

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

Raudel Macias, Anthony Macias, Benito Macias,
Oscar Macias, and Fawn Larance

Case No. 3:21-mj-70054-MAG

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of April 2, 2019 through Feb 10, 2020 in the county of San Mateo in the
Northern District of California, the defendant(s) violated:*Code Section*21 U.S.C. § 846
21 U.S.C. § 841(a)(1), (b)(1)(B)*Offense Description*Conspiracy to Distribute Controlled Substances
Possession of Controlled Substances with Intent to DistributeMaximum Penalties: Minimum of 5 years in prison up to 40 years in prison;
\$5,000,000 fine; at least 4 years supervised release up to lifetime supervised
release; and a \$100 special assessment

This criminal complaint is based on these facts:

See attached affidavit of DEA TFO Luis Leyva

☒ Continued on the attached sheet.Approved as to form /s/
AUSA Daniel PastorSworn to by telephone before me pursuant to
Fed. R. Crim. P. 4.1.Date: 01/15/2021City and state: San Francisco, California/s/ Luis Leyva via telephone*Complainant's signature*Luis Leyva, DEA Task Force Officer*Printed name and title**Judge's signature*Alex G. Tse, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR COMPLAINT

I, Luis Leyva, a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), being duly sworn, state:

INTRODUCTION

1. I make this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a criminal complaint and arrest warrants authorizing the arrests of Raudel Macias, Anthony Macias, Benito Macias, Oscar Macias, and Fawn Larence for violations of 21 U.S.C. § 846 (conspiracy to distribute controlled substances) and 21 U.S.C. § 841(a)(1), (b)(1)(B) (possession of controlled substances with intent to distribute).

SOURCES OF INFORMATION

2. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrants. I have not included every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause that violations of the federal laws identified above have occurred. In addition, not every individual who could be charged based on the underlying facts is being charged in this complaint. Those persons who are not being charged at this point are identified by labels other than their true names.

3. I am familiar with the facts set forth in this Affidavit from my personal observations and inquiries, observations and investigations by other law enforcement officers and/or analysts as related to me in conversation and/or through written reports, and/or from records and/or documents and/or other evidence obtained as a result of this and related investigations. Unless otherwise indicated herein, I believe the information provided to me by others is reliable. In those instances, wherein I assert an opinion or belief with respect to the facts alleged herein, that opinion or belief is based upon my training and experience as set forth previously herein, along with my knowledge of this investigation and any other specific factors I offer in connection with a particular assertion.

AFFIANT BACKGROUND

4. I am a “an investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigation of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

5. I am a TFO of the DEA and have been assigned to the San Francisco Field Division since December 2013. I am also currently employed by the Redwood City Police Department and have served as a Peace Officer since March 2005. I received 22 weeks of training at the Police Officer Standards and Training (POST) Police Academy in San Mateo, California. In 2010, I was assigned to the San Mateo County Narcotics Task Force and attended a two-week POST Narcotic Investigation course in 2011. During my employment, I received training in conducting narcotics investigations, drug identification, drug interdiction, methods of smuggling, manufacturing, packaging, and distribution of drugs; training in undercover operations, laundering of drug proceeds, asset forfeiture, use of Confidential Sources, and the legal aspects of conducting drug investigations.

6. During the course of my employment with the Redwood City Police Department and my assignment at the DEA, I have participated in numerous narcotics investigations using various law enforcement techniques, including the use of confidential sources, undercover operations, physical surveillance, electronic surveillance, investigative interviews, and the execution of state and federal search warrants to search locations for controlled substances, related paraphernalia, cultivation, and/or manufacturing equipment, indicia, and other evidence relating to violations of the Controlled Substances Act, including violations of 21 U.S.C. §§ 846 and 841(a)(1). In my capacity as a DEA TFO, I have personally observed and identified

methamphetamines, cocaine, heroin, liquid lysergic acid diethylamide (LSD), food items impregnated with marijuana, growing marijuana plants, and processed marijuana.

7. I have participated in numerous investigations involving narcotics and controlled substances, such as marijuana, crystal methamphetamine, heroin, cocaine, and LSD. I have also participated in multiple hours of surveillance, observing and recording movements of persons trafficking in drugs and those suspected of trafficking in drugs. I have participated in and/or executed multiple search warrants authorizing the search of locations such as residences, storage facilities, and vehicles related to drug traffickers and their co-conspirators. These investigations have resulted in arrests of numerous individuals, the seizure of illicit drugs and drug-related evidence, and the forfeiture of drug-related assets.

8. As a result of my experience, I have encountered and become familiar with the day-to-day operations and practices, tools, paraphernalia, and related articles utilized by drug traffickers in their efforts to cultivate, possess, import, conceal, and distribute controlled substances. I have also participated in international training on undercover operations and have talked to very experienced law enforcement officials about international drug trafficking trends and methods.

9. I have also become familiar with narcotics traffickers' use of mobile telephones, and their use of numerical codes and code words to conduct their business through my training, education, experience, and my conversations with other agents and officers who conduct drug investigations,. In addition, I have become familiar with narcotics traffickers' methods of operation, including, but not limited to, the manufacturing, distribution, storage, and transportation of narcotics, and the methods used by drug traffickers to collect, transport, safeguard, remit, and/or launder drug proceeds.

10. I am a fluent Spanish speaker. In my work as a DEA TFO, I regularly review and translate portions of conversations and written communications in Spanish that relate to drug trafficking activities.

APPLICABLE STATUTES

11. Pursuant to Title 21, United States Code, Section 841(a)(1), it is unlawful for any person knowingly and intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.

12. Pursuant to Title 21, United States Code, Section 846, it is unlawful for any person to attempt or conspire to commit any offense defined in Title 21, including violations of Section 841(a)(1).

