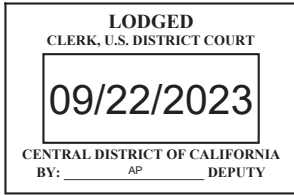


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original  Duplicate Original



# UNITED STATES DISTRICT COURT

for the

Central District of California



UNITED STATES OF AMERICA,

v.

Fidel Jesus PATINO JAIMES,  
Jair Tomas RAMOS DOMINGUEZ, and  
Ezequiel FELIX LOPEZ,

Defendants.

Case No. 5:23-mj-00457

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

Beginning on or about September 18, 2023, in San Bernardino County, and continuing to September 22, 2023, in Santa Barbara County, both counties within the Central District of California, the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 1201(a)(1), (g); 2	Kidnapping

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

Continued on the attached sheet.

/s/

\_\_\_\_\_  
*Complainant's signature*

\_\_\_\_\_  
FBI Special Agent, David A. Ricker

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: September 22, 2023

\_\_\_\_\_  
*Judge's signature*

City and state: Riverside, California

\_\_\_\_\_  
Honorable Sheri Pym, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, David A. Ricker, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation, and have been so employed since 2017. I am currently assigned to the FBI, Los Angeles Field Division, Riverside Resident Agency, and I am also a member of the Inland Empire Hybrid Drug Task Force ("IEHTF"). This task force consists of experienced drug investigators from the FBI, Drug Enforcement Administration ("DEA"), Homeland Security Investigations ("HSI"), Fontana Police Department, and the San Bernardino County Sheriff's Department ("SBSD").

2. I have received 21 weeks (approximately 840 hours) of instruction in the fundamentals of law, ethics, behavioral science, interviewing, report writing, firearms, surveillance, defensive tactics, and case management at the FBI Academy in Quantico, Virginia. Through the course of my employment with the FBI, I have participated in a variety of investigations, including investigations of the following types of crimes: national security, kidnapping, drug trafficking, and violent crimes against children.

3. As an SA, I have received instructions in the identification, collection, and preservation of evidence, photography, latent print collection, and crime-scene investigations. I have also completed thousands of hours of criminal investigations, including compiling information;

interviewing victims, witnesses, and suspects; and collecting evidence to support the filing of criminal complaints and search warrants.

## **II. PURPOSE OF AFFIDAVIT**

4. This affidavit is made in support of a criminal complaint against Fidel Jesus PATINO JAIMES ("PATINO JAIMES"), Jair Tomas RAMOS DOMINGUEZ ("RAMOS DOMINGUEZ"), and Ezequiel FELIX LOPEZ ("FELIX LOPEZ") for kidnapping, in violation of 18 U.S.C. §§ 1201(a)(1), (g); 2.

5. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, many of the statements referenced herein were translated from Spanish to English,<sup>1</sup> and all dates and times are on or about those indicated.

## **III. SUMMARY OF PROBABLE CAUSE**

6. On September 18, 2023, a 17-year old victim ("Victim") was taken by force from a location in Highland (San Bernardino

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<sup>1</sup> Unless otherwise noted, all statements attributed to the defendants in this case or participants in the kidnapping activity were made in Spanish and have been translated by a law enforcement officer fluent in both Spanish and English.

County), California. Ring camera footage from the street where Victim was abducted show two adult males forcing Victim into a silver-colored Jeep Grand Cherokee. Following the abduction, Victim's mother received telephone calls from a speaker using Mexican telephone numbers. The speaker demanded payment of a ransom – initially \$500,000, but later dropped to \$100,000 – and payment of the amount in Nogales, Mexico. The speaker threatened to cut off parts of Victim's body if the ransom was not paid.

