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14 IN THE UNITED STATES DISTRICT COURT
 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

18 **STATE OF CALIFORNIA et al.;**
 19
 20 Plaintiffs,
 21
 22 **v.**
 23 **DONALD J. TRUMP, in his official capacity**
as President of the United States of America
 24 **et al.;**
 Defendants.

Case No. 4:19-cv-00872-HSG
**PLAINTIFF STATES OF CALIFORNIA
 AND NEW MEXICO’S
 SUPPLEMENTAL REQUEST FOR
 JUDICIAL NOTICE RE: REPLY IN
 SUPPORT OF MOTION FOR PARTIAL
 SUMMARY JUDGMENT REGARDING
 SECTIONS 284, 8005, AND 9002, AND
 OPPOSITION TO DEFENDANT’S
 MOTION FOR PARTIAL SUMMARY
 JUDGMENT**

Judge: Honorable Haywood S. Gilliam,
 Jr.
 Trial Date: None Set
 Action Filed: February 18, 2019

1 Plaintiffs hereby respectfully request, pursuant to Federal Rule of Evidence 201, that this
2 Court take judicial notice of the following documents:

- 3 1. Attached hereto as **Exhibit 10** is a true and correct copy of an excerpt of the United States
4 Government Accountability Office Report to Congressional Requesters dated February
5 2017, and titled “SOUTHWEST BORDER SECURITY: Additional Actions Needed to
6 Better Assess Fencing’s Contributions to Operations and Provide Guidance for Identifying
7 Capability Gaps.” As of June 24, 2019, the full report can be found at
8 <https://www.gao.gov/assets/690/682838.pdf>.
- 9 2. Attached hereto as **Exhibit 11** is a true and correct copy of the United States Department
10 of Homeland Security, U.S. Customs and Border Protection media release dated June 20,
11 2019, and titled “Border Patrol Arrests Man Attempting to Smuggle Meth and Heroin.”
12 As of June 24, 2019, the media release is posted on the United States Department of
13 Homeland Security, U.S. Customs and Border Protection website, at
14 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-attempting-smuggle-meth-and-heroin)
15 [attempting-smuggle-meth-and-heroin](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-attempting-smuggle-meth-and-heroin).
- 16 3. Attached hereto as **Exhibit 12** is a true and correct copy of the United States Department
17 of Homeland Security, U.S. Customs and Border Protection media release dated June 14,
18 2019, and titled “Border Patrol Seizes Meth at Checkpoint.” As of June 24, 2019, the
19 media release is posted on the United States Department of Homeland Security, U.S.
20 Customs and Border Protection website, at [https://www.cbp.gov/newsroom/local-media-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seizes-meth-checkpoint#)
21 [release/border-patrol-seizes-meth-checkpoint#](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seizes-meth-checkpoint#).
- 22 4. Attached hereto as **Exhibit 13** is a true and correct copy of the United States Department
23 of Homeland Security, U.S. Customs and Border Protection media release dated June 3,
24 2019, and titled “Border Patrol Arrests Man Attempting to Smuggle Meth.” As of June
25 24, 2019, the media release is posted on the United States Department of Homeland
26 Security, U.S. Customs and Border Protection website at
27 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-attempting-smuggle-meth-0)
28 [attempting-smuggle-meth-0](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-attempting-smuggle-meth-0).

- 1 5. Attached hereto as **Exhibit 14** is a true and correct copy of the United States Department
2 of Homeland Security, U.S. Customs and Border Protection media release dated April 18,
3 2019, and titled “Border Patrol Agents Seize more than \$1M in Narcotics at Checkpoint.”
4 As of June 24, 2019, the media release is posted on the United States Department of
5 Homeland Security, U.S. Customs and Border Protection website at
6 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-seize-more-1m-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-seize-more-1m-narcotics-checkpoint)
7 [narcotics-checkpoint.](https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-seize-more-1m-narcotics-checkpoint)
- 8 6. Attached hereto as **Exhibit 15** is a true and correct copy of the United States Department
9 of Homeland Security, U.S. Customs and Border Protection media release dated April 17,
10 2019, and titled “El Centro Sector Border Patrol Seizes more than 100 Pounds of Meth.”
11 As of June 24, 2019, the media release is posted on the United States Department of
12 Homeland Security, U.S. Customs and Border Protection website at
13 [https://www.cbp.gov/newsroom/local-media-release/el-centro-sector-border-patrol-seizes-](https://www.cbp.gov/newsroom/local-media-release/el-centro-sector-border-patrol-seizes-more-100-pounds-meth)
14 [more-100-pounds-meth.](https://www.cbp.gov/newsroom/local-media-release/el-centro-sector-border-patrol-seizes-more-100-pounds-meth)
- 15 7. Attached hereto as **Exhibit 16** is a true and correct copy of the United States Department
16 of Homeland Security, U.S. Customs and Border Protection media release dated March
17 18, 2019, and titled “Border Patrol Arrests Woman Attempting to Smuggle Meth.” As of
18 June 24, 2019, the media release is posted on the United States Department of Homeland
19 Security, U.S. Customs and Border Protection website at
20 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-woman-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-woman-attempting-smuggle-meth)
21 [attempting-smuggle-meth.](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-woman-attempting-smuggle-meth)
- 22 8. Attached hereto as **Exhibit 17** is a true and correct copy of the United States Department
23 of Homeland Security, U.S. Customs and Border Protection media release dated February,
24 19, 2018, and titled “Methamphetamine Seized at Border Patrol Checkpoint.” As of June
25 24, 2019, the media release is posted on the United States Department of Homeland
26 Security, U.S. Customs and Border Protection website at
27 [https://www.cbp.gov/newsroom/local-media-release/methamphetamine-seized-border-](https://www.cbp.gov/newsroom/local-media-release/methamphetamine-seized-border-patrol-checkpoint)
28 [patrol-checkpoint.](https://www.cbp.gov/newsroom/local-media-release/methamphetamine-seized-border-patrol-checkpoint)

