

UNITED STATES DISTRICT COURT
for the

Eastern District of California

SEALED

United States of America

v.

(1) Jorge CALDERON-CAMPOS, (2) Alberto GOMEZ-SANTIAGO, (3) Byron Adilio ALFARO-SANDOVAL, (4) Johnathan Benjamin TORRES, (5) Jose Angel BELTRAN-CHAIDEZ, (6) and (7) Mark GARCIA.

Case No. 1:22-mj-00060-EPG

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of March 1, 2021 - February 26, 2022 in the county of Kern in the Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 846/841(a)(1) & (b)(1) (A)	Conspiracy to distribute and possess with the intent to distribute controlled substances

This criminal complaint is based on these facts:

See affidavit of HSI Special Agent Cliff Turton Larde, attached hereo and incorporated herein.

Continued on the attached sheet.

Complainant's signature

Cliff Turton Larde, Special Agent, HSI

Printed name and title

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

Telephone _____

Date: Apr 20, 2022

Judge's signature

City and state: Fresno, CA

Hon. U.S. Magistrate Judge Erica P. Grosjean

Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR ARREST WARRANTS ON
CRIMINAL COMPLAINT and SEARCH WARRANTS**

I, Cliff Turton Larde, Special Agent, Homeland Security Investigations, being duly sworn, state:

AFFIANT'S TRAINING AND EXPERIENCE

1. I am an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, § 2510 (7), empowered to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code, § 2516.

2. I am a Special Agent ("SA") with the United States Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"). Prior to working for HSI, I was employed by Immigration and Customs Enforcement ("ICE"), Enforcement and Removal Operations ("ERO") as a Deportation Officer in San Jose, California from January 2018 to March 2019. Prior to working for ERO, I was employed by the United States Border Patrol ("USBP") as a Border Patrol Agent in Nogales, Arizona from December 2010 to December 2017. I have been employed as a SA with HSI since March 2019. During my tenure with HSI, I have completed the Criminal Investigator Training Program ("CITP"), and Homeland Security Investigations Special Agent Training ("HSI-SAT") at the Federal Law Enforcement Training Center ("FLETC") in Glynco, GA. Through my training, I have learned of HSI's criminal investigative authority, as well as investigative techniques. HSI is responsible for enforcing federal criminal statutes prohibiting, among other things, the distribution of and possession with intent to distribute drugs, in violation of Title 21 of the United States Code. I have executed search warrants to seize evidence of violations of federal and state law, as well as arrest warrants to apprehend individuals who have committed such violations. During the course of my employment with HSI, I have assisted in criminal investigations involving cockfighting. I have assisted other agencies in the investigations of persons involved in animal fighting offenses, I am familiar with the actions, traits, habits, and terminology utilized by handlers or owners of chickens involved in animal fighting ventures.

3. During my tenure in law enforcement, I have experience and received training in identifying illegal drugs, learned common trends and concealment methods of narcotics traffickers, physical indicators of narcotics trafficking, and identification of human behavioral indicators of narcotics traffickers. I have also conducted and participated in numerous narcotics-related investigations and arrests, and those investigations or arrests involved unlawful importation, transportation, possession, or distribution of controlled substances, as well as investigations involving narcotics conspiracies, laundering of narcotics proceeds and monetary instruments derived from narcotics activities, and conducting of monetary transactions involving the proceeds of specified unlawful activities.

4. In addition, during my tenure in law enforcement, I have worked with federal, international, state, and local law enforcement agencies, including the U.S. Customs and Border Protection (CBP), Drug Enforcement Agency (DEA), Federal Bureau of Investigation (FBI), Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), Bakersfield Parole (BP), United State Postal Service (USPS), Bakersfield Police Department (BPD), Kern County Sheriff's Office (KCSO), Kern County Probation Department (Kern Probation), and California Highway Patrol (CHP). Working with these different agencies has allowed me to learn from law enforcement officers with a wide range of experiences in drug investigations and other types of criminal activities.

5. Through my training, experience, and conversations with other law enforcement officers, I am familiar with the identification of various controlled substances. I am also familiar with various methods used by individuals to obtain, possess, transport, and/or sell controlled substances. I am also familiar with modus operandi as it pertains to the illegitimate use of such proceeds in violation of federal law. These methods include the use of telephones, cellular telephones, wireless communication technology, counter surveillance, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, and the use of coded or vague communications in age format in an attempt to thwart law enforcement. I have

also interviewed drug dealers, users, and confidential sources and have discussed with them the lifestyle, appearances, and habits and methods of drug dealers and users.

PURPOSE OF AFFIDAVIT

This affidavit is intended to show that there is sufficient probable cause for the requested complaint, arrest warrant, and search warrants, and does not purport to set forth all of my knowledge of the investigation of this matter.

Complaint and Arrest Warrants

6. This affidavit is submitted in support of a request that a complaint and arrest warrants be issued for (1) Jorge CALDERON-CAMPOS (CAMPOS) (2) Alberto GOMEZ-SANTIAGO (GOMEZ-SANTIAGO); (3) Byron Adilio ALFARO-SANDOVAL (ALFARO-SANDOVAL); (4) Johnathan Benjamin TORRES (TORRES); (5) Jose Angel BELTRAN-CHAIDEZ (BELTRAN-CHAIDEZ); (6) _____ ; and (7) Mark GARCIA (GARCIA), charging them with conspiracy to distribute and possess with the intent to distribute heroin and methamphetamine, Schedule I and Schedule II controlled substances, respectively, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A).

Search Warrants

7. This affidavit also is submitted in support of search warrants for the following locations and vehicles, which are further described below and in Attachments A-1 through A-9 (hereby incorporated), and which are collectively referred to hereinafter as the “SUBJECT PREMISES.”

8. It is my opinion, based on my training and experience, and the training and experience of other law enforcement investigators with whom I have spoken, that the items listed in Attachment B, which is incorporated into this affidavit by reference, are items most often associated with the trafficking and distribution of controlled substances, the operation of or engagement in illegal animal fighting ventures, and the proceeds from such illegal operations and unlawful animal fighting ventures.

9. The SUBJECT PREMISES are described below and are believed to contain evidence, fruits, and instrumentalities (as set forth in Attachment B) of the following crimes: conspiracy to distribute and possess with the intent to distribute controlled substances in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and/or operating or participating in an unlawful animal fighting venture, in violation of Title 7, United States Code, Section 2156.

- a. **1906 Belle Terrace, Bakersfield, CA**, as further described in Attachment A-1, attached hereto and incorporated by reference (“CAMPOS’S RESIDENCE”);
- b. **200 East Casa Loma, Bakersfield, CA**, as further described in Attachment A-2, attached hereto and incorporated by reference (“CAMPOS’S STASH HOUSE”);
- c. **125 Stockton Avenue, Arvin, CA**, as further described in Attachment A-3, attached hereto and incorporated by reference (“GOMEZ-SANTIAGO’S RESIDENCE”);
- d. **9451 Fritz Street, Bakersfield, CA**, as further described in Attachment A-4, attached hereto and incorporated by reference (“ORTEGA’S RESIDENCE”);
- e. **4301 Belle Terrace, Apartment 22, Bakersfield, CA**, as further described in Attachment A-5, attached hereto and incorporated by reference (“ANTONIO BELTRAN-CHAIDEZ’S RESIDENCE”);
- f. **1413 Dorian Drive, Bakersfield, CA**, as further described in Attachment A-6, attached hereto and incorporated by reference (“JOSE ANGEL BELTRAN-CHAIDEZ’S RESIDENCE”);

- g. **A tan GMC Sierra, California license plate 8N19756** registered to Alfredo Moreno LEYVA, as further described in Attachment A-7, attached hereto and incorporated by reference (“CAMPOS’S TAN TRUCK”);
- h. **A black Honda Fit, California license plate 7VEB756** registered to Delila G. BELTRAN QUINTERO as further described in Attachment A-8, attached hereto and incorporated by reference (“DELILA’S HONDA”).
- i. **A white Jeep Grand Cherokee, California license plate 8NLA166** registered to Alberto GOMEZ SANTIAGO, as further described in Attachment A-9, attached hereto and incorporated by reference (“GOMEZ-SANTIAGO’S JEEP”);

BASIS FOR FACTS CONTAINED IN THIS AFFIDAVIT

10. I am familiar with the facts and circumstances described herein and make this affidavit based upon personal knowledge derived from my participation in this investigation and upon information I believe to be reliable from the following sources:

- a. My training and experience investigating narcotics traffickers, which includes my discussions with more experienced narcotics investigators;
- b. Oral and written reports about this investigation and other investigations, which I have received from other members of Homeland Security Investigations (HSI), Bakersfield Police Department (BPD), Kern County Sheriff’s Office (KCSO), Kern County Probation Department (Kern Probation), Drug Enforcement Administration (DEA) as well as other federal agents and state law enforcement agencies;
- c. Physical surveillance conducted by HSI, KCSO, DEA, BPD and other law enforcement agencies in this and other investigations, which have been reported to me either directly or indirectly;
- d. Conversations with KCSO Deputies and SAs with the U.S. Department of Agriculture – Office of Inspector General (USDA-OIG), who have experience and expertise in investigating suspected illegal fighting ventures;
- e. Intercepted communications made pursuant to court orders;

- f. Confidential source statements;
- g. Witness statements;
- h. Law enforcement databases; and
- i. Evidence gained through other investigative methods, such as vehicle tracking devices and pole cameras.

11. Except as otherwise noted, when I assert that a statement was made, the information was provided by another federal agent, another law enforcement officer, or a source of information (who may have had either direct or hearsay knowledge of the statement), with whom I have spoken or whose reports or statements I have reviewed. Likewise, information resulting from surveillance, except where otherwise indicated, does not necessarily set forth my own observations but rather has been provided directly or indirectly by other law enforcement officers who conducted such surveillance.

12. This affidavit is submitted for the limited purpose of seeking authorization for the above-referenced arrest and search warrants. Therefore, I have not set forth every fact learned during this investigation. Facts not set forth herein are not relied upon in reaching my conclusion that warrants should be issued.

INTRODUCTION AND SUMMARY OF INVESTIGATION

13. As set forth below, HSI, DEA, KCSO, BPD and its law enforcement partners have developed information that Jorge CALDERON-CAMPOS, aka "AMERICANO," and his co-conspirators are involved in the distribution of controlled substances and offenses violating the Animal Welfare Act in the Eastern District of California and elsewhere.

14. Through a variety of investigative techniques, including Court-authorized electronic surveillance pursuant to Title III wiretap orders, law enforcement discovered that CAMPOS operated a wide-ranging drug trafficking organization (the CAMPOS DTO), and that CAMPOS is heavily involved in illegal cockfighting. Through that investigation, law enforcement identified CAMPOS as a drug distributor importing large quantities of

methamphetamine into the Eastern District of California from a Mexican Cartel member operating in Mexico. Investigators additionally identified at least six Kern County residents who are responsible for distributing large amounts of narcotics in the Eastern District of California. In particular, between March 2021 and February 2022, law enforcement seized in the Eastern District of California more than 86 pounds of methamphetamine and one kilogram of heroin that CAMPOS and his co-conspirators attempted to distribute to other parties.