7. After identifying the vehicle used during the kidnapping in a Facebook Marketplace posting, law enforcement agents obtained subscriber information for the subscriber's account used to make the posting. That subscriber account contained a cellular telephone number. GPS data for the cellular telephone using that cellular telephone number, and another cellular telephone number that was a frequent caller to the first cellular telephone number, showed that both cellular telephones had traveled from Santa Maria (in Santa Barbara County) to Highland (San Bernardino County) the day prior to the kidnapping, and that following the kidnaping both cellular telephones were again in Santa Maria.

8. Law enforcement agents used an electronic surveillance device to obtain additional location information for both cellular telephones and located them within a Motel 6 in Santa Maria. After maintaining surveillance on the room where law enforcement officers believed the cellular telephones were located, and after seeing two adult males enter the room, law

enforcement officers executed a state authorized search warrant on the room. Inside law enforcement agents found Victim, PATINO JAIMES, RAMOS DOMINGUEZ, and FELIX LOPEZ.

9. Following *Miranda* advisements, I interviewed PATINO JAIMES, RAMOS DOMINGUEZ, and FELIX LOPEZ, and during their separate interviews all three admitted to playing a role in abducting Victim, and or confining Victim.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. Victim Abducted in a Jeep Grand Cherokee**

10. On September 18, 2023, at approximately 8:27 a.m., Person One,<sup>2</sup> who was inside Person One's home at the time, heard a loud bang from outside Person One's home. Person One then reviewed Ring camera footage from a Ring camera outside of Person One's home, which captured video of the street in front of Person One's home. Person One identified Victim in the footage, and saw that two adult males took Victim from the vehicle that victim had been driving and pulled Victim into a silver-colored Jeep Grand Cherokee. The ring camera footage, which I have reviewed, showed front end damage to Victim's vehicle, leading me to believe that the two individuals who forced Victim into the silver-colored Jeep Grand Cherokee caused an accident, leading Victim to exit the vehicle that Victim was driving, at which point the kidnappers forced Victim into the silver-colored Jeep Grand Cherokee. In reviewing the footage, other investigators and I also noticed several distinct features

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<sup>2</sup> I know the identity of "Person One."

of the silver-colored Jeep Grand Cherokee, which are not common to all such vehicles.

11. At approximately 3:49 p.m. on September 18, 2023, Victim's mother received a telephone call from a Mexican telephone number. The caller demanded the delivery of \$500,000 to an unspecified location in Nogales, Mexico for the return of Victim, and said that the abduction was the fault of Victim's father. Shortly thereafter, a different Mexican telephone number was used to send a video via WhatsApp to Victim's mother's cellular telephone. The video, which I have reviewed, shows Victim in the backseat of a vehicle consistent in appearance with the interior of a Jeep Grand Cherokee. In the video, Victim spoke, appearing to read from a script, saying that the abduction was Victim's father's fault for an incident that occurred in Yonkers, New York, and saying Victim's father knew what he stole. The video had been modified before it was sent to Victim's Mother to place devil emojis over the windows of the vehicle that would have otherwise been visible in the video.

12. From September 18, 2023, onwards, Victim's mother received multiple telephone calls from different Mexican telephone numbers in which the speaker demanded payment. The speaker threatened to cut off body parts of Victim if payment was not made. In one of the calls the speaker agreed to lower the ransom demand to \$100,000 after Victim's mother said she did not have the money to make the payment demanded.

**B. Jeep Grand Cherokee Later Seen in Santa Maria**

13. On September 20, 2023, I reviewed a Facebook Marketplace posting for a Jeep Grand Cherokee for sale which resembled the vehicle used by the kidnappers. The vehicle in the posting displayed a California license plate. I reviewed California Department of Motor Vehicle records for that license plate, and I saw that the vehicle was last registered in 2017 and was listed as "Planned Non-Operational." I also saw the vehicle's Vehicle Identification Number ("VIN"). I searched in other databases for that VIN and found that it existed in the Arizona Department of Motor Vehicle's database, and that there was a registered owner's address in Yuma, Arizona. I also saw from the database that the Arizona license plate for the vehicle was 37A1SN. I then queried a database containing border crossing information and saw that the database listed the license plate as belonging to a vehicle that had crossed the border from Mexico into the United States at the San Luis Port of Entry on September 17, 2023. I also queried a database aggregating license plate reader ("LPR") information, and saw that the database showed the vehicle bearing that license plate had been in Yuma, Arizona on September 17, 2023.