- 1 9. Attached hereto as **Exhibit 18** is a true and correct copy of the United States Department
2 of Homeland Security, U.S. Customs and Border Protection media release dated February
3 8, 2019, and titled “Border Patrol Stops Two Smuggling Attempts.” As of June 24, 2019,
4 the media release is posted on the United States Department of Homeland Security, U.S.
5 Customs and Border Protection website at [https://www.cbp.gov/newsroom/local-media-
6 release/border-patrol-stops-two-smuggling-attempts](https://www.cbp.gov/newsroom/local-media-release/border-patrol-stops-two-smuggling-attempts).
- 7 10. Attached hereto as **Exhibit 19** is a true and correct copy of the United States Department
8 of Homeland Security, U.S. Customs and Border Protection media release dated February
9 1, 2019, and titled “Border Patrol Arrests Man Attempting to Smuggle Meth.” As of June
10 24, 2019, the media release is posted on the United States Department of Homeland
11 Security, U.S. Customs and Border Protection website at
12 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-
13 attempting-smuggle-meth](https://www.cbp.gov/newsroom/local-media-release/border-patrol-arrests-man-attempting-smuggle-meth).
- 14 11. Attached hereto as **Exhibit 20** is a true and correct copy of the United States Department
15 of Homeland Security, U.S. Customs and Border Protection media release dated January
16 28, 2019, and titled “Border Patrol Discovers Liquid Methamphetamine in Gas Tank.” As
17 of June 24, 2019, the media release is posted on the United States Department of
18 Homeland Security, U.S. Customs and Border Protection website at
19 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-discovers-liquid-
20 methamphetamine-gas-tank](https://www.cbp.gov/newsroom/local-media-release/border-patrol-discovers-liquid-methamphetamine-gas-tank).
- 21 12. Attached hereto as **Exhibit 21** is a true and correct copy of the United States Department
22 of Homeland Security, U.S. Customs and Border Protection media release dated January
23 28, 2019, and titled “Agents Seize Cocaine, Meth in Single Smuggling Attempt.” As of
24 June 24, 2019, the media release is posted on the United States Department of Homeland
25 Security, U.S. Customs and Border Protection website at
26 [https://www.cbp.gov/newsroom/local-media-release/agents-seize-cocaine-meth-single-
27 smuggling-attempt](https://www.cbp.gov/newsroom/local-media-release/agents-seize-cocaine-meth-single-smuggling-attempt).
- 28

- 1 13. Attached hereto as **Exhibit 22** is a true and correct copy of the United States Department
2 of Homeland Security, U.S. Customs and Border Protection media release dated
3 December 17, 2018, and titled “Ultralight Aircraft Incursion Leads Border Patrol to Meth
4 Seizure and 2 Arrests.” As of June 24, 2019, the media release is posted on the United
5 States Department of Homeland Security, U.S. Customs and Border Protection website at
6 [https://www.cbp.gov/newsroom/local-media-release/ultralight-aircraft-incursion-leads-](https://www.cbp.gov/newsroom/local-media-release/ultralight-aircraft-incursion-leads-border-patrol-meth-seizure-and-2)
7 [border-patrol-meth-seizure-and-2.](https://www.cbp.gov/newsroom/local-media-release/ultralight-aircraft-incursion-leads-border-patrol-meth-seizure-and-2)
- 8 14. Attached hereto as **Exhibit 23** is a true and correct copy of the United States Department
9 of Homeland Security, U.S. Customs and Border Protection media release dated
10 December 10, 2018, and titled “Agents Foil Multiple Methamphetamine Attempts.” As of
11 June 24, 2019, the media release is posted on the United States Department of Homeland
12 Security, U.S. Customs and Border Protection website at
13 [https://www.cbp.gov/newsroom/local-media-release/agents-foil-multiple-](https://www.cbp.gov/newsroom/local-media-release/agents-foil-multiple-methamphetamine-attempts)
14 [methamphetamine-attempts.](https://www.cbp.gov/newsroom/local-media-release/agents-foil-multiple-methamphetamine-attempts)
- 15 15. Attached hereto as **Exhibit 24** is a true and correct copy of the United States Department
16 of Homeland Security, U.S. Customs and Border Protection media release dated
17 November 5, 2018, and titled “Border Patrol Agents Intercept Smuggling Attempt.” As of
18 June 24, 2019, the media release is posted on the United States Department of Homeland
19 Security, U.S. Customs and Border Protection website at
20 [https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-intercept-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-intercept-smuggling-attempt)
21 [smuggling-attempt.](https://www.cbp.gov/newsroom/local-media-release/border-patrol-agents-intercept-smuggling-attempt)
- 22 16. Attached hereto as **Exhibit 25** is a true and correct copy of the United States Department
23 of Homeland Security, U.S. Customs and Border Protection media release dated October
24 15, 2018, and titled “Border Patrol Seize Meth Hidden Inside a Vehicle.” As of June 24,
25 2019, the media release is posted on the United States Department of Homeland Security,
26 U.S. Customs and Border Protection website at [https://www.cbp.gov/newsroom/local-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seize-meth-hidden-inside-vehicle)
27 [media-release/border-patrol-seize-meth-hidden-inside-vehicle.](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seize-meth-hidden-inside-vehicle)
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1 17. Attached hereto as **Exhibit 26** is a true and correct copy of the United States Department
2 of Homeland Security, U.S. Customs and Border Protection media release dated October
3 10, 2018, and titled “Alien Smuggling Warrant Yields Arrests of Gang Members and
4 Weapons.” As of June 24, 2019, the media release is posted on the United States
5 Department of Homeland Security, U.S. Customs and Border Protection website at
6 [https://www.cbp.gov/newsroom/local-media-release/alien-smuggling-warrant-yields-](https://www.cbp.gov/newsroom/local-media-release/alien-smuggling-warrant-yields-arrests-gang-members-and-weapons)
7 [arrests-gang-members-and-weapons.](https://www.cbp.gov/newsroom/local-media-release/alien-smuggling-warrant-yields-arrests-gang-members-and-weapons)

8 18. Attached hereto as **Exhibit 27** is a true and correct copy of the United States Department
9 of Homeland Security, U.S. Customs and Border Protection media release dated October
10 9, 2018, and titled “Border Patrol Seize Heroin from Body Carrier.” As of June 24, 2019,
11 the media release is posted on the United States Department of Homeland Security, U.S.
12 Customs and Border Protection website at [https://www.cbp.gov/newsroom/local-media-](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seize-heroin-body-carrier)
13 [release/border-patrol-seize-heroin-body-carrier.](https://www.cbp.gov/newsroom/local-media-release/border-patrol-seize-heroin-body-carrier)

14 19. Attached hereto as **Exhibit 28** is a true and correct copy of the United States Department
15 of Homeland Security, U.S. Customs and Border Protection media release dated October
16 3, 2019, and titled “DACA Recipient Arrested by Border Patrol for Smuggling Meth.” As
17 of June 24, 2019, the media release is posted on the United States Department of
18 Homeland Security, U.S. Customs and Border Protection website, at
19 [https://www.cbp.gov/newsroom/local-media-release/daca-recipient-arrested-border-](https://www.cbp.gov/newsroom/local-media-release/daca-recipient-arrested-border-patrol-smuggling-meth)
20 [patrol-smuggling-meth.](https://www.cbp.gov/newsroom/local-media-release/daca-recipient-arrested-border-patrol-smuggling-meth)

21 **Exhibits 10-28** are judicially noticeable because they are posted on official government
22 websites. *See Daniels–Hall v. Nat’l Educ. Ass’n*, 629 F.3d 992, 998–99 (9th Cir. 2010) (judicially
23 noticing information contained on a government website); *Paralyzed Veterans of America v.*
24 *McPherson*, No. C 06–4670 SBA, 2008 WL 4183981, at *5 (N.D. Cal. Sept. 9, 2008) (finding
25 that courts commonly take judicial notice of information and documents on government websites,
26 citing cases from various jurisdictions). Thus, the statements of government departments and
27 agencies contained within this exhibit are not subject to reasonable dispute, as the statements “can
28

1 be accurately and readily determined from sources whose accuracy cannot reasonably be
2 questioned.” Fed. R. Evid. § 201(b)(2).