STATEMENT OF PROBABLE CAUSE

I. PROBABLE CAUSE THAT CAMPOS AND HIS CO-CONSPIRATORS TRAFFICK NARCOTICS

A. Campos Coordinates with Mexico-based Supplier to Distribute 26 Pounds of Methamphetamine with Gomez-Santiago and Mark Garcia.

15. On March 30, 2021, Court-authorized electronic surveillance revealed CAMPOS called a Mexico-based phone number used by a person identified as “Panzon.” During the call, CAMPOS stated, “we are going to give you the boxes. But he is going to send you the boxes there and he is going to leave it for you on the way ... I can pay it... but, it would be a lot of work. For me to send boxes, and for them to drop the boxes off.” Panzon stated, “Tell him to arrange with ... with him, with the dude. Because he had found up to 20... for 20 holes from there.” Panzon later stated, “I was talking to my pal ... I didn’t tell them anything, man, because I tested that stuff myself ... they never got anything bad.” CAMPOS replied, “I have just came with this mate. He gave me two-and-a-quarter back. And another damned.” CAMPOS elaborated, “I gave him some ... ones that came in pairs ... it came sealed in singles.” Panzon responded, “just give me 100 ... Some are not mine ... if he doesn’t want at 1,100, maybe we can get up with one.”

16. Based on my training and experience, the above-described telephone conversation reveals CAMPOS coordinating with Panzon in relation to various aspects of their mutual narcotics distribution activities. For instance, CAMPOS and Panzon spoke about the quality of the narcotics Panzon is believed to have sent to CAMPOS. CAMPOS explained to Panzon that several of his (CAMPOS) customers had returned a portion of the narcotics due to the quality.

CAMPOS stated, "I just came with this mate. He gave me two-and-a-quarter back." Panzon told CAMPOS, "They never got anything bad." CAMPOS further explained that not all the narcotics were of bad quality. CAMPOS stated he (CAMPOS) gave a customer "some of the ones that came in pairs... and some came... they came by themselves." Based on my training and experience, CAMPOS was referring to the packaging of the narcotics. CAMPOS explained some of the narcotics were packaged in pairs (referring to two pounds per package) and others in singles (one pound per package). Based on my training and experience, I know narcotics traffickers frequently use code words for narcotics while speaking on the telephone. As set forth below, a short time after this conversation, law enforcement arrested a person whom CAMPOS had supplied with narcotics. The subject was in possession of methamphetamine that was packaged as both single- and two-pound packages, similar to what was mentioned during the above phone call.

17. Approximately one hour after CAMPOS's phone call with Panzon, law enforcement surveillance units observed a vehicle registered to Mark GARCIA and a vehicle registered to Alberto Gomez (Alberto GOMEZ-SANTIAGO)¹ at a location CAMPOS appears to use as a part-time residence (CAMPOS'S STASH HOUSE).

18. Several hours later, Panzon called CAMPOS and asked CAMPOS. "so what's up? Have they ... have they picked that up from you?" Based on my training and experience, I believe that Panzon was asking CAMPOS if "they" had picked up any narcotics from him (CAMPOS) based on their previous telephone conversation. Panzon informed CAMPOS, "Okay. I just want you to confirm with me to send the girl in the morning, dude. I found someone to go get the green." Based on my training and experience, I know "green" to be a common term narcotic traffickers use to describe currency. Therefore, I believe Panzon is talking about currency when he (Panzon) referred to "the green." During the conversation, Panzon

¹ Law enforcement surveillance units positively identified CAMPOS driving this vehicle registered to GOMEZ-SANTIAGO several times during the course of this investigation. Surveillance units observed CAMPOS operating the black SUV as early as March 23, 2021.

asked CAMPOS to let him know when CAMPOS sold the narcotics so he (Panzon) could send a courier (“girl”) to pick up the currency. Based on my training and experience, I know high-level members of narcotic trafficking organizations often do not want to take on the risk of transporting narcotics/narcotic proceeds, therefore they often use narcotics couriers. In this instance, I believe “the girl” is the courier Panzon and CAMPOS planned to employ.

19. Shortly after CAMPOS’s communications with Panzon, investigators conducted surveillance at one of CAMPOS’s residences in Bakersfield – 1906 Belle Terrace (CAMPOS’S RESIDENCE). At approximately 5:04 PM, investigators observed arriving at the residence the same vehicle registered to GARCIA seen hours earlier at CAMPOS’S STASH HOUSE. Thereafter, investigators observed the driver of the vehicle (who was identified as GARCIA during a later traffic stop, discussed below) meet in the driveway of the residence with a person matching the physical description of CAMPOS.

20. Shortly afterwards, a white Jeep Grand Cherokee later determined by law enforcement to be registered to Alberto GOMEZ-SANTIAGO (GOMEZ-SANTIAGO’S JEEP) arrived at CAMPOS’S RESIDENCE and the driver was observed meeting in the driveway with Garcia and the other individual (believed to be CAMPOS). Based on surveillance units’ observations and photos obtained that day, investigators were able to compare the photos to GOMEZ-SANTIAGO Driver’s License (DL) photo and determine that in fact it was GOMEZ-SANTIAGO. The driver (GOMEZ-SANTIAGO) was observed taking a white box out of GOMEZ-SANTIAGO’s JEEP, and thereafter, GARCIA was observed placing the white box in the trunk of his vehicle and departing the area. GARCIA was observed as the sole occupant of his vehicle

21. Surveillance units followed GARCIA’s vehicle until it was later stopped by law enforcement for a traffic infraction. With GARCIA’s consent, officers searched his vehicle and located a white box in the trunk – similar in appearance to the white box law enforcement observed earlier being transferred from GOMEZ-SANTIAGO’s JEEP to GARCIA’s vehicle.

The box was later searched and found to contain approximately 26 pounds of a substance that later tested positive for methamphetamine.

22. Later, GARCIA's cellular telephone was searched pursuant to a state court-issued search warrant, and investigators discovered that it contained CAMPOS's telephone number saved as "AMERIKANO," a known alias for CAMPOS. GARCIA's cellular telephone also contained several videos and pictures in relation to illegal rooster fights. One of the videos extracted from GARCIA's cellular telephone revealed CAMPOS partaking in an illegal rooster fight at an unknown location. The video depicted a male matching the physical descriptors of CAMPOS and another unidentified male each holding a rooster. CAMPOS and the unidentified male simultaneously released the roosters and the fight commenced. Throughout the duration of the video, in the background, a separate unidentified male, possibly GARCIA, continuously cheered on CAMPOS using the name "George" (CAMPOS's first name, Jorge, is Spanish for "George") and what sounded like a nickname, "Ameri" (presumably shorthand for CAMPOS's known moniker, "Americano").

23. The day following law enforcement's arrest of GARCIA and seizure of approximately 26 pounds of methamphetamine from his vehicle (March 31, 2021), Court-authorized electronic surveillance revealed CAMPOS called Panzon during which, based on my training and experience, CAMPOS reported the arrest of Garcia and seizure of 26 pounds of methamphetamine. Specifically, CAMPOS told Panzon he was "waiting for that jerk to get out," which, based on the timing of the call in relation to law enforcement's arrest/seizure the previous night, I believe CAMPOS was referencing Garcia's arrest, and used the phrase "getting out" to reference Garcia being released from law enforcement's custody. CAMPOS further explained, "It was not bad. I thought... he told him to take a 'tostada' to them ... to take him 25 he tells the person, and he took twenty-five complete ones. That worked well for me." Based on the prior conversation between CAMPOS and Panzon about packaging, I recognize that CAMPOS was referring to single, one-pound packages ("complete ones."). CAMPOS explained to Panzon that "the jerk" (Garcia) was supposed to take the "double ones" (two-pound packages) but instead

took singles. Therefore, CAMPOS concluded that the seizure was not “as bad” because he (CAMPOS) could have lost more methamphetamine than the 26 pounds recovered by law enforcement.

B. CAMPOS Coordinates with Mexico-based Supplier to Distribute 60 Pounds of Methamphetamine with Gomez-Santiago, Alfaro-Sandoval and Torres.

24. On April 7, 2021, Court-authorized electronic surveillance revealed that CAMPOS² discussed an impending narcotics transaction with Panzon. During the conversation Panzon asked CAMPOS, “How many ... how many of those do you have left there? ... I need to see if we take them out right now.” CAMPOS replied, “like 70.” Panzon stated, “I’m going to tell ... Panchito, to pick all of them up now ... What time should he pick them up.” CAMPOS responded, “Let me call Chaparro.” Panzon stated, “I can see if ... this guy can do me the favor, he can take them to where I’m going to need them there.”

25. Based on my training and experience, I believe during the phone call, CAMPOS was coordinating with Panzon to distribute seventy packages (likely one-pound quantities of methamphetamine) to a courier. Panzon further discussed using a courier (“Panchito”) to transport the narcotics to a convenient location. Based on my training and experience, “Panchito” is a commonly used moniker for people named “Francisco,” and as described below, the likely courier Panzon employed consistent with his communication with CAMPOS – Jonathan Benjamin TORRES – was identified by a witness as “Pancho” and “Francisco.” CAMPOS told Panzon he would call “Chaparro,”³ a suspected narcotics associate, to find out what time “Chaparro” could drop off the narcotics to CAMPOS, for “Panchito” to obtain later.

² The caller used (661) 742-9299. Your affiant identified the caller as CAMPOS based on a comparison of his voice with the known voice of CAMPOS from interceptions of the phone CAMPOS used during the March 30, 2021, narcotics-related communications described above. Additionally, while CAMPOS used his prior phone, he commonly used a specific phrase when he answered a telephone call, “Que rollo, Que rollo” (what’s up, what’s up), which the user of (661) 742-9299 also used during the call described above on April 7, 2021.

³ During a search of a cellular telephone possessed that same day by Mark GARCIA (discussed below), GARCIA listed a telephone number known to be used by GOMEZ-SANTIAGO as “Lalo Chaparro.”

26. Based on my training and experience, narcotic traffickers will often keep narcotics in separate locations to thwart law enforcement detection. I believe when CAMPOS told Panzon that he would call "Chaparro" he was referencing GOMEZ-SANTIAGO and that he would need to call him to have him bring the narcotics to CAMPOS at CAMPOS'S STASH HOUSE.

27. Shortly afterwards, investigators conducting physical surveillance observed CAMPOS entering and exiting a building located at 200 E. Casa Loma Drive, Bakersfield (CAMPOS'S STASH HOUSE), and observed CAMPOS's car, a black Chevrolet Silverado pickup truck (CA 97988P2), parked nearby. Surveillance units observed CAMPOS going in and out of CAMPOS'S STASH HOUSE. Later that day, investigators observed GOMEZ-SANTIAGO's JEEP arrive at the same location. The driver (GOMEZ-SANTIAGO) was observed taking two boxes out of the vehicle and into CAMPOS'S STASH HOUSE, and then departing. Shortly afterwards, another vehicle arrived, and the driver and passenger (later identified during a traffic stop as Byron Adilio ALFARO-SANDOVAL and Johnathan Benjamin TORRES) were seen meeting with CAMPOS, and then entering CAMPOS'S STASH HOUSE. ALFARO-SANDOVAL and TORRES exited the building carrying two boxes similar in appearance to the two boxes GOMEZ-SANTIAGO carried inside the property only a short time earlier. ALFARO-SANDOVAL and TORRES loaded the boxes into their vehicle and departed.

