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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALAM RAZUKI (1),
SYLVIA GONZALES (2),
and
ELIZABETH JUAREZ (3),

Defendants.

Case No.:

18MJ5915

COMPLAINT

Title 18, United States Code, Section 956 -
Conspiracy to kill, kidnap, maim an individual
Title 18, United States Code, Section 1201(c) -
Conspiracy to kidnap

The undersigned complainant being duly sworn states:

COUNT 1

On a date unknown and continuing through on or about November 16, 2018, within the Southern District of California, defendants SALAM RAZUKI, SYLVIA GONZALES, and ELIZABETH JUAREZ did knowingly and intentionally conspire to commit at a place outside the United States, to wit: Mexico, an act that would constitute the offense of murder, kidnapping or maiming if committed in the special maritime and territorial jurisdiction of the United States, in violation of Title 18, United States Code, Section 956.

COUNT 2

1
2 On a date unknown and continuing through on or about November 16, 2018, within
3 the Southern District of California, defendants SALAM RAZUKI, SYLVIA GONZALES,
4 and ELIZABETH JUAREZ did conspire with one another to willfully seize, confine,
5 inveigle, kidnap, abduct and carry away N.M. for another purpose, to wit: intimidation and
6 murder, and to transport N.M. in foreign commerce from the United States to Mexico, in
7 violation of Title 18, United States Code, Section 1201(c).

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9 And the complainant states that this complaint is based on the attached statement of
10 facts, which is incorporated herein by reference.

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12 
13 MICHELLE HART
14 FBI Special Agent

15 Sworn to before me and subscribed in my presence

16 this 16 day of November, 2018.

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19 HONORABLE WILLIAM V. GALLO
20 UNITED STATES MAGISTRATE JUDGE
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Probable Cause Statement

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3 On or about October 17, 2018, SALAM RAZUKI and SYLVIA GONZALES met
4 with a Confidential Human Source (CHS1) requesting CHS1 arrange to kill one of their
5 business associates, N.M.¹ According to RAZUKI and GONZALES, they had invested in
6 multiple properties and business ventures together and were now involved in a civil dispute
7 over their assets. RAZUKI and GONZALES told CHS1 that they wanted CHS1 to “shoot
8 him [N.M.] in the face,” “to take him to Mexico and have him whacked,” or kill him in
9 some other way. RAZUKI and GONZALES provided CHS1 a picture of N.M., which
10 CHS1 provided to the FBI.

11 On or about November 5, 2018, CHS1 met with GONZALES at The Great Maple
12 in San Diego, CA. During the meeting, GONZALES asked if CHS1 could “get rid of
13 Salam’s [RAZUKI] other little problem, [N.M.], because it looks like they’re going to
14 appeal.... I would love for him [N.M.] to go to TJ and get lost. Just leave him over there.”
15 GONZALES said the civil dispute between her, RAZUKI, and N.M. was over \$44 million
16 dollars. GONZALES went on to say, “It’s no joke, Salam [RAZUKI] has a lot of money
17 tied up right now, and he’s paying attorney fees. You need to get rid of this asshole [N.M.],
18 he’s costing me too much money!” GONZALES wanted this to occur before the next
19 court date in their civil suit scheduled on or about November 15, 2018. At a certain point
20 during the conversation, a server was close to their table and GONZALES said, “You don’t
21 have to kill him, you don’t have to put him off the face of the earth.” Despite her words at
22 the time, GONZALES was making a slashing movement across her neck indicating she
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24 ¹ CHS1 has been cooperating with the FBI since 2009 and had provided information,
25 which was vetted and later determined credible, reliably over the years leading to the
26 successful identification and prosecution of drug traffickers, money launderers, and other
27 subjects in numerous FBI criminal investigations. RAZUKI is also a confidential source
28 for the FBI and has been since approximately May 2014. However, RAZUKI has not
informed the FBI of any of his actions, or those of GONZALES or JUAREZ, in attempting
to have N.M. kidnapped and killed.