3 **Exhibits 10-28** are judicially noticeable because government memoranda, bulletins, letters,
4 statements, and opinions are matters of public record appropriate for judicial notice. *See Brown v.*
5 *Valoff*, 422 F.3d 926, 933 n.9 (9th Cir. 2005) (judicially noticing an administrative bulletin);
6 *Mack v. S. Bay Beer Distribs., Inc.*, 798 F.2d 1279, 1282 (9th Cir. 1986) (court may take judicial
7 notice of records and reports of state administrative bodies), *abrogated on other grounds by*
8 *Astoria Fed. Sav. & Loan Ass’n v. Solimino*, 501 U.S. 104, 111 (1991); *Interstate Nat. Gas. Co. v.*
9 *S. Cal. Gas. Co.*, 209 F.2d 380, 385 (9th Cir. 1953) (judicially noticing government agency
10 records and reports); *Cnty. of Santa Clara v. Trump*, 250 F. Supp. 3d 497, 520 n. 5, 522, n. 8, and
11 523, n. 11 (N.D. Cal. 2017) (taking judicial notice of government memoranda and letters).

12 **Exhibits 10-28** are judicially noticeable because the statements of government officials or
13 entities contained within these exhibits are not subject to reasonable dispute, as the statements
14 “can be accurately and readily determined from sources whose accuracy cannot reasonably be
15 questioned.” Fed. R. Evid. § 201(b)(2).

1 Dated: June 24, 2019

Respectfully submitted,

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EXHIBIT 10



February 2017

SOUTHWEST BORDER SECURITY

Additional Actions
Needed to Better
Assess Fencing's
Contributions to
Operations and
Provide Guidance for
Identifying Capability
Gaps

El Centro, California

Sector profile

The geography of El Centro is largely desert, but also includes rugged mountains, agricultural areas, a designated wilderness area, and several military reservations. Cities near the border include Mexicali, Mexico (population 900,000) and Calexico, CA (population 40,000).

Land border	70 miles
Land area	107,750 square miles
Border zones / interior zones	20 / 30
Primary fencing	59 miles
Patrol roads	214 miles
Agents assigned	1004
Funds obligated for tactical infrastructure operations and maintenance (FY 2015)	\$3.7 million
Percentage of total estimated known illegal entries in southwest border zones recorded in the El Centro sector (FYs 2013-2015)	4 percent

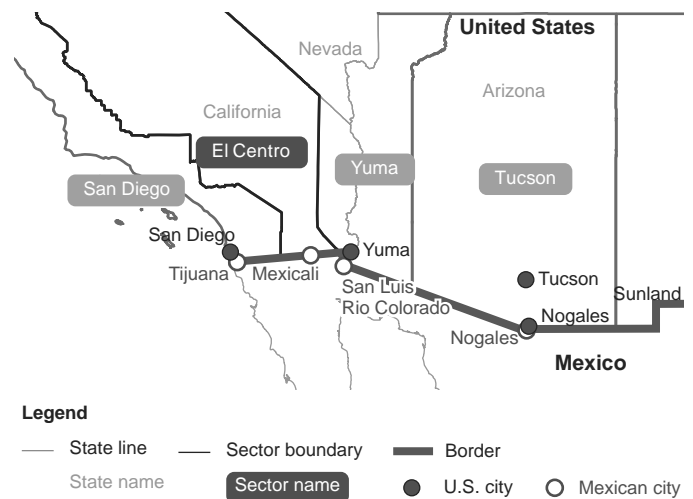
Source: U.S. Customs and Border Protection. | GAO-17-331

Note: FY: Fiscal Year. Zone counts are as of Sept. 2015; miles and layers of fencing, Sept. 2016; patrol roads, Nov. 2015; agents assigned, Sept. 2015.

Fencing overview

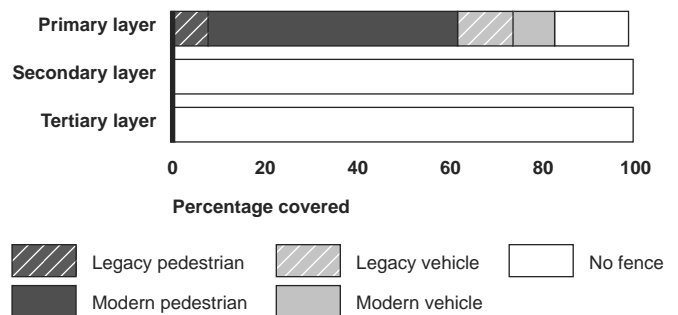
About nine percent of all miles of primary fencing along the southwest border are located in the El Centro sector, where three of the sector's 20 border zones are completely covered by pedestrian fencing and an additional 11 border zones are partially covered by pedestrian fencing. Border Patrol agents recorded approximately 30 percent of estimated known illegal entries in the sector in fiscal years 2013-2015 in the three border zones partially covered by legacy pedestrian fencing, where agents had apprehension rates of 60 percent. Agents recorded 23 percent of estimated known illegal entries in the six border zones without any pedestrian fencing and apprehended 70 percent of illegal entrants in those zones. Border Patrol agents in the sector had an estimated overall apprehension rate of 67 percent, higher than the 56 percent apprehension rate for the southwest border as a whole.

Sector map



Source: U.S. Customs and Border Protection; MapInfo (map). | GAO-17-331

Percentage of sector border miles covered by fencing, by layer, type, and design (September 2016)



Source: GAO analysis of U.S. Customs and Border Protection data. | GAO-17-331

Note: Due to rounding, percentages may not total 100.

Estimated known illegal entries in border zones, by fencing type, design, and coverage, fiscal years 2013-2015

Primary fence type (2015) (number and percent of border zones)	Total estimated known illegal entries		Estimated known drive throughs	Estimated known turn backs and got aways		Apprehension rate of estimated known entrants
	Number	Percentage	Number	Number	Percentage	Percentage
No fence (2, 10%)	6,147	12	9	1,814	11	70
Pedestrian fence (PF) total (11, 55%)	32,001	61	0	11,896	69	63
<i>Modern PF complete coverage (2, 10%)</i>	2,273	4	0	617	4	73
<i>Modern PF partial coverage (5, 25%)</i>	9,178	17	0	3,560	21	61
<i>Legacy PF partial coverage (3, 15%)</i>	15,426	29	0	6,177	36	60
<i>Mixed PF complete coverage (1, 5%)</i>	5,124	10	0	1,542	9	70
Mixed vehicle fence (VF) partial coverage (4, 20%)	5,947	11	19	1,505	9	75
Mixed PF/VF complete coverage (3, 15%)	8,508	16	6	1,980	12	77
Total (20, 100%)	52,603	100	34	17,195	100	67

Source: GAO analysis of U.S. Customs and Border Protection data. | GAO-17-331

Note: "Mixed" fencing coverage refers to border zones with a mixture of legacy and modern fencing designs. Due to rounding, percentages may not total 100.

