

1 **AFFIDAVIT OF DEA SPECIAL AGENT PATRICK O'KAIN**

2 I, Special Agent Patrick O'Kain, being first duly sworn, hereby depose and state as follows:

3 **I. INTRODUCTION**

4 1. I make this affidavit in support of an application for a criminal complaint charging the
5 following persons (collectively, the "Target Subjects") with violations of the Controlled Substances Act:

6 EUTIMIO Reyna-Ceron¹, a/k/a "Tony" a/k/a "Gordo" a/k/a "Little Tony," the person
7 depicted in Attachment 1;

8 MARCELINO Reyna-Ceron, a/k/a "Anthony Rodriguez," a/k/a "Anthony Rodriguez-
9 Carrillo," the person depicted in Attachment 2;

10 CORNELIO Reyna-Ceron, a/k/a "Carlos Alberto Mondragon-Guzman," the person
11 depicted in Attachment 3;

12 ELIZABETH Reyna-Rodriguez, a/k/a "Lisa," the person depicted in Attachment 4;

13 Ramon Medina, a/k/a "MON," the person depicted in Attachment 5;

14 Remigio Madrigal Solorio, a/k/a "MINGO," the person depicted in Attachment 6;

15 Santiago Rubio Chavez, a/k/a "CALAMARGO," the person depicted in Attachment 7;

16 Rodolfo Rivera Herrera, a/k/a "FITO," the person depicted in Attachment 8;

17 RAYMUNDO Doval-Duran, a/k/a "Brian," the user of telephone numbers 707-217-5643
18 and (707) 570-7234, the person depicted in Attachment 9;

19 CRISTINO Vargas Mondragon, a/k/a "Kiti," a/k/a "Kiki," a/k/a "Kitz";

20 Julio Cesar Barbosa, a/k/a "MONTANA";

21 Brigido RANGEL;

22 Angel GUDINO-Urbina, a/k/a "Ramon Gudino-Urbina";

23 Robert ERICKSON;

24 William Anderson, a/k/a "BILLY";

25 FNU LNU, a/k/a "CAJAS," the user of telephone number 408-771-2826;

26 Valentin Camacho Toledo, a/k/a "LEOBARDO Carillo Mondragon," a/k/a "Liobardo
27 Mondragon," a/k/a "LEOBARDO Mondragon," a/k/a "Arturo Hernandez Salazar," the
28 person depicted in Attachment 10;

and in support of an application for a warrant to search the following locations, described more

¹ Because several of the Target Subjects share surnames, I have used first names to distinguish individuals from each other. No disrespect is intended to any person.

1 particularly in Attachments A1-A9 (collectively, the “**Target Locations**”), for the items specified in
2 Attachment B:

3 **Target Premises A:** 131 Schlee Way in Santa Rosa, California 95407;

4 **Target Premises B:** 2276 Truckee Drive in Santa Rosa, California 95401;

5 **Target Premises C:** 2545 Julie Court in Santa Rosa, California 95403;

6 **Target Premises D:** 392 Lincoln Court in Manteca, California 95336²;

7 **Target Premises E:** 211 Redbud Lane in Modesto, California 95354;

8 **Target Premises F:** 209 Redbud Lane in Modesto, California 95354;

9 **Target Premises G:** 448 Rusty Drive in Santa Rosa, California 95401;

10 **Target Premises H:** 36 Meridian Circle in Rohnert Park, California 94928;

11 **Target Premises I:** 3260 Curling Court in San Jose, California 95121;

12 and any computers, cell phones, or other digital media devices found therein or on the Target Subjects at
13 the time of their arrest, and to seize certain items that are fruits, evidence, and instrumentalities of
14 violations of Title 21, United States Code, sections 841 (possession with intent to distribute and
15 distribution of heroin and methamphetamine), 846 (conspiracy to distribute drugs), 843(b) (illegal use of
16 a communications facility) and Title 18, United States Code, section 1956(h) (conspiracy to launder
17 money).³ This search shall include all rooms and garages or storage spaces, attached or unattached, that
18 are associated with the **Target Locations**, and any containers, locked or unlocked, located within or
19 attached to the **Target Locations**.

20 2. The statements contained in this affidavit are based on my own investigation, my training
21 and experience as a law enforcement agent, information provided to me by or through other law
22 enforcement agents, investigators and individuals with knowledge of this matter, and through my review
23 of documents related to this investigation. This affidavit summarizes such information in order to show
24 that there is probable cause to believe that the items listed in Attachment B are believed to be in the

25 _____
26 ² I am not seeking a warrant to search **Target Premises D, E or F** from the Northern District of
27 California. Agents will apply for a warrant for **Target Premises D and E** in the Eastern District of
28 California. Agents have elected not to seek a warrant for **Target Premises F** at this time.

³ Although the affidavit states probable cause to believe that certain of the defendants have
violated money laundering statutes, and therefore, the search warrants seek evidence related to those
crimes, the government is not yet seeking charges for those crimes, though it may in the future.

1 locations described in Attachment A. This affidavit does not purport to set forth all of the evidence
2 gathered to date in this investigation. Based upon the information below, it is my opinion that there is
3 probable cause to believe that the fruits, evidence, and instrumentalities of violations of 21 U.S.C.
4 §§ 841, 843(b) and 846, and 18 U.S.C. § 1956(h) are likely to be found in the **Target Locations**.

5 **II. AGENT BACKGROUND**

6 3. I am an “investigative or law enforcement officer of the United States” within the
7 meaning of Title 18, United States Code, Section 2510(7). As such, I am empowered by law to conduct
8 investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

9 4. I am a Special Agent employed by the Department of Justice, Drug Enforcement
10 Administration (DEA), and have been so since January 2013. I am currently assigned to the Santa Rosa
11 Resident Office of the San Francisco Field Division. I am authorized and presently assigned to
12 investigate and enforce violations of the Controlled Substance Act and other violations of federal law.
13 During my employment with DEA, I received four and one half months of full-time, formalized training
14 at the DEA Basic Agent Training Academy in Quantico, Virginia. This training included, but was not
15 limited to, drug identification, detection, interdiction, undercover operations, money laundering
16 techniques, transportation, concealment, and sales of narcotics, as well as the investigation of
17 individuals and organizations involved in the smuggling, cultivation, manufacturing, and illicit
18 trafficking of controlled substances, including methamphetamine and heroin.

19 5. My training and experience is based on my formal training, as well as the knowledge of
20 other Special Agents of the DEA, other federal agencies, and state and local law enforcement officers
21 who are experienced in the field of investigating controlled substance violations. Additionally, I have
22 had contact with narcotics traffickers and informants and have discussed with them the manufacture,
23 importation, concealment, packaging, sales, use, distribution, and transportation methods utilized by
24 narcotics traffickers and drug trafficking organizations (DTOs). As a result, I have become familiar
25 with the operations and the various tools, methods, trends, paraphernalia, conveyances, and related
26 articles utilized by various traffickers in their efforts to manufacture, import, conceal, package, sell, use,
27 distribute, and transport narcotics.

28 6. Over the course of my career at DEA, I have been involved in investigations of numerous

1 criminal offenses, including those offenses related to this current investigation. I have participated in
2 numerous investigations of illicit drug trafficking organizations, ranging from street level dealers to
3 major dealers. These investigations have included the use of confidential informants; undercover
4 agents; the analysis of pen register, trap and trace, and toll records; physical surveillance; and the
5 execution of search warrants. These investigations have also included the unlawful importation,
6 possession with intent to distribute, and distribution of controlled substances, the related laundering of
7 monetary instruments, the conducting of monetary transactions involving the proceeds of specified
8 unlawful activities, and conspiracies associated with criminal narcotics offenses. I have participated in
9 investigations involving seizures of cocaine, methamphetamine, heroin, LSD, 3,4-
10 Methylenedioxyamphetamine (also known as MDMA, or Ecstasy), and marijuana.

11 7. I have participated in one federal investigation in which court-authorized wire
12 interceptions were used in narcotics and money laundering investigation. During this investigation, I
13 listened to and deciphered conversations between narcotics traffickers in which they discussed their
14 criminal activities in coded language, the meanings of which were later corroborated by surveillance
15 observations or defendants' statements, and I have participated in the seizure of narcotics and narcotics
16 proceeds that resulted from the monitoring of these types of conversations.

17 8. I have participated in approximately five Organized Crime Drug Enforcement Task Force
18 (OCDETF) investigations. OCDETF is a task force comprised of multiple law enforcement agencies
19 which jointly investigate drug trafficking organizations

20 9. I have been involved in the execution of numerous state and federal narcotics-related
21 search warrants. As a result, I have encountered and become familiar with the various tools, methods,
22 trends, paraphernalia, and related articles used by drug traffickers and trafficking organizations in their
23 efforts to import, conceal, manufacture, and distribute controlled substances. I am familiar with the
24 appearance cocaine, methamphetamine, heroin, LSD, MDMA, and marijuana, and other controlled
25 substances. I am familiar with and aware of the terminology used by narcotics traffickers concerning
26 narcotics and narcotics dealing.

27 10. I have interviewed numerous drug dealers, users, and confidential informants and have
28 discussed with them the lifestyle, appearances, and habits of drug dealers and users, the use and meaning

1 of coded language and the concealment of assets. I have become familiar with the manner in which
2 narcotics traffickers smuggle, transport, store, and distribute narcotics, as well as how they collect and
3 launder drug proceeds. I am also familiar with the manner in which narcotics traffickers use telephones,
4 cellular telephone technology, coded or slang-filled telephone conversations, false or fictitious identities,
5 and other means to facilitate their illegal activities and thwart law enforcement investigations.

6 11. I have gained expertise in the use of a variety of law enforcement techniques, including
7 the application and utilization of wire and electronic interceptions, the utilization of confidential sources
8 and undercover agents, the use of physical surveillance techniques, and various other types of electronic
9 surveillance techniques, such as body wires and transmitters. Additionally, I have gained knowledge
10 and expertise in the utilization of pen register and trap and trace devices; telephone toll analysis; the
11 analysis of traditional types of records, including financial records, telephone records, and utility
12 records; and nontraditional records, including records routinely maintained by narcotics traffickers
13 listing amounts of drugs delivered and amounts of money owed (also known as pay-and-owe sheets). I
14 have also gained knowledge and expertise in the collection and identification of drug evidence and the
15 analysis and interpretation of taped conversations obtained by the methods detailed above.

16 12. By virtue of my training and experience, and through my conversations with other agents
17 and officers who conduct drug investigations, I have become familiar with the methods used by drug
18 traffickers to import, transport, safeguard, and distribute drugs, and the methods used by drug traffickers
19 to collect, transport, safeguard, remit, and/or launder drug proceeds.

20 13. I have personally participated in the investigation discussed in this Affidavit. I have also
21 discussed the investigation with other DEA agents and with other law enforcement agencies involved in
22 it. I have reviewed records and reports relating to the investigation. Unless otherwise noted, wherever
23 in this Affidavit I assert that a statement was made, the information was provided by another DEA
24 agent, law enforcement officer, or witness who may have had either direct or hearsay knowledge of that
25 statement and to whom I or others have spoken, or whose reports I have reviewed. Throughout this
26 Affidavit, all sentences that begin with the words "I believe" are based upon such information. Since
27 this affidavit is submitted for the limited purpose of setting forth probable cause for the requested search
28 warrant, I have not included each and every fact known to me concerning this investigation.

1 **III. RELEVANT STATUTES**

2 14. 21 U.S.C. § 841(a)(1) makes it unlawful for a person to knowingly or intentionally
3 manufacture, distribute, dispense, or possess with intent to manufacture, distribute, or dispense,
4 controlled substances, including heroin and methamphetamine.

5 15. 21 U.S.C. § 843(b) makes it unlawful to use a communications facility, including a
6 cellular telephone, to facilitate a violation of Title 21.

7 16. 21 U.S.C. § 846 makes it unlawful for a person to attempt or conspire to manufacture,
8 distribute, or possess with intent to distribute controlled substances.

9 17. 18 U.S.C. § 1956(h) makes it unlawful to conspire to launder the proceeds of certain
10 unlawful activities, including drug trafficking.

11 **IV. PROBABLE CAUSE**

12 **A. Overview**

13 18. This case arises out of a joint investigation by the Drug Enforcement Administration
14 (DEA), the Internal Revenue Service (IRS), the Santa Rosa Police Department (SRPD), and others
15 (collectively, “agents”). The DEA began this investigation in December 2013 after SRPD received
16 information indicating that members of the Reyna-Ceron Family were distributing heroin and
17 methamphetamine in the Santa Rosa area.

18 19. Over the past two decades, heroin has had a terrible impact on our community.
19 According to the National Institute of Drug Abuse, the number of people who died from heroin
20 quadrupled between 1999 and 2013, going from 1,960 in 1999 to 8,257 in 2013, with the majority of
21 that increase coming in the past four to five years. Nat’l Inst. for Drug Abuse, “National Overdose
22 Deaths from Select Prescription and Illicit Drugs,” (Feb. 2015) at [http://www.drugabuse.gov/related-](http://www.drugabuse.gov/related-topics/trends-statistics/overdose-death-rates)
23 [topics/trends-statistics/overdose-death-rates](http://www.drugabuse.gov/related-topics/trends-statistics/overdose-death-rates) (last accessed Nov. 23, 2015) (“NIDA Statistics”). By way
24 of comparison, in 2013 only 5,782 people were murdered with handguns. See “Crime in the United
25 States 2013” at www.fbi.gov⁴ (last accessed Nov. 23, 2015). The overdose death statistics tell only part
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27 ⁴ [https://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/offenses-](https://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/offenses-known-to-law-enforcement/expanded-homicide/expanded_homicide_data_table_8_murder_victims_by_weapon_2009-2013.xls)
28 [known-to-law-enforcement/expanded-](https://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/offenses-known-to-law-enforcement/expanded-homicide/expanded_homicide_data_table_8_murder_victims_by_weapon_2009-2013.xls)
[homicide/expanded_homicide_data_table_8_murder_victims_by_weapon_2009-2013.xls](https://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/offenses-known-to-law-enforcement/expanded-homicide/expanded_homicide_data_table_8_murder_victims_by_weapon_2009-2013.xls)

1 of the story. For every person who dies of a drug overdose, there are approximately another 25 who
2 require emergency medical care. Between 2008 and 2011, an average of 1.1 million people annually
3 visited hospital emergency departments because of drug overdoses. See CDC Nat'l Center for Health
4 Statistics Data Brief No. 196 (Apr. 2015) at 1. The number of people seeking emergency medical care
5 for drug overdoses increased from 30.7/10,000 in 2004-2007 to 35.4/10,000 in 2008-2011. Id. The
6 heroin problem is growing worse. A 2014 study from the Centers for Disease Control and Prevention
7 noted that the number of current heroin users increased 74% between 2009 and 2012. See CDC
8 Morbidity & Mortality Weekly Report vol. 63, no. 39 at 849 (Oct. 3, 2014). The study found that heroin
9 overdose death rates in 28 states doubled between 2010 and 2012, and that nationwide, there was a 45%
10 increase in heroin overdose deaths between 2010 and 2011. The deaths increased for males and females,
11 all age groups, all census regions and all racial/ethnic groups other than American Indians. Similarly,
12 the National Institute for Drug Abuse found that, although cocaine users outnumbered heroin users by
13 approximately 5 times in 2013, id., heroin-involved overdose deaths (8,257) were almost twice those of
14 cocaine (4,944).

15 20. Heroin abuse is not just a national problem. It is also a local problem. In the Northern
16 District of California, 105 people died from heroin overdoses between 2011 and 2013, with almost half
17 of those deaths occurring in 2013 alone. See Cal. Dept. of Pub. Health Vital Statistics Death Data (Nov.
18 2015). Between 2012 and 2014, another 1,232 people in the Northern District were admitted to hospital
19 emergency departments for conditions related to heroin abuse and survived. Cal. Office of Statewide
20 Health Planning & Dev., Emergency Dept. Data (Nov. 2015). In Sonoma County, where the Reyna-
21 Ceron Family operates, the non-fatal treat and release emergency department visit rate for unintentional
22 drug poisoning due to heroin increased 267% between the 2009-2011 and 2012-2014 time periods.

23 21. This investigation has involved, among other things, five federal wiretaps of seven
24 phones, trash pulls, mail covers, search warrants, physical surveillance and at least 20 controlled
25 purchases of drugs between August ²⁰¹⁴~~2015~~ and October 2015. Over the course of this investigation,
26 agents have developed evidence indicating that EUTIMIO and MARCELINO operate a heroin and
27 methamphetamine distribution network. Based on the information I have learned through the course of
28 this investigation, I believe that the individuals and their respective roles are as follows:

- 1 • EUTIMIO manages the day-to-day distribution operation, taking calls from customers
2 and dispatching couriers to deliver drugs to the customers. I believe that EUTIMIO
3 distributes about a kilogram of heroin per week.
- 4 • MON, MINGO and CALAMARGO are couriers who deliver drugs for EUTIMIO. They
5 also help EUTIMIO process the drugs EUTIMIO obtains to prepare them for distribution;
- 6 • MARCELINO is EUTIMIO's elder brother or father. MARCELINO oversees EUTIMIO
7 and obtains cars for EUTIMIO's couriers to use to distribute drugs. MARCELINO also
8 manages the group's money;
- 9 • ELIZABETH is MARCELINO's daughter. ELIZABETH is also either married to or in a
10 dating relationship with MON. ELIZABETH aids the group in splitting up the drug
11 proceeds and managing the group's bank accounts.
- 12 • CORNELIO is another of EUTIMIO's brothers. CORNELIO has sold drugs to
13 confidential informants in the past and more recently has assisted EUTIMIO's operations
14 by delivering money to one of EUTIMIO's suppliers.
- 15 • CAJAS is one of EUTIMIO's suppliers. CAJAS also supplies FITO;
- 16 • CRISTINO operated his own distribution network and also supplied EUTIMIO with
17 drugs until August 12, 2015, when agents arrested CRISTINO, MONTANA, RANGEL
18 and GUDINO with 18.82 kilograms of black tar heroin, 1.97 kilograms of white powder
19 heroin, and 9.77 kilograms of 99.1% pure methamphetamine;
- 20 • MONTANA delivered drugs for CRISTINO;
- 21 • BILLY was one of CRISTINO's customers and a person to whom MONTANA delivered
22 drugs. I believe that BILLY bought between a half ounce and an ounce of heroin from
23 CRISTINO each day and then sold those drugs on the street.
- 24 • RANGEL and GUDINO supplied CRISTINO with the methamphetamine and heroin
25 seized on August 12, 2015;
- 26 • FITO is related to EUTIMIO by marriage and also runs a separate distribution network.
27 He also shares intelligence with EUTIMIO regarding sources of supply and law
28 enforcement activity in their area;

- ERICKSON was a street-level dealer who purchased drugs from both EUTIMIO and FITO. I believe that on September 2, 2015, ERICKSON obtained heroin from FITO and then re-sold some of that heroin to, among others, a person who gave the drugs to NM.⁵ NM overdosed and died after using that heroin;
- RAYMUNDO is also related to EUTIMIO by marriage and he too runs a separate distribution network; and,
- LEOBARDO is one of EUTIMIO's current suppliers.