14. The LPR database also showed that the vehicle was captured by a different LPR in Santa Maria, California on September 18, 2023, approximately four-and-a-half hours after the abduction occurred. I obtained video footage that captured images of the vehicle when the LPR detected the license plate, and I identified the vehicle in the September 18, 2023 footage

from Santa Maria, California as the same as in the Ring footage that captured the abduction of Victim. The vehicle had distinctive features including a sticker affixed in a specific location and aftermarket wheels, which are not common to all Jeep Grand Cherokees. I could see these features in both the Ring camera footage of the abduction and in the imaging from the LPR.

**C. Identification of Cellular Phones Used by Kidnappers**

15. I reviewed information provided by Facebook concerning the account belonging to the person who posted the Jeep Grand Cherokee for sale on Facebook Marketplace. Facebook subscriber records identified the account user as "Eliaz Gomez," using a telephone number ending in 7994.

16. I reviewed records provided by T-Mobile relating to a cellular telephone using a telephone number ending in 7994. I saw that the cellular telephone was subscribed to "Elias Gomez-Sanchez," with a specific street address in Santa Maria, California.

17. I reviewed toll records for the cellular telephone number ending in 7994 and saw that the most called number was a telephone number ending in 9322. I reviewed records provided by AT&T for a cellular telephone using a number ending in 9322.

18. From GPS information provided by T-Mobile and AT&T for the cellular telephones using numbers ending in 7994 and 9322, I saw that on September 17, 2023, the day prior to the kidnapping, both cellular telephones traveled from Santa Maria to Highland. The cellular phone using the number ending in 7994 was turned



off around midnight and was not turned on again until approximately noon on September 18, 2023, at which point it was located South of Santa Maria. The cellular telephone number ending in 9322, however, appears to have been left on throughout the abduction. At approximately 8:28 a.m. on September 18, 2023, approximately one minute after the abduction, the cellular telephone number ending in 9332 sent a signal ("ping") to a cellular tower a few blocks from the abduction site in Highland, California. The GPS information for the cellular telephone using the number ending in 9322 then showed the cellular telephone travel from the Highland area to Santa Maria. Once the cellular telephone using the number ending in 7944 was turned on, both cellular telephones appeared to be in the same area.

19. On September 18, 2023 at approximately 9:22 p.m., the user of the Eliaz Gomez Facebook Messenger account wrote to another Facebook Messenger account under the name Edgar Venegas, "The boy is comfortable in my bathroom."

20. On September 19, 2023 at approximately 9:09 a.m., the user of the Eliaz Gomez Facebook Messenger account wrote to another Facebook Messenger account under the name Elias Fernando Hernandez, "The damn cell phone wasn't working and the problem is I have that kid here."

21. As of the early morning on September 21, 2023, GPS information for both cellular telephones using numbers ending in 7994 and 9322 indicated that the cellular telephones were located in Santa Maria in a vicinity that encompassed the

address used on Elias Gomez-Sanchez's residence according to both T-Mobile Subscriber records and Department of Motor Vehicle records.

22. After obtaining a state search warrant for the use of a cell-site simulator, fellow agents and I used the cell-site simulator in the vicinity of Elias Gomez-Sanchez's address. However, the cellular telephone using the number ending in 7994 was not located at that residence. Fellow agents and I then moved to a different location within Santa Maria and again used the cell-site simulator. We were then able to locate the telephone at the Motel 6 located at 1007 East Main Street, Santa Maria, California, room number 137.