28. Investigators followed and observed the vehicle driven by TORRES and ALFARO-SANDOVAL (passenger) proceed to and arrive at the rear of a fenced property at 602 Williams Street, Bakersfield. A short time later, law enforcement observed the vehicle pull through the front gate and stop to the front of the property. One of the occupants of the vehicle exited, approached and locked the gate to the fence surrounding the property, and then returned to and entered the vehicle, after which the vehicle departed.

29. Law enforcement surveillance units followed ALFARO-SANDOVAL and TORRES's vehicle for a few minutes until it arrived at a Bakersfield business believed to be a marijuana dispensary. ALFARO-SANDOVAL and TORRES entered the business empty-

handed, and a short time later, returned to their vehicle and drove away. Shortly afterwards, a CHP officer stopped the vehicle and identified ALFARO-SANDOVAL and TORRES as the occupants but did not locate the two boxes they were seen loading into their vehicle earlier at CAMPOS'S STASH HOUSE.

30. Later that evening, investigators executed a state court-issued search warrant at 602 Williams Street and located a vehicle parked at that address, inside of which were the same two boxes that investigators observed ALFARO-SANDOVAL and TORRES carrying into their vehicle at CAMPOS'S STASH HOUSE and driving to that address earlier that evening. Law enforcement searched the boxes and found approximately 60 pounds of a substance that later tested positive as 99% pure methamphetamine.

31. A law enforcement officer involved in the search warrant execution conducted a recorded interview with a witness at 602 Williams Street. The witness identified a photo of TORRES as a person he knew as "Francisco" and "Pancho" and who, according to the witness, rented one of the mechanic shops at the property. As set forth above, this is consistent with CAMPOS's identification of "Panchito" – a commonly-used moniker for people named "Francisco" – as his intended courier when CAMPOS discussed with Panzon the planned drug transaction shortly before ALFARO-SANDOVAL and TORRES picked-up the methamphetamine at CAMPOS'S STASH HOUSE. The witness explained he had seen Francisco (TORRES) at the property approximately one hour prior to law enforcement arriving to execute the search warrant. The witness also confirmed that he was aware the vehicle in which law enforcement discovered the 60 pounds of methamphetamine belonged to Francisco (TORRES).

32. The day following law enforcement's seizure of the 60 pounds of methamphetamine (April 8, 2022), Court-authorized electronic surveillance revealed Panzon spoke to CAMPOS and asked CAMPOS, "How much did you give to, to Panchito, dude?" CAMPOS replied to Panzon "Fifty-eight (58)." Based on my training and experience I believe that Panzon was confirming with CAMPOS that CAMPOS had turned over the

methamphetamine to Panchito (TORRES) the previous day. Additionally, I believe when CAMPOS stated that he gave him “Fifty-eight (58),” he was referencing giving TORRES approximately fifty-eight pounds of methamphetamine.

C. Campos Coordinates with Beltran-Chaidez to Distribute Heroin. and Jose Angel

33. On January 26, 2022, at approximately 5:54 pm, Court-authorized electronic surveillance of CAMPOS’s cellular phone revealed he spoke to Antonio BELTRAN-CHAIDEZ (hereinafter, “TONY”), whom CAMPOS referred to during the call as “Tony⁴. CAMPOS stated he “needed that black rooster” and asked TONY whether he had one, and “how much” it was. CAMPOS stated he would ask “another buddy” if TONY did not have one. Based on my training and experience, your affiant knows that narcotic traffickers often use coded terminology when discussing narcotics in order to defeat law enforcement detection efforts. Based on the substance of the conversation, your affiant believes CAMPOS was using the term “black rooster” to reference narcotics, specifically heroin (commonly referred to as “black”) and “one” rooster in reference to one kilogram of heroin.

34. Approximately five hours later, Court-authorized electronic surveillance revealed CAMPOS spoke to “TONY” again. During the call, CAMPOS stated that the “guys want, like, three, three of those.” “TONY” stated, “one I could leave for a little less,” and that it was “loose.” “TONY” elaborated, “it’s missing two ... little kids ... I could not tell you if it’s a hundred” (likely a reference to one-hundred percent complete). CAMPOS asked, “how much are you going to give it to me for?” “TONY” eventually replied, “this one is at 17.” “TONY” continued, “there’s two missing. I can leave that one at 15.” Near the end of the conversation, CAMPOS explained he would have them “sleep at the corral.”

35. Based on my training and experience, and knowledge of this investigation, your affiant believes CAMPOS and “TONY” were negotiating a price for the narcotics “TONY” was to provide to CAMPOS. I believe when CAMPOS informed “TONY” that he needed three, CAMPOS was referencing three kilograms of heroin. Based on the substance of the conversation, your affiant believes when “TONY” told CAMPOS that one of the three kilograms was “missing two little kids” he was informing CAMPOS that the kilo of heroin was missing two ounces. During the intercepted communication, CAMPOS and “TONY” continued to discuss the price of the narcotics and ultimately agreed that “TONY” would deliver the narcotics to CAMPOS the following day between 8:00 am and 9:00 am. Based on my knowledge of this investigation, your affiant knows that when CAMPOS mentioned during the call his “corral,” he was referencing CAMPOS’S STASH HOUSE.

36. The next day (January 27, 2022), at approximately 8:51 am, Court-authorized electronic surveillance of CAMPOS’s cellular phone revealed he spoke to “TONY” and indicated he was “on my way.” “TONY” confirmed, “I’ll see you there in 20 to 30” (presumably, minutes). Approximately 45 minutes later, investigators using a Court-authorized pole camera observed that a black Nissan Murano arrived at CAMPOS’S STASH HOUSE. A person later identified as Jose Angel BELTRAN-CHAIDEZ (discussed below)⁵ exited the vehicle, opened the hood of the Nissan Murano, and retrieved a white plastic bag from what appeared to be the engine compartment area. Based on my training and experience, I am aware that drug traffickers commonly conceal their narcotics in vehicles while transporting them in places where they think it is unlikely law enforcement would search for narcotics, such as under the hood.

⁵ As discussed further below, the person who spoke to CAMPOS explained he would be going to CAMPOS’s location, and thereafter, Court-authorized pole camera surveillance revealed that a vehicle arrived at CAMPOS’s property driven by a person later stopped by law enforcement and determined to be Jose Angel BELTRAN CHAIDEZ. Approximately five minutes after Jose Angel BELTRAN CHIDEZ arrived at CAMPOS’s location, Antonio BELTRAN CHAIDEZ called CAMPOS and stated his “brother” was “outside” (Antonio and Jose Angel are believed to be brothers).

37. Approximately five minutes after observing BLETRAN-CHAIDEZ arrive at CAMPOS's STASH HOUSE, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed he spoke to "TONY" and "TONY" informed CAMPOS that his brother was outside (likely a reference to being outside CAMPOS'S STASH HOUSE) waiting for CAMPOS. Investigators monitoring a Court-authorized pole camera in the vicinity of CAMPOS's STASH HOUSE observed the person believed to be BELTRAN-CHAIDEZ enter CAMPOS'S STASH HOUSE while carrying the white plastic bag BELTRAN-CHAIDEZ earlier had retrieved from the engine bay of his vehicle.

38. Shortly afterwards, law enforcement conducting physical surveillance observed BELTRAN-CHAIDEZ depart CAMPOS'S STASH HOUSE in the Nissan Murano and followed him to the vicinity of 4301 Belle Terrace. Aerial surveillance units observed the driver of the Nissan Murano walk to the area of Apartment 22 (ANTONIO BELTRAN-CHAIDEZ RESIDENCE). In addition, law enforcement surveillance units confirmed the area where the driver of the Nissan Murano was last seen led to the front door of Apartment 22. Surveillance units also located the Nissan Murano parked in the marked parking stall designated for Apartment 22.

39. Shortly after BELTRAN-CHAIDEZ entered ANTONIO BELTRAN-CHAIDEZ RESIDENCE, investigators conducting physical surveillance observed him enter the Nissan Murano he previously was observed driving and depart from the property. Surveillance units followed the Nissan Murano to JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE, where the driver exited the Nissan Murano and walked into the residence.

40. Several days later, on January 31, 2022, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed that BELTRAN-CHAIDEZ called CAMPOS during which, based on my training and experience, BELTRAN-CHAIDEZ asked CAMPOS for an update on the heroin he had delivered to CAMPOS on January 27. In particular, CAMPOS asked, "How's it going?" BELTRAN-CHAIDEZ replied, "Here, waiting." CAMPOS told BELTRAN-CHAIDEZ to "come over" (likely, to CAMPOS'S STASH HOUSE). BELTRAN-

CHAIDEZ inquired, “nothing happened?” CAMPOS confirmed, “No, nothing happened.”

Based on previous conversations, I believe CAMPOS was unable to contact the customer for the heroin and agreed to return the heroin to “TONY” through his brother (BELTRAN-CHAIDEZ), who called CAMPOS to coordinate the pickup of the heroin.

41. Later that same day, investigators monitoring a Court-authorized pole camera observed the black Nissan Murano (previously seen being driven by BELTRAN-CHAIDEZ) arrive at CAMPOS’S STASH HOUSE and park next to CAMPOS’S TAN TRUCK. The driver (BELTRAN-CHAIDEZ, discussed below) exited the Nissan Murano and entered CAMPOS’S STASH HOUSE.

42. Shortly afterwards, investigators monitoring a Court-authorized pole camera observed CAMPOS and presumably BELTRAN-CHAIDEZ exit CAMPOS’S STASH HOUSE. BELTRAN-CHAIDEZ carried a grocery-style plastic bag to the rear cargo area of the Nissan Murano and loitered there for approximately five minutes. Thereafter, BELTRAN-CHAIDEZ walked to the driver-side door while carrying a brown cardboard box, which he placed near the front driver tire, opened the driver door, and appeared to be crouching near the driver seat area of the Nissan Murano. Shortly after, BELTRAN-CHAIDEZ was observed once again in the rear cargo area of the Nissan Murano where he placed the cardboard box.

43. Shortly after the Nissan Murano departed, a CHP K-9 officer initiated a vehicle stop on the Nissan Murano after observing the driver impermissibly use a wireless device while driving. The CHP officer identified the driver, and single occupant of the Nissan Murano, as Jose Angel BELTRAN-CHAIDEZ. A record check performed by the CHP officer revealed Jose Angel BELTRAN-CHAIDEZ was unlicensed.

44. The CHP officer utilized his K-9 partner to conduct an exterior sniff of the vehicle. The K-9 alerted to multiple locations of the Nissan Murano, to include the driver area, the driver side passenger area, and the rear cargo area of the Nissan Murano. Following the K-9’s detection of drug odors in and/or from the Nissan Murano, the CHP officer searched and located what appeared to be an aftermarket compartment located next to the pedals of the vehicle

and directly below the center console of the Nissan Murano. A subsequent search of the compartment revealed approximately 1100.5 grams of suspected heroin wrapped in a vacuum sealed clear plastic bag.

D. CAMPOS Coordinates Narcotics Trafficking Throughout January and February 2022

45. Court-authorized electronic surveillance of CAMPOS's cellular phone throughout January and February 2022 confirmed he continued to coordinate the trafficking of narcotics, including with the Mexico-based drug supplier he was first intercepted communicating with in March 2021 ("Panzone," discussed above).

