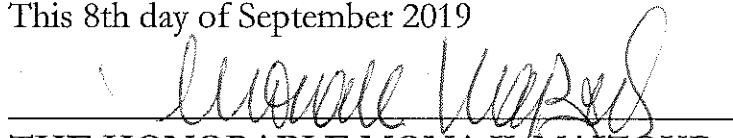
CONCLUSION:

Based on the foregoing, there is probable cause to believe that Jatinderpal Singh violated 21 United States Code, Section 841(a).



Special Agent Brian Manns
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me
This 8th day of September 2019



THE HONORABLE MONA K. MAJZOUB
UNITED STATES MAGISTRATE JUDGE