FACTS SUPPORTING PROBABLE CAUSE

13. The Drug Enforcement Administration (DEA), partnered with other agencies, has been investigating (among other things) a drug trafficking organization (DTO) in which Raudel Macias (hereafter “Raudel”) is the central figure (the MACIAS DTO). Agents have used several means to investigate the DTO’s activities, including court-authorized federal wiretaps and physical and electronic surveillance

14. Based on intelligence generated during the course of the investigation, agents learned that the Macias DTO was a street-level drug distribution group, responsible for distributing methamphetamine, cocaine, heroin, and fentanyl to numerous street level customers and resellers in the Northern District of California. As a result of the investigation, agents learned that members of the Macias DTO operated at least two “dealer” telephone lines that received calls from customers in the Bay Area with requests for various types of drug product. Once the order was received, the order would be passed to Raudel Macias, who was in charge of

handling supply for the organization. Other members were responsible for delivering drugs to customers and collecting the proceeds. As discussed below, the investigative team was able to document these activities through, among other means, wiretaps and undercover purchases of drugs.

Anthony Macias and Benito Macias Sell Fentanyl to a Confidential Source (CS) Working under Law Enforcement Supervision

15. On April 2, 2019, at the direction of law enforcement, a confidential source (CS)¹ made arrangements by phone to purchase fentanyl.² After calling the last known number of the Macias Drug Trafficking Organization (DTO), the CS went to the buy location, the parking lot of 24-Hour Fitness in Redwood City, California, with San Mateo County Detective Boyce. Detective Boyce watched the area from a distance while the CS met the sellers in a Silver Honda.

16. Detective Boyce conducted surveillance on the meeting and took photos, but there was no audio recording. The CS got into the Honda and bought .2 grams of fentanyl.³ After the purchase, the CS got out of the Honda and gave the fentanyl to Detective Boyce. The fentanyl was packaged in a plastic bindle with red tape on the opening. The CS told Detective Boyce that there were two males and a female in the Honda. The two males were later identified as

¹ The CS began cooperating with law enforcement for monetary compensation. The CS has misdemeanor convictions for petty theft, narcotics related charges, and vehicle code violations. The CS has been arrested, but not convicted, for other crimes including driving under the influence and assault. During unrelated past investigations, the CS has provided information and conducted controlled purchases of narcotics on multiple occasions, which have resulted in the seizure of narcotics, currency, and firearms. To the best of my knowledge, the CS has never provided false information in an informant capacity. The CS has thus far provided reliable information that has resulted in the successful prosecution of criminal cases.

² The phone call was not recorded.

³ Law enforcement later used TruNarc to test the fentanyl, and it tested positive for fentanyl.

Anthony Macias (Anthony) and Benito Macias-Lopez (Benito).

17. On April 18, 2019, Detective Boyce and I conducted another controlled buy using the same CS. Law enforcement conducted surveillance of and took photographs of the transaction, but there was no audio recording. The CS called a telephone number with 2459 as the last four digits (-2459)⁴ and went to a Safeway parking lot in Union City, California.

18. At the parking lot, the CS met a Toyota Camry. The CS entered the rear side of the Camry and met with Oscar Macias and Fawn Larance. Oscar sat in the driver seat and Larance sat in the front passenger seat. Oscar gave the CS fentanyl⁵ packaged in a plastic bindle with red tape⁶ on it.

19. After receiving the fentanyl, the CS asked Oscar if he had methamphetamine. Oscar reached under the driver's seat and gave the CS a bindle wrapped with blue tape on the opening. The bindle contained 1 gram of methamphetamine.⁷ After the sale, CS got out of the Camry and the Camry left the parking lot.

20. Law enforcement followed the Camry to 1750 Via Sarita, San Lorenzo, CA. Fawn Larance got out of Camry and went into 1750 Via Sarita. Oscar Macias then got out of the Camry, threw something in a garbage can in front of the residence, and then got back in the vehicle. A short time later, Larance came out of the residence, got back into Camry, and she and Oscar Macias drove off.

⁴ The phone call was not recorded. At the time, CS was a non-testifying source.

⁵ Law enforcement used TruNarc to test the fentanyl. The results were positive for fentanyl.

⁶ In search warrant affidavits for this case, the color was listed as yellow. This was an error.

⁷ Law enforcement used TruNarc to test the methamphetamine, and it tested positive for methamphetamine.

Oscar Macias and Fawn Larance Sell Fentanyl and Methamphetamine to the CS

21. On April 23, 2019, Detective Boyce and I conducted another controlled buy with the CS. The CS called Oscar Macias at telephone number -2459 to buy .2 grams of fentanyl. Oscar Macias told the CS to meet him at the Fremont Hub shopping center (Fremont Hub) in Fremont, California. Before the buy, law enforcement spotted the Camry parked at 4425 Inyo Court in Fremont. The Camry left Inyo Court, and officers followed it to the Fremont Hub.

22. After the CS arrived at the Fremont Hub, the CS got a call from Fawn Larance.⁸ Larance told the CS that they were near the Marshalls. The CS told Larance that the CS was at Party City. Larance then told CS that they would come to the CS.

23. Several minutes later, Oscar Macias drove the Camry to the Party City parking lot. The CS walked to the Camry and got inside. Oscar Macias was in the driver's seat, and Fawn Larance was in the front passenger seat. The CS bought fentanyl⁹ from Oscar Macias and Fawn Larance. The fentanyl was contained in a plastic bindle with red tape.¹⁰ The CS was wearing a recording device during this transaction.

24. After the fentanyl sale, the CS told Oscar Macias that the CS knew someone interested in buying methamphetamine. The CS then called me (I was acting undercover) and handed the phone to Oscar Macias. I spoke to Oscar in Spanish¹¹, and Oscar Macias agreed to

⁸ The phone call was not recorded. At the time, CS was a non-testifying source.

⁹ Law enforcement used TruNarc to test the fentanyl. The results were positive for fentanyl.

¹⁰ In other search warrant affidavits in this case, the color was listed as yellow. This was an error.