B. The Reyna-Ceron Distribution Operation and Controlled Purchases

22. Over the course of this investigation, agents working with confidential sources ("CS") have conducted at least 20 controlled purchases of heroin and/or methamphetamine from three different individuals – EUTIMIO, CORNELIO, and FITO. Most of those transactions followed the same pattern: a CS called EUTIMIO's "Customer Phone" and ordered drugs. EUTIMIO then used his "Inside Phone" to dispatch a courier – MON, MINGO, CALLAMARGO and others – to deliver those drugs. The chart below lists those transactions:

Date	Quantity	Substance	Buyer	Seller
4/17/14	76.1 grams ⁶ 82.9 grams (99% pure) (82.0 grams actual)	Heroin Methamphetamine	CS-1 ⁷	CORNELIO
8/29/14	Approx. 1 ounce + 6 grams	Heroin	CS-3 ⁸ UC-1	EUTIMIO

⁵ Out of consideration for the victim's family, the victim will be identified only as "NM" in this affidavit.

⁶ The bolded exhibits are those for which I have received official lab results. The results for the other exhibits are still pending and thus are listed as "approximate" weights.

⁷ I worked with CS-1 between December 2013 and July 2014, and I found CS-1 to be reliable. CS-1 was working for financial consideration. CS-1 had previously been convicted of misdemeanors involving the false display of a disability placard in 2006, violation of a protective order and threatening with the intent to terrorize in 2009, and violation of a protective order in 2013. To the best of my knowledge, CS-1 has never provided me with false information, nor do I have any reason to doubt the reliability of the information he/she provided. SRPD also indicated that they believed CS-1 to be reliable during their interactions.

⁸ CS-3 is a confidential source assigned to SRPD. CS-3 has a criminal record involving primarily narcotics-related convictions and was working for consideration on several pending state cases. CS-3 has conducted multiple controlled purchases of heroin from the Reyna-Ceron Family DTO at the direction of SRPD. Detectives from the SRPD report that they believe CS-3's information to be reliable.

Date	Quantity	Substance	Buyer	Seller
9/4/14	Approx. 18 grams	Heroin	CS-3 UC-1	EUTIMIO
10/16/14	Approx. 4.3 grams	Heroin	CS-3	EUTIMIO
11/19/14	Approx. 8 grams	Heroin	CS-4 ⁹ UC-2	EUTIMIO
12/18/14	Approx. 1 ounce	Heroin	CS-3 UC-1	EUTIMIO
12/23/14	Approx. 1 ounce	Heroin	UC-1	EUTIMIO
1/8/15	Approx. 8 grams	Heroin	CS-4 UC-2	EUTIMIO
3/24/15	47.1 grams	Heroin	CS-7 ¹⁰	EUTIMIO
4/6/15	47.8 grams	Heroin	CS-7	EUTIMIO
4/22/15	Approx. 2 ounces	Heroin	CS-7	EUTIMIO
5/5/15	47.5 grams	Heroin	CS-7	EUTIMIO
5/13/15	48.3 grams	Heroin	CS-7	EUTIMIO
5/25/15	47.9 grams	Heroin	CS-7	EUTIMIO
6/2/15	Approx. 4 ounces	Heroin	CS-7	EUTIMIO
6/14/15	Approx. 2 ounces 55.2 g (96.8% pure) (53.4 grams actual)	Heroin Methamphetamine	CS-7 UC-3	EUTIMIO
6/24/15	48.2 grams	Heroin	CS-7	EUTIMIO
10/14/15	Approx. 7 grams	Heroin	CS-10 ¹¹	EUTIMIO
11/20/15	Approx. 5.1 grams	Heroin	CS-10	EUTIMIO
11/25/15	Approx. 2 ounces	Heroin	CS-10	FITO
12/2/15	Approx. 64 grams	Methamphetamine	CS-11 ¹²	RAYMUNDO

⁹ I have been working with CS-4 since October 27, 2014. CS-4 has conducted multiple controlled purchases of heroin from the Reyna-Ceron Family DTO at DEA's direction. CS-4 was working for consideration for a minor drug possession charge and a theft charge in Sonoma County and received a reduced sentence based on her/his cooperation. I have found CS-4's information to be accurate.

¹⁰ CS-7 has been working with the DEA since March 2015. Prior to working with the DEA, CS-7 worked with Ukiah Police Department for approximately four months. Ukiah PD considers CS-7 to be reliable. CS-7 told me that s/he has been buying heroin from EUTIMIO since 2012. CS-7 has multiple drug-related convictions but is not working for consideration for any current charges; instead, CS-7 worked for consideration towards charges that her/his significant other was facing. CS-7 has also been compensated financially. As set forth below, I have conducted multiple controlled purchases with CS-7, and I have found CS-7 to be reliable.

¹¹ CS-10 has been working with SRPD since approximately early October 2015. CS-10 is working towards consideration for pending drug charges. CS-10 has prior convictions for prostitution, theft, and drug possession. The detectives who work with CS-10 believe CS-10 to be reliable.

1 Eutimio has used at least 18 phone numbers (both customer and inside phones) since August 15, 2014.
2 Based on three different periods of intercepting EUTIMIO's wire and electronic communications, it
3 appears that EUTIMIO dispatched his runners to deliver drugs upwards of 20 times per day. The
4 following are examples of how these transactions took place.

5
6 **1. May 25, 2015 Controlled Purchase**

7 23. For example, on May 25, 2015, a CS purchased two ounces of heroin from EUTIMIO.
8 The CS reported that s/he had been purchasing heroin since 2012 from a person s/he knew as "Tony"
9 and who I believe was EUTIMIO.¹³ During the transaction, agents were monitoring EUTIMIO's
10 customer phone ("Target Telephone 1") and his inside phone ("Target Telephone 2"). Agents
11 intercepted both the call from the CS in which s/he ordered drugs on Target Telephone 1 and the
12 dispatch call where EUTIMIO sent his courier to deliver the drugs. On May 25, 2015, I connected the
13 CS with EUTIMIO. This call, which was monitored pursuant to a federal wiretap, went as follows:

14 EUTIMIO: Hello
15 CS: Hey Tony. How are you, man?
16 EUTIMIO: Good, good, and you?
17 CS: I'm hanging in there, it's kind of slow. But, I'm trucking
18 along, you know what I mean?
19 EUTIMIO: Yeah, its fine, everything is good.
20 CS: Yeah, right on. Hey, I'm down here at the Fulton Road
21 McDonalds. Can you send the fellas down for two?
22 EUTIMIO: OK.
23 CS: Alright, I'll see you.
24 EUTIMIO: Alright, see you there.

21 ¹² Santa Rosa Police Department has been working with CS-11 since approximately March 2015.
22 S/he is working for consideration towards pending charges for possession of a controlled substance for
23 sale. CS-11 was previously charged for possession for sale of a controlled substance. CS-11 has
24 conducted approximately five controlled purchases at the direction of Santa Rosa PD and has provided
25 information on the whereabouts of a wanted subject. SRPD considers CS-11 to be reliable.

26 ¹³ I believe for several reasons that EUTIMIO used Target Telephones 1 and 2. First, the physical
27 location data indicated that both phones were consistently located at or very near 131 Schlee Way
28 (**Target Premises A**), which I believe is EUTIMIO's residence. Second, on May 21, 2015, EUTIMIO
spotted a surveillance team following him as he left **Target Premises A** and drove to **Target Premises B**. EUTIMIO used Target Telephone 2 to contact co-conspirators, including MARCELINO, to notify them. The photograph attached as Attachment 1 is a booking photograph of EUTIMIO. Agents confirmed that this photograph matches the man that they saw outside **Target Premises A** on May 21, 2015. Third, as described below, EUTIMIO gave the name "Eutimio Reyna Ceron" in an intercepted call on a successor inside phone (Target Telephone 6). The voice was the same as on Target Telephones 1 and 2.

1 Approximately one minute later, at 12:25 p.m., EUTIMIO called a person I believe was MINGO, one of
2 EUTIMIO's couriers.¹⁴ In that call, EUTIMIO told MINGO to bring two "cahuamas" to the customer at
3 the "M."¹⁵

4 24. Based on my training and experience, as well as information learned during the course of
5 the investigation, I believe that EUTIMIO understood the reference to "two" as a reference to two
6 ounces of heroin. I also believe that the CS's use of the word "fellas" referred to the couriers EUTIMIO
7 uses to deliver heroin. I further believe that "cahuamas" (which is a Spanish word that is slang for a 40-
8 ounce bottle of beer) is a code word that EUTIMIO uses to describe one ounce of heroin. I also believe
9 that "M" is code for the McDonalds, which is where CS told EUTIMIO s/he was located.

10 25. Approximately 11 minutes after the call between CS-7 and EUTIMIO, I observed a
11 Toyota Solara occupied by two Hispanic male adults drive into the McDonald's parking lot and pass in
12 front of the CS's vehicle. The CS followed the Toyota out of the parking lot. The two vehicles came to
13 a stop a short distance away. The CS got out, approached the Toyota and completed the transaction.
14 Another agent and I recovered approximately two ounces of heroin from the CS. The Drug
15 Enforcement Administration's Western Regional Lab confirmed that it was 47.9 grams of heroin.

16 26. The CS identified MON as the driver of the Toyota and said he (MON) was the same
17

18 ¹⁴ Agents intercepted calls between EUTIMIO and MINGO beginning in May and June 2015, and
19 again in October and November 2015. Those calls indicated that MINGO is one of EUTIMIO's
20 couriers. On October 11, 2015, agents intercepted a call in which EUTIMIO sent MINGO to an auto
21 parts store in Santa Rosa. Agents took photographs of MINGO and CALAMARGO as they were
22 leaving the store. Then on November 20, 2015, during a controlled purchase, EUTIMIO dispatched
23 MINGO to deliver heroin to the CS. MINGO arrived by himself. The surveillance agents confirmed he
24 was the same person seen leaving the auto parts store. On December 6, 2015, a Sebastopol police
25 officer pulled over a car in which CALAMARGO and MINGO were riding. According to wire
26 intercepts of calls between MINGO and EUTIMIO, CALAMARGO was driving. The officer identified
27 the driver as Santiago Rubio Chavez and photographed him. The photograph was of the other of the two
28 persons EUTIMIO sent to the auto parts store on October 11, 2015. The officer identified the passenger
as Remigio Madrigal Solorio. MINGO is depicted in Attachment 6. CALAMARGO is depicted in
Attachment 7.

¹⁵ Many of these communications occurred in Spanish, and only selected calls intercepted during
this period are summarized below. These descriptions are not verbatim accounts, but are based on initial
summaries and draft translations that have been prepared by monitors who are fluent in both Spanish
and English. As such, it is possible that there will be some discrepancies between the descriptions set
forth below and the final translated. Interpretations of the substance of the calls are based upon the
training and experience of law enforcement agents involved in the investigation, as well as evidence
developed through various other investigative techniques that agents have used in conjunction with
intercepted communications in order to develop the investigation.

1 person who had been present during prior controlled purchases.¹⁶ The CS did not recognize the person
2 in the passenger seat. The CS said that the passenger was holding the heroin in his hand as the CS
3 arrived at the Toyota. According to the CS, the passenger handed the CS the heroin and the CS handed
4 the passenger \$1,000 in official advance funds. The passenger then handed the money to MON.

5 **2. June 2, 2015 Controlled Purchase**

6 27. On June 2, 2015, the CS purchased another four ounces of heroin from EUTIMIO and his
7 couriers. I connected the CS with EUTIMIO on the phone. The call included the following exchange:

8 CS: Hey, I'm down here in Santa Rosa, at the McDonalds on
9 Fulton. You said you had some new stuff.
10 EUTIMIO: Yeah.
11 CS: Yeah. I'm going to need to get four of them. Is there any
12 chance you could work me a deal?
13 EUTIMIO: I'll be honest with you, man. I can't. It's the price
14 (unintelligible) because this stuff is more better. This guy
15 didn't put in too much cut, is why I can't go lower than that
16 man.
17 CS: Yeah? Alright, I was hoping maybe you could, you know,
18 work me up something nice, you know. I'm buying more
19 than two, you know.
20 EUTIMIO: I got another one that I can work out. But, you're not going
21 to like it. You know? That's why I'm trying to give to you
22 the good stuff.
23 CS: Yeah, I want the better stuff, you know.
24 EUTIMIO: That's why I'm trying to told you, that I have.
25 CS: That's why I'm buying four of them, you know what I
26 mean?
27 EUTIMIO: Yeah, yeah, yeah, yeah. I can't work in the deal, because
28 me and the money, man. Because this guy, he don't put in
too much cut is why (unintelligible) I'm not talking very
clean, but it's better than the other one.
CS: Uh huh. Okay.
EUTIMIO: That's why I'm trying to told you I can't give it to you any
more cheap than that.
CS: Alright. Maybe in the future.
EUTIMIO: Uh, yeah, maybe.
CS: I'm not going to stop trying. Alright, so are you going to
send the fellas out with four?
EUTIMIO: Huh?
CS: Are you going to send the fellas out with four?
EUTIMIO: Four? Okay.
CS: I'm at the McDonalds here on Fulton.
EUTIMIO: Okay, I'll see you there. Four big ones right?
CS: Four big ones, yeah.
EUTIMIO: Okay, I'll see you there.
CS: Alright, thanks.

28 ¹⁶ The CS made the first controlled purchase on the DEA's behalf on March 24, 2015. The CS made approximately five purchases prior to the May 25, 2015 transaction.

1 Immediately after the call with CS-7, toll records show that EUTIMIO called MON.¹⁷ In this
2 conversation, EUTIMIO told MON to deliver four “cauhamas.” EUTIMIO then told MON to give the
3 CS the ones from “the refrigerator” because the CS stated he/she wanted better quality.

4 28. Based on my training and experience, as well as the information learned during the
5 course of this investigation, I believe that EUTIMIO understood the CS’s reference to “four big ones” to
6 mean four ounces of heroin. I also believe that the discussion of “cut” was a reference to non-narcotic
7 substance used to dilute heroin, and EUTIMIO was telling the CS that he was providing a higher quality
8 drug, which would have less “cut” and therefore could not be discounted. I further believe that
9 EUTIMIO communicated the CS’s request for four ounces of heroin to MON when EUTIMIO told
10 MON to deliver four “cauhamas.”

11 29. At approximately 3:07 p.m., agents observed a Honda sedan arrive at the parking lot
12 where the CS was waiting. The CS followed the Honda a short distance away and then parked and went
13 up to the Honda and completed the transaction. Following the purchase of heroin, another agent and I
14 recovered approximately four ounces of heroin from the CS. A field test was positive for the presence
15 of heroin. I am still awaiting final laboratory results.

16 30. The CS told me that the driver was the same person who had been present on prior
17 occasions, the person the CS previously had identified as MON. The CS was unable to see the
18 passenger’s face. The CS said that the passenger was holding the heroin in his hand as the CS arrived at
19 the window. The passenger handed the CS the heroin and the CS gave the passenger \$2,000.00 in cash.

20 3. June 14, 2015 Controlled Purchase

21 31. On June 14, 2015, the CS ordered two ounces of methamphetamine and two ounces of
22 heroin from EUTIMIO. I connected the CS with EUTIMIO on the phone. The call, which was
23

24 ¹⁷ Information obtained earlier in the investigation suggests that MON’s true name may be
25 Raymond or Ramon Medina. During the course of the wire interceptions, the interceptees referred to
26 him as “MON”, which is possibly short for Ramon. Raymond Medina is the name listed on the
27 subscriber information for the phone MON used during the interception of Target Telephones 1 and 2.
28 In addition, agents took photographs of MON as he walked away from **Target Premises C** on May 13,
2015. One of those photographs is included in Attachment 5. Agents showed the CS one of those
photographs as well. The CS recognized this individual as the person who was part of the May 25, 2015
transaction. Grand jury subpoenas for bank records uncovered a tax refund check payable to Elizabeth
Rodriguez and “R Medina-Aguilar,” but agents have not yet located a driver’s license photo or mug shot
in order to confirm MON’s identity.

