

Memorandum



Subject Disclosure re Use of Advertisements	Date March 7, 2012
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To
Defense Counsel

From
United States Attorney's Office

HSI Special Agent [REDACTED] is in possession of information that, in or about November 2011, two drug transportation brokers made statements that an advertisement was placed in a Mexican newspaper (likely "El Mexicano") soliciting persons to drive vehicles from the Republic of Mexico into the United States, that persons responding to the advertisement would be offered employment picking up vehicles in the United States and bringing them to Mexico, and that, at some point, certain of the persons would be tricked into unknowingly crossing drugs, or some type of contraband, into the United States.

In late January 2012, HSI Special Agent [REDACTED] came into possession of information that at least five or six groups of drug trafficking recruiters in the Baja California border region have placed help wanted advertisements in Mexican publications. The advertisements are used to recruit drug couriers, although they appear to offer employment. One recruiter said that he pays the drivers that he hires through the advertisements \$200 per job and that the drivers do not know that they are bringing drugs into the United States. The advertisement allegedly placed by this recruiter ran in "La Frontera."

In mid-February 2012, HSI Special Agent [REDACTED] came into possession of information that an individual in the Baja California border region was, for an unknown extended period of time, placing newspaper advertisements seeking drivers to import goods into the United States. Individuals who responded to the advertisement and accepted were to be paid approximately \$100 for driving the vehicles and did not know that they would be transporting narcotics into the United States.

There is additional information which, although may not be material to your client's case, could be disclosed to you. This information consists of Reports of Interviews of individuals in drug importation cases who have claimed to have responded to help-wanted newspaper advertisements, and some of the advertisements themselves. However, the disclosure of the ROI's will require a Protective Order.

This information may exceed the scope of discovery mandated by law and, to that extent, is provided voluntarily and solely as a matter of discretion. By providing this information, the United States does not waive its right to object to any future discovery requests on this or other topics, and does not waive any objection to the admissibility of the above-referenced information.