¹¹ I spoke to other DTO members in Spanish. Our conversations that are described in this Affidavit are summarized translations. The call was recorded.

sell me one ounce of methamphetamine for \$350. We called each other “Primo,” which means cousin in Spanish. After I got off the phone with Oscar, law enforcement saw Oscar Macias drive the Camry to 4425 Inyo Court and then return to the Fremont Hub.

25. When Oscar returned to the Fremont Hub, he gave the CS an ounce of methamphetamine¹², and the CS paid Oscar \$350. The CS acted as if the CS was lending me the money. The money the CS used as payment was from law enforcement funds.

The Affiant Arranges a Drug Deal with “Tio” (Raudel Macias)

26. On April 30, 2019, I called telephone number -2459 in an attempt to arrange a controlled narcotics purchase.¹³ I believe Oscar Macias initially answered the phone because of his voice and because he called me Primo. I had to call telephone number -2459 on multiple occasions that day before I could finalize a deal.

27. During one of the calls with telephone number -2459, I spoke in Spanish to, what sounded like, an older Hispanic male. The older Hispanic man referred to himself as “Tio,” (“uncle” in Spanish). Based on subsequent events and the results of the investigation, I believe that “Tio” was Raudel Macias.

28. I told Tio that I was the guy that bought the “ice.”¹⁴ Tio said that he knew who I was. He then said that we do not call it ice, we call it water. I told Tio that I was trying to finalize the deal. Tio then said he would call the youngsters to get back to me. We ended the call after that.

¹² Law enforcement used TruNarc to test the methamphetamine. The results were positive for methamphetamine.

¹³ The calls were recorded.

¹⁴ Ice is a commonly used slang term for methamphetamine.

29. Later on April 30, 2019, I received a call from telephone number -2459. I ultimately agreed to buy a half ounce of fentanyl and one ounce of methamphetamine for \$1,250.

30. We decided to meet at the Fremont Hub on May 2, 2019. I told the person who called me that I would text him on the morning of May 2 to confirm that the deal would happen.

31. On May 2, 2019, law enforcement set up surveillance at 4425 Inyo Court. Agents saw a Honda and a Black Mazda parked in the driveway. I called -2459 to confirm that the drug deal would happen that day. A different young adult Hispanic male answered the phone and told me to meet in Newark by the New Park Mall. I told the man that the runners were already at the Fremont Hub. The young Hispanic man told me that he was not the one who arranged to meet at the Fremont Hub. He then asked what kind of vehicle the runners were in, and I said it was a silver Toyota sedan. The young man then agreed to meet at the Fremont Hub.

32. After I got off the phone with -2459, law enforcement saw the Honda leave 4425 Inyo Court. Approximately 15 minutes after my call, the surveillance team at the Fremont Hub saw the Honda drive into the parking lot, do a couple of passes by the undercover silver Toyota sedan, and then park a few rows away.

33. Detective Boyce identified the driver of the Honda as Benito Macias and the passenger as Anthony Macias.

Anthony Macias and Benito Macias Sell Fentanyl and Methamphetamine to UCs

34. After Benito Macias parked the Honda, Anthony Macias got out and walked over to the undercover agents' (UCs) vehicle. One of the UCs asked Anthony Macias if he was here for Primo, and Anthony Macias said yes. Anthony Macias and the UCs then entered the UCs' vehicle.

35. Inside the UC vehicle, Anthony Macias gave the UCs approximately a half-ounce

of fentanyl and one ounce of methamphetamine in exchange for \$1,250. The drugs were packaged individually in clear plastic and they were bundled in green cellophane. The transaction was recorded. After the transaction, Anthony Macias got out of the car and walked over to the shopping center.

36. Benito Macias then drove the Honda around the parking lot and picked up Anthony Macias. Agents saw the Honda drive back to 4425 Inyo Ct.

37. I sent the drugs and packaging to the DEA Western Regional Laboratory for drug and fingerprint analysis. The drug test results were: 12.387 grams of fentanyl and 27.7 grams of methamphetamine with 99% purity.

38. The Western Regional Lab informed me that a latent fingerprint from the packaging matched that of Raudel Macias.

39. Prior to the May 2, 2019 controlled buy, Detective Boyce had seen Raudel Macias at 4425 Inyo Court on multiple occasions and saw him driving the black Mazda.

**Fawn Larance Temporarily Takes Over the Drug Distribution Routes Normally Handled
By Anthony Macias and Benito Macias**

40. After the May 2, 2019 controlled buy, I believe that Anthony Macias and Benito Macias grew concerned that law enforcement had been involved in the transaction. Another known customer of the Macias DTO told Detective Boyce and I that the Macias DTO believed that the CS was a snitch. The DTO also discontinued using telephone number -2459.

41. Agents noticed that they were not seeing Anthony and Benito driving the Honda on their usual drug routes.¹⁵ In their absence, however, agents saw Fawn Larance driving the

¹⁵ Prior to May 2, 2019, law enforcement conducted physical surveillance of the Honda's movements.

Honda along those same drug routes.

42. On June 20, 2019, for example, Detective Boyce saw Fawn Larance driving the Honda throughout the day, and making numerous stops throughout San Mateo County that were consistent with the stops frequently made by Benito Macias and Anthony Macias during their narcotics transactions.

43. At one point during the surveillance, Larance was seen parking in the Home Depot parking lot at 1125 Old County Rd in San Carlos, California. A man arrived several minutes later and parked his vehicle next to the Honda. The man then got into the back seat of the Honda for a short period, before exiting and returning to his vehicle. This activity was consistent with narcotics transactions frequently conducted by the DTO.

Anthony Macias and Benito Macias Return to Selling Drugs Along Their Previous Drug Routes

44. On July 10, 2019, I obtained a federal GPS tracker warrant for the Honda, and I installed it on July 16, 2019. I obtained a federal GPS tracker warrant for the Mazda on July 25, 2019, and I installed it on July 30, 2019.