1 recorded, went as follows:

2 EUTIMIO: Hey
3 CS: Hey Tony. How are you?
4 EUTIMIO: Good, good, and you?
5 CS: I'm hanging in there. Hey I'm down here in Santa Rosa.
6 EUTIMIO: I'm at the McDonalds on Fulton.
7 EUTIMIO: Okay. How many?
8 CS: I'm going to need two black, and do you have any white?
9 EUTIMIO: Yeah.
10 CS: What's the price on an ounce?
11 EUTIMIO: \$550
12 CS: \$550? Okay, can I get two of those?
13 EUTIMIO: Two and two?
14 CS: Two and two.
15 EUTIMIO: Okay. Two of the white and two of the black.
16 CS: Right, and I had to have a friend bring me down cause my
17 car broke down . . .
18 EUTIMIO: Okay, see you there.
19 CS: Alright, thank you.

20 Immediately after the CS called EUTIMIO, EUTIMIO called MON. EUTIMIO told MON to go see the
21 customer, who wanted two "cahuamas" of the "R" and two of the "M." EUTIMIO told MON to drive
22 around with nothing at first. EUTIMIO said that he was not very convinced by the CS, whom he
23 believed sounded different. MON confirmed that he could drive by with nothing on him at first, but that
24 the CS would likely follow. EUTIMIO told MON to drop off one of the other couriers, known only as
25 "PANZAS," with the "work" at the park – and not to drop him off at the place where they usually met
26 the CS. EUTIMIO instructed MON to drive around for a while before conducting the transaction.

27 32. Based on my training and experience and information learned during this investigation, I
28 believe that EUTIMIO understood "black" to mean heroin and "white" to mean methamphetamine. I
29 believe that EUTIMIO told the CS that he charged \$550.00 per ounce of methamphetamine. I also
30 believe that EUTIMIO understood that the CS requested to purchase two ounces of heroin and two
31 ounces of methamphetamine when the CS requested two of the black and two of the white. I believe
32 that when EUTIMIO ended the call by saying "Okay, see you there" he did not plan to deliver the drugs
33 himself, but intended to send his runners to conduct the delivery. I further believe that EUTIMIO used
34 several code words to communicate the CS's order to MON. I believe EUTIMIO's reference to
35 "cahuamas" was a reference to an ounce. I believe his use of the letter "R" was short for "raspado,"
36 which is the Spanish word for shaved-ice and is a common code word for methamphetamine. I also

1 believe that EUTIMIO's use of the term "M" was short for "morena" which is the Spanish word for dark
2 or brown and was a reference to heroin. I further believe that EUTIMIO told MON that the CS sounded
3 different on the phone because EUTIMIO was suspicious that the CS might be working with law
4 enforcement. I believe that EUTIMIO's advice to MON to drive around for awhile and drop off
5 PANZAS with the "work" – which I believe was a reference to drugs – before meeting with the CS was
6 meant to allow MON to check out the situation first to determine whether the transaction was a trap and,
7 if it was, to allow MON to avoid getting caught with drugs at the meeting location.

8 33. At my direction, the CS rode in a car with an undercover officer ("UC") to the meeting
9 location. At approximately 12:27 p.m., agents observed a silver Honda Accord arrive in the parking lot.
10 The UC and the CS followed the Accord out of the parking lot. There was only one Hispanic male in
11 the Accord. The Accord, with the UC and the CS following, drove several blocks and made several
12 turns. Finally, the Accord came to a stop. The UC observed a Hispanic male adult walk up to the
13 Accord get into the front passenger seat. At approximately 12:30 p.m., MON called EUTIMIO. During
14 the call, MON said that the UC looked similar to an individual who had been with another customer.
15 MON also described the car the UC and CS were driving. EUTIMIO asked MON if he saw anything
16 else and MON said he hadn't. MON then described the UC to EUTIMIO. EUTIMIO told MON that it
17 was his (MON's) decision if he wanted to go through with the deal, and MON said he would do it.
18 EUTIMIO instructed MON to ask the UC where he was from.

19 34. The CS completed the transaction and obtained approximately two ounces of heroin and
20 two ounces of methamphetamine. The CS later said that s/he handed \$2,100 to the passenger, who then
21 handed the money to MON. MON handed the drugs to the passenger, who handed them to the CS. The
22 CS told me that the driver appeared to be nervous and drove away quickly after the transaction. The
23 DEA's Western Regional Lab tested the suspected methamphetamine and confirmed that it was 55.2
24 grams of 96.8% pure (53.4 grams of actual) methamphetamine. The lab results on the suspected heroin
25 are still pending, though the substance field tested positive for the presence of heroin.

26 35. After the transaction, MON called EUTIMIO and told EUTIMIO that he (MON) thought
27 the UC was law enforcement. MON said that the UC was taking photos and kept looking at MON.
28 EUTIMIO asked about the money that the CS had used to pay for the drugs. MON reported that it was

1 all in flat \$100 denominations. MON said that the CS usually pays with 20s and 10s.

2 36. Later in the day, EUTIMIO called MARCELINO to discuss the transactions.¹⁸
3 EUTIMIO said that in the morning, the customer – which I believe was a reference to the CS – had
4 ordered a good amount of the “M.” EUTIMIO said that the customer typically ordered one or two, but
5 this time he ordered four. EUTIMIO said that he didn’t like the presence of the other individual – which
6 I believe was a reference to the UC – and said that the CS sounded different when he called. EUTIMIO
7 said that MON believed that the UC was the same person who was with another customer when
8 EUTIMIO “got made” in the red car. EUTIMIO also described the undercover vehicle. MARCELINO
9 advised EUTIMIO to be careful. EUTIMIO replied that he only sold the drugs to the CS, but not the
10 UC. MARCELINO instructed EUTIMIO to get rid of the money from that transaction immediately.
11 EUTIMIO said that the CS paid with 100-dollar bills, and MARCELINO again told EUTIMIO to get rid
12 of the bills. MARCELINO then told EUTIMIO not to sell anything to the CS in the future. EUTIMIO
13 also explained the steps he had taken with MON and PANZAS. MARCELINO told EUTIMIO that if
14 the CS were arrested, the CS would give information to law enforcement. EUTIMIO asked if law
15 enforcement would arrest him right away, and MARCELINO said that they would try to catch
16 EUTIMIO with more drugs. If law enforcement was unable to catch EUTIMIO with more drugs, they
17 would probably just arrest him with what they could. EUTIMIO told MARCELINO that he was going
18 to change his telephone number just in case. MARCELINO acknowledged. Shortly after that,
19 EUTIMIO stopped using the telephone the CS had been calling to contact EUTIMIO.

20 4. The DTO’s Daily Distribution Operation

21 37. The pattern described above repeats itself between 20 and 30 times per day. For
22 example, on October 9, 2015, EUTIMIO dispatched MINGO at least 21 times between 10:03 a.m. and
23 9:41 p.m. to deliver drugs to EUTIMIO’s customers. At the end of the day, EUTIMIO asked MINGO
24 how much it was and MINGO said it was 5730. EUTIMIO also asked if MINGO had grabbed two and
25 half from the new one. I believe EUTIMIO was asking MINGO how much money MINGO had for
26

27 ¹⁸ On August 20, 2015, I followed MARCELINO based on the location data from the phone on
28 which he carried out this conversation with EUTIMIO. I was able to positively identify him as matching
the DMV photograph in Attachment 2. I saw MARCELINO get into a gray Chevy Tahoe registered to
Anthony Rodriguez, an alias he commonly uses, and drive away.

1 EUTIMIO and how much drugs were left. In the same call, EUTIMIO said CALAMARGO was going
2 to start working then. The next day, EUTIMIO dispatched MINGO to deliver to 20 customers. A few
3 days later, EUTIMIO dispatched MINGO to see 13 customers in the first half of the day, and he
4 dispatched MON to see another 12 customers in the second half of the day.

5 38. On October 15, 2015, while dispatching MON to deliver drugs to a customer, EUTIMIO
6 told MON that it was time for him to be the “co-pilot,” that CALAMARGO was going to be the
7 chauffeur. By November 22, 2015, it appears that CALAMARGO already understood the routes. On
8 that day, EUTIMIO dispatched MON to deliver a “familiar,” which I believe is an ounce of
9 methamphetamine, and said that CALMARGO already knew where to go. That same day, EUTIMIO
10 told MON to ask CALAMARGO if CALAMARGO knew who a customer they called “La Parca” was.
11 EUTIMIO said CALAMARGO should go see him at the same place as the other day with MINGO and
12 give him a “coronita” (which I believe is a gram of heroin or methamphetamine) for free so he could try
13 it. On December 2, 2015, EUTIMIO dispatched MON to deliver drugs and asked whether MON was
14 working with CALMARGO. MON affirmed.

15 39. I believe that MARCELINO supports the DTO’s operations in several ways.¹⁹ First, as
16 described above, he provides advice and counsel to EUTIMIO.

17 40. Second, it appears that MARCELINO invests directly in the drugs the DTO sells. On
18 September 27, 2015, ELIZABETH called MARCELINO to say that she had “bad news,” that a third
19 party had given MON \$1,500 in fake one hundred-dollar bills. ELIZABETH reported that it had been
20 MON’s last client of the evening. ELIZABETH also reported that MON was angry and had reported the
21 situation to “Gordo” (a moniker for EUTIMIO), and told “Gordo” to call the third party to see if he
22 answered. Several times in the conversation, ELIZABETH reported that “Gordo” said that he didn’t
23 care because it was MARCELINO’s “drop.” I believe this means that when MON received the fake
24 currency, he was selling drugs on MARCELINO’s behalf. The next day, EUTIMIO spoke to
25

26 ¹⁹ In addition to the assistance described in the following paragraphs, it appears MARCELINO also
27 has involvement in bringing people up from Mexico to work as couriers for the DTO. On June 11,
28 2015, MARCELINO told EUTIMIO to send money to a person named “Santiago Rubio Chavez” along
with money EUTIMIO was sending to “Ofelia.” EUTIMIO then arranged with another person to send
the money to Rubio and Ofelia. Santiago Rubio Chavez is now the courier known as CALAMARGO.
As described herein, it also appears that Ofelia is now in the United States.

1 MARCELINO about the fake money. In this call, MARCELINO suggested they might use the bills to
2 purchase phones at night. I believe this meant that MARCELINO was going to try to pass the fake bills
3 as real currency in a night time transaction where the recipient would be less likely to notice that the
4 bills were not real. On September 29, 2015, MARCELINO called ELIZABETH and asked what she and
5 MON had decided to do about the counterfeit bills. ELIZABETH reported that EUTIMIO had told her
6 that the couriers should try to give MARCELINO as much as they could. I believe this reflects the fact
7 that the couriers were responsible to MARCELINO for losing drugs that he had paid for. Ultimately,
8 MARCELINO instructed ELIZABETH to send the bills to him in Manteca. After he received them,
9 MARCELINO said they were so obviously fakes that he could not understand how MON did not realize
10 they were not real bills. ELIZABETH said it was late at night and MON was in a hurry.

11 41 Third, it appears that MARCELINO buys salvage vehicles for EUTIMIO's couriers to
12 use to distribute drugs. For example, on October 2, 2015, MARCELINO told EUTIMIO about a green
13 Acura TL that MARCELINO was considering purchasing. MARCELINO said he called EUTIMIO
14 because EUTIMIO had said he was interested in getting a car for "work." Based on calls intercepted on
15 October 7, 2015, it appears MARCELINO acquired the car for EUTIMIO, got the windows tinted for
16 him, and then had it delivered to EUTIMIO in Santa Rosa. During the controlled purchase on October
17 14, 2015, the couriers arrived in a green Acura TL. In addition, on October 18, 2015, MARCELINO
18 suggested Nissan Altima for EUTIMIO to buy through an auction. EUTIMIO asked if it was like the
19 one MARCELINO had given EUTIMIO once for the "guaches." "Guaches" is the term EUTIMIO uses
20 for his couriers.

21 C. **ELIZABETH Aids in Splitting the Drug Proceeds**

22 42. ELIZABETH assists EUTIMIO and MARCELINO in keeping track of the proceeds from
23 their drug sales. In a call on June 5, 2015, EUTIMIO asked ELIZABETH to calculate how much he
24 owed to "his dad" – a term of endearment EUTIMIO uses for MARCELINO. After they discussed
25 various expenses and arrived at a final total EUTIMIO owed to MARCELINO, EUTIMIO said he would
26 send the money to MARCELINO. In still another call, EUTIMIO and ELIZABETH discussed money
27 owed to MARCELINO, followed shortly after with a call from EUTIMIO to MARCELINO in which
28 EUTIMIO said that he was sending MARCELINO the money.

1 43. Similarly, as described above, ELIZABETH reported to MARCELINO the sale of drugs
2 for fake currency. When ELIZABETH told MARCELINO that EUTIMIO seemed unconcerned
3 because it was MARCELINO's "drop," I believe she was explaining that because the drugs at issue had
4 been sold on MARCELINO's behalf, and not EUTIMIO's, that it was MARCELINO who was losing
5 money, not EUTIMIO. In that same call, ELIZABETH stated that she had deposited money. I believe
6 ELIZABETH (who resides in Santa Rosa) was advising MARCELINO (who resides in Manteca) that
7 she had put his share of the drug proceeds into an account so that he could access the money.

8 44. The calls about the fake bills continued on September 29, 2015. MARCELINO told
9 ELIZABETH that he would take the bills to see if he could use them to "pay the rent" or "buy shit at
10 night." MARCELINO and MON (who was using ELIZABETH's phone) also discussed whether
11 ELIZABETH and MON had enough money, and MON said that they would be fine, referring to the
12 "raspado" (believed to be code for methamphetamine). ELIZABETH then returned to the phone and
13 told MARCELINO that he was supposed to get more for the "tirada" but that "Gordo" gave it to his
14 brother-in-law for 100 dollars less and was going to "replace what he sold." I believe that ELIZABETH
15 was saying that EUTIMIO had short-changed MARCELINO by selling MARCELINO's drugs cheaply,
16 but had promised to replace those drugs with other drugs that he would sell at a higher profit.

17 45. A review of ELIZABETH's banking activity suggests that she is involved in laundering
18 money on behalf of the DTO. Between May 2010 and February 2015, ELIZABETH opened or
19 maintained 12 different bank accounts at three different banks. An analysis of the six accounts at Wells
20 Fargo in her name and one in her father MARCELINO's name shows a total of \$883,204 in cash
21 deposits into the accounts between 2011 and 2015. At Bank of the West, ELIZABETH had two
22 accounts in her name with a total of \$143,954 in cash deposits from 2013 to 2015. The accounts do not
23 appear to contain deposits from paychecks or expenditures for living expenses, even though
24 ELIZABETH is believed to be in her early twenties. In addition, she has frequently used these accounts
25 as a basis to convert cash into cashier's checks, a common tactic to turn drug proceeds into a negotiable
26 instrument that can then be used in other financial transactions.

27 46. On September 16, 2015, ELIZABETH called MARCELINO to tell him that her mother
28 had just received a notice from Bank of America that the bank was closing MARCELINO's account and

1 that he had about two weeks to withdraw the money. MARCELINO asked ELIZABETH how much
2 was in that account and she said \$12,701. MARCELINO then spoke to a woman I believe was
3 ELIZABETH's mother. She told MARCELINO that "Chiquito," another of MARCELINO's children,
4 had gotten the same letter and that she had sent ELIZABETH to the bank with "Chiquito" to figure it
5 out. MARCELINO said he would have to re-open an account at Wells Fargo. In a subsequent call,
6 MARCELINO told the same woman that he could not remember what name he had used to open the
7 Wells Fargo account. He said he thought it was under the name "Marcelino," but he could not be sure.
8 The woman told MARCELINO to ask "Lisa" because she might remember. MARCELINO then called
9 ELIZABETH to ask her if she remembered what name he had used to open his Wells Fargo account.
10 ELIZABETH said she could not remember. MARCELINO reminded her that she had the information to
11 make deposits. ELIZABETH said she would check. She also asked if that account had an address in
12 Manteca and MARCELINO said it did. ELIZABETH said she was looking in her notebook, but she
13 could not find the information.

14 47. I believe this series of calls indicates that MARCELINO has opened bank accounts using
15 aliases in an attempt to conceal his identity and to thwart law enforcement's attempts to seize funds in
16 those accounts by linking them to him and the Reyna-Ceron Family's drug dealing activities. Further, I
17 believe that MARCELINO's exchanges with ELIZABETH indicate that ELIZABETH makes deposits
18 to MARCELINO's alias accounts and that she keeps a notebook with the names on the various accounts
19 to keep track of which aliases they have used for each account.

20 48. The next day, ELIZABETH's phone was intercepted calling MARCELINO to report
21 what "Gaby" at Wells Fargo was telling ELIZABETH about the account. Special Agent Craven
22 observed ELIZABETH at Wells Fargo at the same time as this call was made, speaking on her phone,
23 and identified her as the person depicted in Attachment 4.

24 **D. EUTIMIO Sends Money Wires in Fake Names**

25 49. EUTIMIO has engaged in several transactions designed to conceal the source of his
26 money. For example, agents monitoring EUTIMIO's phone pursuant to a federal wiretap intercepted a
27 calls on June 4, 2015, in which EUTIMIO told a woman in Mexico that he was sending two money
28 wires and including the Money Transfer Control Numbers ("MTCN"). He said that one was sent under

1 the name "Eutimio Reyna" and the other under "Maria Guadalupe Doval Duran." EUTIMIO directed
2 that the deposits be made in two different names, one of which could be his father's. Records
3 subpoenaed from Western Union indicate that two wires were sent from the United States that day to
4 Michoacan, Mexico. The first, in the amount of \$1,960, was sent in the name "Eutimio Reyna Ceron" to
5 "Lizbeth Radilla Castillo." The second, in the amount of \$2,000, was sent in the name "Maria
6 Guadalupe Doval Duran" to "Eutimio Reyna Ceron."