46. For instance, during a call on January 21, 2022, I believe that CAMPOS and Panzone discussed their associated narcotics activities. Based on the conversation, I determined Panzone was a source of supply for CAMPOS. For instance, CAMPOS told Panzone that an unidentified person "needed some," and explained, "He said, 'See if you can get them for me today or tomorrow.' I told him, 'I'll call this guy later.' I don't know how you are with that." In the conversation, CAMPOS shared with Panzone his suspicion that law enforcement was possibly surveilling him. CAMPOS told Panzone, "Let me tell you, my old lady told me that a van had parked out front. She said, 'Hey, a van parked there and they were, they were taking photos of the house.' Sons of bitches! Well, I got even more worried. I said, 'Well, it would be some shit if I they fucked me now, now that I'm at standstill.'" CAMPOS also told Panzone he might flee and stay with his brother that lives out of state for a few days. Based on my training and experience, I know narcotic traffickers will often move locations to avoid detection and evade law enforcement.

47. During the call, CAMPOS asked Panzone, "But how much are they, Chato, for those chickens?" Panzone replied, "Right now there at, like, nine. I'll give them to you for nine." Based on my training, experience and previous criminal investigations involving cock fighting, I know chickens are rarely sold. The animal that is most commonly sold is the rooster, both for breeding and cock fighting purposes. As a result, I determined CAMPOS was referring to a

pound of methamphetamine as a “chicken.” I believe Panzon was referring to \$900.00 when he told CAMPOS “nine” per chicken. \$900.00 falls in the typical range of prices for a pound of methamphetamine in southern California at the time of this call if bought directly from a supplier in Mexico.

48. On February 5, 2022, Court-authorized electronic surveillance revealed CAMPOS received a text message asking CAMPOS, “Have the dolls arrived to you?” Based on my training and experience, I believe the message author’s use of the term “doll” was a code word for a unit of narcotics, since investigators have not developed any information to suggest CAMPOS is involved in the sales of dolls. CAMPOS later answered, “I still haven’t received them ... later, or tomorrow in the afternoon,” likely referencing that CAMPOS anticipated receiving narcotics in the near future.

49. Similarly, On February 8, 2022, Court-authorized electronic surveillance revealed CAMPOS received a phone call from someone who asked him, “is there any soda there, or what?” CAMPOS replied, “Perhaps, yes!” The other party asked, “How much?” CAMPOS replied, “I believe at 24.” The third party countered, “you couldn’t leave it at, like 21 or 22?” Based on my training and experience, the caller spoke with CAMPOS about the purchase of a kilo of cocaine. The term “soda” commonly is used by narcotic traffickers when referencing cocaine. CAMPOS stated the price was “24,” where \$24,000 is the current average price for a kilo of cocaine in Kern County at the time of this call. The caller then attempted to negotiate a lower price (“like 21 or 22”), referring to \$21,000 or \$22,000 instead of \$24,000.

50. On February 8, 2022, Court-authorized electronic surveillance revealed CAMPOS received a call from Panzon. During the call, in an apparent reference to the call earlier that day regarding “soda” (cocaine, discussed above), CAMPOS stated, “A friend called me a little while ago, that he wanted one or two of those.” CAMPOS later asked, “How much are those going for?” Panzon – seemingly referring to the price for a kilo of cocaine – replied, “for me, they give them to me for nineteen” (an apparent reference to \$19,000 per kilo).

51. Shortly after the call with Panzon, CAMPOS called back the customer who earlier had called and asked CAMPOS about “soda,” but the customer told CAMPOS he had already “grabbed some.” However, the customer asked CAMPOS for his pricing and CAMPOS stated, “twenty-one and a half.” CAMPOS offered to show the product to the customer with no commitments. The customer asked CAMPOS for his pricing on “the waters.” Based on my training and experience, “water” is a term used by narcotic traffickers when referencing methamphetamine. CAMPOS told the customer the price for methamphetamine was cheap and not worth grabbing unless it was “a shit ton” (i.e., large amount). CAMPOS stated, “in order for me to do something, some fucking ten and a half.” Here, CAMPOS was referring to \$1,500 per pound, which falls in the current price range for a pound of methamphetamine in Kern County at the time of this call.

II. PROBABLE CAUSE THAT PREMISES AND VEHICLES USED BY CAMPOS AND HIS CO-CONSPIRATORS HOLD EVIDENCE OF DRUG TRAFFICKING AND ILLEGAL ANIMAL FIGHTING VENTURES

52. As used herein, the terms “records,” “documents,” and “materials” include all information recorded in any form, whether in handmade form (including, but not limited to, writings, drawings, painting), photographic form (including, but not limited to, photographs, videos and tapes), mechanical form (including, but not limited to, phonograph records, printing, typing); or electrical, electronic or magnetic form (including, but not limited to, tape recordings, cassettes, compact discs, electronic or magnetic storage devices such as floppy diskettes, hard disks, CD-ROMs, digital video disks, memory sticks, optical disks, printer buffers, smart cards, smart phones, iPods and iPads and similar tablets, as well as digital data files and printouts or readouts from any magnetic, electrical or electronic storage device).

53. Based on my training and experience, on information provided to me by other law enforcement personnel and knowledge of this investigation, I believe the following:

Unlawful Animal Fighting Ventures:

a. In the United States, cockfighters often participate in cockfighting tournaments called “derbies” where large numbers of cockfighters will pit their roosters against one another for the entertainment of others and to enrich themselves financially. Cockfighters are sometimes referred to as “cockers.” Cockfighting spectators gamble on the outcomes of the cockfights, and the owners of the animals stand to gain financially either through their own wagers, through an arrangement with the host of the cockfight, or through the enhanced value of their winning gamecocks.

b. Roosters have a natural bony spur on back of their leg. This spur is used by the rooster to cause injury to other animals when it kicks with its leg. This is the rooster's primary means of inflicting injury. Typical cockfights employ the use of weapons that are attached to the backs of the birds' legs. Cockfighters trim the bird's natural spur to the desired length to fit a boot equipped with an implement known as a “gaff” or “knife” to enhance the bird's ability to cause more damage. The gaff is an icepick-like implement that is strapped to both legs and designed to cause puncturing damage, while knives come in different sizes (short knife or long knife) and are designed to cause slashing or stabbing damage to the opponent bird. These weapons are also called long heels, short heels, jagers, bayonets, Texas Twisters, socket knives, long knives, short knives, slashers, and postizas in other parts of the country and the world. These weapons are attached to a small, soft leather collar referred to as a “boot”. The boot is used to hold the weapon which is then wrapped around the bird's ankle and fit by means of the boot's hole over the bird's trimmed spur.

c. Due to the enhanced stabbing and slashing ability bestowed upon the birds by the manmade weapons, cockfighting is an extremely painful, bloody, and deadly event. Birds are stabbed, slashed open, eviscerated, and partially decapitated. Birds that lose a match most often die. It is not uncommon for winning birds to die shortly after a fight or be unable to continue in the derby because of mortal wounds.

d. Cockfighters take pride in their gamecocks and breed them as others might breed nonfighting animals. Cockfighters select their animals for the traits they value—size, toughness, and aggression—and may enhance the performance of the animals using veterinary drugs. Cockfighters then train their gamecocks to fight, often to the death.

e. Owners/operators of cockfighting arenas, called “pits,” hold organized fights where many people can fight their trained birds against the fighting birds of other people. These arenas, depending on the level of sophistication, will have multiple pits to host “main fights,” and “drag pits” to accommodate fights in the main pit that have lasted too long and lost the interest of the spectators. In a “drag pit,” the birds are not always actively engaging one another. The function of a “drag pit” is to allow the fight to continue to determine which bird concedes or dies. These arenas will often have permanent stadium-style seating, electricity, plumbing, concessions, and ample parking for participants and spectators.

f. Owners charge participants a set fee to enter his or her birds into a derby. This fee may be anywhere from one hundred dollars to tens of thousands of dollars, depending on the event. The winner of the match, derby, or hack is the person whose birds have the best overall win/loss record. This person wins the “pot” or fees collected from the other participants. If multiple people tie with the best win/loss record, then the pot is split between them.

g. Owners enrich themselves by keeping a percentage of the pot, charging participants for extra “options” (which may increase a participant’s chance of winning more money), charging spectators to park at the pit, charging a fee for spectators to get into the event, selling food and drinks at the event, selling gaffs and other bird fighting supplies, charging vendors to set up booths at the pit, charging premiums for preferred seating, charging annual rentals of VIP rooms at the pit location, and charging annual fees for bird “keeps” at the pit location. A keep is a wooden hut with multiple compartments to house and segregate a contestant’s fighting birds while they attend the event. This is sometimes referred to as a “cockhouse.”

h. Persons engaged in cockfighting breed, buy, sell, and traffic in specialized breeds of roosters bred specifically for cockfighting. These breeds are called by names such as “Black Velcro” and “Sweater,” which refer to the “bloodline” of the bird. These bloodlines of birds have been purposefully bred for cockfighting. Particular breeds known for their winning records in cockfighting matches are prized by users. Since many cockfighters will “go through” dozens or even hundreds of birds a year competing at derbies, there is ample commerce in fighting birds.

i. When a person who breeds fighting birds sells them, he or she will often ship the fighting birds to the buyer. For domestic shipments, birds may be shipped through the U.S. mail in a USPS-approved container. When the buyers are from outside of the United States, the breeders will ship the birds overseas. Due to the various diseases that can be carried by chickens, many importing countries require testing to ensure that chickens that are being exported from the United States are free of disease. The international shipment of fowl typically involves an export health certificate that accompanies the birds which are placed in a shipping crate and brought to a commercial cargo carrier for shipment.

j. Cockfighters and breeders often use the internet and computers to further their activities. Various websites carry cockfighting information and videos about techniques, birds, breed characteristics, and news related to cockfighting.

k. It is common for those who engage in illegal cockfighting to often keep their animals at their residences, attached or detached garages and sheds, and at other locations in more rural areas if their main residence is not well suited for housing their fighting roosters. Additionally, those who engage in illegal cockfighting will often also store their implements used in illegal cockfighting, such as blades and gaffs, at these locations.