45. On July 31, 2019, Detective Boyce and I monitored the GPS tracker on the Honda. Based on the tracker, the Honda appeared to travel to locations where law enforcement believed they previously saw the DTO engaging in narcotics transactions, such as: a Target in Redwood City; a residence at Brewster Avenue in Redwood City; College of San Mateo campus; an apartment complex in Foster City on Triton Drive; and a Safeway on Polhemus Road. I believe Anthony and Benito drove to those locations to sell narcotics to customers.

46. On that day, Detective Boyce and I followed the Honda to a park in Menlo Park. Detective Boyce saw Benito driving the Honda and Anthony in the passenger seat. Detective Boyce saw, what he believed to be, a hand-to-hand drug transaction between Anthony and

another individual in the park. Detective Boyce believed it was a hand-to-hand transaction. He was approximately ten feet from the customer's vehicle, where the transaction occurred. He saw Anthony open the passenger door to the customer's vehicle and lean in. Detective Boyce then saw their bodies move towards each other very quickly, and then he saw Anthony and the customer immediately part ways. These observations are consistent with hand-to-hand drug transactions he has seen in the past.

47. Soon after the transaction, the customer was stopped for a traffic violation. The customer gave consent to search his vehicle. The officer found a small piece of aluminum foil with circular burn marks on it that was consistent with narcotics use. He also found a small pea sized, clear plastic bindle with a blackish brown tar-like substance wrapped up. The bindle had white tape on it. The officer believed that the substance was heroin based on his training and experience.

Raudel Macias Delivers Suspected Narcotics to Anthony Macias Prior to Anthony's Sale of Drugs to a Customer

48. On July 31, 2019, I followed the Mazda. At approximately 7:44 p.m., I located the Mazda at a Ross parking lot in San Mateo. I saw Raudel Macias in the driver's seat of the Mazda and a female in the passenger's seat. I saw Raudel get out of the Mazda, walk to the trunk, open it, and stand beside it.

49. At approximately 7:45 p.m., I saw the Honda, driven by Benito Macias, arrive at the Ross parking lot. Benito parked the Honda 4-6 spaces away from the Mazda. I then saw Anthony Macias get out of the front passenger's side door and go into the store.

50. After Anthony went into the store, I saw Raudel stand by the Mazda's trunk holding a cellular telephone with a Bluetooth earpiece in his ear. It appeared as if he was making phone calls.

51. After a few minutes, I saw Anthony Macias leave the store while talking on a cellular telephone to his ear. As Anthony Macias was speaking, he walked in the direction of Raudel Macias. It appeared that Raudel Macias saw Anthony Macias, and then I saw Raudel walk towards Anthony. I saw the two meet, and it appeared that Raudel handed something to Anthony. A few seconds after they met, the two parted ways and headed back to their cars. Both got back into their cars and drove off.

52. Detective Boyce and I followed the Honda to a Park-and-Ride parking lot in Burlingame off the 280 Freeway. At approximately 8:00 p.m., we saw the Honda parked next to a white Hyundai with a California license plate number 8LCZ820. A short time later, we saw the two cars drive away.

53. Detective Boyce and I followed the Hyundai because we believed the DTO and the driver of the Hyundai had engaged in a narcotics transaction. I believe it was a narcotics transaction because the two cars met very briefly in a secluded parking lot with no occupied cars near them. In my experience, brief car-to-car meetings are a common way to purchase narcotics. I have seen many car-to-car narcotics transactions in my career, and I have conducted (while undercover) numerous car-to-car narcotics transactions. These transactions are very brief. Money and narcotics are exchanged very quickly and the two cars generally part ways immediately. These transactions often occur in secluded parking lots such as this one so that other individuals cannot witness the transaction. Based on these observations, we decided to follow the Hyundai (driven by the suspected customer). As discussed below, we recovered heroin from the Hyundai, which the driver admitted he had just purchased.

54. We followed the Hyundai with the license plate number 8LCZ820 to a Taco Bell in San Mateo County. The driver parked and went inside. I followed him inside. The driver

ordered food, picked it up, and went back to his car.

55. A San Mateo police officer walked over to the driver's side of the Hyundai, and the officer saw the driver with a syringe, a small metal cap with burnt residue, and a package of small white dots. The officer believed the driver was about to inject a controlled substance. The driver admitted to the officer that he had heroin. The officer searched the driver and found a plastic bag of heroin¹⁶, a piece of red tape, and a piece of blue tape. The officer arrested the driver and read him his Miranda rights.

56. The driver told the officer that he just bought the heroin for \$60 off of the 280 Freeway (where Detective Boyce and I saw the Honda parked next to the white Hyundai).

57. The driver gave officers consent to search his phone to show that he was only using and not selling heroin. The driver pointed out a text conversation with phone number 650-704-2437 (-2437). The text conversation showed the driver texting with a contact named "Abc" with the listed number "+1 650-704-2437." I reviewed the text conversations between the driver and 2437. According to text log¹⁷, on July 31, 2019, listed as "Today," the following text conversation occurred between phone number -2437 and the driver:

2437: I'm around bro – (at 12:46 p.m.)

Driver: Word I just need to make 60 – (at 3:29 p.m.)

2437: Okay we'll just let me know – (at 3:41 p.m.)

Driver: I juse need to make like 10or15 bucks but ill prob be down there at 730 – (at 6:33 p.m.)

¹⁶ The officer used NarcoTest to test the heroin. The results were positive for heroin.

¹⁷ Law enforcement did not seize the driver's phone. Instead, law enforcement photographed the text conversation from the phone.

2437: Ok bro I'll be waiting – (at 6:59 p.m.)

Driver: Hey ill be sm in like 28 mins you want to meet at that chevron in Millbrae
– (at 7:19 p.m.)

Driver: I'm almost near Millbrae do you want to meet there or where – (at 7:31 p.m.)

2437: Yea bro – (at 7:35 p.m.)

Driver: Word like 10 mins – (at 7:36 p.m.)

Driver: Om like 3 min away – (at 7:36 p.m.)

