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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2023 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EZEQUIEL FELIX LOPEZ,  
FIDEL JESUS PATINO JAIMES, and  
aka "Fidel De Jesus Patino-  
Jaimes,"  
JAIR TOMAS RAMOS DOMINGUEZ,  
  
Defendants.

ED CR No. 5:23-cr-00199-JGB

I N D I C T M E N T

[18 U.S.C. §§ 1201(c), (g):  
Conspiracy to Kidnap a Minor; 18  
U.S.C. §§ 1201(a)(1), (g):  
Kidnapping a Minor; 18 U.S.C.  
§ 922(g)(1): Felon in Possession  
of a Firearm and Ammunition; 18  
U.S.C. §§ 924(d)(1), 981(a)(1)(C)  
and 28 U.S.C. § 2461(c): Criminal  
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 1201(c), (g)]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Minor Victim had not attained the age of 18 years.
2. Defendants EZEQUIEL FELIX LOPEZ, FIDEL JESUS PATINO JAIMES, also known as "Fidel De Jesus Patino-Jaimes," and JAIR TOMAS RAMOS DOMINGUEZ had attained the age of 18 years and were not a parent,

1 grandparent, brother, sister, aunt, uncle, or an individual having  
2 legal custody of Minor Victim.

3 B. OBJECT OF THE CONSPIRACY

4 3. Beginning on an unknown date and continuing to on or about  
5 September 22, 2023, in San Bernardino and Santa Barbara Counties,  
6 within the Central District of California, and elsewhere, defendants  
7 FELIX LOPEZ, PATINO JAIMES, and RAMOS DOMINGUEZ, and others known and  
8 unknown to the Grand Jury, conspired and agreed with each other to  
9 knowingly, willfully, and unlawfully seize, confine, inveigle, decoy,  
10 kidnap, abduct, and carry away and hold for ransom and reward Minor  
11 Victim, a person who had not yet attained the age of eighteen years,  
12 and in committing and in furtherance of the commission of the offense  
13 used a means, facility, and instrumentality of interstate and foreign  
14 commerce, namely, telephones, vehicles, and web-based communication  
15 platforms, in violation of Title 18, United States Code, Sections  
16 1201(a)(1), (g).

17 C. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
18 ACCOMPLISHED

19 4. The object of the conspiracy was to be accomplished, in  
20 substance, as follows:

21 a. Unidentified coconspirators targeted Minor Victim's  
22 family for a kidnap and ransom scheme because of an alleged debt owed  
23 by Minor Victim's father to a drug trafficking organization.

24 b. Defendants FELIX LOPEZ and PATINO JAIMES would conduct  
25 surveillance in the area where Minor Victim lived, in San Bernardino  
26 County.

27 c. Defendants FELIX LOPEZ and PATINO JAIMES would abduct  
28 Minor Victim from close to his home, in San Bernardino County.

1           d. Defendants FELIX LOPEZ and PATINO JAIMES would carry  
2 away Minor Victim to Santa Maria in Santa Barbara County.

3           e. Unidentified coconspirators would call Minor Victim's  
4 mother, using a cross-border telephone network, and the WhatsApp web-  
5 based communication platform, threatening to harm Minor Victim,  
6 including threats to murder him and cut off his body parts, and  
7 demanding payment of a ransom for Minor Victim's return.

8           f. An unidentified coconspirator would make a video of  
9 Minor Victim following his abduction, which would be sent to Minor  
10 Victim's mother via WhatsApp, and in which Minor Victim would read  
11 from a script relaying information from Minor Victim's abductors.

12           g. Defendant RAMOS DOMINGUEZ would provide a location for  
13 storing and concealing the vehicle that defendants FELIX LOPEZ and  
14 PATINO JAIMES used to transport Minor Victim, following Minor  
15 Victim's abduction.

16           h. Defendants FELIX LOPEZ, PATINO JAIMES, and RAMOS  
17 DOMINGUEZ would hold Minor Victim against Minor Victim's will, and  
18 would brandish a firearm and a knife in front of Minor Victim, while  
19 they would detain Minor Victim.

20 D. OVERT ACTS

21           5. In furtherance of the conspiracy and to accomplish its  
22 object, on or about the following dates, defendants FELIX LOPEZ,  
23 PATINO JAIMES, and RAMOS DOMINGUEZ, and others known and unknown to  
24 the Grand Jury, committed various overt acts in San Bernardino and  
25 Santa Barbara Counties, within the Central District of California,  
26 and elsewhere, including, but not limited to, the following:

27           Overt Act No. 1: On September 18, 2023, in San Bernardino  
28 County, using a Jeep Grand Cherokee, defendants FELIX LOPEZ and

1 PATINO JAIMES caused an automobile accident with the vehicle Minor  
2 Victim drove.

3 Overt Act No. 2: On September 18, 2023, once Minor Victim got  
4 out of the vehicle that Minor Victim drove, defendants FELIX LOPEZ  
5 and PATINO JAIMES forced Minor Victim, against Minor Victim's will,  
6 to enter the Jeep Grand Cherokee.

7 Overt Act No. 3: On September 18, 2023, defendants FELIX LOPEZ  
8 and PATINO JAIMES transported Minor Victim, against Minor Victim's  
9 will, in the Jeep Grand Cherokee, from San Bernardino County to Santa  
10 Maria in Santa Barbara County.

11 Overt Act No. 4: On September 18, 2023, an unidentified  
12 coconspirator used a Mexican telephone number to call the United  
13 States-based cellular telephone used by Minor Victim's mother, and  
14 demanded the delivery of \$500,000 to an unspecified location in  
15 Nogales, Mexico in exchange for the release of Minor Victim.