1 wanted N.M. to be killed. During the conversation, GONZALES advised that there was
2 no reason to involve RAZUKI in planning for the kidnapping of N.M. because “I am the
3 one with the balls, any time they [business partners, including RAZUKI] have a problem,
4 they come after me ... they say Sylvia is like a little ... honey badger ... they’re like send
5 the honey badger after them.”

6 On November or about 8, 2018, CHS1 met with GONZALES at Banbu Sushi Bar
7 and Grill in La Mesa, CA. At the outset of the meeting, GONZALES continued to
8 complain about N.M. and the ongoing civil lawsuit. According to GONZALES, another
9 individual was coming, later identified as ELIZABETH JUAREZ, to talk about how to
10 handle N.M. GONZALES said, “Elizabeth [JUAREZ] right here, Elizabeth is going to
11 give you a proposition also on that problem. She said all you got to do is get him to Mexico
12 and she’ll take care of him over there.” CHS1 asked, “She will?” and GONZALES replied,
13 “Yes, that’s why she’s coming.”

14 Approximately one hour, 20 minutes into GONZALES’ and CHS1’s meeting at
15 Banbu Sushi Bar and Grill, JUAREZ joined them. JUAREZ said that all CHS1 needed to
16 do was to get N.M. down to Mexico and she would take care of the rest. JUAREZ and
17 GONZALES said a lot of people have it out for N.M. so nothing would come back on
18 RAZUKI. GONZALES said she wanted to watch and wanted N.M. to know that it had
19 come from them [GONZALES and RAZUKI], but JUAREZ cautioned GONZALES
20 shouldn’t watch because it would be gruesome and haunt her. JUAREZ said this “wasn’t
21 her first rodeo” and went on to talk about a previous incident involving a female from Vista,
22 CA, who was drugged and kidnapped. CHS1, GONZALES, and JUAREZ discussed a cost
23 of \$2,000 for the job. CHS1 clarified whether GONZALES and JUAREZ wanted this to
24 happen in the United States or Mexico. JUAREZ said, “No, I don’t want it done here [in
25 the United States].” GONZALES added, “No, let’s do it in Mexico because we can’t be
26 charged in the US. Let’s do it in Mexico in case anything comes back to us.” JUAREZ
27 said, “In Mexico it’s easier to make things go away. You pay for your freedom.”
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1 GONZALES and JUAREZ said they wanted to “put the turkey up to roast before
2 Thanksgiving.” After the meeting, CHS1 positively identified a driver’s license photo of
3 ELIZABETH JUAREZ as the individual that joined them and talked of the kidnapping and
4 murder of N.M. This is the same individual observed by FBI agents as joining the meeting
5 as well. GONZALES advised that RAZUKI often referred to N.M. as “the midget” and
6 near the end of the dinner, JUAREZ handed CHS1 her cellphone to take a picture of
7 GONZALES and JUAREZ and said, “You can take a picture of us when we were going to
8 get rid of the midget [decided to kidnap and kill N.M.]”

9 After dinner, CHS1 called GONZALES and confirmed that CHS1 could kidnap and
10 murder N.M. During the call, CHS1 told GONZALES to provide information on N.M.,
11 including his address, what car he drives, and other identifying information. GONZALES
12 asked to meet the next day so she could give CHS1 the information requested.

13 On or about November 9, 2018, GONZALES called CHS1 and asked CHS1 to meet
14 her, RAZUKI, and JUAREZ. During the meeting, RAZUKI’S assistant, GIOVANNA
15 CONTRERAS, was also present in the room, but did not participate in the conversation
16 and had headphones in her ears most of the time. RAZUKI, GONZALES, and JUAREZ,
17 discussed with CHS1 several loans they were trying to secure for their businesses,
18 including cannabis dispensaries, as well as RAZUKI’S frustration with the ongoing civil
19 suit with N.M. At times during the meeting, RAZUKI went to the other side of the room
20 to work, though CHS1 believes it was close enough to overhear the continued conversation
21 between CHS1, GONZALES, and JUAREZ. GONZALES asked CHS1 if CHS1 needed
22 money [for the kidnapping of N.M.] and said she would go get \$1,000, but asked if CHS1
23 wanted the full payment instead. CHS1 indicated that \$1,000 fine for the time being and
24 GONZALES went to the Goldn Bloom Dispensary and returned with \$1,000 cash.
25 Surveillance agents observed GONZALES walk to the Goldn Bloom Dispensary across
26 the street and return.
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1 After the meeting, CHS1 provided agents with \$1000 cash provided by GONZALES
2 as well as an envelope with a piece of paper inside, which had also been provided by
3 GONZALES. The paper had two business addresses for N.M. according to GONZALES
4 in a later meeting.