Narcotics Trafficking:

1. Narcotics trafficking is an ongoing or continuing criminal enterprise. Narcotics traffickers, or those that assist in that venture, maintain and tend to retain accounts or records of those transactions. Drug traffickers tend to keep these accounts and records in their

residence, attached or detached garages and sheds, vehicles, storage units, safes and storage containers located therein, and in other areas under their control.

m. Because narcotics traffickers frequently continue their criminal activity indefinitely, they keep records of their illegal activities for a period of time extending beyond the time during which they actually possess controlled substances, in order to maintain contact with criminal associates for future narcotics transactions, and to have records of prior transactions for which, for example, they might still be owed narcotic proceeds, or might owe someone else money. Because possession of the documents themselves, unlike possession of narcotics, is not illegal, narcotics traffickers often fail to take precautions to destroy or conceal the documentation. Therefore, documentation may survive for many months, sometimes years, after a large volume drug transaction has occurred, often in the traffickers' residences, vehicles, storage units, and other areas under their control. Such documentation may be in hard copy form or stored in digital devices such as computers, cell telephones and other mobile communication devices.

n. Individuals involved in narcotics trafficking commonly provide narcotics to trusted distributors in their organization on credit, and commonly obtain narcotics from their suppliers on credit. Therefore, I am aware that individuals involved in narcotics trafficking maintain books, records, customer lists, receipts, notes, ledgers, and other papers relating to the transportation, receipt, ordering, sales, and distribution of narcotics, narcotics proceeds, and equipment, and that such documents may be in code to thwart law enforcement detection. Such records often indicate the identity of co-conspirators. The aforementioned books, records, receipts, notes, ledgers, correspondence, etc., are commonly maintained where the narcotics traffickers have ready access to them, i.e., residences, vehicles, storage units, and other areas under their control. Such documentation may be in hard copy form or stored in digital devices such as computers, cell telephones and other mobile communication devices.

o. Drug traffickers often place their assets in names other than their own to avoid detection of those assets by law enforcement; those persons are commonly family

members, spouses or companions, friends, and associates who accept title of assets to help the trafficker avoid discovery and detection.

p. Individuals involved in narcotics trafficking will conduct narcotics-related activities at various locations and residences in an effort to avoid law enforcement detection.

q. Individuals involved in narcotics trafficking often conceal evidence of their drug trafficking, including narcotics and narcotics proceeds, in their residences, or the residences of friends or relatives, and in surrounding areas to which they have ready access such as garages, carports and outbuildings. They also conceal evidence in vehicles, including vehicles outside of their residences, and storage units, so that they have ready access to it and so that they can hide it from law enforcement, including law enforcement officers executing search warrants at their residences or businesses.

r. Narcotics traffickers often utilize vehicles to transport and distribute controlled substances in facilitation of their trafficking activities. Traffickers will also utilize vehicles as locations to store controlled substances prior to distribution. Large-scale traffickers will often use vehicles with hidden compartments, also known as traps, to store narcotics or narcotics proceeds in order to conceal the presence of such contraband from law enforcement. Narcotics traffickers will often drive and use vehicles registered in the names of individuals other than themselves in an effort to avoid detection by law enforcement.

s. Individuals involved in narcotics trafficking commonly use certain paraphernalia to package and prepare controlled substances for distribution (such as tupperware, cellophane, heat sealers, glycine or plastic baggies, latex gloves, cutting agents and dilutants, chemical testing devices, triple beam scales and other weighing devices, measuring devices, strainers, compression devices, etc.). Individuals involved in narcotics trafficking commonly store these items in their residences, garages, outbuildings, storage units and areas, carports, and in the residences of friends or relatives, in their vehicles, and in other areas to which the traffickers have ready access.

t. Individuals involved in narcotics trafficking generally sell narcotics for cash proceeds. Narcotics traffickers often have on hand large amounts of United States currency in order to maintain and finance their ongoing business. Narcotics traffickers often keep large sums of currency, caches of narcotics, financial instruments, precious metals, jewelry, automobiles, and other items of value and/or proceeds of narcotic transactions, including evidence of financial transactions related to obtaining, transferring, secreting, or spending large sums of money acquired from engaging in the acquisition and distribution of controlled substances in their residence, vehicles, safes, storage containers, and in other areas under their control.

u. Unexplained wealth is probative evidence of crimes motivated by greed, in particular, trafficking in controlled substances.

v. Individuals involved in narcotics trafficking often launder money obtained through illegal drug transactions through legitimate businesses. Traffickers who are involved in such money laundering often structure financial transactions to avoid reporting requirements, and often keep records of their activities and financial transactions. To escape detection, however, they mix and intermingle those records with records of lawful transactions. In such instances, it is necessary to analyze the entire record to isolate the records of unlawful transactions, and it is not feasible to extract the records of unlawful activities without such analysis.

w. Additionally, when narcotics traffickers amass large quantities of cash from the sale of narcotics, they will sometimes attempt to legitimize these profits through the use of banks and financial institutions and their services, including accounts, securities, traveler's checks, cashiers' checks, money orders, wire transfers, certificates of deposit, and safe deposit boxes. Records from such transactions, including tax records, are often maintained in residences, offices and business locations, garages, storage units and buildings, automobiles, and safe deposit boxes.

x. Narcotics traffickers typically will obtain and distribute controlled substances on a regular basis, as a distributor of a legitimate commodity would purchase stock

for sale such narcotics traffickers will also have an “inventory” which will fluctuate in size depending on the demand for the product.

y. Narcotics traffickers commonly have in their possession (that is, on their person, at their residence, and in areas under their control), firearms, including, but not limited to, handguns, pistols, revolvers, rifles, shotguns, machine guns, silencers, and other weapons. Such firearms are used to protect and secure a trafficker’s property. Such property may include, but is not limited to, narcotics and other dangerous drugs, jewelry, narcotics paraphernalia, books, records, ledgers, and quantities of currency related to their drug trafficking activity.

z. Narcotics traffickers may take or cause to be taken, photographs, videotapes, or other recordings of themselves, their associates, their property, and their product. Such traffickers often maintain photographs and/or videotapes at their residences or in the areas under their control.

aa. Narcotics traffickers may maintain in their possession or at their residence or other storage areas under their control fictitious identification, including, but not limited to, drivers licenses, employment cards, insurance cards, social security cards, naturalization records, certificates of birth and passports which are obtained by the traffickers and utilized in an effort to prevent law enforcement identification of the traffickers and their narcotic trafficking activity.

bb. Individuals involved in narcotics trafficking often use cellular telephones and other communication devices sometimes in fictitious and/or other individual's names. Traffickers commonly receive telephone calls, voicemail messages and text messages from individuals seeking to conduct narcotics transactions. As a result, traffickers often maintain in their residences, vehicles, and locations where they conduct transactions, records and items that reflect or contain names, addresses, and/or telephone numbers for their associates and co-conspirators in the trafficking organization. These records and items include telephone address books and telephone listings, text messages, voicemails, as well as letters, telephone bills, e-mails, and personal notes reflecting names, identities, addresses, and telephone numbers. Traffickers often keep records and evidence of their illegal activities for a period of time

extending beyond during which they actually possessed illegal narcotics and controlled substances, in order to maintain contact with their criminal associates for future narcotic transactions, and so that they can have records of prior transactions for which a trafficker might still be owed money or might owe someone else money.

cc. Individuals involved in narcotics trafficking often use various locations to serve different functions so that customers, thieves, and law enforcement do not learn about any one location where large quantities of narcotics, money, and/or other narcotic-related assets and evidence are stored. Therefore, one or more locations are often used to store lesser amounts of narcotics, money, and/or narcotics-related assets, and additional locations are used to meet customers.

54. It is my opinion, based on my training and experience, and the training and experience of other law enforcement investigators with whom I have spoken, that the items listed in Attachment B, as they relate to narcotics trafficking offenses and illegal animal fighting ventures, are items often associated with the trafficking and distribution of controlled substances and engagement in illegal fighting ventures, as well as the proceeds from such illegal operations. The items to be searched for and seized, as set forth in Attachment B, include data and information contained in computers, smartphones, tablet computers, laptops, computer media, external data storage devices, and digital media players and all such equipment containing such data and information.

B. Probable Cause to Believe that CAMPOS Resides at 1906 Belle Terrace, Bakersfield (CAMPOS'S RESIDENCE)

55. As discussed in detail above, CAMPOS orchestrated the distribution of 26 pounds of methamphetamine from CAMPOS'S RESIDENCE to Mark Garcia on March 30, 2021.

56. Throughout the investigation of the CAMPOS DTO, investigators regularly have observed CAMPOS coming and going on a daily basis from CAMPOS'S RESIDENCE, as

recently as February 13, 2022.⁶

57. Additionally, as recently as April 19, 2022, investigators observed CAMPOS'S TAN TRUCK and DELILA'S HONDA (vehicles CAMPOS regularly operates, discussed below) parked in the driveway of CAMPOS'S RESIDENCE.

58. Based on the information described above, your affiant believes there is probable cause to conclude that CAMPOS resides at 1906 Belle Terrace, Bakersfield, and as such, that evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846, and 7 U.S.C. § 2156 will be found there.

C. Probable Cause to Believe that CAMPOS Maintains a Stash House at 200 East Casa Loma Drive, Bakersfield (CAMPOS'S STASH HOUSE)

59. As discussed in detail above, CAMPOS and vehicles operated by GOMEZ-SANTIAGO and Garcia were observed at CAMPOS'S STASH HOUSE on March 30, 2021, hours before the three collaborated in the distribution of 26 pounds of methamphetamine at CAMPOS'S RESIDENCE.

60. Moreover, as discussed in detail above, on April 7, 2021, CAMPOS and GOMEZ-SANTIAGO used CAMPOS'S STASH HOUSE as the meeting place and distribution situs for 60 pounds of methamphetamine delivered to ALFARO-SANDOVAL and TORRES.

61. Separately, a Court-authorized pole camera installed in the vicinity of CAMPOS'S STASH HOUSE and/or data obtained from Court-authorized vehicle tracking devices revealed that CAMPOS'S TAN TRUCK, DELILA'S HONDA and several other vehicles used by the CAMPOS DTO (discussed above and below in greater detail) have continued to frequent this location throughout the course of this investigation.

⁶ CAMPOS use of CAMPOS'S RESIDENCE as his primary residence is corroborated by the fact that the mother of his newborn child (February 15, 2022, according to Court-authorized electronic surveillance of CAMPOS's cellular phone) – Delila Beltran Quintero – is the registered operator of DELILA's HONDA, which according to California DMV records lists "1906 Belle Terrace, Bakersfield" as the registered address, and which as discussed below commonly is parked at CAMPOS'S RESIDENCE).

62. For example, on January 23, 2022, CAMPOS was observed arriving at CAMPOS'S STASH HOUSE and retrieving what appeared to be boxes out of the rear area of DELILA'S HONDA. Again, on March 17, 2022, CAMPOS was observed departing CAMPOS'S STASH HOUSE in CAMPOS'S TAN TRUCK transporting what appeared to be boxes in the rear area of the truck. I believe these boxes are used to transport CAMPOS's roosters he uses to participate in illegal cockfights, based on several communications that were intercepted in which CAMPOS discussed illegal cockfighting, described below.