El Paso, New Mexico and Texas

Sector profile

The sector includes mountains, deserts, irrigation canals, and rivers and just over a half of the sector area consists of small towns and isolated rural areas. The international border separates the cities of Ciudad Juarez, Mexico (population 1.3 million) and El Paso, TX (population 670,000).

Land border / river border	180 miles / 88 miles
Land area	125,000 square miles
Border zones / interior zones	39 / 41
Primary fencing	166 miles
Patrol roads	465 miles
Agents assigned	2,364
Funds obligated for tactical infrastructure operations and maintenance (FY 2015)	\$5.9 million
Percentage of total estimated known illegal entries in southwest border zones recorded in the El Paso sector (FYs 2013-2015)	5 percent

Source: U.S. Customs and Border Protection. | GAO-17-331

Note: FY: Fiscal Year. Zone counts are as of Sept. 2015; miles and layers of fencing, Sept. 2016; patrol roads, Nov. 2015; agents assigned, Sept. 2015.

Fencing overview

Approximately 25 percent of all primary border fencing miles along the southwest border are located in the El Paso sector, as well as about a third of all secondary and tertiary fencing. Agents recorded about 67 percent of estimated known illegal entries in border zones partially covered with pedestrian fencing and eight percent in zones with complete pedestrian fencing. Agents recorded the lowest estimated zone apprehension rate on the southwest border (17 percent) in the three border zones in the sector that are completely covered by modern pedestrian fencing; four percent of total estimated known illegal entries were recorded in these zones. Agents recorded 25 percent of estimated known illegal entries in the sector in border zones with no pedestrian fencing, where the estimated apprehension rate ranged from 52 to 58 percent.

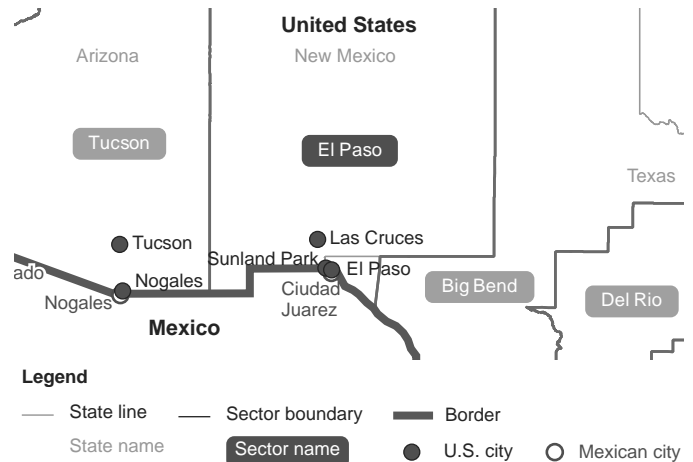
Estimated known illegal entries in border zones, by fencing type, design, and coverage, fiscal years 2013-2015

Primary fence type (2015) (number and percent of border zones)	Total estimated known illegal entries		Estimated known drive throughs	Estimated known turn backs and got aways		Apprehension rate of estimated known entrants
	Number	Percentage	Number	Number	Percentage	Percentage
No fence (7, 18%)	8,021	13	15	3,848	11	52
Pedestrian fence (PF) total (21, 54%)	41,066	68	1	27,667	78	33
<i>Modern PF complete coverage (3, 8%)</i>	2,661	4	0	2,203	6	17
<i>Modern PF partial coverage (13, 33%)</i>	18,534	30	1	12,474	35	33
<i>Legacy PF partial coverage (2, 5%)</i>	7,072	12	0	5,391	15	24
<i>Mixed PF complete coverage (1, 3%)</i>	2,273	4	0	1,689	5	26
<i>Mixed PF partial coverage (2, 5%)</i>	10,526	17	0	5,910	17	44
Vehicle fence (VF) total (9, 23%)	7,004	12	14	2,919	8	58
<i>Modern VF partial coverage (7, 18%)</i>	5,454	9	7	2,334	7	57
<i>Legacy VF partial coverage (1, 3%)</i>	703	1	6	406	1	42
<i>Mixed VF partial coverage (1, 3%)</i>	847	1	1	179	1	79
Mixed PF/VF partial coverage (2, 5%)	4,737	8	2	1,188	3	75
Total (39, 100%)	60,828	100	32	35,622	100	41

Source: GAO analysis of U.S. Customs and Border Protection data. | GAO-17-331

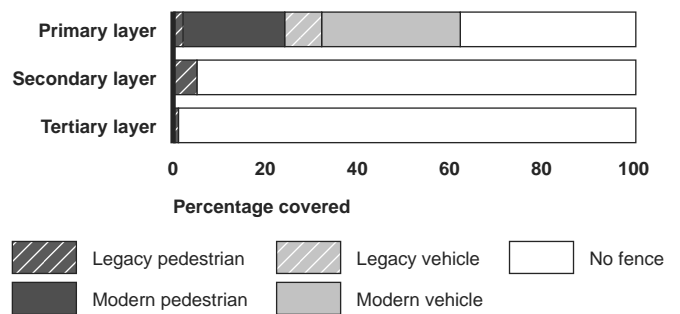
Note: "Mixed" fencing coverage refers to border zones with a mixture of legacy and modern fencing designs. Due to rounding, percentages may not total 100.

Sector map



Source: U.S. Customs and Border Protection; MapInfo (map). | GAO-17-331

Percentage of sector border miles covered by fencing, by layer, type, and design (September 2016)



Source: GAO analysis of U.S. Customs and Border Protection data. | GAO-17-331

EXHIBIT 11

[\(https://instagram.com/customsborder/\)](https://instagram.com/customsborder/) [\(https://www.flickr.com/photos/cbpphotos/\)](https://www.flickr.com/photos/cbpphotos/)
 [\(https://twitter.com/cbp\)](https://twitter.com/cbp) [\(https://www.linkedin.com/company/2997?trk=tyah\)](https://www.linkedin.com/company/2997?trk=tyah)
 [\(https://www.youtube.com/user/customsborderprotect\)](https://www.youtube.com/user/customsborderprotect)



U.S. Customs and
Border Protection
(/)

Border Patrol Arrests Man Attempting to Smuggle Meth and Heroin

Release Date: June 20, 2019

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents working at the Highway 86 immigration checkpoint arrested a man suspected of smuggling methamphetamine and heroin Wednesday morning.