5 On or about November 13, 2018, GONZALES contacted CHS1 again via phone and
6 informed CHS1 that RAZUKI and GONZALES would be with N.M. in court at the Hall
7 of Justice located at 330 West Broadway, San Diego, CA. GONZALES requested CHS1
8 join them so CHS1 could see N.M. in person. CHS1 declined going into the courtroom,
9 but agreed to stand outside the building and wait for N.M. to exit. While inside the Hall of
10 Justice, GONZALES took a picture of N.M. with her phone and sent it to CHS1 and then
11 called CHS1 and described what N.M. was wearing at the hearing. GONZALES exited
12 the Hall of Justice and met with CHS1 to further discuss the description of N.M., which
13 was recorded. During this meeting, GONZALES explained that "10605 Roselle St." and
14 "9212 Mira Est. Ct 218 SD 92126" were locations of businesses N.M. manages. She did
15 not specifically explain the address, "2815 Camino Del Rio S. #124 San Diego, CA
16 92108." According to GONZALES, the information on the envelope and back of the paper,
17 was to assist CHS1 in locating N.M. for the kidnapping and murder in Mexico.
18 GONZALES also stated during the meeting "if they take him now, it's gunna be good."
19 GONZALES went back into the courthouse and provided CHS1 with updates as N.M. was
20 departing the Hall of Justice to ensure CHS1 observed N.M. as he left. GONZALES told
21 CHS1 that N.M. would be exiting the courthouse and that GONZALES, RAZUKI,
22 JUAREZ, and their attorney would exit after him. FBI agents observed N.M. exit the
23 courthouse after CHS1 had been told this and agents observed RAZUKI, GONZALES,
24 and JUAREZ proceeded on foot to the vehicle they arrived in and departed.

25 In an interview with FBI on November 15, 2018, N.M. advised that he had invested
26 in real estate with RAZUKI in order to lease buildings to various entities – mainly
27 marijuana dispensaries. Later on November 15, 2018, CHS1 met with RAZUKI, which
28

1 was recorded and surveilled by FBI agents. CHS1 said, "I took care of it." RAZUKI
2 replied, "So he will take care of it, or it's done?" CHS1 replied, "Done." RAZUKI quickly
3 changed the subject to discuss other business investments and pending loans. Later in the
4 conversation, CHS1 said, "Well, when I talked to what's her name, she said that she wanted
5 to have proof. Do you want to see it, or are you ok with it?" RAZUKI replied, "No, I'm
6 ok with it. I don't want to see it." Shortly thereafter, CHS1 requested the remainder of the
7 agreed-upon payment and RAZUKI directed CHS1 to follow up with GONZALES for
8 payment.

9 On November 15, 2018, GONZALES was arrested and advised of her Miranda
10 rights and agreed to speak with agents. During her interview, GONZALES admitted the
11 existence of the ongoing civil lawsuit between N.M. and RAZUKI, GONZALES, and
12 JUAREZ, but denied involvement in any conspiracy to kidnap and kill N.M.

13 On November 16, 2018, JUAREZ was arrested and advised of her Miranda rights
14 and agreed to speak with agents. JUAREZ admitted to having the meetings and
15 conversations about kidnapping and killing N.M., but said she didn't think the group would
16 actually go through with it.

17 On November 16, 2018, RAZUKI was arrested and advised of his Miranda rights
18 and agreed to speak with agents. During his interview, RAZUKI admitted the existence of
19 the ongoing civil lawsuit between N.M. and RAZUKI, GONZALES, and JUAREZ
20 involving approximately \$40 million. RAZUKI heard that N.M. was missing, but thought
21 it was a joke and denied involvement in any conspiracy to kidnap and kill N.M.