7 50. That same day, EUTIMIO sent additional money to Mexico using a co-conspirator with
8 fake identification. Agents intercepted a call in which EUTIMIO asked an associate to run an errand
9 with him and bring his identification. The associate asked if he should bring his own or the other one.
10 EUTIMIO said the other one. Later, EUTIMIO sent a text message to an unknown person with wire
11 instructions. The text included the MTCN, the sender's name – "Daniel Reyna Rodriguez" – and the
12 recipient's name – "Delmo." The recipient of EUTIMIO's text message asked if EUTIMIO had
13 received the two other names s/he had sent, "Angel" and "Junior." EUTIMIO responded that he had and
14 included another MTCN, another sender name – "Rodrigo Alvares Penalosa" – and another recipient
15 name – "Angel Faurrieta." Western Union records confirm that on June 4, 2015, \$750 were sent from
16 "Daniel Reyna Rodriguez" in the United States to "Edelmira Reyna Ceron," and that \$2,000 were sent
17 from "Rodrigo Alvares Penalosa" to "Angel Faurrieta Cruz." Both wires went to Michoacan, Mexico.

18 51. On June 12, 2015, MARCELINO told EUTIMIO that third parties could not receive the
19 money transfers because the personal identification numbers ("PINs") were blocked. EUTIMIO told
20 MARCELINO that he would call the "guy." MARCELINO asked EUTIMIO if he was going to send it
21 under another name and said that "Jose" was going to send MARCELINO other names so that
22 EUTIMIO could send \$500 to each one. Following this conversation, EUTIMIO spoke to another
23 person, a male, about how to break up the money wire into four transfers of \$500 each. MARCELINO
24 then sent EUTIMIO text messages with the names "Diana Laura Garcia Rojas" and "Diana Leticia
25 Rojas Segovia." EUTIMIO then called the unknown male back and they discussed the amount that
26 different wire remitters would pay. The male told EUTIMIO that the only solution was for EUTIMIO to
27 go with an identification and get the money back. EUTIMIO said he did not have an identification
28 because the names on them were fake. He then said he would redirect the wires to someone else in

1 Michoacan because in Michoacan there was no limit. EUTIMIO then spoke to MARCELINO again and
2 related the information about the limits different remitters would pay. MARCELINO asked EUTIMIO
3 to explain it to "Lisa" and then put ELIZABETH on the phone. EUTIMIO told her to send it through
4 "Orlandi," which I believe is a reference to wire remitter Orlandi Valuta, and for the third parties to
5 receive it at Elektra, which I know is a chain of stores in Mexico. EUTIMIO told her to send \$490 and
6 that there were two names and it would be \$490 each. I know that some wire remitters require that the
7 recipient present identification to pick up the money and that, above a certain dollar amount (in some
8 cases, \$500), the wire remitter keeps a copy of the identification card. I believe these exchanges were
9 part of EUTIMIO's and MARCELINO's attempts to send money wires under fake names and to keep
10 the wires small enough to avoid the wire remitters' identification policies.

11 52. EUTIMIO later received two names by text message from a telephone in Mexico –
12 Gibran Jesus Ramirez Hernandez and Diana Laura Garcia Rojas. He then called Orlandi Valuta from
13 the Camacho Market on Sebastopol Road in Santa Rosa, claiming to be "Daniel Reyna Rodriguez," and
14 asking to change the names on two wires to Diana Laura Garcia Rojas and Gibran Jesus Ramirez
15 Hernandez. Records obtained from Orlandi Valuta confirm that two wires, each for \$480.01, were sent
16 from the Camacho Market in Santa Rosa to two persons in Mexico with the names EUTIMIO had given
17 to the Orlandi Valuta operator.

18 53. In intercepted calls on June 11 and 12, 2015, EUTIMIO checked on the status of two
19 Western Union money wires for \$980 and \$966.98, respectively, both sent from "Jose Ceron Jimenez."

20 54. Based on the calls intercepted during the monitoring of EUTIMIO's Customer and Inside
21 Phones, agents have been able to trace at least \$11,564 that was wired to Mexico using fake names
22 between June 4 and June 13, 2015.

23 **E. CRISTINO's Deliveries to EUTIMIO**

24 55. Interceptions of EUTIMIO's wire and electronic communications and physical
25 surveillance also revealed that CRISTINO was one of EUTIMIO's sources of supply. I believe that
26 CRISTINO delivered drugs to EUTIMIO five times between May 19, 2015 and June 17, 2015.

27 56. For example, on May 19, 2015, EUTIMIO called CRISTINO and asked if CRISTINO
28 had any of the "ones" he (EUTIMO) had gotten before. CRISTINO said that he had two of the

1 “ventiladores.” CRISTINO said that he had “clean” ones, “regular” ones, and “good” ones, but no one
2 wanted to pay for the “good” ones. EUTIMIO ordered some of the ones he had received before. Later
3 that evening, EUTIMIO and CRISTINO coordinated a meeting at “the office.” Based on my training
4 and experience and my knowledge of the facts of this investigation, I believe that in this exchange,
5 EUTIMIO was seeking a resupply from CRISTINO and CRISTINO told EUTIMIO that he had drugs of
6 different purities (“clean,” “regular” and “good”), and that he had a certain quantity (two “ventiladores”)
7 to provide.

8 57. There was a similar exchange of calls and text messages on May 25, 2015, May 26, 2015
9 and May 27, 2015, indicating that CRISTINO made another delivery on May 27, 2015. Four days after
10 the delivery, EUTIMIO exchanged text messages with CRISTINO about “the ticket,” which I believe
11 was a reference to payment for the earlier delivery.

12 58. On June 5, 2015, EUTIMIO called CRISTINO and asked if CRISTINO was ready with
13 “the same.” CRISTINO said he was. CRISTINO said that he would bring it to EUTIMIO sooner rather
14 than later. EUTIMIO asked CRISTINO to call him when he was leaving so that he could arrange for a
15 “guacho” to meet him. CRISTINO then asked if he should make three “ventiladores.” EUTIMIO said
16 that whatever CRISTINO wanted to do was fine. Shortly after that, EUTIMIO and CRISTINO
17 exchanged a series of text messages in which EUTIMIO asked whether CRISTINO had any “cuts.”
18 CRISTINO asked if he should make it for EUTIMIO. EUTIMIO asked if he would do him the favor
19 because he would not have time. CRISTINO then texted EUTIMIO to say that he was in possession of
20 340 of the cut ones and asked if he should make more. EUTIMIO texted to just bring that. I believe that
21 these communications indicated that EUTIMIO wanted 340 units of the same product he had received
22 from CRISTINO before, and that EUTIMIO would have one of his couriers (a “guacho”) meet
23 CRISTINO to receive the delivery. I also believe that the question about “cuts” referred to heroin that
24 had already been diluted with non-narcotic substance. I believe that EUTIMIO wanted CRISTINO to
25 provide this diluted substance because EUTIMIO did not have time to do that work himself. A short
26 time later, CRISTINO texted EUTIMIO to say he was on his way over, and then sent another text
27 indicating he was three minutes away. A few minutes later, agents saw a black SUV resembling
28 CRISTINO’s Acura MDX arrive at **Target Premises C**.

1 59. About five hours later, EUTIMIO called CRISTINO and complained that the product
2 appeared to be similar to chewing gum, that it was a ball of “stickiness.” CRISTINO told EUTIMIO
3 that it was the same as the previous time, and he speculated that the high temperature during the day was
4 the cause of the problem and that if a third party had stored it in a “closed house,” it would have gotten
5 even hotter inside. EUTIMIO agreed and said that he had just put it in the refrigerator for 10 minutes
6 and it was not looking good. CRISTINO asked if EUTIMIO just wanted to make one “ventilador” and
7 CRISTINO would look for another one for EUTIMIO. EUTIMIO agreed and said that he would have
8 the “guachos” make just one “ventilador.” An hour later, EUTIMIO called CRISTINO and told him that
9 putting it in “the fridge” was not working. CRISTINO speculated that it had been left in the car in the
10 heat, and that putting it in the refrigerator would not fix it. He said EUTIMIO would have to lay it out
11 and let it dry on its own. CRISTINO said that he had inspected it prior to bringing it to EUTIMIO and it
12 was the same. CRISTINO said that he broke it and it cracked nicely. CRISTINO said that he would
13 pick up the 40 tomorrow and bring EUTIMIO another one that he had. CRISTINO said that he could
14 bring him a “six zero.” I know that black tar heroin commonly is in the form of a black or dark brown
15 solid, rock-like substance, and can also be a more pliable, sticky substance. I believe that the exchange
16 between EUTIMIO and CRISTINO, and the references to the substance being sticky when EUTIMIO
17 received it, but a hard solid when CRISTINO inspected it, indicates that CRISTINO delivered heroin to
18 EUTIMIO. I further believe that CRISTINO agreed to take some of the heroin back and deliver a new
19 batch to EUTIMIO, since at least part of the batch he delivered on June 5, 2015 was difficult for
20 EUTIMIO to work with.

21 60. On June 8, EUTIMIO again called CRISTINO to ask if it was possible for CRISTINO to
22 bring the things over to the “office.” EUTIMIO said that a “guacho” would be there and would receive
23 it. CRISTINO asked if EUTIMIO wanted the “cuarentito,” which translates to “little 40” or the “six
24 zero.” EUTIMIO said to bring the “cuarentito.” CRISTINO said that he would make the delivery
25 without any “sticky ones,” and then he asked if he should take the “ventana.” EUTIMIO confirmed.
26 Based on my training and experience, I believe this telephone call was a continuation of the discussion
27 referenced the prior delivery. I believe that CRISTINO agreed to deliver 40 units that he and EUTIMIO
28 discussed on June 5, 2015. I also believe that CRISTINO was promising to deliver a higher quality

1 product – i.e., no “sticky ones” – as opposed to the prior delivery. I also believe that the reference to the
2 “ventana,” which is Spanish for “window,” was code for methamphetamine. I further believe that the
3 reference to a “guacho” was a reference to a courier who was going to meet CRISTINO to accept the
4 delivery of drugs. Shortly after this discussion, EUTIMIO called MINGO and asked him to get things
5 ready in the office because someone was going to be coming in 20 to 30 minutes.²⁰ About six minutes
6 later, EUTIMIO called MON and told him to “metrear” the “cortina” and put it in the blender, so that it
7 could be ready for him. I believe EUTIMIO was discussing the process of preparing a cutting agent for
8 addition into the drugs that CRISTINO was going to deliver. I also believe that he used the term
9 “metrear” to refer to measuring, and that the term “cortina” is a play on words with “cut,” the additive
10 that they planned to combine with the drugs.

11 61. About an hour later, agents conducting surveillance saw MON and another Hispanic male
12 arrive in the vicinity of **Target Premises C** in a Honda Accord. Twenty minutes later, agents watching
13 a pole camera saw a black Acura MDX pull into the driveway at **Target Premises C**. Agents observed
14 the driver of the Acura, who was a Hispanic male adult exit the vehicle, open the rear driver’s side door
15 and reach inside. The driver of the vehicle then went back to the front driver’s side and reached inside.
16 The driver then turned and walked towards the front door of **Target Premises C**. Twenty minutes later,
17 the driver returned and drove away. I followed him to a fast-food restaurant, where I saw that the driver
18 was CRISTINO. From the fast food restaurant, agents followed CRISTINO back to his residence at
19 5342 Eunice Street in Rohnert Park.

20 62. Based on intercepted calls between EUTIMIO and CRISTINO and physical surveillance
21 in the area of **Target Premises C**, I believe CRISTINO also delivered drugs to EUTIMIO at **Target**
22 **Premises C** on June 14, 2015. That day, agents intercepted calls between EUTIMIO and CRISTINO
23 indicating that CRISTINO was going to make another delivery. Agents then saw CRISTINO departing
24 the area of **Target Premises C**. Later that same day, EUTIMIO called MARCELINO to discuss the
25 delivery. MARCELINO asked EUTIMIO how much money he sent. EUTIMIO said almost 18 and a
26 half. EUTIMIO said that he had returned some “squishy” ones, and MARCELINO asked if EUTIMIO
27

28 ²⁰ Based on the telephone number EUTIMIO called and voice identification conducted by the DEA
contract monitors, agents believe EUTIMIO was speaking to MINGO during this call.

1 had counted what was there. EUTIMIO confirmed. MARCELINO asked if EUTIMIO was able to get
2 different ones after EUTIMIO returned the others. EUTIMIO confirmed. EUTIMIO explained that
3 when he opened the “ventilador” it was really squishy and sticky and because of that, EUTIMIO lost
4 eight or nine “grapitas.” EUTIMIO said that he was able to get two good ones because he was paying
5 full price and not on credit. EUTIMIO said he was paying \$320, and he complained that the price
6 should have been lower because of the poor quality. EUTIMIO stated that he lost some customers
7 because the quality was poor.

8 63. Based on my training and experience and information learned during this investigation, I
9 believe that MARCELINO and EUTIMIO were discussing the exchange of money for drugs with
10 CRISTINO. I believe that EUTIMIO’s reference to 18 and a half may refer to \$18,500 that EUTIMIO
11 paid CRISTINO for heroin. I believe that EUTIMIO explained that CRISTINO had delivered low-
12 quality heroin, which EUTIMIO exchanged for a higher quality. I also believe that EUTIMIO used the
13 term “ventilador” to refer to approximately one half of a kilogram. I also believe that EUTIMIO refers
14 to grams as “grapitas” and he informed MARCELINO that he lost eight or nine grams of heroin due to it
15 sticking to its packaging. I believe that EUTIMIO’s reference to paying \$320 is the price per ounce that
16 EUTIMIO paid for the heroin from CRISTINO.

17 **F. CRISTINO’s Distribution Business**

18 64. In addition to supplying drugs to EUTIMIO and the Reyna-Ceron Family, CRISTINO
19 ran his own distribution operation. Between July 30, 2015 and August 18, 2015, agents monitored
20 CRISTINO’s phone. During the course of that federal wiretap, agents intercepted multiple calls per day
21 in which CRISTINO took orders from customers and dispatched a courier, whom he called
22 “MONTANA,” to deliver those drugs. One of CRISTINO’s regular customers was BILLY. BILLY
23 called almost every day to order a half ounce to an ounce of heroin and methamphetamine. For
24 example, on August 2, 2015, BILLY asked CRISTINO for a “half” and a little bit of “yellow.”
25 CRISTINO immediately called MONTANA and told him to take BILLY a half of a carton and also
26 “grampita” or less of “ventana.” I know that “ventana,” which is Spanish for “window,” is a common
27 code word for methamphetamine.

28 65. The next day, BILLY called CRISTINO and said that people were complaining about it

1 tasting like vinegar. I know that heroin has a strong vinegar-like odor. I also know that the quantities of
2 heroin BILLY was buying – half an ounce to an ounce of heroin per day – are more than most heroin
3 users would purchase at a given time, and that these quantities indicate that BILLY was selling the drugs
4 he purchased from CRISTINO. I believe that BILLY’s statement about people complaining was a
5 reference to BILLY’s customers, the users who bought heroin from BILLY. BILLY asked how much it
6 would cost for the stuff that didn’t have as much cut. CRISTINO said that one piece – which I know to
7 be a slang term for one ounce of heroin – would be \$600. BILLY asked for half of a “piece”.
8 CRISTINO then dispatched MONTANA to deliver the drugs.

9 66. The next day, August 4, 2015, BILLY called and ordered another “half.” CRISTINO
10 again dispatched MONTANA to deliver the drugs.

11 67. The Petaluma Police Department arrested BILLY on August 26, 2015 for a warrant and
12 the charges filed were for possession of a controlled substance for sale. At the time of his arrest, BILLY
13 had in his possession the phone he had used to contact CRISTINO and which agents had intercepted.
14 BILLY was released from jail on November 23, 2015.

15 **G. Seizure of Drugs from CRISTINO**

16 68. On August 12, 2015, based on information learned during the monitoring of CRISTINO’s
17 phone, agents applied for a warrant²¹ to search CRISTINO’s house at 5342 Eunice Street in Rohnert
18 Park. During surveillance that morning, agents observed two vehicles – a GMC Envoy and a Chevrolet
19 Cobalt – arrive at CRISTINO’s residence. Video captured on a pole camera showed that at least two
20 Hispanic male adults took the wheels off of one of the Envoy and rolled those wheels to CRISTINO’s
21 garage. It appeared that they then replaced those wheels with wheels they took out of CRISTINO’s
22 garage. The driver of the Cobalt stayed in his vehicle. Once the tires were exchanged, the Envoy and
23 the Cobalt drove away together. Shortly thereafter, agents executed the search warrant at CRISTINO’s
24 residence.

25 69. In CRISTINO’s garage, agents found four mounted tires on wheels. Inside those tires,
26 agents found donut-shaped metal compartments clamped around the insides of the wheels themselves,
27

28 ²¹ Agents obtained this warrant from Sonoma County Superior Court Judge Jamie Thistlewaite.
Agents elected to use a state search warrant to conceal the existence of the ongoing federal investigation.

1 concealed by the tires. Agents found drugs inside those compartments. The DEA's Western Regional
2 Laboratory tested those drugs and confirmed that they were 18.82 kilograms of black tar heroin, 1.97
3 kilograms of white powder heroin and 9.77 kilograms of 99.1% pure methamphetamine. The white
4 powder heroin was labeled "Chaina." CRISTINO admitted that the drugs were in his possession, but
5 claimed to be storing them for someone else. At the time of his arrest, CRISTINO had in his possession
6 the phone agents had intercepted. Agents seized it.

7 70. Agents also stopped and arrested the drivers of the Envoy, GUDINO, and the Cobalt,
8 RANGEL. I know it is common for a large shipment of drugs to include both a load car and a chase car.
9 The load car is the one carrying the drugs. The chase car follows the load car and ensures that it gets to
10 its destination. This is to ensure that the load car driver – who knows that he is transporting a large
11 quantity of drugs – does not attempt to steal the drugs, and also to watch out for traps and law
12 enforcement. CRISTINO and RANGEL remain in state custody. GUDINO posted bail and fled. There
13 is currently an active warrant for his arrest.