Driver: Im in the lot be4 tge chevron – (at 7:57 p.m.)

58. Drug trafficking organizations and users of narcotics often use coded language to disguise their activities. Based on my training and experience, I know that narcotics users will say things such as I need “to work” or “to make” a certain amount, which translates out to how much the user wants to spend. Based on my training and experience, I believe that the driver is telling the DTO that he wants to buy \$60 worth of narcotics. He later admitted to an officer that he bought \$60 worth of heroin. The driver is also telling the DTO his location and approximate time to meet. The driver tells the DTO he is “in the lot be4 tge chevron.” I believe he is telling the DTO that he is in the lot before the Chevron. The lot in which Detective Boyce and I saw the driver meet Anthony Macias was located one exit before a Chevron gas station.

A Trash Pull Yields Further Evidence of the Macias DTO Conspiracy

59. On August 2, 2019, Detective Boyce and I saw the Mazda and Honda parked in the driveway of 31151 Birkdale Way, Hayward, California (the suspected residence of Anthony and Benito).

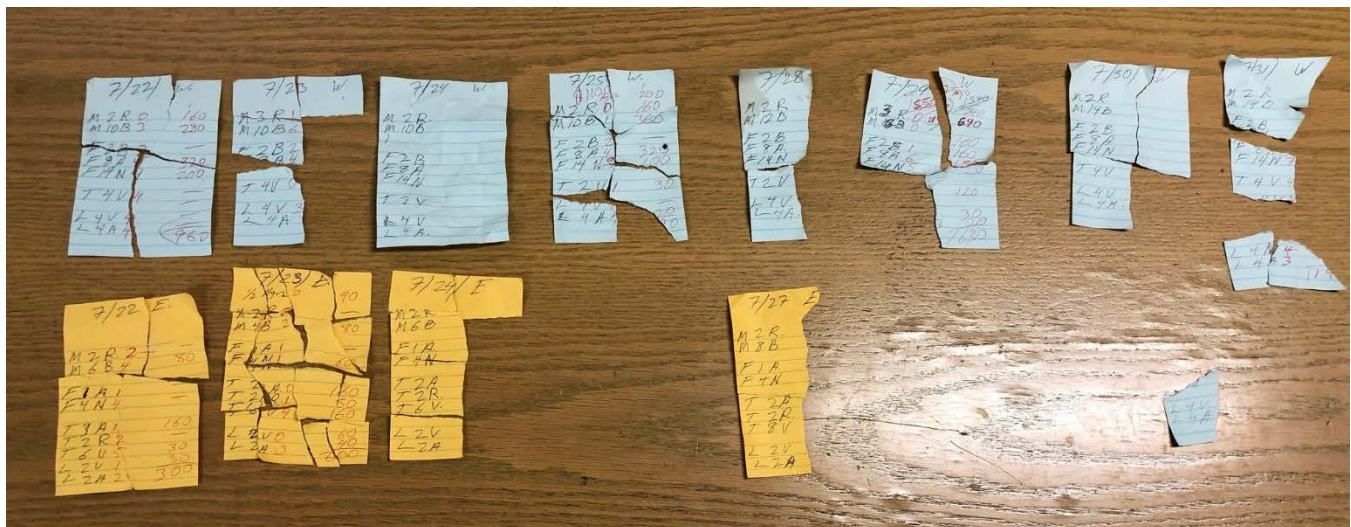
60. Detective Boyce saw Raudel Macias come out of the residence carrying a white plastic bag. Raudel put the bag in the trash and walked away. After Raudel left, Detective Boyce went into the trash and retrieved the bag.

61. Inside the bag were: (1) torn pieces of paper with writing; (2) numerous pieces of

plastic tips with colored tape; and (3) plastic baggies and green cellophane. The plastic baggies and green cellophane wrapping were substantially similar to the packaging from the May 2, 2019 controlled buy. The plastic baggies, green cellophane, and pieces of colored tape are shown in the photo below.

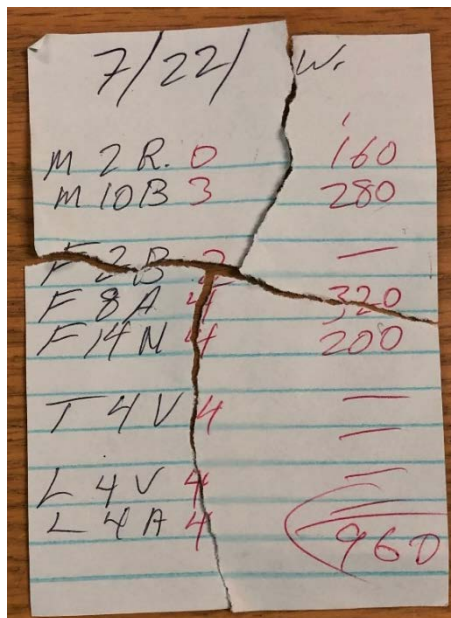


62. Detective Boyce and I pieced the torn pieces of paper back together. The reassembled paper contained writing. The papers we reassembled are depicted in the photograph below.



63. The papers consisted of similar columns of letter and numbers. Not all of the papers could be pieced back together because some pieces were missing. The photo below shows

an example of a fully reconstructed paper.



64. All of the papers have a date at the top followed by either a W or an E. I believe W stands for West and E stands for East because I believe the DTO separates their business in two different territories, east and west.

65. I believe that F corresponds to fentanyl, T corresponds to heroin, and M corresponds to methamphetamine. I believe this because, based on the investigation, the DTO deals in fentanyl, heroin, and methamphetamine. Agents bought fentanyl and methamphetamine from the DTO through a confidential source and undercover agents. Law enforcement stopped some of the DTO's customers and found heroin in their possession, as well as different colored tape.