23. Fellow agents and I also conducted in-person visual surveillance of the Motel 6, and of room number 137. Fellow agents and I saw a white colored Jeep Cherokee arrive in the parking lot of the Motel 6. We then saw two Hispanic adult males exit the white colored Jeep Cherokee and walk to, and enter, room 137. Agents maintained visual surveillance of the room throughout the night and did not see anyone exit the room.

24. The following day, September 22, 2023, at approximately 7:00 a.m., investigators executed state authorized search warrants for room 137 of the Motel 6 and for the residence in Santa Maria listed on the T-Mobile subscriber records and on Elias Gomez-Sanchez's California Driver's License.

25. Inside the hotel room, investigators found Victim and three adult males, including the two males that investigators

saw enter the hotel room the previous day. The three adult males identified themselves as PATINO HAYMAS, RAMOS DOMINGUEZ, and FELIX LOPEZ. RAMOS DOMINGUEZ had a Mexican identification card on his person, in the same name as he provided to investigators. PATINO JAIMES and FELIX LOPEZ did not have identification documents on their persons, however an investigator found a credit card in the name of FELIX LOPEZ in the pocket of a pair of jeans located within the room.

26. As investigators entered the room, they saw PATINO JAIMES toss a firearm on the floor. The firearm is a Taurus G2C 9mm handgun with serial number TMT60087. It had a loaded magazine. They saw Victim lying on the floor in a corner of the room. They also found a switchblade lying on the floor of the room nearby luggage. An investigator found a red sweatshirt that resembles a sweatshirt worn by one of the kidnappers in the Ring camera footage.

**D. *Mirandized and Recorded Interviews***

27. On September 22, 2023, I conducted *Mirandized* and recorded interviews of PATINO HAYMAS, RAMOS DOMINGUEZ, and FELIX LOPEZ. Each person was interviewed separately, with no one else present for the interview but for the interviewee, myself, and Task Force Officer Julio Landaverde, who translated my questions from English to Spanish, and who translated the answers of each interviewee from Spanish to English.

28. PATINO JAIMES said that he drove to San Bernardino on September 18, 2023, to kidnap Victim. He said that he was wearing a red sweatshirt and red shoes during the kidnapping.

In my review of the Ring camera footage, I saw that one of the kidnappers wore a red sweatshirt and red shoes.

29. FELIX LOPEZ said that he drove to San Bernardino on September 18, 2023, to kidnap Victim, and that he was wearing a black jacket. In my review of the Ring camera footage, I saw that one of the kidnappers wore a black jacket. He also said that he is the owner of the silver-colored Jeep Grand Cherokee, and that it is currently being stored at 330 Enos Street in Santa Maria. He also confirmed that his cellular telephone number was the number ending in 7994.

30. RAMOS DOMINGUEZ said that he resides at 330 Enos Street in Santa Maria. He said that FELIX LOPEZ and PATINO JAIMES arrived at his residence the afternoon of September 18, 2023 with Victim. He knew Victim had been kidnapped, and he agreed to store the silver-colored Jeep Grand Cherokee at 330 Enos Street. He also agreed to accompany FELIX LOPEZ, PATINO JAIMES, and Victim, and to use his white-colored Jeep Cherokee to drive them around. He said he also agreed to keep watch on Victim. He confirmed his cellular telephone number as the number ending in 9322.

**E. Instrumentalities of Interstate Commerce**

31. I believe that PATINO JAIMES, RAMOS DOMINGUEZ, FELIX LOPEZ, and unidentified co-conspirators used multiple instrumentalities of interstate commerce during the kidnapping described herein including use of cellular telephones, Jeep vehicles, and internet-based applications including WhatsApp and Facebook.

**V. CONCLUSION**

32. For all the reasons described above, there is probable cause to believe that PATINO JAIMES, RAMOS DOMINGUEZ, and FELIX LOPEZ violated 18 U.S.C. §§ 1201(a)(1), (g); 2 (kidnapping, and aiding and abetting and causing the same).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 22nd day of September, 2023.



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HONORABLE SHERI PYM  
UNITED STATES MAGISTRATE JUDGE