14 71. Agents also arrested MONTANA on August 12, 2015, when he arrived at CRISTINO's
15 house. At the time of his arrest, MONTANA was in possession of his courier phone – the same phone
16 he had used to communicate with CRISTINO to coordinate drug deliveries. MONTANA remains in
17 state custody, along with CRISTINO and RANGEL.

18 **H. FITO's Distribution Operation**

19 72. During the monitoring of one of EUTIMIO's Inside Phones, EUTIMIO and FITO had
20 numerous telephone calls relating to their respective efforts to obtain a new source of supply. For
21 example, on October 9, 2015, FITO called EUTIMIO. During that call, EUTIMIO asked if FITO had
22 found anything. FITO said he had not, that he was still with the same person. EUTIMIO asked if it
23 came out good. FITO replied that people hadn't said anything to him yet. EUTIMIO asked if it was
24 750. FITO said the dude had told him that he could possibly give it to FITO for 7. EUTIMIO said the
25 one he had was so-so. FITO acknowledged and said he had gotten a "micha," not a complete one.
26 EUTIMIO said he could serve them for FITO for now. FITO said EUTIMIO's was no good. EUTIMIO
27 said he was making 3 from 1. FITO said that was why, that EUTIMIO was "fucking them up too
28 much." FITO told EUTIMIO that if EUTIMIO wanted some, the dude had some.

1 73. I believe that in this exchange, EUTIMIO was asking FITO if FITO had found a new
2 source of supply and FITO said he had not, that he was still using his same source. I believe EUTIMIO
3 then asked if that source was selling units of drugs for “750,” which I believe is \$750 or \$7,500. FITO’s
4 response indicates, I believe, that he could get units for \$700 or \$7,000 each. EUTIMIO’s statement that
5 he one he had was “so-so” and his subsequent offer to “serve them” for FITO “for now,” I believe,
6 meant that EUTIMIO felt he had relatively poor quality drugs at the moment, and thus he was offering
7 to distribute FITO’s drugs for FITO. I further believe that EUTIMIO’s statement that he was making 3
8 from 1 means that he was diluting every unit of drugs he received into 3 units to sell. I believe that
9 FITO’s response – that EUTIMIO was “fucking them up too much” – meant that FITO thought that the
10 reason EUTIMIO had poor quality drugs to sell was that EUTIMIO was diluting his drugs too much.

11 74. EUTIMIO and FITO spoke again on October 13, 2015. In that call, they again discussed
12 the quality of the heroin they each had and their respective sources. EUTIMIO said the last ones that he
13 got from the third party were half hard and half sticky. EUTIMIO added that it was all the same
14 material, but some parts were sticky and some parts were hard. EUTIMIO said he was putting in the
15 same amount as always. EUTIMIO told FITO that all that the third party would say was that it was
16 good. FITO acknowledged and said that the ones he had at the moment were soft. FITO added that he
17 would seal them once he did whatever he did and the next day they were always rock hard and that it
18 was easier to break off that way. FITO added that people had not complained yet. FITO and EUTIMIO
19 then discussed whether either had had any contact with unidentified persons in Tracy, San Jose and also
20 persons in Tijuana and Guerrero.

21 75. On November 25, 2015, at the direction of DEA agents, a CS purchased approximately
22 two ounces of heroin from FITO by calling 707-540-5861 (hereinafter referred to as “FITO’s customer
23 phone”). At the time of the purchase, agents were also monitoring the physical location data for this
24 telephone. FITO’s customer phone is regularly located at **Target Premises G**.

25 76. Additionally, on December 1, 2015, at approximately 9:30 a.m., agents conducted
26 surveillance on FITO. During the surveillance, agents observed FITO, the person depicted in
27 Attachment 8, drive a maroon Acura MDX out of the driveway of **Target Premises G**. At this
28 approximate time, the AT&T physical location data for FITO’s customer phone indicated that the phone

1 was located at **Target Premises G** (with a certainty radius of 9 meters).

2 77. At approximately 10:37 a.m., agents located FITO driving the maroon Acura, traveling
3 southbound on Range Avenue near Jennings Avenue. Agents positively identified FITO as the driver of
4 the Acura. At the approximate time of the agent's observation, the AT&T location data for FITO's
5 customer phone indicated the phone was located on 1071 Jennings Avenue, Santa Rosa, CA, and gave a
6 certainty factor of 5 meters. Range Avenue near Jennings Avenue, the location in which the agents
7 positively identified FITO, is within the radius of the certainty factor of 5 meters.

8 78. At approximately 2:19 p.m., Special Agent Craven positively identified FITO in the
9 driver's seat of the maroon Acura parked in the parking lot of Roseland Elementary School. His
10 observation of FITO matched a photograph of FITO from a prior arrest warrant on file, which is
11 attached as Attachment 8. At the time of SA Craven's observation, the physical location data indicated
12 that FITO's customer phone was located on 990 Sebastopol Rd., Santa Rosa, CA, and gave a certainty
13 factor of 51 meters. Roseland Elementary School is within the radius of the certainty factor of 51
14 meters. Agents observed FITO drive directly back from the Roseland elementary school to **Target**
15 **Premises G**.

16 **I. ERICKSON and the Death of NM**

17 79. ERICKSON was arrested in July 2015. At that time, he was in possession of small
18 amounts of heroin, methamphetamine, hydrocodone and oxymorphone, as well as a scale and packaging
19 materials. ERICKSON admitted that he sold heroin. ERICKSON was released on bail with charges
20 pending from the July 2015 arrest. I believe, based on witness statements and ERICKSON's own later
21 admissions, that on September 2, 2015, ERICKSON sold a gram of heroin to four persons, one of whom
22 was NM. I further believe that those four person split the heroin among themselves. Three of them,
23 including NM, passed out after injecting the heroin. The fourth injected himself with heroin and then
24 left to go to a Narcotics Anonymous meeting. When he returned, he discovered NM and the other two
25 lying on his bed. NM was not breathing and was cold to the touch. He attempted to rouse all three. NM
26 would not wake up. He then carried her body to the parking lot and laid it on the trunk of a car. He
27 kicked the other two out of his apartment as well. One of them called 9-1-1, but it was too late. The
28 EMTs found NM's lifeless body on the ground in the parking lot, where her so-called friends had laid

1 her when they were unable to move her body from the trunk of the car to the passenger compartment.
2 The EMTs attempted to revive her with CPR, naloxone (which reverses the effect of opiate overdoses)
3 and epinephrine (to stimulate her heart). None of these measures succeeded and they pronounced her
4 deceased in the parking lot. Earlier that day, NM had ingested alcohol, Valium, Xanax and Klonopin
5 (all of which, according to her friends and records obtained through this investigation, she had been
6 prescribed). Her death has been ruled an accident caused by the combined toxicity of alcohol,
7 benzodiazepines and heroin. I understand that a toxicologist has opined that NM would not have died if
8 she had not ingested heroin.

9 80. Phone records indicate that ERICKSON was one of EUTIMIO's steady customers and
10 had been in contact with both EUTIMIO and FITO in the days leading up to the transaction that resulted
11 in NM's death. During the first period of interception, ERICKSON called EUTIMIO almost every day
12 to order a half ounce of heroin. The telephone number ERICKSON used was the same telephone
13 number he had in his possession when he was arrested in July 2015. ERICKSON continued using that
14 phone number after he was released, and he continued to call EUTIMIO and FITO daily. Phone records
15 also indicate that ERICKSON had two contacts with FITO on September 2, 2015, about an hour before
16 he sold heroin to the group including NM. ERICKSON had the same phone in his possession when he
17 was arrested on October 9, 2015. ERICKSON remains in custody on state charges.

18 **J. RAYMUNDO's Distribution Operation**

19 81. I believe RAYMUNDO is EUTIMIO's brother-in-law. Based on calls intercepted during
20 monitoring of Target Telephone 6 (EUTIMIO's then-current inside phone), I believe RAYMUNDO has
21 his own drug distribution cell, and that RAYMUNDO and EUTIMIO discussed sourcing and sharing
22 drugs. Examples are set forth below.

23 82. On October 13, 2015, at approximately 9:09 p.m., RAYMUNDO called EUTIMIO on
24 Target Telephone 6. RAYMUNDO said his "compadre" had found the lady and was on the way to pick
25 her up. RAYMUNDO said if EUTIMIO got some he was going to "need 10 clean ones," and
26 RAYMUNDO wanted EUTIMIO to add 5 so that it would be 15. RAYMUNDO told EUTIMIO to talk
27 to "the lady," and added that if EUTIMIO didn't get anything from the lady, RAYMUNDO still wanted
28 to. EUTIMIO agreed but said it would all depend on the number. EUTIMIO told RAYMUNDO to ask

1 BURRO. RAYMUNDO said he would call BURRO and ask.

2 83. Based on my training and experience, I believe that RAYMUNDO and EUTIMIO were
3 discussing potentially purchasing drugs from a female source of supply from Los Angeles (per other
4 Title III intercepts) connected to BURRO. I believe RAYMUNDO's "compadre"²² is BURRO, and that
5 RAYMUNDO relayed to EUTIMIO that BURRO was transporting the female source of supply to or
6 around the Santa Rosa area. I believe RAYMUNDO wanted EUTIMIO to buy drugs from the source of
7 supply, and that RAYMUNDO in turn wanted to buy drugs from this source of supply through
8 EUTIMIO. I believe "10 clean ones" refers to 10 units of drugs in the state EUTIMIO would receive
9 them from the source of supply, and that RAYMUNDO wanted EUTIMIO to add 5 units of additives to
10 the drugs to produce a final quantity of 15 units of drugs. I believe when RAYMUNDO told EUTIMIO
11 to "talk to the lady," he wanted EUTIMIO to talk with the female source of supply, and that
12 RAYMUNDO would buy drugs directly from her if EUTIMIO did not buy from her and then give some
13 to RAYMUNDO. I believe EUTIMIO's response that "it would all depend on the number" meant that
14 EUTIMIO's decision to buy drugs from the female source would depend on the price she charged. I
15 believe EUTIMIO told RAYMUNDO to ask BURRO for more specifics about the price of the drugs,
16 and that RAYMUNDO agreed to call BURRO and ask.

17 84. During this same conversation, EUTIMIO said EUTIMIO would give "each 'grapita' for
18 \$30." RAYMUNDO said RAYMUNDO would "give 3 to go for \$100." EUTIMIO said that was fine
19 as well. EUTIMIO told RAYMUNDO that there was "nothing good at the moment." RAYMUNDO
20 told EUTIMIO that EUTIMIO should just let go of it how it arrived. RAYMUNDO said "that way
21 people would pay 900-1200 per piece." RAYMUNDO said people were frustrated because everyone
22 would bring work that was cut. EUTIMIO told RAYMUNDO that EUTIMIO had "tried that method
23 already, but it didn't make a difference because people complained right away about it not being good."
24 RAYMUNDO acknowledged and said it was probably because they were used to something specific.

25 85. Based on my training and experience, I believe that RAYMUNDO and EUTIMIO were
26 discussing details of their pricing and drug-processing operations. I also believe that EUTIMIO's giving
27

28 ²² The word "compadre" can mean "godfather," or simply "buddy." I do not know which meaning
RAYMUNDO intended in this case.

1 “each ‘grapita’ for \$30” refers to selling each gram of drugs for \$30, and RAYMUNDO’s giving “3 to
2 go for \$100” refers to selling 3 units for \$100. I believe that EUTIMIO’s comment that “there was
3 nothing good at the moment” refers to EUTMIO’s dissatisfaction with current options for buying drugs,
4 and RAYMUNDO’s advice that EUTIMIO “should just let go of it how it arrived” means EUTIMIO
5 should not put more additives in the drugs, but should sell them in the state in which he purchased the
6 drugs. I believe RAYMUNDO’s comment that people would then pay “900-1200 per piece” means he
7 thinks customers would pay \$900 to \$1200 per ounce of drugs—implied to be more than EUTIMIO was
8 then getting for the units of drugs. I believe RAYMUNDO’s statement that “people were frustrated”
9 refers to dissatisfied customers, and that “everyone would bring work that was cut” refers to drug
10 dealers selling drugs that were heavily diluted with additives. I believe EUTIMIO’s response that “it
11 didn’t make a difference” means his past efforts to sell drugs without further processing them were not
12 beneficial, and that “people complained right away” means his customers complained about the less-
13 processed drugs.

14 86. Additionally, on December 2, 2015, at the agents’ direction, CS-11 purchased
15 approximately two ounces of methamphetamine from RAYMUNDO by calling telephone number 707-
16 217-5643, which is the same number RAYMUNDO used during the calls as described above. CS-11
17 told me that the user of this phone was named Raymundo Doval Duran, and provided the photograph of
18 RAYMUNDO attached as Attachment 9. The suspected drugs field tested positive for the presence of
19 methamphetamine.

20 **K. CORNELIO’s Participation in the Operation**

21 87. CORNELIO has performed different roles for the Reyna-Ceron Family drug distribution
22 organization over time. In April 2014, CORNELIO sold 3 ounces of heroin and 3 ounces of
23 methamphetamine to a CS.

24 88. In addition, on May 21, 2015, EUTIMIO called CORNELIO on May 21, 2015 to report
25 that he (EUTIMIO) had spotted a surveillance team. Similarly, on September 18, 2015, a surveillance
26 team followed CORNELIO and another Reyna-Ceron brother as the two left **Target Premises C**. After
27 the surveillance team had followed the car for a while, it suddenly stopped and CORNELIO leaned out
28

1 the passenger window, yelled at the surveillance team and stuck out his middle finger at them.²³ In a
2 call to MARCELINO later that day, the other brother and CORNELIO related to MARCELINO that
3 they believed they had been followed and that CORNELIO had flipped off the truck following them and
4 yelled, "What the fuck, are you following me?!" Further, the other brother said that "Gordo" (a
5 nickname EUTIMIO's family uses for him) told CORNELIO that if it had been someone else, they
6 would have confronted CORNELIO. MARCELINO said that was not good and asked CORNELIO if
7 CORNELIO had told "Lisa." CORNELIO said he had told "Lisa" to get out of there and lay low for a
8 while. I believe, based on my training and experience and my knowledge of the facts of this
9 investigation, that the other brother and CORNELIO were relating to MARCELINO that they had
10 spotted a surveillance team and had called out to the surveillance team to show that they (the other
11 brother and CORNELIO) were aware they were being followed. I further believe that the other
12 brother's reference to "Gordo" indicated that he had told EUTIMIO about the incident, and that
13 EUTIMIO had said that if it had been anyone other than a surveillance team, the person would have
14 challenged CORNELIO for being so rude. I further believe that MARCELINO asked whether anyone
15 had told ELIZABETH – whom he referred to as "Lisa" – and that CORNELIO said he had and that he
16 had advised ELIZABETH to get out of the house because both were concerned about her being in a
17 house with drugs when/if the police raided the house. On September 20, 2015, two days after
18 CORNELIO and his brother spotted the surveillance team, EUTIMIO called MARCELINO and said he
19 was going to change his number and that he would contact MARCELINO with the new number.
20 EUTIMIO (calling himself "Gordo") then sent MARCELINO a text "Nuevo," meaning "new."
21 MARCELINO responded, "Gordo?" And EUTIMIO responded, "Si," meaning "yes." I believe that
22 EUTIMIO decided to change his telephone number as a precaution after he learned that two of the
23 members of his family had been followed by law enforcement.

24 **L. CAJAS Supplies EUTIMIO and FITO**

25 89. On October 13, 2015, EUTIMIO called CORNELIO and ask him to take a ticket to his
26 uncle Jose. I believe this was a coded request to take money ("ticket") to a supplier in San Jose. In
27

28 ²³ The agents identified CORNELIO from his booking photo, Attachment 3, as the one who leaned
out the window and flipped them off.

1 subsequent calls, EUTIMIO directed CORNELIO to go to a specific bar in San Jose. Meanwhile,
2 EUTIMIO spoke to CAJAS on the phone and CAJAS told EUTIMIO to leave the money with a woman
3 at the bar. EUTIMIO then called CORNELIO and told him to give it to a girl to count it. EUTIMIO
4 said it was 8 pesos, and told CORNELIO to be careful. CORNELIO agreed. I believe that these calls
5 reflect that EUTIMIO sent CORNELIO to San Jose to deliver \$8,000 ("8 pesos") to pay CAJAS for a
6 past delivery of drugs, and that CAJAS told EUTIMIO to leave it with a woman at the bar rather than
7 meeting with CORNELIO directly.

8 90. On October 16, 2015, EUTIMIO called CAJAS. CAJAS told EUTIMIO that "there
9 might be some things available today" and he would call EUTIMIO back. Based on my training and
10 experience, I believe CAJAS' reference to "some things" was code for drugs. Later that day, CAJAS
11 called EUTIMIO and told him that he was "waiting for a guy to arrive for the last 2 to three hours," but
12 he hadn't called. CAJAS also told EUTIMIO that the "other guy said yes as well, but, wouldn't be until
13 Sunday or Monday." EUTIMIO said that was fine and that EUTIMIO "still had some" there.
14 EUTIMIO asked if the two guys had given prices to CAJAS and CAJAS said that they hadn't given
15 prices yet. Based on my training and experience, I believe these calls were regarding the sources that
16 CAJAS gets the drugs from. I believe there were two different sources that CAJAS was talking about. I
17 further believe that EUTIMIO told CAJAS that he still had enough drugs in his possession for sale that
18 waiting until Sunday or Monday for one of the sources was fine.