66. I believe the other column of letters corresponds to the colored tapes the DTO uses. The letters are R, B, A, N, V. I believe these letters are colors in Spanish. I believe these letters stand for: Rojo (red); Blanco (white); Azul (blue) and Amarillo (yellow); Naranja

(orange); and Verde (green). Law enforcement has recovered these colors of tape during this investigation.

67. I believe the first column of numbers is the quantity of product that the street-level distributors start out with that day, and the second column of numbers is unsold product for that day. The last column of numbers is the total amount of money made from that product.

68. For example, in the above ledger's first row, the DTO started out with 2 bindles of methamphetamine in red tape, and had 0 left, therefore, each bindle was \$80 because the total is \$160. The second row shows that the DTO started out with 10 methamphetamine in blue tape and ended with 3, therefore, the DTO sold 7 bindles at 40 dollars each totaling \$280.

Raudel Macias Coordinates a 5-Ounce Heroin Deal Through Telephone Calls that were Intercepted through a Court-Authorized Wiretap.

69. On February 10, 2020, the DEA intercepted an incoming call to Raudel Macias at a telephone with the last four digits of 5032 (-5032)¹⁸ from Oscar Macias.¹⁹ The following is a transcript of the call and a translation of the call from Spanish to English.

NAME	TRANSCRIPCION	TRANSLATION
	[Comienzo de llamada]	[Beginning of call]
RAUDEL	Ey.	Hey.
OSCAR	[Carraspea] ¿Todavía hay aquellos seis (6) pantalones [I/I]?	[Clears throat] Are there still those six (6) pants [U/I]?
RAUDEL	Sí. Hay... Están cinco (5) separados o, los quiere de uno en uno. ¿Cuándo los quiere, o qué?	Yes. There's ... There's five (5) separate ones or, does he want them
OSCAR	A ver, yo le pregunto.	Let me see, I'll ask him
RAUDEL	¿Cuándo los quiere? Porque nomas hay cinco (5) de los otros. Están de	When does he want them? Because there's only five (5) of the other ones.

¹⁸ A United States District Court judge had issued an order authorizing the interception of communications over this telephone.

¹⁹ I listened to this call and I am familiar with Oscar's voice.

	dos (2) en dos (2).	They come two (2) by two (2).
OSCAR	<i>Okay.</i> Ahorita le pregunto cuándo, cuándo, cuándo los quiere.	Okay. I'll ask him when, when, when he wants them.
RAUDEL	<i>Okay.</i> Andale, pues.	Okay. All right, then.
	[Fin de la llamada]	[End of call]

70. Based on my training and experience, I believe Oscar is asking Raudel for six ounces of drug product for a customer. I believe when Oscar says six pants, he means six ounces of a particular drug product. I believe Raudel tells Oscar that he has five ounces left of the type of drug that he wants and 2 ounces portions of another type of drug product. Oscar then tells Raudel that he will talk to the customer and ask him when he wants it.

71. The next day, Raudel, using Telephone -5032, called Anthony Macias.²⁰ The following is a transcript of the call and a translation of the call from Spanish to English.

NAME	TRANSCRIPCION	TRANSLATION
	[Comienzo de llamada]	[Beginning of call]
ANTHONY	¡Ey!	Hey!
RAUDEL	¿Ah? ¡Tony!	Huh? Tony!
ANTHONY	¿Qué paso? ¿Qué paso?	What's up? What's up?
RAUDEL	Ira... ¿Dónde estás?	Look... Where are you?
ANTHONY	Aquí estoy en la... Vi, vine... Aquí esta una... En la... Estamos aquí en la <i>Target</i> . [I/I]	I am here at the... I came... There is a... at the... We are here at Target. [U/I]
RAUDEL	Ira, para que tu contestes el teléfono porque va venir aquel el de la mano.	Look, so you can pick up the phone because that guy with the hand is going to come.
ANTHONY	‘Apa, pero [I/I]...	Dad, but [U/I]...
RAUDEL	¡Aquí lo traigo, el teléfono ya! Ya	I have the phone here now! I already

²⁰ I listened to this call and I am familiar with Anthony's voice.

	se lo quite!	took it from him!
	[Interposición de voces]	[Voices overlap]
ANTHONY	[I/I] <i>Okay, okay.</i> Aquí estoy en la <i>Target</i> . Ven pa la <i>Target</i> . [I/I]	[U/I] <i>Okay, okay.</i> I am here at <i>Target</i> . Come to <i>Target</i> . [U/I]
	[Interposición de voces]	[Voices overlap]
RAUDEL	¡No me quiso dar las llaves! ¡Me lo dio por debajo de la puerta!	He didn't want to give me the keys! He gave it to me underneath the door!
ANTHONY	[Risitas] Entonces de [PH] paso [I/I] en el carro, eh.	[Chuckles] So then on the way [PH] [U/I] in the car, huh.
RAUDEL	Aquí... ¡A ver quién habla! Hay una, una, una llamada perdida. ...Pa que tú me, me hables a mí.	Here... See who called! There is a, a, a missed call. ...So you [Stutters] can call me.
ANTHONY	<i>Okay.</i> Pues aquí estoy en la <i>Target</i> . Ven aquí donde están las esas [I/I]	<i>Okay.</i> Well I am here at <i>Target</i> . Come here where those things are [U/I]
	[Interposición de voces]	[Voices overlap]
RAUDEL	¡Allí en frente, allí te veo ahorita! <i>Bye.</i>	I'll see you there, there in the front, right now. <i>Bye.</i>
ANTHONY	Ira, aquí donde están los, los, los de esos de la, de los, de los cargadores de los, de los carros de la Tesla.	Look, here where those, those, those things are, the, the, the chargers for the, the Tesla cars.
RAUDEL	¿Que?	What?
ANTHONY	‘Onde cargan los carros, ‘apa!	Where the cars get charged, dad!
RAUDEL	¡Ah, allí en la Tesla! Allí te los doy. <i>Bye.</i>	Oh, there at Tesla! I'll give them to you there. <i>Bye.</i>
	[Fin de la llamada]	[End of call]

72. Based on my training and experience and this investigation, I believe Raudel is attempting to coordinate a meeting with Anthony to give him the phone that Oscar used to call Raudel the day before, (510) 358-0372. I believe when Raudel says, “Look, so you can pick up the phone because that guy with the hand is going to come,” he is talking about the customer who wanted the five ounces of drug product. Hand is commonly used by drug traffickers as a domination of 5 portions because a hand has five fingers. I believe Raudel did meet with

Anthony and gave him phone (510) 358-0372 because Anthony used that phone to call Raudel approximately 45 minutes later.