63. For instance, on January 15, 2022, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed a conversation between CAMPOS and a person believed to be Jose Altamirano, transcribed below:

NAME	TRANSLATION
	[Beginning of call]
	[Telephone rings]
ALTAMIRANO	What's up George?
CAMPOS	Hey! What's up?
ALTAMIRANO	Oh, no, well, I, I was going to tell you if you were at the corrals, I can swing by later to see the chickens.
CAMPOS	Come by, I'll be here.
ALTAMIRANO	Okay. No, later on. I came here to Mark's to pick up, to pick up some chickens. In a little while, once I leave here, I'll swing by over there.
CAMPOS	All right, I'll be here.
ALTAMIRANO	All right, then.
CAMPOS	Okay.
	[End of call]

64. Later the same day, Court-authorized electronic surveillance on CAMPOS's cellular phone revealed a conversation between CAMPOS and a person believed to be Hector Velasquez, transcribed below:

NAME	TRANSLATION
	[Beginning of call]
	[Telephone rings]
VELASQUEZ	<i>Where you at?</i>
CAMPOS	Here at the corral. [Background: chickens clucking]
VELASQUEZ	Where are you?
CAMPOS	The corral!
VELASQUEZ	<i>Are you almost done or no?</i>
CAMPOS	<i>Yeah. Yes. I just need to feed them.</i>

VELASQUEZ	Are we, we going to a <i>derby</i> or no?
CAMPOS	Where? Let's go!
VELASQUEZ	Okay, I'll go get you.
CAMPOS	Alright, alright! I'll be here. [Background: chickens clucking]
VELASQUEZ	Okay.
	[End of call]

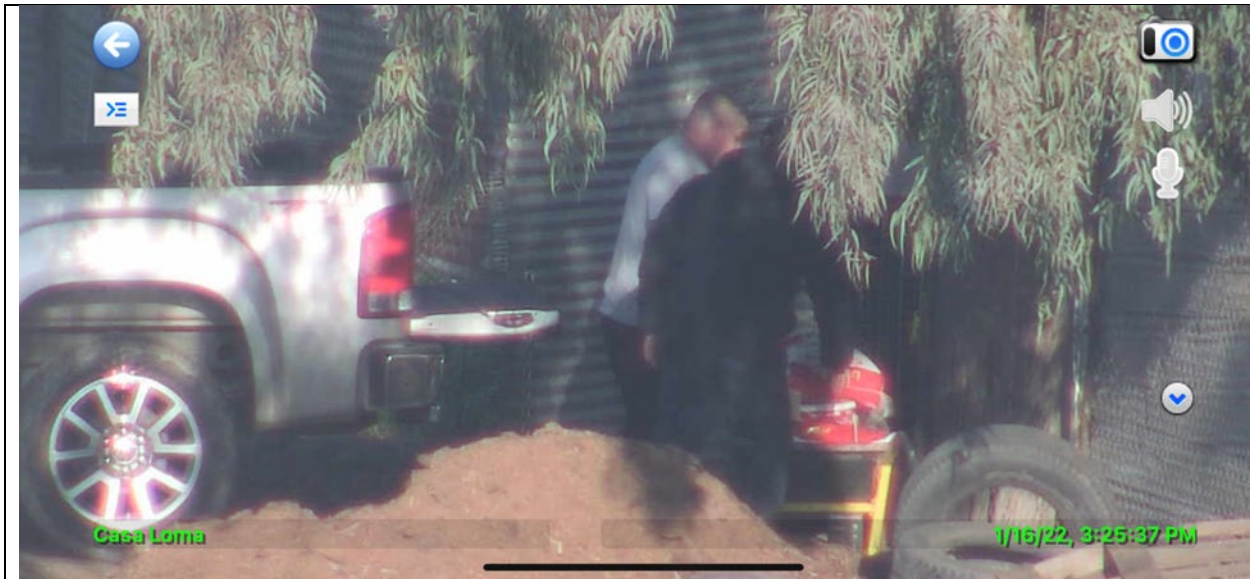
65. Based on your affiant's training and experience, I believe that when Velasquez asked CAMPOS if he wanted to attend a "derby," he was referencing cockfights. Based in part on the fact that investigators heard what sounded like several roosters clucking in the background of the call, it is also your affiant's belief that CAMPOS is utilizing CAMPOS'S STASH HOUSE to house his fighting roosters (which CAMPOS referred to in both calls transcribed above as "the corrals").

66. On January 16, 2022, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed a conversation between CAMPOS and a person believed to be Altamirano (with whom CAMPOS had spoken to the day prior, discussed above), transcribed below:

NAME	TRANSLATION
	[Beginning of call]
	[Telephone rings]
CAMPOS	Hey! Where you go? Where you go?
ALTAMIRANO	I came over there to tend to the roosters.
CAMPOS	I came to pick the [U/I] to [U/I] these fuckers.
ALTAMIRANO	Yes?
CAMPOS	I'm going to play Mark's and the other yellow one.
ALTAMIRANO	Right now?
CAMPOS	Yes, here at the corral. Right now, I'm just arriving at the corral and then I'll go over there.
ALTAMIRANO	Oh, well, we'll head out that way now. Which one are you going to play?
CAMPOS	The two (2) heavy ones. The two (2) big yellow ones that I was telling you. The two (2) fucking [U/I]. There have been many times that [U/I], the fuckers. The two (2) heavy ones.
ALTAMIRANO	Okay. We're set then.
CAMPOS	Okay.
ALTAMIRANO	Okay.
	[End of call]

67. Shortly afterwards, investigators using a Court-authorized pole camera observed CAMPOS arriving in CAMPOS'S TAN TRUCK at CAMPOS'S STASH HOUSE. Your affiant

believes CAMPOS's statement that he was "at the corrals" is a reference to CAMPOS'S STASH HOUSE. CAMPOS and a male matching the physical descriptors of Rodolfo Serrato (based on comparison with the photo on Serrato's driver's license) were observed exiting CAMPOS'S TAN TRUCK and carrying what appeared to be bird feed bags into CAMPOS'S STASH HOUSE. Shortly after, Serrato was observed carrying two (2) brown boxes with handles at the top and small circular ventilation holes on the sides of the boxes, consistent with boxes that are utilized to transport roosters, and placing them inside CAMPOS'S TAN TRUCK. Based on the substance of the above conversation, it is your affiant's belief that CAMPOS'S statement of "two heavy ones" was in reference to two large fighting roosters; one of them being a rooster Altamirano had picked up the previous day from "Mark" and brought over to CAMPOS'S STASH HOUSE. A photograph from the Court-authorized pole camera depicting CAMPOS, Serrato and the rooster boxes appears below.





68. Approximately one hour after observing Serrato loading the boxes into CAMPOS'S TAN TRUCK, court-authorized geolocation of CAMPOS'S cellular phone indicated he was in the area of Blackburn Road and Highway 184, an area your affiant knows based on training and experience historically has been used for cockfighting events.

69. Later that afternoon, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed a conversation between CAMPOS and a person believed to be Alfredo Moreno. During the call, CAMPOS mentioned "the derby" and stated he "robbed him good" and "beat those fuckers." Moreno asked, "How did my friend do," and CAMPOS responded, "he won like 1,000 to 1,500 bucks on each one." CAMPOS also stated, "I brought two heavy ones ... and played Chilly Willy. We played at 4,000."

70. Based on my training, experience, and knowledge of this investigation, I believe CAMPOS was boasting to Moreno that he had won a rooster fight using the two roosters ("two heavy ones") that he and Serrato had placed inside CAMPOS'S TAN TRUCK earlier that day in the brown boxes.

71. As recently as April 7, 2022, CAMPOS was observed arriving at CAMPOS'S STASH HOUSE in CAMPOS'S TAN TRUCK.

72. Based on the information described above, your affiant believes there is probable cause to conclude that CAMPOS and his co-conspirators use 200 E. Casa Loma Drive, Bakersfield, as a “stash house” to secrete narcotics that are distributed and/or sold to others, and that CAMPOS currently houses fighting roosters and associated fighting implements at this location, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846, and 7 U.S.C. § 2156 will be found there.

D. Probable Cause to Believe that GOMEZ-SANTIAGO resides at 125 Stockton Avenue, Arvin (GOMEZ-SANTIAGO’S RESIDENCE)

73. As discussed in detail above, GOMEZ-SANTIAGO collaborated with CAMPOS in the distribution of large amounts of methamphetamine on March 30 and April 7, 2021. Subsequent investigation revealed that GOMEZ-SANTIAGO travelled to and from his residence – GOMEZ-SANTIAGO’S RESIDENCE – on several occasions in connection with suspected narcotics trafficking activities.

74. For example, on August 19, 2021, investigators covertly followed GOMEZ-SANTIAGO from GOMEZ-SANTIAGO’S RESIDENCE as he traveled in GOMEZ-SANTIAGO’S JEEP towards the Los Angeles area. Investigators observed GOMEZ-SANTIAGO’S JEEP briefly stop by a junk yard located in Fontana, CA. On September 30, 2021, members of Orange County Sheriff’s Department, Regional Narcotic Suppression Program Team executed search warrants at the junk yard that GOMEZ-SANTIAGO had stopped at the previous month and a nearby location associated with the organization operating the junk yard. The searches resulted in the discovery and seizure of approximately 190 pounds of methamphetamine, seven kilograms of cocaine, one kilogram of heroin, an assortment of pills and a firearm. Based on my training, experience, and knowledge of this investigation, I believe GOMEZ-SANTIAGO traveled to this location to pick up narcotics or drop off proceeds from the sale of narcotics, as he traveled hundreds of miles on this date for no other reasonably apparent legitimate purpose.

75. Additionally, on September 2, 2021, investigators followed GOMEZ-SANTIAGO'S JEEP as it traveled from GOMEZ-SANTIAGO'S RESIDENCE to Fresno. Investigators observed GOMEZ-SANTIAGO'S JEEP enter a gas station and appeared to be driving in a manner that indicated GOMEZ-SANTIAGO was conducting counter surveillance, a tactic commonly used by narcotic traffickers to see if law enforcement is following them. Investigators observed GOMEZ-SANTIAGO'S JEEP as it travelled through the shopping center parking lot toward the vicinity of a silver-colored minivan that turned on its headlights and drove in front of GOMEZ-SANTIAGO'S JEEP.

76. Immediately afterwards, investigators observed both vehicles exiting the shopping center parking lot in tandem. Court-authorized tracker data revealed GOMEZ-SANTIAGO'S JEEP briefly stopped in a residential neighborhood nearby. Investigators observed a person walking away from GOMEZ-SANTIAGO'S JEEP and walking towards the silver-colored minivan while carrying a white-colored plastic bag, similar to a grocery shopping bag.

77. The distance travelled from GOMEZ-SANTIAGO'S RESIDENCE to the shopping center in Fresno is an approximate 270-mile round trip. Based on my training and experience and investigators' observations described above, I believe GOMEZ-SANTIAGO traveled to Fresno on this date to deliver narcotics.

78. On several occasions over the course of this investigation, a Court-authorized pole camera installed in the vicinity of 125 Stockton Avenue, Arvin (GOMEZ-SANTIAGO'S RESIDENCE), revealed GOMEZ-SANTIAGO arriving at and departing the residence. Additionally, GOMEZ-SANTIAGO'S JEEP had been observed parked directly in front of GOMEZ-SANTIAGO'S RESIDENCE as recently as April 6, 2022.

79. On numerous recent occasions, investigators (using both pole camera surveillance and Court-authorized vehicle tracker data) have continued to observe GOMEZ-SANTIAGO'S JEEP spend the late evening hours at GOMEZ-SANTIAGO'S RESIDENCE, including on April 1, 2022 through April 6, 2022. Based on my training and experience, I believe this pattern indicates that GOMEZ-SANTIAGO resides at GOMEZ-SANTIAGO'S RESIDENCE.

80. On January 23, 2022, law enforcement observed GOMEZ-SANTIAGO and one of GOMEZ-SANTIAGO'S associates, believed to be Leonel Milian-Garcia, arriving at GOMEZ-SANTIAGO'S RESIDENCE. Milian-Garcia exited the driver seat of a Toyota Camry, walked to the passenger-side of the vehicle, and looked around as GOMEZ-SANTIAGO retrieved what appeared to be a bag and a black backpack from the backseat, after which both were observed entering GOMEZ-SANTIAGO'S RESIDENCE.