19 91. On the following day, October 17, 2015, EUTIMIO called CAJAS and asked CAJAS if
20 he had any "updates." CAJAS confirmed that he had spoken to a third party and the third party would
21 see CAJAS later that night. EUTIMIO acknowledged and told CAJAS that he would call him later
22 because he was "getting thirsty." Based on my training and experience, I believe CAJAS informed
23 EUTIMIO that he had talked to a source and the source was supposed to meet CAJAS that night. I
24 believe that EUTIMIO's reference to being "thirsty" implied that he was getting low on his drug supply
25 and would need to re-supply soon.

26 92. The next day, October 18, 2015, EUTIMIO called CAJAS and asked CAJAS what was
27 up and CAJAS responded that "nothing had gotten done." EUTIMIO told CAJAS to call him if he
28 talked to a third party. Based on my training and experience, I believe EUTIMIO called CAJAS to

1 check if CAJAS had received any drugs or talked to the source. I further believe that the fact that
2 EUTIMIO called CAJAS day after day indicated that EUTIMIO's supply was running low and he
3 needed to re-supply. Later that same day, CAJAS called EUTIMIO and told EUTIMIO to come over.
4 EUTIMIO asked how the "herramienta" (literally, "tool") was and if CAJAS had seen it yet. CAJAS
5 confirmed and said "they were like the first ones" and "they looked like they're going to be good."
6 EUTIMIO asked if there was the chance to check them out over there and CAJAS confirmed. Later in
7 the conversation, EUTIMIO asked if the numbers were the same and CAJAS said that he thought so. I
8 believe that when EUTIMIO asked how the "herramienta" was, he was asking CAJAS whether CAJAS
9 had looked at the drugs and whether they appeared to be good quality. I further believe that when
10 EUTIMIO asked about the "numbers," he was referring to the price of the drugs. EUTIMIO finished the
11 conversation by saying he would call his "guache" to see if he could head out. I believe "guache" is a
12 term EUTIMIO uses to refer to couriers. EUTIMIO later scheduled their meeting for the next day.

13 93. On October 19, 2015, CAJAS called EUTIMIO. EUTIMIO told CAJAS that he was
14 waiting for his "guachito" to come over so they could head over. At approximately 1:54 p.m. (Call No.
15 1990), EUTIMIO called CAJAS and told him they would arrive at CAJAS' location in 40 minutes.
16 CAJAS directed EUTIMIO to take the 101 towards Los Angeles and then take the 680 towards
17 Sacramento and take the Alum Rock exit. CAJAS told EUTIMIO to go to the Jack in the Box next to a
18 cemetery EUTIMIO acknowledged. Based on this call, agents identified the Jack in the Box, which was
19 located at 15 South Capitol Ave. in San Jose. Agents established surveillance in the area. At
20 approximately 2:33 p.m., agents observed a gray Toyota Sienna bearing CA license plate 7MSB957
21 enter the Jack in the Box parking lot and park on the eastern side of the lot. I previously observed
22 EUTIMIO driving this vehicle on October 18, 2015. I observed that the vehicle was occupied by at least
23 two individuals, one in the driver's seat and one in the front passenger seat.

24 94. At approximately 2:36 p.m. CAJAS called EUTIMIO and asked if he was there.
25 EUTIMIO affirmed and said he had just arrived. CAJAS told EUTIMIO he would arrive in one minute.
26 At about the same time, agents observed a gray Toyota Tundra arrive at the Jack in the Box parking lot.
27 At approximately 2:38 p.m., CAJAS called EUTIMIO and told him to follow him. Agents observed the
28 Toyota Sienna pull out of the parking space and drive to the location of the Tundra. DEA SA Shawn

1 Foust observed the Tundra, followed by the Sienna, drive out of the parking lot and proceed south on S.
2 Capitol Ave. Agents followed the two vehicles as they drove to a nearby apartment complex parking lot
3 and parked behind the northern most building of the apartment complex (the building is labeled with the
4 number "131"). Agents were unable to observe what apartment unit the occupants of the vehicles
5 entered. Around this time, physical location data indicated that EUTIMIO's phone was located within a
6 791 meter radius of the intersection of Capitol Expressway and S. Capitol Ave. The apartment building
7 at 131 Nancy Ln. falls within that radius.²⁴ At approximately 3:25 p.m., an agent observed the Toyota
8 Sienna turn southwest onto Rose Ave. and out of view of the agents. About 80 minutes later, agents
9 observed the Toyota Sienna traveling northbound on Highway 101 in San Rafael. I believe EUTIMIO
10 was returning to Santa Rosa after purchasing drugs from CAJAS in San Jose.

11 95. At about 5:15 p.m., EUTIMIO called his brother BENIGNO. EUTIMIO asked
12 BENIGNO if he could give EUTIMIO a ride. BENIGNO affirmed and EUTIMIO told him to drive
13 towards Petaluma. At about 5:31 p.m., BENIGNO called EUTIMIO and EUTIMIO told BENIGNO to
14 go to Novato. At about 5:48 p.m., BENIGNO called EUTMIO and EUTIMIO told BENIGNO to go to
15 the Panda Express near Redwood Blvd. Agents located and watched a Panda Express in Novato near
16 the intersection of Diablo Ave. and Redwood Blvd., but did not see the Toyota Sienna. At about 6:04
17 p.m., agents observed a light colored Acura 4-door sedan turn onto Diablo Ave from the Safeway
18 parking lot across from the Panda Express parking lot. Agents observed the Toyota Sienna minivan
19 driving directly behind the Acura. A DEA agent observed both vehicles drive toward the on-ramps of
20 Highway 101. Agents later searched California DMV records and learned that the Acura, which bore
21 CA license plate 7KWV695, was registered to Anthony Rodriguez at 211 Redbud Lane in Modesto, CA.
22 "Anthony Rodriguez" is one of MARCELINO's aliases.

23 96. At approximately 6:06 p.m., EUTIMIO called his associate and told him to "get lost" and
24 asked if he "had seen him." The associate acknowledged. EUTIMIO instructed the associate to drive in
25 that direction so no one would notice. The associate then asked how to get to the freeway. Based on my
26 training and experience, I believe that BENIGNO was driving the Acura. I further believe that
27

28 ²⁴ The physical location data was obtained pursuant to a warrant signed by the Honorable Sallie Kim on September 25, 2015.

1 EUTIMIO either saw the agents as he passed by them on Highway 101 in San Rafael and called
2 BENIGNO to come and pick up EUTIMIO's associate and the drugs they were carrying (which I
3 believe they had purchased from CAJAS), or that EUTIMIO was just being cautious and – believing that
4 law enforcement in the Santa Rosa area knew his face – did not want to drive all the way to Santa Rosa
5 with the drugs. I believe that BENIGNO arrived in the Acura and picked up EUTIMIO's associate and
6 the drugs that EUTIMIO purchased from CAJAS. I further believe that EUTIMIO saw the surveillance
7 agents in Novato, and that was why he asked the associate if the associate had “seen him” and told the
8 associate to “get lost.” I believe EUTIMIO was attempting to ensure that neither he nor his associate
9 was caught with drugs. Half an hour later, agents observed the Acura exit Todd Road from north-bound
10 Highway 101 in Santa Rosa.

11 97. At approximately 7:50 p.m., EUTIMIO called CAJAS. EUTIMIO told CAJAS that he
12 “should try to get rid of the ‘device.’” EUTIMIO warned CAJAS that “the ‘ramadita’ wasn’t good.”
13 CAJAS asked why and EUTIMIO said he “ran into some dudes” that wanted to give EUTIMIO a “ride
14 up here.” EUTIMIO said that everything around there was good, but that nothing from over here, but
15 those dudes were just looking at the moon and the stars. CAJAS asked if “they did,” and EUTIMIO
16 negated and said that “there was nothing,” that “they just got stuck like [unintelligible].” CAJAS
17 acknowledged. EUTIMIO said that “from there, they got stuck to the asses.” CAJAS asked if it was
18 “right there at the corner.” EUTIMIO affirmed. CAJAS cursed. EUTIMIO warned CAJAS to stay
19 alert, and asked if CAJAS had another “device.” CAJAS said “it is new.” EUTIMIO then said, “yes,
20 yes, just in case,” “one never knows what’s up,” and asked CAJAS to send him another number.
21 EUTIMIO also said that he had “Fabiola’s number” and if CAJAS wanted, he could send his number to
22 CAJAS through Fabiola. CAJAS agreed and acknowledged. Following this call, EUTIMIO’s phone
23 ceased making outgoing calls. Based on my training and experience with this investigation, I believe
24 EUTIMIO warned CAJAS that he had spotted what he believed to be surveillance by law enforcement
25 and, to avoid detection by law enforcement, proposed that they both cease using their phones and use
26 new phones to conduct future transactions. I further believe that EUTIMIO then ceased using his phone.

27 ///

28 ///

1 **M. Additional Facts Regarding the Target Premises**

2 **1. Target Premises A**

3 98. I believe that EUTIMIO resides at **Target Premises A**. On October 8, 2015, agents
4 monitoring EUTIMIO's phone intercepted a call from EUTIMIO to ADT (the security services
5 company) (Call No. 55). The representative asked for EUTIMIO's name and address. EUTIMIO said
6 his name was "Eutimio Reyna-Ceron" and he gave the address for **Target Premises A**. In addition,
7 according to public records database queries, as of December 29, 2014, EUTIMIO provided his name
8 for unspecified utility services at **Target Premises A**.

9 99. During all of the interception periods on EUTIMIO's inside phones (Target Telephones
10 2, 6 and 7) agents monitored the physical location data for these phones and they were consistently
11 located at or in the vicinity of **Target Premises A** during the late night and early morning hours and
12 throughout the day. For example, on the nights of October 30, October 31, November 1 and November
13 2, 2015, EUTIMIO's inside phone and customer phone were co-located at 131 Schlee Way from the late
14 evening until the mid-morning, with accuracy radii from 2-51 meters.

15 **2. Target Premises B**

16 100. I believe that EUTIMIO's sister, Maria Reyna-Giles, lives at **Target Premises B** and that
17 EUTIMIO stores evidence, fruits, and instrumentalities relating to the above crimes at the **Target**
18 **Premises B**. For example, a CS told me that **Target Premises B** is used to hold currency obtained from
19 drug sales. According to the CS someone robbed **Target Premises B** in 2014 and stole a significant
20 amount of money.

21 101. In addition, I know from information learned during the monitoring of EUTIMIO's
22 phones that he meets with his runners at the end of nearly every day, or talks with them on the phone, to
23 discuss the accounting for that day's drug sales. I believe that EUTIMIO sometimes uses **Target**
24 **Premises B** to hold these meetings. For example, on May 20, 2015, one of EUTIMIO's couriers called
25 EUTIMIO and during the call, EUTIMIO said that he would call back so that they could meet and talk.
26 EUTIMIO called the courier back and said that he was outside. Approximately 3 minutes before that
27 call, physical location data indicated that EUTIMIO's phone was located in the street in front of **Target**
28 **Premises B** within a 6 meter radius.

1 102. Additionally, I believe EUTIMIO still uses **Target Premises B** to store drug proceeds.
2 On November 27, 2015, Maria Reyna-Giles called EUTIMIO and asked if he still had “clothes” at her
3 house. EUTIMIO said that he was not sure and asked why. Maria responded that EUTIMIO had not
4 told her if he had come by to. EUTIMIO interrupted and told her that he did have some there. Maria
5 acknowledged and asked if he had some left over and EUTIMIO responded “yeah, about a size 50 in
6 pants.” Maria acknowledged and told EUTIMIO that she wanted to know so that she could “put them to
7 wash.” At that comment, both parties laughed. EUTIMIO then repeated that it was still there.
8 EUTIMIO told Maria that it was the one that has been there for a while and Maria asked if EUTIMIO
9 had been by to check it. EUTIMIO said he had not checked on it in about a month in a half. EUTIMIO
10 asked if Maria wanted to check it and Maria declined.

11 103. Moments later, EUTIMIO called his wife and told her that he was going to go to Maria’s
12 house to “count . . . ,” then he paused and said he had to check on the clothes he had there. According to
13 the ping data for EUTIMIO’s customer phone, shortly after he spoke to his wife, his phone moved to
14 **Target Premises B**. The phone was located at the residence at the intervals of 9:16 p.m., 9:31 p.m., 9:47
15 p.m., and 10:02 p.m. (with the accuracy radiuses of between 6 and 21 meters). At 10:22 p.m.,
16 EUTIMIO’s customer phone was located at **Target Premises A**.

17 104. EUTIMIO has also used **Target Premises B** to evade a surveillance team. On May 21,
18 2015, agents followed EUTIMIO from an area near **Target Premises A** to **Target Premises B**. At
19 approximately 8:59 a.m., agents intercepted a call from EUTIMIO to CORNELIO. In that call,
20 EUTIMIO said that had seen the surveillance team. EUTIMIO said that it had been awhile since he had
21 last noticed “them.” EUTIMIO stated that he believed one of the agents recognized him and that was
22 the reason the agents followed him. EUTIMIO said that he recognized one of the agents as well.
23 EUTIMIO then told CORNELIO that he went to “the office” because the vehicle in which he was
24 driving was registered at that address. About a half-hour later, EUTIMIO called one of his couriers,
25 MINGO, to ask if everything was “all right.” During that call, EUTIMIO told MINGO to keep an eye
26 out because the cops were out on the street. EUTIMIO then called MARCELINO and recounted his
27 observations. During the call, EUTIMIO accurately described vehicles the surveillance team had used
28 that day. EUTIMIO said that once he believed the agents were out of the area, he left his car at the

1 house of his “comadre” and that his “compadre Charles” drove him home while he hid. I know that
2 Maria Reyna-Giles’ husband is Charles Giles. I believe that Charles Giles assisted EUTIMIO by driving
3 EUTIMIO from **Target Premises B** back to **Target Premises A** while EUTIMIO hid in the backseat.

4 105. Additionally, the Reyna-Ceron Family uses **Target Premises B** as the registered address
5 for vehicles used to support its drug operation. For example, on October 16, 2014, the DEA and SRPD
6 conducted a controlled purchase of heroin from EUTIMIO. After the transaction, agents observed the
7 couriers get into a white Acura TL bearing CA license plate 7EPA068. According to CA DMV records,
8 this vehicle was registered to Charles Giles at 211 Redbud Ln., Modesto, CA (**Target Premises E**).
9 According to DMV records, this Acura previously bore CA license plate 6JKH206 and was registered to
10 David Caravello at **Target Premises B**. SRPD Detective Whitten observed EUTIMIO driving this
11 vehicle on August 7, 2014. Further, as noted above, the gray minivan that EUTIMIO was seen driving
12 on May 21, 2015 was also registered to **Target Premises B**.

13 106. Further, as described above, EUTIMIO called ADT on October 8, 2015 to make some
14 changes to his account – specifically, he wanted to change the credit card number used to pay for the
15 service. Though he reported that his address was **Target Premises A**, he also said that the account was
16 in the name of Maria Doval and Charles Giles. The ADT representative asked if EUTIMIO was calling
17 regarding the services at **Target Premises B**, and he said that he was calling for the services at **Target**
18 **Premises A**. The representative asked if EUTIMIO was Mr. Giles, and EUTIMIO said he was not.
19 EUTIMIO said that the name on the card was “Eutimio Reyna Ceron.” I believe this exchange indicates
20 that the ADT account is in EUTIMIO’s sister’s name, even though he is paying for the security services
21 at both **Target Premises A and B**.

22 3. Target Premises C

23 107. In addition to the facts set forth above, I believe that the Reyna-Ceron Family uses
24 **Target Premises C** to process and store drugs and other evidence, fruits, and instrumentalities relating
25 to the above crimes. I further believe that ELIZABETH, MON, MINGO and ELIZABETH’s younger
26 brother, reside at **Target Premises C**. I believe, based on intercepted calls, that the house is rented.
27 Agents have not contacted the landlord to find out whose name is on the lease out of concern that this
28 information might get back to the Reyna-Ceron Family and undermine the investigation. Nevertheless,

1 agents have been monitoring a closed circuit video feed with a view of the driveway and front of **Target**
2 **Premises C** since April 10, 2014. Agents have regularly observed members of the Reyna-Ceron Family
3 drug trafficking organization at this address through this camera. In addition, on May 14, 2015, an agent
4 observed ELIZABETH and MON entering and exiting **Target Premises C**.

5 108. As described above, agents conducted surveillance in the area of **Target Premises C** on
6 September 18, 2015. The agents followed CORNELIO and another Reyna-Ceron brother as they left
7 **Target Premises C**. CORNELIO spotted the surveillance team. On September 21, 2015,
8 MARCELINO contacted ELIZABETH's phone, and asked to speak with MON (Call No. 553).
9 MARCELINO told MON that he and "Lisa" should find someplace else. I believe that MARCELINO
10 was directing MON to find someplace else for himself (MON) and ELIZABETH to live or to find a new
11 location for the stash house, just in case law enforcement were watching **Target Premises C**. I believe
12 this reflected MARCELINO's continuing concern after learning that law enforcement were in the area
13 of **Target Premises C** three days earlier.

14 109. As described above, CRISTINO was one of EUTIMIO's sources of supply. Based on
15 wire intercepts of EUTIMIO's calls and surveillance observations, I believe CRISTINO delivered drugs
16 to EUTIMIO five times between May 19, 2015 and June 17, 2015, and that all of those deliveries went
17 to **Target Premises C**.

18 110. On October 9, 2015, EUTIMIO called MON, and asked MON to make the "honey."
19 MON said that the "honey was already made. EUTIMIO then told MON to let EUTIMIO know when
20 he was there and that EUTIMIO would come over. EUTIMIO spoke to MON again a short time later
21 and reiterated that MON should call EUTIMIO once he was there so EUTIMIO could come over. At
22 about 7:46 p.m., EUTIMIO called MON and asked if MON was at the office yet. MON replied that
23 they were almost there and that they were getting the keys. EUTIMIO told MON that he would meet
24 MON there.