73. At approximately 5:04 p.m., Raudel, using Telephone -5032, calls Benito Macias.²¹ The following is a transcript of the call and a translation of the call from Spanish to English.

NAME	TRANSCRIPCION	TRANSLATION
	[Comienzo de llamada]	[Beginning of call]
BENITO	[I/I].	[U/I]
RAUDEL	Barry...	Barry...
BENITO	Eh.	Huh.
RAUDEL	¿Andas bien ocupado, o estás dormido, o qué?	Are you really busy, or are you sleeping, or what
BENITO	No, ¿por qué?	No, why?
RAUDEL	Pos, te oigo como dormido. Ey, el [I/I] aquel se fue con Juanito el bailarín. Porque el otro borrachero según le ha dado de lata. Allá decía que le quería quitar las llaves... no le pude quitar las llaves ni el teléfono. No me los quiso dar. Se encerró y aventó el teléfono 'pa abajo. Voy a ir aquí con doña Sebalina. Pero, este quiere el dinero. Habla con Juanito que le dé el dinero a Juanito si no se lo quiero dar a él, porque tienen hambre. ¿Qué hago?	Well, you sound like you're sleeping. Hey, that [U/I] left with Juanito the dancer. Because the other drunk was being annoying. I had wanted to take the keys... I wasn't able to take the keys or the telephone. He wouldn't give them to me. He locked himself inside and threw the phone underneath. I'm going to go to doña Sebalina's. But, this one wants the money. Talk with Juanito to give the money to Juanito if he doesn't want to give it to him because they're hungry. What should I do?
BENITO	[Exhala]	[Exhales]
RAUDEL	Porque van a ir a comer. [Ruido al fondo] Dime que hago; ¿cuánto le doy, o qué?	Because they're going to go eat. [Noise in the background] Tell me what to do; how much should I give him, or what?
BENITO	Pos, [I/I]...	Well, [U/I]...
	[Interposición de voces]	[Voices overlap]

²¹ I listened to this call and I am familiar with Benito's voice.

RAUDEL	Él trae, él trae el teléfono. Dile [I/I] contestar a ver si viene el muchacho aquel de las, de la mano, el de la mañana. Ahorita aquí nomas me hablo que fuera con doña Sebalina, la del callejón del Sapo.	He has, he has the phone. Tell him [U/I] to answer to see if that guy for the, for the hand is coming, the one from the morning. He just called for me to go see doña Sebalina, the one from the Sapo alley.
BENITO	Mm.	Mm.
RAUDEL	Pero digo, ¿cuánto doy de dinero, unos cuarenta (40), o qué? ¿A Juan? A él no. Ya [I/I] que te de cambio, ¿o qué?	But I'm saying, how much money should I give, forty (40), or what? To Juan? Not to him. You're [U/I] going to want change, or what?
BENITO	Sí.	Yes.
RAUDEL	Estás dormido. El otro borrachero, yo no sé qué vamos hacer con él. No me quiso dar las llaves y se va a dar unos fregadazos en el carro, yo no sé. No entiende. A ver qué, entonces nomás le voy a dar cuarenta (40), ¿okay?	You're sleeping. I don't know what we're going to do about the other drunk. He didn't want to give me the keys and he's going to crash his car, I don't know. He doesn't understand. Well, then, I'm just going to give him forty (40), okay?
BENITO	Okay.	Okay.
RAUDEL	Y aquí mientras le voy a decir que él conteste el teléfono, al cabo ya lo veo normal, medio normal, no sé. Creo que no anda bailando. Si no, no anduviera con Juan. Pero, de todos modos, se vino que, porque aquel le hizo bronca aquél, ya ves. Okay, eso nomás [I/I] que supieras.	And meanwhile, I'm going to tell him to answer the phone, anyway, I can see that he's normal, sort of normal, I don't know. I don't think he's dancing. He wouldn't be with Juan if he was. But, anyway, he came because that other one caused problems. Okay, that's all [U/I] wanted you to know.
BENITO	[I/I]...	[U/I]...
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I] el paquete del otro día, quien sabe. Ahí mañana hablamos con él. Quien sabe se lo acabaría, no sé qué haría con el. El ese cabrón del Borrachales. Ahí, pues.	[U/I] the package from the other day, who knows. We'll talk to him tomorrow. Who knows if he finished it, I don't know what he could've done with it. That fucker, Borrachales. All right, then.
BENITO	[I/I]...	[U/I]...
RAUDEL	Puedo trabajar de aquí de lo que salga.	I can work here with whatever comes up.
BENITO	Okay, bye.	Okay, bye.

	[Interposición de voces]	[Voices overlap]
RAUDEL	<i>Bye.</i>	Bye.
	[Fin de la llamada]	[End of call]

74. Based on my training and experience, I believe when Raudel says, “He has, he has the phone. Tell him [U/I] to answer to see if that guy for the, for the hand is coming, the one from the morning,” he is telling Benito make sure that Anthony follows up with setting up the five ounce deal.

75. At 5:20 p.m. Benito called Raudel at Telephone -5032. The following is a transcript of the call and a translation of the call from Spanish to English.