The incident occurred at approximately 7:40 a.m., when a 21-year-old man drove a white 2006 Nissan Xterra to the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered 14 packages hidden inside all four tires of the vehicle. Agents determined that the substances in the packages were consistent with the characteristics of methamphetamine and heroin.

The total weight of the 10-methamphetamine packages discovered was 78 pounds with an estimated value of \$179,400.

The total weight of the four heroin packages was 10.5 pounds with an estimated value of \$241,500.

The man, a United States citizen, the vehicle, and the narcotics were turned over to the Drug Enforcement Administration (DEA).



Smugglers stuff a car's tires with more than \$400K of hard narcotics.

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Last modified: June 21, 2019

Tags: **Border Security, U.S. Border Patrol, Smuggling**

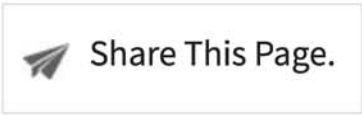


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**U.S. Customs and
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Border Patrol Seizes Meth at Checkpoint

Release Date: June 14, 2019

NILAND, Calif. – El Centro Sector (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents working at the Highway 111 immigration checkpoint arrested a man suspected of smuggling methamphetamine Friday morning.

The incident occurred at approximately 7:23 a.m., when a 55-year-old man driving a gold 1992 Jaguar Sovereign approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered 24 packages hidden inside of the vehicle's rocker panels. Agents determined that the substance in the packages was consistent with the characteristics of methamphetamine.

The total weight of the methamphetamine discovered was 48.3 pounds, with an estimated value of \$111,090.

"This seizure demonstrates the vital role our canine teams perform in detecting dangerous drugs thus keeping these off our streets which safeguards our communities," said El Centro Sector Chief Patrol Agent Gloria I. Chavez.

The man, a Mexican citizen, the vehicle, and the narcotics were turned over to the Drug Enforcement Administration (DEA).

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Last modified: June 17, 2019

Tags: **Border Security, Smuggling, U.S. Border Patrol**

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Border Patrol Arrests Man Attempting to Smuggle Meth

Release Date: June 3, 2019

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents working at the Highway 86 immigration checkpoint arrested an individual suspected of smuggling methamphetamine Saturday morning.

The incident occurred at approximately 11:55 a.m., when a 27-year-old man driving a black 2012 Jeep Wrangler approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered 22 packages hidden inside a spare tire that was mounted on the rear door. Agents determined that the substance in the packages was consistent with the characteristics of methamphetamine.

The total weight of the methamphetamine discovered was 24.85 pounds, with an estimated value of \$57,155.

The man, a United States citizen, the vehicle, and the narcotics were turned over to the Drug Enforcement Administration (DEA).



Agents discover meth stashed inside a spare tire.

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Last modified: June 3, 2019

Tags: **Border Security, Smuggling, U.S. Border Patrol**

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U.S. Customs and Border Protection

Border Patrol Agents Seize more than \$1M in Narcotics at Checkpoint

Release Date: April 18, 2019

SALTON CITY, Calif. – El Centro Sector Border Patrol agents assigned to the Highway 86 immigration checkpoint arrested a man suspected of smuggling fentanyl and methamphetamine valued at more than \$1 million on Wednesday afternoon.

The incident occurred at approximately 5:35 p.m., when 24-year-old Mexican man who had valid Border Crossing Card approached the checkpoint driving a gray Nissan Versa.

Agents referred the man to secondary inspection for further examination of his documents and vehicle.

At secondary inspection, agents investigated further and discovered 33 packages concealed in an aftermarket floorboard located in the front passenger and rear passenger area. The packages were examined and tested positive for the characteristics of fentanyl and methamphetamine.

There were eight packages wrapped in cellophane containing fentanyl, weighing 18.33 pounds with an estimated street value of \$997,680. The remaining 25 packages were wrapped in black tape and contained methamphetamine, totaling 30.27 pounds with an estimated street value of \$69,261.

The combined street value of all the narcotics seized was \$1,066,941.

“Stopping this narcotics trafficking event represents a significant seizure and undoubtedly softened the blow to our communities that the opioid crisis is causing,” said David S. Kim, Assistant Chief Patrol Agent. “Our agents deserve all the credit for the hard work and dedication they display everyday to keep our communities safe.”



Agents stop man with dangerous drugs in his car.

The subject, narcotics and vehicle were turned over to the Drug Enforcement Administration for further investigation.

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Last modified: April 24, 2019

Tags: **Border Security, U.S. Border Patrol, Smuggling**

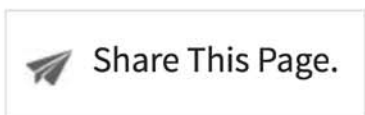


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El Centro Sector Border Patrol Seizes more than 100 Pounds of Meth

Release Date: April 17, 2019

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents working at the Highway 86 immigration checkpoint arrested a man suspected of smuggling methamphetamine on Tuesday.

The incident occurred at approximately 1:55 p.m., when a 23-year-old man driving a 2012 burgundy Nissan Altima approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered a black plastic bag that was behind the driver seat of the vehicle. The bag contained a vacuum sealed wrapped bundle. Agents discovered three additional black plastic bags inside the trunk.

Border Patrol agents retrieved a total of 99 bundles from all the plastic bags which contained a crystal like substance. The substance tested positive for the properties of methamphetamine.

The total weight of the methamphetamine discovered was 102.4 pounds, with an estimated value of \$235,520.

The man, a United States citizen, the methamphetamine and vehicle were turned over to the Drug Enforcement Administration.

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Agents find 99 bundles of meth in man's car.

official ports of entry. CBP is charged with securing the borders of the United States while enforcing hundreds of laws and facilitating lawful trade and travel.

Last modified: April 18, 2019

Tags: **Border Security, Smuggling, U.S. Border Patrol**

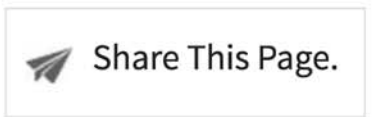


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Border Patrol Arrests Woman Attempting to Smuggle Meth

Release Date: March 18, 2019

SALTON CITY, Calif. – **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents working at the Highway 86 immigration checkpoint arrested a woman suspected of smuggling methamphetamine on Saturday.

The incident occurred at approximately 5:47 p.m., when a 26-year-old woman driving a black Nissan Altima approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered several packages hidden inside the gas tank of the vehicle. Agents determined that the substance was consistent with the characteristics of methamphetamine.

The total weight of the methamphetamine discovered was 43.98 pounds, with an estimated value of \$145,100.

The woman, a Mexican citizen, the methamphetamine and vehicle were turned over to the Imperial County Sheriffs' Office Border Crime Suppression Team.