25 111. Several minutes after the calls, at approximately 8:10 p.m., physical location data showed
26 that EUTIMIO's phone was located near 2412 Pomo Ct. in Santa Rosa, CA with a radius of 652 meters.
27 **Target Premises C** is within that radius. At approximately 8:25 p.m., 8:42 p.m. and 8:58 p.m.,
28 EUTIMIO's phone was located near 2616 Iriquois St. with a 537 meter accuracy radius. **Target**

1 **Premises C** is also within that radius.

2 112. I believe that the Reyna-Ceron Family temporarily stores drug proceeds at **Target**
3 **Premises C** as well. For example, on October 9, 2015 at approximately 9:41 p.m., MINGO called
4 EUTIMIO and informed EUTIMIO that he had arrived at the “office” and that the “ticket” was ready.
5 EUTIMIO asked how much it was and MINGO stated that it was 5,730. EUTIMIO acknowledged and
6 asked if MINGO had taken two and a half from the new one. MINGO confirmed. EUTIMIO then told
7 MINGO to give that to EUTIMIO’s “apa...to Lisa.” Based on my training and experience with this
8 investigation, I know that the Reyna-Ceron Family uses “the office” as code for **Target Premises C**. I
9 also know that the family refers to drug money as a “ticket.” I believe that MINGO informed EUTIMO
10 that he had arrived at **Target Premises C** and counted the drug proceeds, and that they totaled \$5,730. I
11 believe that EUTIMIO asked if MINGO had taken two and a half ounces of drugs from a recently
12 prepared load. Furthermore, I believe that EUTIMIO refers to MARCELINO as “Apa” and to
13 ELIZABETH as “Lisa”, and thus that he instructed MINGO to give the drug proceeds to MARCELINO,
14 through ELIZABETH because she resides at **Subject Premises C**.

15 113. EUTIMIO has also conducted several transactions with LEOBARDO, a source of supply,
16 at **Subject Premises C**. For example, on November 20, 2015, at approximately 2:07 p.m., agents
17 intercepted a call in which LEOBARDO called EUTIMIO to discuss the drugs that LEOBARDO was
18 supplying. LEOBARDO told EUTIMIO to tell him when he needed “zapateria”. EUTIMIO told
19 LEOBARDO to hold on a little because “this one didn’t want to work” (likely meaning customers were
20 unhappy with the quality). LEOBARDO told EUTIMIO that the ones he had were the ones that had “1”
21 and that LEOBARDO also had the “6-0 kind” (likely referring to batches of different quality drugs).
22 EUTIMIO told LEOBARDO that this one was “really low” (likely referring to the purity) and that
23 EUTIMIO added to it (likely more drugs) and he had only made one “ventilador” (a quantity of drugs
24 mixed with the cutting agent). LEOBARDO told EUTIMIO that the “crumbly kind” were “of the one”.
25 EUTIMIO reiterated to LEOBARDO that he had only made one “ventilador” and still had the other
26 “ventilador” there. LEOBARDO told EUTIMIO not to worry and that LEOBARDO would exchange it.
27 EUTIMIO asked if LEOBARDO could exchange it tonight and asked if he could bring some of the “6-0
28 kind” to see if there was a difference. LEOBARDO assured EUTIMIO there was a difference.

1 114. EUTIMIO and LEOBARDO exchanged several more calls that night coordinating the
2 time at which they should meet to exchange the drugs. Eventually, LEOBARDO sent a text message to
3 EUTIMIO stating "I'll arrive in ten minutes". This text message was sent at approximately 8:30 p.m.
4 At approximately 8:35 p.m., the location data on EUTIMIO's phone had traveled from **Subject**
5 **Premises A to Subject Premises C** (with an accuracy radius of 8 meters). At approximately 8:42 p.m.,
6 I observed a dark colored Honda pull into Julie Court, where **Subject Premises C** is located, and on the
7 live feed video camera, I observed a dark colored vehicle pull up to the door of 2545 Julie Ct. I
8 observed an individual get out of the vehicle and walk towards the door of the residence and out of view.
9 At approximately 9:07 p.m., I observed a dark gray Honda exit Julie Ct. and drive northbound on
10 Northcoast St. and out of view.

11 115. On November 26, 2015, at approximately 1:07 p.m. agents intercepted a call between
12 EUTIMIO and LEOBARDO. During the call, EUTIMIO asked how much LEOBARDO was giving the
13 "tacos" for at the "Lonchera." LEOBARDO replied that they were 35 and then said they were 3.50
14 each, but that they would not be ready until Saturday. LEOBARDO said that if EUTIMIO wanted, they
15 could be ready by the following night. EUTIMIO confirmed and asked LEOBARDO to set aside two
16 for EUTIMIO if an unidentified third party arrived. LEOBARDO told EUTIMIO that it was set and
17 LEOBARDO would bring two packages to EUTIMIO tomorrow. EUTIMIO told LEOBARDO that he
18 was going to meet with an individual in order to give her the "ticket" for the "ventilador" and the 60, for
19 80 total. LEOBARDO confirmed that it was 80. EUTIMIO then told LEOBARDO to call him and
20 LEOBARDO told EUTIMIO that it would likely be tomorrow, but if he could get it done today, he
21 would call EUTIMIO ahead of time.

22 116. At approximately 3:12 p.m., through video surveillance footage, SA O'Kain observed a
23 tan Toyota Sienna bearing CA license plate 7CNE417 arrive at **Target Premises C**. A male adult exited
24 the driver's side, walked to the front of the van, opened the hood of the van, accessed the engine
25 compartment, and then shut the hood. The man then walked towards the front entrance of **Target**
26 **Premises C** and out of view. Moments later, the man returned to the van and drove away. According to
27 DMV records, the van is registered to Laureano Gallegos/Blanca Esmeralda at **Target Premises H**. The
28 man's appearance matched that of a prior booking photograph of LEOBARDO, attached as

1 Attachment 10.

2 117. At approximately 3:15 p.m., LEOBARDO called EUTIMIO and told EUTIMIO that it
3 was finished and that LEOBARDO had left “two.” EUTIMIO asked if it was the same and
4 LEOBARDO confirmed and said it was “two” of the “6-0.” EUTIMIO asked if was of the same “tools”
5 and LEOBARDO affirmed and assured EUTIMIO he would have no problems with them. EUTIMIO
6 asked how many LEOBARDO had left of those and LEOBARDO replied that he had about six of those
7 same packages.

8 **4. Target Premises D**

9 118. I believe that MARCELINO and one of his sons reside at **Target Premises D**. Agents
10 monitoring a closed circuit video feed of **Target Premises D** regularly see MARCELINO entering and
11 exiting the residence. In addition, on August 19, 2015, agents conducting surveillance and monitoring
12 the physical location data for MARCELINO’s phone observed that his phone and one of his cars – a
13 Chevrolet Cheyenne – moved together from an address in Ceres, California, to **Target Premises E** (with
14 an accuracy radii of 537 and 652 meters). Both the phone and the vehicle then went back to the address
15 in Ceres, where an agent saw that the vehicle was occupied by one Hispanic male adult who resembled
16 MARCELINO. The agent followed the vehicle as it drove north to Manteca, CA, and exited at
17 Yosemite Ave. I finally saw the car parked at **Target Premises D**. MARCELINO’s phone’s physical
18 location data showed that it followed roughly the same path and ended in the vicinity of 604 Poplar Ave.
19 in Manteca, CA within an 871 meter radius. MARCELINO’s residence at 392 Lincoln Ct. (**Target**
20 **Premises D**) is included in that radius.

21 119. On October 28, 2014, agents collected a garbage bag from inside the trash receptacle left
22 curbside in front of **Target Premises D**. Agents searched through the contents of the garbage bag and
23 located indicia bearing the name “Anthony Rodriguez,” an alias MARCELINO uses, as well as indicia
24 bearing ELIZABETH’s name.

25 **5. Target Premises E**

26 120. I believe that MARCELINO’s girlfriend resides at **Target Premises E** and that
27 MARCELINO uses that residence to store evidence, fruits, and instrumentalities relating to the above
28 crimes, and also as a place to receive mail and keep other records related to the DTO’s operations. In

1 approximately January 2014, a CS told me that MARCELINO kept money at **Target Premises E**. In
2 addition, cars associated with the DTO are registered there. For example, following the October 16,
3 2014 controlled purchase, agents observed the couriers drive to another location, where they were
4 picked up by another car. That car was registered to Charles Giles at **Target Premises E**. I believe
5 Giles actually resides at **Target Premises B**. Further, the car the couriers used during controlled
6 purchases on May 5 and May 13, 2015 was registered to **Target Premises E**. Another car used in the
7 investigation, a 2003 Toyota bearing license plate 7JIC203 was also registered to **Target Premises E** for
8 a short time in the Spring of 2015. And on October 19, 2015, when EUTIMIO was attempting to evade
9 the surveillance team, he called an associate to come and pick him up. That person arrived in a car (CA
10 license plate 7KWV695) that was registered to Anthony Rodriguez at **Target Premises E**. "Anthony
11 Rodriguez" is one of MARCELINO's aliases. Furthermore, agents obtained mail cover for **Target**
12 **Premises E**, which revealed that "Giovanny Jimenez Reyna," "David Caravello," "Anthony Reyna,"
13 "Anthony Rodriguez," "Katheryn Moore" (who I believe is a previous resident), "Anthony Reyna-
14 Romero," and "Anthony Rodriguez-Carillo" received mail at this address.

15 121. Three of EUTIMIO's prior phones have been registered to **Target Premises E**, one in the
16 name "Eutimio N ReynaCeron," one in the name of "Eutimio Ceron," and one in the name "Danny R.
17 Perez." In addition, Eutimio's inside phone that was the subject of some of the wiretap intercepts
18 described above (Target Telephone 6) was registered to 201 Redbud Lane, Modesto, California.
19 Though **Target Premises E** is at 211 Redbud Lane in Modesto, the DTO sometimes uses slightly
20 different addresses when registering cars or phones. For example, a 2001 Chevrolet Tahoe that is
21 regularly used by MARCELINO and parked in the driveway of MARCELINO's residence at 392
22 Lincoln Ct., Manteca, CA, is registered to 398 Lincoln Ct., Manteca CA.

23 122. Moreover, on September 27, 2015, MARCELINO spoke to his girlfriend and told her that
24 a guy was going to come by to possibly purchase some car doors in the house. MARCELINO asked his
25 girlfriend to send him the address. She then sent him a text: "211 redbud ln modesto ca 95354."

26 123. In addition, on October 19, 2015, EUTIMIO travelled to **Target Premises E** after he
27 spotted a surveillance team following him during a suspected drug transaction with CAJAS. On the
28 following day, surveillance agents observed the same Toyota Sienna that EUTIMIO was driving during

1 the suspected drug delivery parked in the driveway of **Target Premises E**.

2 **6. Target Premises F**

3 124. Agents believe the Reyna-Ceron Family DTO also utilizes **Target Premises F**, which is
4 adjacent to and appears from a Google satellite view to be connected to **Target Premises E** as part of a
5 duplex structure.

6 125. Through pole camera footage agents have observed vehicles associated with the DTO
7 parked at **Target Premises F**. For example, a Silver Tacoma bearing CA license plate 16058U1, was
8 observed parked in the driveway of **Target Premises C** on August 1, 2015. On October 2, 2015 a
9 license plate reader captured an image of the Tacoma parked in the driveway of **Target Premises E**. On
10 October 6, 2015 a silver pickup matching the appearance of the Tacoma was parked at **Target Premises**
11 **D**. And on October 8 and October 14, 2015 a silver pickup matching the appearance of the Tacoma was
12 located in the driveway of **Target Premises F**. On the October 8, 2015 pole camera footage,
13 MARCELINO was observed sitting on the tailgate of the truck as it was parked in the driveway of
14 **Target Premises F**.

15 126. Moreover, a commercial database search for **Target Premises F** shows "Ofelia Reglado"
16 associated with the address as of November 1, 2015. On May 27, 2015, agents intercepted a call
17 between EUTIMIO and ELIZABETH in which EUTIMIO asked ELIZABETH to deposit money for
18 "Ofelia" in Mexico. ELIZABETH said she did not know how to spell the last name, and EUTIMIO said
19 he would send it to ELIZABETH. EUTIMIO then sent ELIZABETH a text message which read "Ofelia
20 reglado virelas." ELIZABETH received the message during the call with EUTIMIO, and then read the
21 name aloud: "Ofelia Reglado Vireles." Calls intercepted during the monitoring of EUTIMIO's phones
22 in October 2015 revealed that EUTIMIO and MARCELINO conspired to pay a smuggler to take Ofelia
23 across the border in June 2015.

24 127. Thus, I believe that the "Ofelia Reglado" listed in public databases as associated with
25 **Target Premises F** is the same "Ofelia" discussed in intercepted communications involving EUTIMIO,
26 MARCELINO and ELIZABETH, and that the DTO has control over **Target Premises F**.

27 **7. Target Premises G**

28 128. I believe that FITO resides at **Target Premises G**. I believe this based on physical

1 location data on FITO's phones, as well as surveillance. Agents initiated monitoring the physical
2 location data on FITO's phone on November 27, 2015. FITO's customer phone consistently is located
3 at **Target Premises G** late at night and then again early in the morning.²⁵ For example, on November
4 27, 2015, the phone was located on the southern side of **Target Premises G** at approximately 11:12
5 p.m., with a certainty radius of 6 meters. The next morning, at approximately 10:04 a.m., when the
6 phone was turned on, it was still located at **Target Premises G**, with a certainty radius of 6 meters.
7 FITO's customer phone regularly pings at **Target Premises G** throughout the daytime hours, as well.

8 129. In addition, on December 1, 2015, at approximately 9:30 a.m., agents observed FITO, as
9 depicted in Attachment 8, drive a maroon Acura MDX out of the driveway of **Target Premises G**. At
10 this approximate time, the AT&T physical location data for FITO's customer phone indicated that the
11 phone was located at **Target Premises G** (with a certainty radius of 9 meters). At approximately 10:37
12 a.m., agents located FITO driving the maroon Acura, traveling southbound on Range Avenue near
13 Jennings Avenue. Agents positively identified FITO as the driver of the Acura. At the approximate
14 time of the agent's observation, the location data for FITO's customer phone indicated that the phone
15 was located at 1071 Jennings Avenue, Santa Rosa, CA, and gave a certainty factor of 5 meters. Range
16 Avenue near Jennings Avenue, the location in which the agents positively identified FITO, is within the
17 radius of the certainty factor of 5 meters.

18 130. At approximately 2:19 p.m., SA Craven positively identified FITO in the driver's seat of
19 the maroon Acura parked in the parking lot of Roseland Elementary School. At the time of SA Craven's
20 observation, the physical location data received from the cellular carrier of FITO's customer
21 phone indicated the phone was located on 990 Sebastopol Rd., Santa Rosa, CA, and gave a certainty
22 factor of 51 meters. Roseland Elementary School is within the radius of the certainty factor of 51
23 meters. Agents observed FITO drive directly back from the Roseland Elementary School to **Target**
24 **Premises G**.

25 8. Target Premises H

26 131. As described above, I believe LEOBARDO resides at **Target Premises H**. I believe this
27

28 ²⁵ I believe FITO turns his phone off during the night because no real-time location data is provided during the late night hours.

1 based on physical location data of LEOBARDO's phone (707-527-2868), the one used to set up the
2 delivery to EUTIMIO. Location data has placed LEOBARDO's phone at or near **Target Premises H**
3 137 times (out of 840 instances of location data provided) between November 27, 2015 and December 8,
4 2015, with accuracy radiuses of 41 to 538 meters. For example, on November 28, 2015, location data
5 showed LEOBARDO's phone at or near **Target Premises H** from 9:53 p.m. through 8:02 a.m. the next
6 day (with accuracy radiuses ranging from 41 meters to 538 meters). On December 3, 2015, location
7 data showed LEOBARDO's phone at or near **Target Premises H** from 8:22 p.m. through 12:18 a.m. the
8 next day (with accuracy radiuses ranging from 88 meters to 564 meters). On December 5, 2015,
9 location data showed LEOBARDO's phone at or near **Target Premises H** from 10:25 a.m. through 3:53
10 p.m (with accuracy radiuses ranging from 41 meters to 364 meters).

11 132. Surveillance has also confirmed LEOBARDO's presence at **Target Premises H**. As
12 mentioned above, during a suspected drug delivery from LEOBARDO to EUTIMIO on November 26,
13 2015, through video surveillance footage, I observed a tan Toyota Sienna bearing CA license plate
14 7CNE417 arrive at **Target Premises C**. A male adult exited the driver's side, walked to the front of the
15 van, opened the hood of the van, accessed the engine compartment, and then shut the hood. The man
16 then walked towards the front entrance of **Target Premises C** and out of view. Moments later, the man
17 returned to the van and drove away. According to CA DMV records, the Toyota Sienna is registered to
18 Laureano Gallegos/Blanca Esmeraldo, Blanca Esmeralda at **Target Premises H**. On November 29,
19 2015, at approximately 12:29 p.m., LEOBARDO's phone was located on Route 101 in Petaluma,
20 California, just south of E Washington St, with a 488 meter accuracy radius. At 12:42 p.m., I observed
21 the same tan Toyota Sienna arrive and park in the driveway of **Target Premises H**. I observed a
22 Hispanic male adult wearing a dark colored sweatshirt exit from the front driver's side of the Toyota
23 Sienna. The man appeared to be LEOBARDO, based on his booking photograph on file. The man
24 opened the hood of his vehicle and accessed the engine compartment. He then shut the hood and walked
25 to the front door of the residence and out of view. At approximately 1:01 p.m., LEOBARDO's phone
26 was located at **Target Premises H**, with an accuracy radius of 401 meters. At approximately 1:03 p.m.,
27 agents observed LEOBARDO walk from the residence and enter the driver's seat of the Toyota Sienna
28 followed by a female adult. The vehicle then departed the area. At approximately 1:16 p.m., the phone

1 was located at the intersection of Fredricks Rd. and Gravenstein Hwy S, Sebastopol, CA, with and
2 accuracy radius of 88 meters.