16 Overt Act No. 5: On September 18, 2023, utilizing WhatsApp, an  
17 unidentified coconspirator sent the United States-based cellular  
18 telephone used by Minor Victim's mother, a video of Minor Victim in  
19 the backseat of a vehicle; in that video Minor Victim read from a  
20 script and said that the abduction was the fault of Minor Victim's  
21 father.

22 Overt Act No. 6: On September 18, 2023, upon the arrival of  
23 Minor Victim and defendants FELIX LOPEZ and PATINO JAIMES in Santa  
24 Maria, defendant RAMOS DOMINGUEZ provided a place to store the Jeep  
25 Grand Cherokee used in the abduction, as well as a second Jeep  
26 vehicle to transport Minor Victim in and around Santa Maria.

27 Overt Act No. 7: From September 18, 2023 to September 22, 2023,  
28 one or more unidentified coconspirators called the United States-

1 based cellular telephone used by Minor Victim's mother from different  
2 Mexican telephone numbers, demanding payment for the return of Minor  
3 Victim, and threatening harm to Minor Victim, including threats to  
4 murder him and cut off his body parts, if payment was not made.

5 Overt Act No. 8: From September 18, 2023 to September 22, 2023,  
6 defendants FELIX LOPEZ, PATINO JAIMES, and RAMOS DOMINGUEZ detained  
7 Minor Victim against Minor Victim's will, in and around Santa Maria,  
8 California, and threatened to cut off Minor Victim's body parts.

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COUNT TWO

[18 U.S.C. §§ 1201(a)(1), (g), 2(a)]

[ALL DEFENDANTS]

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4 1. Paragraphs 1 and 2 of Section A of Count One of this  
5 Indictment are re-alleged and incorporated here.

6 2. Beginning on September 18, 2023 and continuing to September  
7 22, 2023, in San Bernardino and Santa Barbara Counties, within the  
8 Central District, and elsewhere, defendants EZEQUIEL FELIX LOPEZ,  
9 FIDEL JESUS PATINO JAIMES, also known as "Fidel De Jesus Patino-  
10 Jaimes," and JAIR TOMAS RAMOS DOMINGUEZ, each aiding and abetting the  
11 others, knowingly, willfully, and unlawfully seized, confined,  
12 inveigled, decoyed, kidnapped, abducted, and carried away and held  
13 for ransom and reward Minor Victim, and, in committing and in  
14 furtherance of the commission of the offense, used a means, facility,  
15 and instrumentality of interstate and foreign commerce, namely, a  
16 cellular telephone, a motor vehicle, and web-based communication  
17 platforms.

COUNT THREE

[18 U.S.C. § 922(g) (1)]

[DEFENDANT PATINO JAIMES]

On or about September 22, 2023, in Santa Barbara County, within the Central District of California, defendant FIDEL JESUS PATINO JAIMES, also known as "Fidel De Jesus Patino-Jaimes," knowingly possessed the following firearm and ammunition, in and affecting interstate and foreign commerce:

1. A Taurus, model G2C, 9mm pistol, bearing serial number TMT60087;
2. Four rounds of Federal Cartridge Co. 9mm ammunition;
3. Two rounds of Winchester 9mm ammunition;
4. One round of Cascade Cartridge Inc. 9mm ammunition; and
5. Four rounds of Geco 9mm ammunition.

Defendant PATINO JAIMES possessed such firearm and ammunition knowing that he had previously been convicted of at least one felony crime, punishable by a term of imprisonment exceeding one year, including, Illegal Reentry, in violation of Title 8, United States Code, Sections 1326(a), (b) (1), in the United States District Court for the District of Arizona, case number 2:22-00985, on or about October 17, 2022.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of any defendant's conviction of  
8 the offenses set forth in either of Counts One or Two of this  
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 a. All right, title, and interest in any and all  
13 property, real or personal, constituting, or derived from, any  
14 proceeds traceable to the offenses; and

15 b. To the extent such property is not available for  
16 forfeiture, a sum of money equal to the total value of the property  
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),  
19 as incorporated by Title 28, United States Code, Section 2461(c), any  
20 defendant so convicted shall forfeit substitute property, up to the  
21 value of property described in the preceding paragraph if, as the  
22 result of any act or omission of said defendant, the property  
23 described in the preceding paragraph, or any portion thereof (a)  
24 cannot be located upon the exercise of due diligence; (b) has been  
25 transferred, sold to, or deposited with a third party; (c) has been  
26 placed beyond the jurisdiction of the court; (d) has been  
27 substantially diminished in value; or (e) has been commingled with  
28 other property that cannot be divided without difficulty.



FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d) (1) and 28 U.S.C. § 2461(c)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal  
2 Procedure, notice is hereby given that the United States of America  
3 will seek forfeiture as part of any sentence, pursuant to Title 18,  
4 United States Code, Section 924(d) (1), and Title 28, United States  
5 Code, Section 2461(c), in the event of any defendant's conviction of  
6 the offense set forth in Count Three of this Indictment.  
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8  
9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) All right, title, and interest in any firearm or  
12 ammunition involved in or used in any such offense; and

13 (b) To the extent such property is not available for  
14 forfeiture, a sum of money equal to the total value of the property  
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p),  
17 as incorporated by Title 28, United States Code, Section 2461(c), the  
18 convicted defendant shall forfeit substitute property, up to the  
19 value of the property described in the preceding paragraph if, as the  
20 result of any act or omission of said defendant, the property  
21 described in the preceding paragraph or any portion thereof (a)  
22 cannot be located upon the exercise of due diligence; (b) has been  
23 transferred, sold to, or deposited with a third party; (c) has been

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