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Agents pull more than 43 lbs. of meth from gas tank.

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Methamphetamine Seized at Border Patrol Checkpoint

Release Date: February 19, 2019

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents working at the Highway 86 immigration checkpoint arrested two women suspected of smuggling methamphetamine Friday evening.

The incident occurred at approximately 8:30 p.m., when a passenger bus approached the checkpoint. Agents referred the bus to secondary inspection for an immigration inspection of the occupants.

While in secondary inspection, a Border Patrol canine detection team alerted to two unclaimed luggage bags that were in the overhead bin compartment. Upon inspecting the contents of the bags, Border Patrol agents found 31 small packages wrapped in cellophane. The agents tested the packages; it was determined that the content was consistent with the characteristics of methamphetamine.

Upon further investigation, agents were able to determine the proprietors of the bags and arrested a 19-year-old and 16-year-old Mexican national.

The total weight of the methamphetamine discovered was 10.4 pounds, with an estimated street value of \$27,560.

Both subjects and the narcotics were turned over to Drug Enforcement Administration.

In fiscal year 2019, El Centro Sector agents have seized more than 1,096 pounds of methamphetamine, amounting to over \$2.5 million.

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Border Patrol Stops Two Smuggling Attempts

Release Date: February 8, 2019

SALTON CITY, Calif. – El Centro Sector (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents working at the Highway 86 immigration checkpoint arrested one individual suspected of smuggling methamphetamine. Agents also arrested two more attempting to smuggle suspected illegal aliens on Thursday.

The first incident occurred at approximately 1 p.m., when a 33-year-old man driving a light blue Hyundai approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered several packages of suspected narcotics hidden in the interior upholstery of the all the seat backrests of the vehicle. Agents determined that the substance was consistent with the characteristics of methamphetamine.



Agents discovered meth packages stuffed inside seat backrests.

The total weight of the methamphetamine discovered was 40.6 pounds, with an estimated value of \$107,590.

The man, a Mexican citizen, vehicle and contraband were turned over to the Drug Enforcement Administration (DEA).

The second incident occurred at approximately 10:46 p.m., when a 40-year-old man driving a white tractor trailer accompanied by a 37-year-old woman approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary for further investigation.

After a search of the vehicle, agents discovered three suspected illegal aliens hiding in the trailer. The men, a 38-year-old and 28-year-old Mexican citizens and a 48-year-old Guatemala citizen were determined to be

illegally present in the United States.

The driver, passenger and the three men were placed under arrest and were transported to the Calexico Border Patrol Station for further processing.

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Last modified: February 11, 2019

Tags: **Border Security, Smuggling, U.S. Border Patrol**

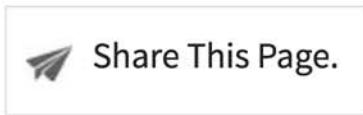


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Border Patrol Arrests Man Attempting to Smuggle Meth

Release Date: February 1, 2019

SALTON CITY, Calif. – **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents working at the Highway 86 immigration checkpoint arrested a man suspected of smuggling methamphetamine on Thursday.

The incident occurred at approximately 4:45 p.m., when a 36-year-old man driving a blue Chevrolet Blazer approached the checkpoint. A Border Patrol canine detection team alerted to the vehicle. Agents sent the vehicle to secondary inspection for further investigation.

While in secondary inspection, Border Patrol agents discovered 14 packages hidden inside the air conditioner blower. Agents determined that the substance was consistent with the characteristics of methamphetamine.

The total weight of the methamphetamine discovered was 9.88 pounds, with an estimated value of \$26,000.

The vehicle, methamphetamine and subject will be turned over to the Drug Enforcement Administration agency (DEA).



Border Patrol agents pull 14 packages from A/C blower.

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Border Patrol Discovers Liquid Methamphetamine in Gas Tank

Release Date: January 28, 2019

SALTON CITY, Calif. – **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents of the Indio Station assigned to the Highway 86 checkpoint arrested a man suspected of smuggling liquid methamphetamine hidden inside one of his pickup's gas tanks yesterday.

The arrest occurred at approximately 8:50 a.m., when Rene Elizalde, a 22-year-old man approached the Border Patrol checkpoint in a 1997 Ford F-250.

As the vehicle approached the primary inspection booth, a Border Patrol K9 team alerted to the vehicle. The primary agent referred the vehicle for a secondary inspection.

During the secondary inspection, the K9 again alerted to the driver's side of the vehicle. Agents used a fiber-scope camera to search the vehicles two-gas tanks. In one of the gas tanks agents saw a liquid that did not look like gasoline. Agents tested the substance, which yielded positive for the characteristics of methamphetamines.

"Liquid methamphetamine is an extremely dangerous form of the narcotic and thankfully our agents were able to prevent it from advancing further into the United States," said Chief Patrol Agent Gloria I. Chavez. "Our communities are much safer with these drugs off our streets."

The narcotics weighed of 75 pounds with an estimated street value of \$198,750.

Elizalde, a U.S. citizen, the vehicle and the narcotics were turned over to the Drug Enforcement Administration for further investigation.

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Last modified: January 28, 2019

Tags: **Border Security, Smuggling, U.S. Border Patrol**



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Agents Seize Cocaine, Meth in Single Smuggling Attempt

Release Date: January 28, 2019

SALTON CITY, Calif. – **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents assigned to the Highway 86 checkpoint arrested a man suspected of smuggling methamphetamine and cocaine concealed in an aftermarket floor compartment underneath the driver and passenger seats Sunday afternoon.

The arrest occurred at approximately 3:30 p.m., when a 35-year-old Mexican national approached the Border Patrol checkpoint in a brown 2015 Renault Duster Expression.

As the vehicle approached the primary inspection booth, a Border Patrol K9 team alerted to the vehicle. The primary agent referred the vehicle for a secondary inspection.

During the secondary inspection, agents discovered 61 wrapped packages hidden within an aftermarket floor compartment underneath the driver and passenger seats. Of the 61 packages 56-tested positive for the characteristics of methamphetamines. The other five packages tested positive for the characteristics of cocaine.



Agents pulled 61 packages from a man's car

The 56 packages containing methamphetamine had a combined weight of 109.65 pounds with an estimated street value of \$284,856. The five packages containing cocaine weighed a total of 13.12 pounds with a street value of \$170,560.

The vehicle and the narcotics were turned over to the Drug Enforcement Administration for further investigation.

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Last modified: January 28, 2019

Tags: **Border Security, U.S. Border Patrol, Smuggling**

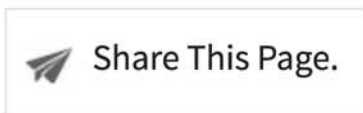


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Ultralight Aircraft Incursion Leads Border Patrol to Meth Seizure and 2 Arrests

Release Date: December 17, 2018

CALEXICO, Calif. – El Centro Sector (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents tracked an ultralight aircraft that made a cross-border incursion from Mexico that lead to a drug seizure and the arrest of two individuals early Sunday morning.