3 9. Target Premises I

4 133. Based on a combination of wire intercepts, surveillance, physical location data for
5 CAJAS's cellular phone, and public records, I believe CAJAS resides at **Target Premises I**.

6 134. On October 13, 2015, agents intercepted communications between EUTIMIO and
7 CAJAS regarding EUTIMIO's providing payment to CAJAS. After these exchanges, EUTIMIO called
8 CORNELIO at approximately 10:52 a.m. and asked CORNELIO is he was on speaker phone because he
9 needed to tell him a secret. EUTIMIO then told CORNELIO that he needed CORNELIO to take the
10 "ticket" to his "Uncle Jose". Cornelio acknowledged. I believe the "ticket" was a reference to drug
11 money and "Uncle Jose" was a reference to "San Jose".

12 135. At approximately 1:09 p.m., CORNELIO called EUTIMIO and told EUTIMIO he would
13 be there in 15 to 20 minutes. EUTIMIO then called CAJAS and told CAJAS that he would be there in
14 15 or 20 minutes. CORNELIO then called EUTIMIO and told EUTIMIO he was at the "Market
15 Apatzingan." EUTIMIO said that it would be at the "pizza place" and CORNELIO asked if the guy
16 would be there. EUTIMIO responded that the guy would be at the bar next to the pizza place.
17 EUTIMIO then told CORNELIO to look for a new gray Toyota Tundra out back or in front.

18 136. At approximately 1:38 p.m., CAJAS called EUTIMIO and asked if he was there.
19 EUTIMIO told CAJAS that he had sent his brother. EUTIMIO asked CAJAS if he could count the
20 ticket so there would not be a problem. CAJAS asked if EUTIMIO's brother was with a dark guy and
21 EUTIMIO confirmed that he was with "Cubano" who was a friend. CAJAS told EUTIMIO that he
22 would call the bar. EUTIMIO suggested that the lady working at the bar could count it. Based on my
23 training and experience I believe EUTIMIO told CAJAS that his brother had gone down with the drug
24 money. CAJAS and EUTIMIO agreed that CORNELIO could just leave the money at the bar with a
25 woman who worked there.

26 137. At approximately 1:40 p.m., EUTIMIO called CORNELIO and told him to give it to the
27 girl to count. EUTIMIO told him that it should be 8 pesos. Based on my training and experience, I
28 believe that when EUTIMIO said "8 pesos," he meant \$8,000.00, and that CORNELIO was to give that

1 money to a woman who worked at the bar.

2 138. Agents found through a Google Map search that the Apatzingan Market is located at 901
3 Oakland Rd in San Jose, and shows Giovanni's Pizza located next to RIVERA's BAR, listed at 858 N.
4 13th St. in San Jose. Agents believe RIVERA's BAR was the location in which CORNELIO delivered
5 the suspected drug money.

6 139. Commercial database information lists 858 N 13th St. in San Jose as LA CORONA BAR,
7 and the telephone number as 408-280-1538. A financial query for 858 N 13th St. in San Jose reveals
8 that on May 2, 2012, Lorraine Tamayo received a \$10,908 cash deposit to her business account. The
9 business was LA CORONA TACQUERIA, and Tamayo was listed the manager. Surveillance agents
10 observed that the sign affixed above 858 N 13th St, San Jose reads "LA CORONA BAR".

11 140. As described above, on the October 19, 2015 agents established surveillance at the Jack-
12 in-the-Box, located at 15 South Capitol Ave. in San Jose. Agents had intercepted calls between
13 EUTIMIO and CAJAS regarding a suspected drug transaction, and EUTIMIO and CAJAS had agreed to
14 meet at the Jack-in-the-Box.

15 141. At approximately 2:33 p.m., agents observed a gray Toyota Sienna bearing CA license
16 plate 7MSB957 enter the Jack-in-the-Box parking lot and park on the eastern side of the lot. I observed
17 EUTIMIO driving this vehicle on October 18, 2015. I observed that the vehicle was occupied by at least
18 two individuals, one in the driver's seat and one in the front passenger seat.

19 142. At approximately 2:36 p.m. CAJAS called EUTIMIO and asked if he was there.
20 EUTIMIO affirmed and said he had just arrived. CAJAS told EUTIMIO he would arrive in one minute.
21 At about the same time, agents observed a gray Toyota Tundra bearing CA license plate 02188B1, arrive
22 at the Jack-in-the-Box parking lot. At approximately 2:38 p.m., CAJAS called EUTIMIO and told him
23 to follow him. Agents observed the Toyota Sienna pull out of the parking space and drive to the
24 location of the Tundra. Agents observed the Tundra, followed by the Sienna, drive out of the parking lot
25 and proceed south on S. Capitol Ave. Agents followed the two vehicles as they drove to a nearby
26 apartment complex parking lot and parked behind the northern most building of the apartment complex
27 (the building is labeled with the number "131"). Agents were unable to observe what apartment unit the
28 occupants of the vehicles entered. Around this time, physical location data (obtained by federal warrant)

1 indicated that EUTIMIO's phone was located within a 791 meter radius of the intersection of Capitol
2 Expressway and S Capitol Ave. The apartment building at 131 Nancy Ln. falls within that radius. I
3 believe CAJAS was driving the aforementioned gray Toyota Tundra. As described above, both
4 EUTIMIO and CAJAS discontinued using their phones after EUTIMIO spotted surveillance following
5 him on his trip back from San Jose to Santa Rosa.

6 143. I believe CAJAS's current phone is 408-771-2826. Agents monitoring EUTIMIO's new
7 phone intercepted calls with this number and the contract linguists monitoring the wire intercepts
8 compared the voice on that phone to the voice on CAJAS's predecessor phone and determined it was the
9 same person. I obtained a warrant for the physical location data for CAJAS's current phone. According
10 to the data, on December 3, 2015 from 12:30 a.m. to 11:00 a.m. CAJAS' current phone was located on
11 and around **Target Premises I** with certainty radiuses ranging from 2 meters to 64 meters (with
12 exception of three location intervals that had poor accuracy radii at 1:46 a.m., 2:01 a.m. and 2:16 a.m.).

13 144. From December 3, 2015 at 11:15 p.m. to December 4, 2015 at 11:00 a.m. CAJAS'
14 current phone was located at and around **Target Premises I** with certainty radii ranging from 2 meters
15 to 71 meters (with exception to one ping with very poor accuracy at 2:45 a.m.).

16 145. Agents received no location data for the night of December 4, 2015 to the morning of
17 December 5, 2015, or for the night of December 5, 2015 to the morning of December 6, 2015. It is
18 possible that CAJAS had his phone turned off during that time.

19 146. On December 6, 2015 at approximately 10:39 a.m., based on the location data of CAJAS'
20 current phone, I conducted surveillance at **Target Premises I** and observed the gray Toyota Tundra
21 bearing license plate 02188B1 (the same truck observed on October 19, 2015), parked in the driveway of
22 **Target Premises I**. I also observed two other vehicles parked in the driveway, a black Toyota SUV
23 bearing CA license plate 5XOH507 and a dark colored Honda sedan bearing CA license plate
24 6MGW986. According to California DMV records, both the Toyota and the Honda are registered to
25 Lorraine Asis Tamayo at **Target Premises I**.

26 **V. GENERAL KNOWLEDGE REGARDING DRUG TRAFFICKING**

27 147. Based on my training, experience, and participation in this and other narcotics trafficking
28 investigations and upon my consultation with other experienced law enforcement officers, I know the

1 following information regarding individuals, involved in drug trafficking:

2 a. These persons often maintain documents pertaining to the possession,
3 importation, exportation, and/or distribution of controlled substances and illegal proceeds, including
4 invoices, shipping labels, tracking numbers, boxes, and envelopes at their residences, stash houses,
5 and/or in their vehicles where they are available for reference and concealed from law enforcement;

6 b. Drug traffickers commonly store drugs and drug paraphernalia, including pipes,
7 syringes, and rolling papers, in their residences, stash houses, and/or vehicles in order to have ready
8 access to the drugs and/or paraphernalia in order to conduct their drug trafficking business or to use
9 those drugs personally;

10 c. Drug traffickers attempt to mask the distinct odors of particular drugs through the
11 use of heat sealing and/or canning devices and/or aromatic substances such as laundry soap, dryer
12 sheets, air fresheners, or axle grease;

13 d. Drug traffickers often dilute, or "cut," drugs in order to maximize the volume of
14 drugs they have to sell, and thus their profits. Drug traffickers use various substances to dilute drugs,
15 including mannitol, mannite, lactose, Vitamin B12, and MSM. Drug traffickers use equipment, such as
16 scales, sifters, hammers, grinders, razor blades, glass panes, mirrors and kilo or pound presses as part of
17 the dilution or "cutting" process. Once the drug has been "cut," drug traffickers usually will repackage
18 it, often in smaller quantities, using masking agents, tape, heat sealers and heat sealed bags, ziplocs bags,
19 paper bindles, and/or other containers for redistribution. It is common for drug traffickers to maintain
20 such equipment and supplies in their residences, stash houses;

21 e. Drug traffickers keep books, receipts, notes, ledgers and other forms of records
22 specifically relating to their drug distribution activities. Because drug traffickers often "front" drugs to
23 their customers – that is, sell the drugs on credit – or receive drugs from their suppliers on credit, such
24 documentation is necessary to keep track of the amounts paid and owed with respect to their customers
25 and suppliers. These ledgers are more commonly known as "pay/owe sheets" and may be as simple as
26 notations on miscellaneous pieces of paper or may be recorded more formally in notebooks or even
27 computer spreadsheets, and are frequently encoded in order to protect those involved. Drug traffickers
28 often keep such records on their person or in their residences, stash houses, and/or vehicles;

1 f. Drug trafficking is a cash business. Customers pay for drugs with cash and
2 dealers commonly purchase drugs from their suppliers with cash. Drug traffickers commonly keep large
3 sums of currency, financial instruments, precious metals, jewelry, and other items of value which
4 represent either the proceeds from drug sales or are intended for the purchase controlled substances.
5 When drug traffickers amass such wealth, they often attempt to legitimize that wealth or otherwise
6 conceal it and its origin from discovery by law enforcement. To accomplish this, drug traffickers often
7 use different techniques, including the use of foreign and domestic banks and their attendant services,
8 including savings and checking accounts, securities, cashier's checks, money drafts and letters of credit
9 to exchange drug proceeds into money that appears to come from a legitimate source. Drug traffickers
10 also purchase real estate or vehicles, and establish shell corporations and business fronts that they use to
11 launder drug proceeds. Drug traffickers often utilize fictitious or "straw-holder" owners to conceal the
12 true ownership, vehicles, or other valuable items purchased with the proceeds of illicit drug sales. In
13 addition, drug traffickers often use wire transfers, cashier's checks, and money orders to pay for drugs or
14 other costs relating to their distribution business. Drug traffickers often keep these items of value, and
15 records relating to them, on their person or in their residences, stash houses, and/or vehicles where they
16 are concealed from law enforcement and readily available.

17 g. Drug traffickers go to great lengths to hide and secure the drugs, drug proceeds,
18 other items of value and records relating to their drug business. This is to safeguard those items against
19 robbery and keep them from law enforcement. These secure locations typically include safes, vaults, or
20 other locked containers, as well as specially constructed concealed compartments such as those often
21 found in vehicles used specifically to facilitate drug trafficking. Other methods of concealment include
22 the burial of such items underground, the use of locked vehicles, trailers, out buildings, sheds, and/or
23 exterior closets, the use of natural spaces within walls, furniture, vehicles, and other areas, and the use of
24 sealed cans and canning machines;

25 h. Drug traffickers often use the United States Postal Service or commercial express
26 mail delivery companies, such as FedEx or UPS, to ship drugs and money to various points within the
27 United States. They do so, at least in part, due to the convenience of the service and the availability of
28 related internet and phone tracking services, speed of delivery, and to reduce their risk of arrest during

1 the transportation of drugs from one place to another. They often use hand-written airbills, drop the
2 packages near closing time, pay for such services in cash and utilize false or nominee names, addresses,
3 and/or telephone numbers when using such services in order to further insulate themselves from
4 detection by law enforcement. Drug traffickers frequently maintain records relating to their use of these
5 services, such as receipts, copies of airbills, empty and/or previously used boxes, packing tape, packing
6 popcorn/filler and other packaging materials, and package tracking records printed from the internet, at
7 their residences, stash houses, and/or in their vehicles where they are available for reference.

8 i. Drug trafficking is a business that involves numerous co-conspirators, from
9 lower-level dealers to higher-level suppliers, as well as associates to process, package and deliver the
10 drugs and persons to launder the drug proceeds. These persons frequently maintain listings of names,
11 aliases, telephone numbers, pager numbers, facsimile numbers, physical addresses, and email addresses,
12 sometimes encoded and sometimes not encoded, for the purpose of contacting their suppliers, customers,
13 transporters, and others involved in their illicit drug distribution activities. These records are typically
14 maintained on their person or in their residences, stash houses, and/or vehicles, so they are readily
15 available in order to efficiently conduct their drug trafficking business. Moreover, such records are
16 often stored electronically within the memory of telephones, computers, and/or personal digital
17 assistants such as iPhone and Blackberry devices;

18 j. Drug traffickers often use cellular telephones, satellite telephones, pagers and text
19 messaging devices, voicemail or answering machine systems, telephone calling cards, computers, email,
20 and/or personal digital assistants such as iPhone and Blackberry devices in order to communicate with
21 their suppliers, customers, transporters, and others involved in their illicit drug distribution activities.
22 Drug traffickers often keep these items on their person or in their residences, stash houses, businesses,
23 and/or vehicles where they are readily available;

24 k. Drug traffickers often travel by car, bus, train, or airplane, both domestically and
25 to and/or within foreign countries, in connection with their illegal activities in order to meet with co-
26 conspirators, conduct drug transactions, or to transport drugs or drug proceeds. Documents relating to
27 such travel, such as calendars, travel itineraries, maps, airline ticket and baggage stubs, frequent use club
28 membership information and records associated with airlines, rental car companies, and/or hotels,

1 airline, hotel and rental car receipts, credit card bills and receipts, photographs, videos, passports, and
2 visas, are often maintained by drug traffickers in their residences, stash houses, and/or vehicles where
3 they are readily available for use or reference;

4 l. Drug traffickers frequently possess firearms, ammunition, silencers, explosives,
5 incendiary devices, and other dangerous weapons to protect their profits, supply of drugs, and persons
6 from others who might attempt to forcibly take such items and/or harm them during transactions. Such
7 weapons, which are often stolen or otherwise possessed illegally, are typically maintained on their
8 person or in their residences, stash houses, and/or vehicles where they are concealed from law
9 enforcement and readily available;

10 m. Drug traffickers often utilize two way radios, police scanners, video surveillance
11 systems, and other counter surveillance equipment to prevent detection by law enforcement, and that
12 such items are typically maintained at their residences, stash houses, and/or in their vehicles.

13 n. Drug traffickers frequently take, or cause to be taken, photographs and/or videos
14 of themselves, their criminal associates, their real and personal property, their weapons, and their drugs,
15 and that such items are often stored on their person, in their residences, and/or vehicles;

16 o. During the course of a search it is not uncommon to find items of personal
17 property that tend to identify the person(s) in residence occupancy, control, or ownership of the place
18 being searched vehicle, such as cancelled mail, deeds, leases, titles, registration information, rental
19 agreements, photographs, videos, diaries, utility and telephone bills, tax documentation, travel
20 documents, statements, passports, driver's licenses and/or identification cards, immigration
21 documentation, birth certificates, and keys.

22 VI. CONCLUSION

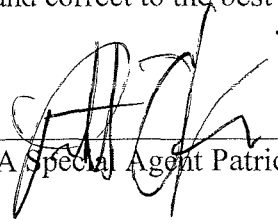
23 148. Based on the foregoing, it is my opinion that there is probable cause to believe that the
24 **Target Subjects** have violated Title 21, United States Code, sections 841, 843(b) and 846 and Title 18,
25 United States Code, section 1956(h), and that the **Target Locations** will contain evidence of these
26 violations. Therefore, I request that the Court issue a complaint against the **Target Subjects** and a
27 warrant authorizing agents to search the **Target Locations**.

28 149. Since this investigation is continuing, disclosure of the complaint, the search and seizure

1 warrants, this affidavit, and/or this application and the attachments thereto will jeopardize the progress
2 of the investigation and potentially endanger the agents and confidential sources working on the
3 investigation. It may also cause the **Target Subjects** to flee and/or destroy evidence of their crimes.
4 Accordingly, I request that the Court seal the application, this affidavit, the complaint, the warrants and
5 the supporting papers, except that the Clerk of the Court be directed to provide copies of these
6 documents to the United States Attorney's Office and/or the Drug Enforcement Administration for use
7 in connection with this case.

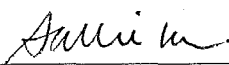
8
9 I declare under penalty of perjury that the above is true and correct to the best of my knowledge.

10
11 Dated: December 9, 2015



DEA Special Agent Patrick O'Kain

12
13 Subscribed and sworn to before me this 9 day of December, 2015 in San Francisco, California.

14
15 

HON. SALLIE KIM
16 United States Magistrate Judge