81. Based on the information described above, your affiant believes there is probable cause to conclude that GOMEZ-SANTIAGO resides at 125 Stockton Avenue, Arvin, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846 will be found there.

F. Probable Cause to Believe that CAMPOS Frequent and ORTEGA Resides at 9451 Fritz Street, Bakersfield (ORTEGA'S RESIDENCE)

82. During the course of this investigation, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed he communicated with Horacio Ortega-Diaz "Nacho"⁷ on several occasions and was observed frequenting ORTEGA'S RESIDENCE.

83. On February 24, 2022, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed he spoke with ORTEGA and asked ORTEGA if "the guys" had arrived yet and whether they "brought barajas." ORTEGA told CAMPOS that they had. CAMPOS told ORTEGA he was on his way over. Shortly after, Court-authorized tracker data from CAMPOS'S TAN TRUCK indicated CAMPOS had arrived at ORTEGA'S RESIDENCE. Based on your affiant's training and experience, I recognize that "barajas" is a slang term commonly used to reference cards. During the investigation CAMPOS had continued to frequent locations in Bakersfield that are known to law enforcement as "underground casinos" where individuals engage in illegal gambling for monetary gain.

⁷ Ortega-Diaz was arrested on May 10, 2021, for Cultivating Marijuana, Maintaining a dwelling for sales and the possession of Marijuana for the purpose of sales.

84. On December 29, 2021, law enforcement surveillance units drove by ORTEGA'S RESIDENCE and observed several rooster enclosures visible from the street. Law enforcement aerial surveillance on January 20, 2022, confirmed the existence of a large number of rooster enclosures located at ORTEGA'S RESIDENCE (depicted in the photograph below). CAMPOS communicated frequently with ORTEGA about engaging in illegal cockfighting, based on Court-authorized electronic surveillance of CAMPOS's cellular phone. It is your affiant's belief that ORTEGA houses fighting roosters at this location based on the substance of his conversations with CAMPOS and the several rooster enclosures that were observed during aerial and ground surveillance.

85. On January 17, 2022, Court-authorized geolocation of CAMPOS's cellular phone showed him in the area of Fritz Street, an area that CAMPOS has continued to frequent during this investigation, including as recently as March 16, 2022.

86. Court-authorized tracker data collected from CAMPOS'S TAN TRUCK similarly has revealed CAMPOS'S TAN TRUCK at ORTEGA'S RESIDENCE, including on: January 24, 26 and 31, 2022; February 3, 4, 8, 9, 10 and 24, 2022; and March 9, 14 and 16, 2022.



87. On February 3, 2022, Court-authorized tracker data from CAMPOS'S TAN TRUCK indicated the truck was departing ORTEGA'S RESIDENCE. Shortly afterwards, law enforcement using a Court-authorized pole camera observed CAMPOS'S TAN TRUCK arriving at CAMPOS'S STASH HOUSE and CAMPOS was observed offloading a box with small circular ventilation holes on the sides of the boxes, consistent with boxes that are utilized to transport roosters. Based on my training, experience and knowledge of this investigation, I believe CAMPOS took a rooster to ORTEGA's RESIDENCE in connection with engaging in unlawful animal fighting.

88. Law enforcement has had limited surveillance of ORTEGA's RESIDENCE due to its location at the end of a dead-end street in a rural area, making it extremely difficult for law enforcement to maintain a covert presence in the area.

89. Based on the information described above, your affiant believes there is probable cause to conclude that CAMPOS frequents 9451 Fritz Street in connection with participating in illegal gambling, illegal animal fighting ventures, and as such, that evidence, fruits and instrumentalities of violations of 7 U.S.C. § 2156 will be found there.

G. Probable Cause to Believe that Antonio BELTRAN-CHAIDEZ Resides at 4301 Belle Terrace, Apartment 22, Bakersfield, CA (ANTONIO BELTRAN-CHAIDEZ RESIDENCE)

90. As discussed in detail above, on January 26 and 27, 2022, Antonio BELTRAN-CHAIDEZ ("TONY") coordinated with CAMPOS to distribute heroin using "TONY"'s brother (Jose Angel BELTRAN-CHAIDEZ). After BELTRAN-CHAIDEZ is believed to have delivered the heroin to CAMPOS, law enforcement surveillance units followed him and confirmed he drove directly from CAMPOS'S STASH HOUSE to ANTONIO BELTRAN-CHAIDEZ'S RESIDENCE.

91. "TONY" and CAMPOS also have discussed illegal rooster fighting. For instance, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed the two spoke on February 24, 2022. CAMPOS asked TONY whether the "little store" sold "boots" (likely rooster fighting boots). TONY replied, "yes." CAMPOS asked "TONY" whether he was going to go to

“the one tomorrow for 2,000” (likely a reference to the entrance fee for a rooster fighting event,” and “TONY” replied, “yes.”).

92. On February 24, 2022, investigators conducted surveillance at ANTONIO BELTRAN-CHAIDEZ RESIDENCE and observed a person who matched the physical characteristics of “TONY” exiting the residence and depart in a silver Nissan Altima. Investigators followed the Nissan Altima and visually confirmed “TONY” was the driver of the vehicle. Investigators followed the Nissan Altima as it returned to the vicinity of ANTONIO BELTRAN-CHAIDEZ RESIDENCE and observed “TONY” as he entered ANTONIO BELTRAN-CHAIDEZ RESIDENCE (Apartment 22) without knocking.

93. Based on the information described above, your affiant believes there is probable cause to conclude that “TONY” resides at 4301 Belle Terrace, Apartment 22, Bakersfield, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846 and 7 U.S.C. § 2156 will be found there.

H. Probable Cause to Believe that Jose Angel BELTRAN-CHAIDEZ Resides at 1413 Dorian Drive, Bakersfield, CA (JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE)

94. As discussed in detail above, on January 27, 2022, Jose Angel BELTRAN-CHAIDEZ delivered heroin to CAMPOS and shortly afterwards, returned to JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE. Several days later, on January 31, 2022, BELTRAN-CHAIDEZ returned to CAMPOS’S STASH HOUSE to retrieve the heroin that CAMPOS seemingly had been unable to sell or distribute. Law enforcement later stopped BELTRAN-CHAIDEZ’s vehicle and discovered approximately one kilogram of heroin concealed inside.

95. On March 16, 2022, investigators conducting physical surveillance observed the Nissan Murano parked in the driveway of JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE. On March 17, 2022, investigators conducting physical surveillance once again observed the Nissan Murano, along with a blue Dodge four-door sedan, bearing California temporary license tag BM64G72, parked in the driveway of JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE.

On March 24, 2022, investigators observed Jose Angel BELTRAN-CHAIDEZ driving the blue Dodge four-door sedan observed at his residence the week prior.

96. On April 5 and 7, 2022, investigators conducting physical surveillance observed the blue Dodge four-door sedan parked on the street adjacent to and on the driveway of JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE. Based on my training and experience, I believe this reflects that BELTRAN-CHAIDEZ still resides at JOSE ANGEL BELTRAN-CHAIDEZ RESIDENCE.

97. Based on the information described above, your affiant believes there is probable cause to conclude that BELTRAN-CHAIDEZ resides at 1413 Dorian Drive, Bakersfield, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846 will be found there.

I. Probable Cause to Believe a tan GMC Sierra, California License Plate 8N19756, is CAMPOS'S Vehicle (CAMPOS'S TAN TRUCK)

98. Throughout the course of this investigation, CAMPOS has been observed operating almost on a daily basis and parking CAMPOS'S TAN TRUCK in the driveway of CAMPOS'S RESIDENCE, including as recently as April 8, 2022, was observed via a Court authorized pole camera.

99. On April 4, 2022, investigators using a Court-authorized pole camera observed CAMPOS arriving at CAMPOS'S STASH HOUSE in CAMPOS'S TAN TRUCK. CAMPOS appeared to be transporting three brown boxes in the bed of CAMPOS'S TAN TRUCK with small circular ventilation holes on the sides of the boxes, consistent with boxes that are utilized to transport roosters. As recently as April 7, 2022, investigators using a Court-authorized pole camera observed CAMPOS arriving at CAMPOS'S STASH HOUSE in DELILA'S HONDA.

100. Based on the information described above, your affiant believes there is probable cause to conclude that CAMPOS uses and drives CAMPOS'S TAN TRUCK and DELILA'S HONDA, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846, and 7 U.S.C. § 2156 will be found inside.

J. Probable Cause to Believe a black Honda Fit, California License Plate 7VEB756, is Used by CAMPOS (DELILA'S HONDA)

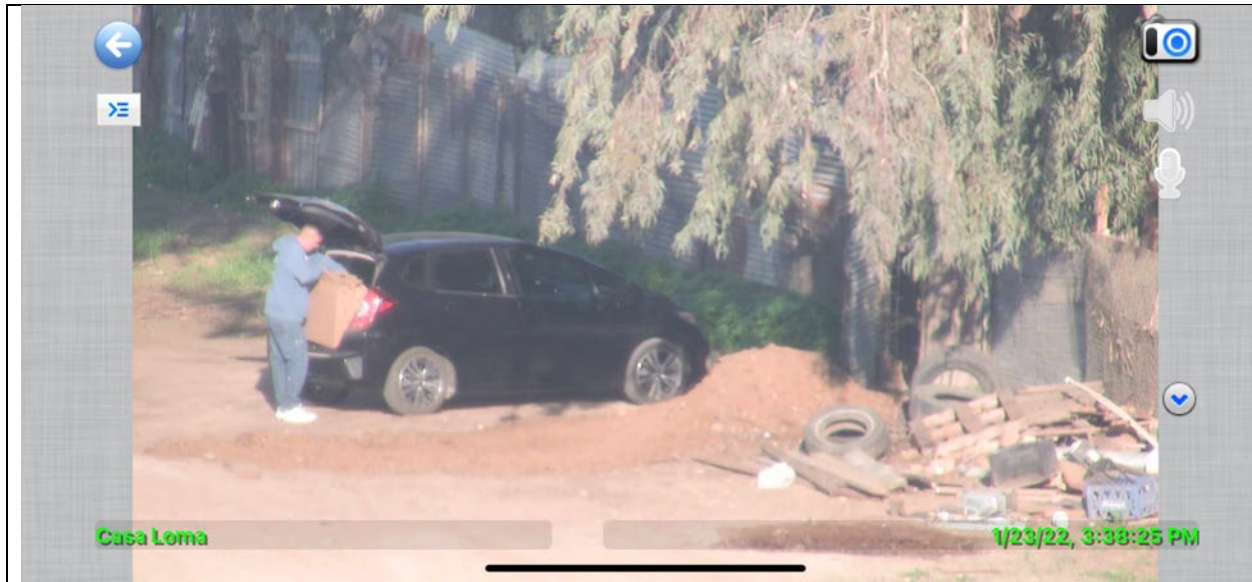
101. CAMPOS and Delila have been observed leaving CAMPOS'S RESIDENCE on a regular basis throughout the course of this investigation. Based on social media queries, Delila appears to be in a romantic relationship with CAMPOS. Younger children appear to reside with them at CAMPOS'S RESIDENCE.