The incident occurred at approximately 12:10 a.m., when agents observed an ultralight aircraft fly over the international border from Mexico into U.S. airspace. The aircraft was operating without any lights. Agents on the ground were able to track the aircraft’s route and observed the aircraft descend just north of Calexico before gaining altitude and flying back towards Mexico.



Agents seize 129.33 lbs. of meth and other items after tracking an ultralight aircraft incursion.

Agents responded to the location and discovered two brown zippered bags lying under heavy brush, a metallic cage and a bicycle in the agricultural field where the aircraft was observed to have dropped in altitude. Agents encountered two individuals in the vicinity who were interviewed and arrested on suspicion they were receiving the dropped narcotics.

At the station, agents unpacked 60 duck taped bundles containing white powder-like substance inside of the two zippered bags that tested positive for the characteristics of methamphetamine. The combined weight of the packages totaled 129.33 lbs., with an estimated value of \$1,422,553.

“The invaluable coordination among CBP components led to the tracking of an ultralight aircraft which resulted in the interdiction of narcotics and arrest of individuals,” said Chief Patrol Agent Gloria I. Chavez. “Ultralight aircraft not only pose a threat to legitimate air traffic in the vicinity, but also to national security. These aircraft are able to carry small payloads of dangerous cargo or dangerous people.”

Both subjects and the narcotics, were turned over to the Drug Enforcement Administration for further

investigation.

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Last modified: May 9, 2019

Tags: **Border Security, U.S. Border Patrol, Smuggling**



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Agents Foil Multiple Methamphetamine Attempts

Release Date: December 10, 2018

SALTON CITY, Calif. – El Centro Sector (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents assigned to the Highway 86 immigration checkpoint thwarted multiple attempts by individuals trying to smuggle methamphetamine over the weekend.

The first incident occurred at approximately 11:50 a.m., Saturday morning, when a female passenger in an unlicensed taxi, approached the checkpoint. During an immigration inspection, agents referred the vehicle to secondary inspection for further investigation.

In secondary, a Border Patrol canine detection team alerted to the passenger side of the vehicle where agents discovered three packages strapped to the stomach area of the female passenger containing a white crystal like substance weighing 3.96 lbs.

The second incident occurred Saturday at approximately 3:50 p.m., when a female driver approached the checkpoint in a grey Nissan Altima. In primary, agents referred the vehicle to secondary inspection for further investigation.

In secondary, a Border Patrol canine detection team alerted to the vehicle and upon further inspection of the vehicle, agents discovered 17 packages containing a white crystal like substance, wrapped in brown tape near the dashboard, weighing a total of 22.14 lbs.

The third incident occurred Sunday morning at approximately 9:58 a.m., when female U.S. citizen approached the checkpoint in a Nissan Altima. During an immigration inspection, agents referred the vehicle to secondary inspection for further investigation.



Border Patrol agents discovered nearly 4 pounds of methamphetamine strapped to the stomach of a female

In secondary, a Border Patrol canine detection team alerted to the vehicle and upon further inspection, agents discovered several packages containing a white crystal like substance in the vehicles floorboard weighing a total of 56.7 lbs.

The fourth incident occurred at approximately 7:50 p.m., Sunday evening, when another unlicensed taxi approached the checkpoint. During an immigration inspection, agents referred the vehicle and passengers to secondary inspection for further investigation.

In secondary, agents discovered one black package strapped to the stomach area of a 16-year-old male U.S. citizen. The package contained a white crystal like substance weighing 3.27 lbs.

“Our Border Patrol agents from the Indio Station did an outstanding job of interdicting almost 90 pounds of methamphetamine over the weekend,” said Chief Patrol Agent Gloria I. Chavez. “Drug smugglers going through our checkpoints will be caught and charged to the fullest extent of the law..”All of the packages seized from all four incidents were examined and tested positive for the characteristics of methamphetamine.

The combined weight of the packages seized totaled 87.07 lbs., with an estimated value of \$228,085.

The subjects and narcotics were turned over to the Drug Enforcement Administration and the Imperial County High Intensity Drug Trafficking Area team for further investigation.

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Last modified: December 12, 2018

Tags: **Border Security, Smuggling, U.S. Border Patrol**



Nearly 57 pounds of methamphetamine were discovered in the vehicle floorboard

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Border Patrol Agents Intercept Smuggling Attempt

Release Date: November 5, 2018

CALEXICO, Calif. – El Centro Sector Border Patrol Agents assigned to the Calexico Station successfully disrupted an attempt to smuggle narcotics into the United States Saturday morning.

At around 2 a.m., agents assigned to an area, approximately two miles east of the Calexico Port of Entry, observed an object that appeared thrown over the international boundary fence with Mexico, into the United States.

Border Patrol agents conducted a brief search before encountering a female suspect in the yard of a nearby apartment complex. Agents noted that the woman appeared to be concealing a large purse behind her back.

After receiving consent to search the purse, Border Patrol agents discovered two football-shaped bundles wrapped in a clear plastic material.

Agents performed a test to uncover the contents of the packages and determined that the bundles contained methamphetamine.

The combined weight for both packages of methamphetamine was 4.2 pounds with a total street value of \$11,130.

“This is yet another excellent display of the diligence in which our agents protect our community and our country,” said Chief Patrol Agent Gloria I. Chavez.

The narcotics and woman, a 26-year-old USC, were turned over to the Drug Enforcement Agency (DEA).

U.S. Customs and Border Protection is the unified border agency within the Department of Homeland Security charged with the management, control and protection of our nation's borders at and between official ports of entry. CBP is charged with securing the borders of the United States while enforcing hundreds of laws and facilitating lawful trade and travel.

EXHIBIT 25

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[U.S. Customs and Border Protection \(@cbp\) on Twitter](https://twitter.com/cbp) [U.S. Customs and Border Protection on LinkedIn](https://www.linkedin.com/company/2997?trk=tyah)
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U.S. Customs and
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Border Patrol Seize Meth Hidden Inside a Vehicle

Release Date: October 15, 2018

SALTON CITY, Calif. – **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) Border Patrol agents assigned to the Highway 86 immigration checkpoint arrested a Mexican national suspected of smuggling methamphetamine hidden in her vehicle Friday afternoon.

The incident occurred at approximately 12:30 p.m., when a 26-year-old woman approached the checkpoint in a white Dodge crossover.

During an immigration inspection, agents referred the vehicle to secondary inspection for further investigation.

In secondary, a Border Patrol canine detection team alerted to the vehicle. Agents conducted a thorough search, which revealed 12 packages concealed behind the vehicle’s engine in the area of the firewall.