102. On January 23, 2022, Court-authorized electronic surveillance revealed that CAMPOS spoke with Delila Beltran and asked her where she had placed the "small backpack, with the blades" CAMPOS stated he had left them in her car (DELILA'S HONDA). Beltran said it was in the trunk. CAMPOS asked if she was referring to DELILA'S HONDA, Beltran responded, "yeah." CAMPOS said he thought it had been stolen but remembered it was not in CAMPOS'S TAN TRUCK and was in DELILA'S HONDA. Beltran confirmed that CAMPOS had taken her car and not the truck. It is your affiant's belief that when CAMPOS asked Beltran where the small backpack was with the blade, he was referencing blades utilized for cockfights.

103. Shortly afterwards, Court-authorized tracker data from CAMPOS'S TAN TRUCK and investigators' observations using a Court-authorized pole camera revealed that CAMPOS arrived at CAMPOS'S RESIDENCE, exited CAMPOS'S TAN TRUCK, entered DELILA's HONDA, and departed. Shortly afterwards, investigators using a Court-authorized pole camera observed CAMPOS arriving at CAMPOS'S STASH HOUSE, retrieving three brown boxes with handles at the top and small circular ventilation holes on the sides of the boxes, consistent with boxes that are utilized to transport roosters, and departing.

104. Several hours later, CAMPOS returned to CAMPOS'S STASH HOUSE driving DELILA's HONDA. Investigators using a Court-authorized pole camera observed CAMPOS retrieving from the trunk of DELILA'S HONDA two brown boxes with handles at the top and small circular ventilation holes on the sides of the boxes, consistent with boxes that are utilized to transport roosters (depicted in the photograph below) and placing them inside CAMPOS'S

STASH HOUSE. Thereafter, CAMPOS left the property and drove to CAMPOS'S RESIDENCE.



105. Later that day, Court-authorized electronic surveillance of CAMPOS's cellular phone revealed he called a person and stated that he was home. CAMPOS confirmed that he had gone to "the corrals" and "won." Based on the substance of this conversation, it is your affiant's belief that CAMPOS engaged in illegal cockfights on this date and won the fights. CAMPOS then transported the roosters utilized in the cockfights back to CAMPOS'S STASH HOUSE utilizing DELILA's HONDA.

106. As recently as April 6, 2022, investigators observed DELILA'S HONDA parked in the driveway of CAMPOS'S RESIDENCE and Delila getting the mail, getting into DELILA'S HONDA and departing.

107. As recently as April 7, 2022, investigators using a Court-authorized pole camera observed DELILA'S HONDA arriving at CAMPOS'S STASH HOUSE, CAMPOS getting out, meeting with a person and walking into the property.

108. Based on the information described above, your affiant believes there is probable cause to conclude that CAMPOS uses DELILA'S HONDA, and as such, that evidence, fruits

and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846, and 7 U.S.C. § 2156 will be found there.

K. Probable Cause to Believe a white Jeep Grand Cherokee, California License Plate 8NLA166, is GOMEZ-SANTIAGO's Vehicle (GOMEZ-SANTIAGO'S JEEP)

109. As discussed in detail above, on March 30 and April 7, 2021, GOMEZ - SANTIAGO transported in GOMEZ-SANTIAGO'S JEEP several boxes of methamphetamine that, with the involvement and assistance of CAMPOS and other co-conspirators, was further distributed to others. Moreover, on August 19, 2021, GOMEZ-SANTIAGO'S JEEP travelled to Fontana and stopped briefly at a property that was the target of an ongoing narcotics investigation, which law enforcement searched the following month and found to harbor more than 200 pounds of illegal drugs.

110. As recently as April 6, 2022, investigators using a Court-authorized pole camera observed GOMEZ-SANTIAGO'S JEEP driving up to GOMEZ-SANTIAGO'S RESIDENCE, parking directly in front of the side gate and GOMEZ-SANTIAGO was observed exiting GOMEZ-SANTIAGO'S JEEP and entering GOMEZ-SANTIAGO'S RESIDENCE.

111. Based on the information described above, your affiant believes there is probable cause to conclude that GOMEZ-SANTIAGO uses GOMEZ-SANTIAGO'S JEEP, and as such, that evidence, fruits and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1)/846 will be found there.

L. UNLOCKING DIGITAL DEVICES WITH BIOMETRIC FEATURES

112. The warrants I am applying for would permit law enforcement to compel certain individuals (as set forth in Attachment B) to unlock digital devices (such as cellular telephones, smartphones, and tablets) subject to seizure pursuant to this warrant using the device's biometric features. I seek this authority based on the following:

a. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that many electronic devices, particularly newer mobile devices and laptops, offer their users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners, facial recognition features, and iris recognition features. Some devices offer a combination of these biometric features, and the user of such devices can select which features they would like to utilize.

b. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a feature called “Touch ID,” which allows a user to register up to five fingerprints that can unlock a device. Once a fingerprint is registered, a user can unlock the device by pressing the relevant finger to the device’s Touch ID sensor, which is found in the round button (often referred to as the “home” button) located at the bottom center of the front of the device. The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

c. If a device is equipped with a facial recognition feature, a user may enable the ability to unlock the device through his or her face. For example, this feature is available on certain Android devices and is called “Trusted Face.” During the Trusted Face registration process, the user holds the device in front of his or her face. The device’s front-facing camera then analyzes, and records data based on the user’s facial characteristics. The device can then be unlocked if the front-facing camera detects a face with characteristics that match those of the registered face. Facial recognition features found on devices produced by other manufacturers have different names but operate similarly to Trusted Face.

d. If a device is equipped with an iris recognition feature, a user may enable the ability to unlock the device with his or her irises. For example, on certain Microsoft

devices, this feature is called “Windows Hello.” During the Windows Hello registration, a user registers his or her irises by holding the device in front of his or her face. The device then directs an infrared light toward the user’s face and activates an infrared-sensitive camera to record data based on patterns within the user’s irises. The device can then be unlocked if the infrared-sensitive camera detects the registered irises. Iris recognition features found on devices produced by other manufacturers have different names but operate similarly to Windows Hello.

e. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are considered to be a more convenient way to unlock a device than by entering a numeric or alphanumeric passcode or password. Moreover, in some instances, biometric features are considered to be a more secure way to protect a device’s contents. This is particularly true when the users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

f. As discussed in this affidavit, based on my training and experience I believe that one or more digital devices will be found during the search. The passcode or password that would unlock the device(s) subject to search under this warrant is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the device(s), making the use of biometric features necessary to the execution of the search authorized by this warrant.

g. I also know from my training and experience, as well as from information found in publicly available materials including those published by device manufacturers, that biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, inactive, or has not been unlocked for a certain period of time. For example, Apple devices cannot be unlocked using Touch ID when (1) more than 48 hours has elapsed since the device was last unlocked or (2) when the device has not been unlocked using a fingerprint for 8 hours

and the passcode or password has not been entered in the last 6 days. Similarly, certain Android devices cannot be unlocked with Trusted Face if the device has remained inactive for four hours. Biometric features from other brands carry similar restrictions. Thus, in the event law enforcement personnel encounter a locked device equipped with biometric features, the opportunity to unlock the device through a biometric feature may exist for only a short time.

h. In my training and experience, the person who is in possession of a device or has the device among his or her belongings at the time the device is found is likely a user of the device. However, in my training and experience, that person may not be the only user of the device whose physical characteristics are among those that will unlock the device via biometric features, and it is also possible that the person in whose possession the device is found is not actually a user of that device at all. Furthermore, in my training and experience, I know that in some cases it may not be possible to know with certainty who is the user of a given device, such as if the device is found in a common area of a premises without any identifying information on the exterior of the device. Thus, it will likely be necessary for law enforcement to have the ability to require any individual, who is found at the SUBJECT PREMISES and reasonably believed by law enforcement to be a user of the device, to unlock the device using biometric features in the same manner as discussed above.

i. Due to the foregoing, if law enforcement personnel encounter a device that is subject to seizure pursuant to this warrant and may be unlocked using one of the aforementioned biometric features, the warrant I am applying for would permit law enforcement personnel to (1) press or swipe the fingers (including thumbs) of any individual, who is found at the subject premises and reasonably believed by law enforcement to be a user of the device(s), to the fingerprint scanner of the device(s) found at the premises; (2) hold the device(s) found at the premises in front of the face to those same individuals and activate the facial recognition feature; and/or (3) hold the device(s)

found at the premises in front of the face of those same individuals and activate the iris recognition feature, for the purpose of attempting to unlock the device(s) in order to search the contents as authorized by this warrant.

REQUEST FOR SERVICE AT ANY TIME AND FOR SEALING

113. I request that the Court authorize execution of the search warrants at any time of day or night, owing to the need to provide for the safety and security of executing law enforcement officers and to minimize the likelihood that people who have custody and control of the SUBJECT PREMISES and whose assistance may be necessary to execute the search warrants are unavailable. Moreover, based on law enforcement surveillance of and other information relating to the SUBJECT PREMISES, your affiant is aware that occupants of several of the identified premises and vehicles depart the SUBJECT PREMISES before 6:00 am. Several of the defendants who occupy the SUBJECT PREMISES have been observed departing their residences in the early morning hours to attend cockfights and to tend to their fighting roosters.

114. I further request, in order to avoid compromising this ongoing investigation, to avoid the subjects' flight, and for the safety of the agents and officers, that this application and affidavit, warrants, and orders be filed under seal until further order of the Court, except that copies should be made available to the United States Attorney's Office and other law enforcement agencies designated by the United States Attorney's Office whose assistance is deemed necessary to execute the arrest and search warrants.

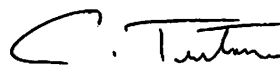
CONCLUSION

115. Based on my training, experience, and the information contained within this affidavit, I submit there is probable cause to believe Jorge CALDERON-CAMPOS, Alberto GOMEZ-SANTIAGO, Byron Adilio ALFARO-SANDOVAL, Johnathan Benjamin TORRES, Jose Angel BELTRAN-CHAIDEZ, and Mark GARCIA conspired with each other and others, to distribute and possess with the intent to distribute at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, and at

least 500 grams of a mixture and substance containing a detectable amount of methamphetamine and 50 grams of actual methamphetamine, Schedule I and II controlled substances, in violation of Title 21, United States Code, Sections 846, 841(a)(1), (b)(1)(A).

116. Also based on the foregoing, I submit there is probable cause to believe that evidence, fruits, and instrumentalities of conspiracy to distribute controlled substances, distribution of controlled substances, and possession with intent to distribute controlled substances, in violation of 21 U.S.C §§ 846, 841(a)(1), and/or operating or participating in an unlawful animal fighting venture, in violation of 7 U.S.C. § 2156, as those items are set forth in Attachment B, will be located at the SUBJECT PREMISES (as those are described in Attachments A-1 through A-9).

Respectfully submitted,



Cliff Turton Larde, Special Agent
Homeland Security Investigations

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed.R.Crim.P 4(d) and 4.1 this 20 day of April, 22.



Hon. Erica P. Grosjean
U.S. Magistrate Judge, Eastern District of California

Reviewed and approved as to form:

/s/ Christopher D. Baker

Christopher D. Baker
Assistant U.S. Attorney