The packages were examined and tested positive for the characteristics of methamphetamine. The combined weight of the packages totaled 19.52 pounds, with an estimated value of \$51,728.

“This drug seizure is a testament to the hard work our agents are doing on a daily basis,” said Chief Patrol Agent Gloria I. Chavez. “The communities of this great nation are a little safer today.”



Agents discovered 12 packages of meth in engine compartment.

The woman, a Mexican national, was turned over to the Drug Enforcement Administration along with the vehicle and narcotics for further investigation.

So far, in fiscal year 2019, El Centro Sector agents have seized 36.68 pounds of methamphetamine, valued over \$97,000.

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Last modified: October 15, 2018

Tags: **Border Security, U.S. Border Patrol, Smuggling**



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EXHIBIT 26

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U.S. Customs and Border Protection

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Alien Smuggling Warrant Yields Arrests of Gang Members and Weapons

Release Date: October 10, 2018

EL CENTRO, Calif. – U.S. Border Patrol agents assigned to the **El Centro Sector** (</border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california>) served a search warrant on a house in El Centro that led to the arrests of two smugglers, eight illegal aliens, 3.75 grams of methamphetamine, and a cache of weapons.

An investigation into alien smuggling led Border Patrol agents to a house on the 500 block of Vine Street in El Centro this morning to serve a search warrant. The warrant was served without incident and 10 individuals were taken into custody. Eight of those taken into custody were illegal aliens.

The other two, a 50-year-old man and a 28-year-old man, both United States citizens, were arrested on suspected human smuggling charges. The 28-year-old man is also known to be a local gang member with “La Garra Sur” in Calexico.

A search of the house uncovered a cache of weapons, five rifles and four handguns. Agents also seized 3.75 grams of methamphetamine, drug paraphernalia, body armor, and \$5,325 in U.S. currency.

“This is a sobering reality that illustrates the danger and high stakes that criminal organizations involved in human smuggling pose to law enforcement officers, those they smuggle, and our communities,” said Chief Patrol Agent Gloria I. Chavez. “The dedicated agents of El Centro Sector and our partners will root out criminal organizations operating in the Imperial Valley wherever they may be, ensuring that they have no safe haven.”

The two smuggling suspects are in federal custody pending prosecution for violations of federal law. The



Agents seize a cache of weapons, currency, drugs and other illicit items from home.

eight illegal aliens are being held as material witnesses.

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Last modified: October 11, 2018

Tags: **Border Security, Search and Seizure, U.S. Border Patrol**

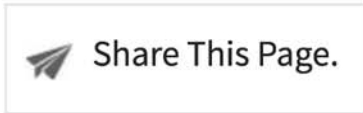


EXHIBIT 27

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U.S. Customs and
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Border Patrol Seize Heroin from Body Carrier

Release Date: October 9, 2018

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents assigned to the Highway 86 immigration checkpoint arrested a United States citizen suspected of smuggling heroin concealed around his waist the morning of Oct. 5th.

The incident occurred at approximately 11:30 a.m., when a 31-year-old man approached the checkpoint as a passenger in a blue Acura coupe.

During an immigration inspection of the occupants, agents referred the vehicle to secondary inspection for further investigation.

In secondary, a Border Patrol canine detection team alerted to the vehicle and agents discovered two sealed packages placed between his buttocks and taped in place.

Agents examined the packages, which tested positive for the characteristics of heroin. The combined weight of the packages totaled more than one-half pound (281.77 grams) with an estimated value of \$21,132.

“This seizure is an example of the great work of the men and women of the El Centro Sector,” said Chief Patrol Agent Gloria I. Chavez. “Our community is a safer place because of the vigilance our agents demonstrate on a daily basis.”

The man and the narcotics were turned over to the High Intensity Drug Trafficking Area (HIDTA) team for further investigation.

In the last fiscal year, El Centro Sector agents seized more than 50 pounds of heroin, valued more than \$1 million.

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Last modified: October 11, 2018

Tags: **Border Security, U.S. Border Patrol, Smuggling**

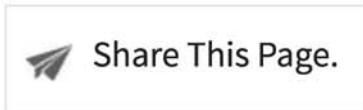


EXHIBIT 28

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U.S. Customs and Border Protection

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DACA Recipient Arrested by Border Patrol for Smuggling Meth

[español \(/newsroom/local-media-release/patrulla-fronteriza-arresta-beneficiario-de-daca-por-contrabandear?language=es\)](#)

Release Date: October 3, 2018

SALTON CITY, Calif. – El Centro Sector (/border-security/along-us-borders/border-patrol-sectors/el-centro-sector-california) Border Patrol agents assigned to the Highway 86 immigration checkpoint arrested a Deferred Action for Childhood Arrivals (DACA) recipient of Mexico suspected of smuggling methamphetamine hidden in the trunk of his vehicle Tuesday morning.

The incident occurred at approximately 11:24 a.m., when a 22-year-old man approached the checkpoint in a grey Kia Optima.

During an immigration inspection, agents referred the vehicle to secondary inspection for further investigation.

In secondary, a Border Patrol canine detection team alerted to the vehicle and agents discovered 14 vacuum-sealed packages concealed inside of the vehicle's trunk.

The packages were examined and tested positive for the characteristics of methamphetamine. The combined weight of the packages totaled 17.14 pounds, with an estimated value of \$34,284.

“Every drug seizure our agents make is an important step forward to secure our streets from dangerous narcotics and dangerous people,” said Chief Patrol Agent Gloria I. Chavez. “I commend our agents for the hard work and dedication in keeping our communities safe.”

The man was turned over to the Drug Enforcement Administration along with the vehicle and narcotics for



*More than 17 lbs. of meth was
discovered inside a car trunk.*

further investigation.

In the last fiscal year, El Centro Sector agents have seized more than 1646.91 pounds of methamphetamine, valued over \$4.3 million.

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Last modified: October 4, 2018

Tags: **Border Security**, **Smuggling**, **U.S. Border Patrol**



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CERTIFICATE OF SERVICE

Case Name: **California, et al. v Trump, et al.**
(Border Wall 2019)

No. **4:19-cv-00872**

I hereby certify that on June 24, 2019, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **PLAINTIFF STATES OF CALIFORNIA AND NEW MEXICO'S REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING SECTIONS 284, 8005, AND 9002, AND OPPOSITION TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT;**
- **PLAINTIFF STATES OF CALIFORNIA AND NEW MEXICO'S SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE RE: REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING SECTIONS 284, 8005, AND 9002, AND OPPOSITION TO DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT; and**
- **DECLARATION OF MICHAEL CAYABAN IN SUPPORT OF PLAINTIFF STATES OF CALIFORNIA AND NEW MEXICO'S REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING SECTIONS 284, 8005, AND 9002, AND IN OPPOSITION TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on June 24, 2019, at Sacramento, California.

L. Aguirre
Declarant


Signature