NAME	TRANSCRIPCIÓN	TRANSLATION
	[Comienzo de llamada]	[Beginning of call]
RAUDEL	Ey, [Falla de audio] ey, ey	Hey, [Audio glitch] hey, hey.
ANTHONY	Ey, ¿ónde, ónde, ónde dijo el este, el de la, él ah, él aquel el de la, él de la mano que dónde lo va ver?	Hey, where, where, where, did he say you were going to meet the one with, the one uh, that one with, the one with the hand?
RAUDEL	El, él... a, a, allá en la casa grande. De siempre, pos allá...	O, o, over at the big house. As always, over there.
	[Interposición de voces]	[Voices overlap]
ANTHONY	Oh, pos, dijo que ya iba a comer y ya iba ‘pa allá.	Oh, well, he said he was going to go eat and would go over there.
RAUDEL	[I/I]. [I/I] te dije que le dijeras que te diera hora, hora y media [I/I]...	[U/I]. [U/I] I told you to tell him to give you an hour, hour and a half [U/I]...
	[Interposición de voces]	[Voices overlap]
ANTHONY	Dijo, dijo dijo que iba, iba a llegar a las 6:00 ahí.	He said, he said, he said that he was, he was going to get there at 6:00.
RAUDEL	Ya son las 6:00, pues.	Well, it’s 6:00 already.
ANTHONY	Son las 5:30, apá.	It’s 5:30, dad.
RAUDEL	Por eso. Yo voy a llegar a mi casa y no voy ni a comer, ya me voy. Dile que si te puede esperar a las	That’s what I mean. I’m going to get home and not even eat, then leave. Ask him if he can wait for you at

	6:30.	6:30.
ANTHONY	Oh...	Oh...
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I]...	[U/I]...
	[Interposición de voces]	[Voices overlap]
ANTHONY	Yo le digo, yo le digo que ahí sí... ahí, ahí esté las 6:30.	I'll tell him, I'll tell him that... to be there, there at 6:30.
RAUDEL	6:30 [I/I], dile que a las 7:00 ahí lo veo.	6:30 [U/I], tell him I'll see him there at 7:00.
ANTHONY	Pos [I/I]...	Well [U/I]...
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I].	[U/I].
ANTHONY	Apá ¿cómo que a las 7:00?	Dad, what do you mean at 7:00?
RAUDEL	[I/I] pues, dile, porque apenas voy aquí en el trafiquero. Dónde estás tú?	[U/I] well, ask him, because I'm here in traffic. Where are you?
ANTHONY	Aquí estoy en, en la gasolinera de la esquina de tu casa.	I'm here at the, at the corner gas station by your house.
RAUDEL	Ah, que cabrón, ¿verdad? Y yo, mira como vengo [I/I] todavía por aquí por la Industrial. Hay un montón de tráfico.	Ah, fucker, right? And me, I'm still coming [U/I] on Industrial. There's a lot of traffic.
ANTHONY	¿Ya, ya, ya la miraste, o todavía no?	Did, did, did you see her already?
RAUDEL	No, ya, desde a que horas. Pero, pues, hay un montón de tráfico. Ahí [I/I] ahorita te acercas ahí con tiempo para que te [I/I]...	Yeah, a long time ago. But, well, there's a lot of traffic. Give yourself time to get close there so you can [U/I]...
	[Interposición de voces]	[Voices overlap]
ANTHONY	¿Por qué no le digo mejor que se venga pa... que te mire acá, apá?	Why don't I tell him it would be better for him to come to... so he can see you over here, dad?
RAUDEL	Porque el mugrero allá está. Eh, lo veo en otro lado, pues, [I/I]. Yo quiero [I/I] que lo vea ahí, ah, en la tienda del peso; ¿o, en dónde dice?	Because the crap is over there. Uh, I can see him somewhere else then, [U/I]. I want [U/I] hem to see it there, uh, at the dollar store; or where did he say?

ANTHONY	¿Onde le, ónde le... en la...	Where you, where you... at the...
	[Interposición de voces]	[Voices overlap]
RAUDEL	O lo...	Oh...
ANTHONY	Onde...	Where...
	[Interposición de voces]	[Voices overlap]
RAUDEL	O lo...	Oh...
	[Interposición de voces]	[Voices overlap]
	[I/I]...	[U/I]...
RAUDEL	O lo veo ahí, a, a, ahí en la, en la Food Max.	Or I can meet him th, th, there at, there at Food Max.
	Mm, [I/I].	Mm, [U/I].
RAUDEL	¿En la calle? Estuviera más bien en la casa, pero [I/I]...	In the street? It would be better at the house, but [U/I]...
	[Interposición de voces]	[Voices overlap]
ANTHONY	[I/I] mejor, mejor ahí en la casa, en la casa. No, no, ahí cerca, no. [Voz al fondo]	[U/I] better, better at the house, at the house. Not, not close by. [Voice in the background]
RAUDEL	[I/I]. Es por eso te decía porque, cuando estamos ahí, siempre ha ido.	[U/I]. That's what I was telling you because, when we're there, he has always come.
ANTHONY	Ajá.	Uh-huh.
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I]. [Voz al fondo]	[U/I]. [Voice in the background]
ANTHONY	Nomás estoy diciendo 'pa que sea cerca 'pa ti.	I'm just saying so it can be close for you.
RAUDEL	¿Todo? Pues, si quiere acercarse ahí, pues, no se van a ir a la casa mía, ¿no? O a la casa chica nunca ha ido; no queremos que vaya ahí.	Everything? Well, if he wants to come near there, well, He's not going to my house, right? He's never gone to the little house; we don't want him to go there.
ANTHONY	No, no, ahí está bien, ahí está bien, entonces. Le voy...	No, no, it's fine there, it's fine there, then. I'm going to...
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I].	[U/I].

ANTHONY	...a decir que a las 6:30.	...tell him at 6:30.
RAUDEL	<i>Okay</i> , [I/I] porque ando algo retirado [I/I] ahí. Por seguro él va ver al Borrachales, ya ves cómo está.	Okay. [U/I] because I'm a bit far [U/I] from there. He's going to see Borrachales, for sure, you know how that is.
ANTHONY	Oh, ¿lo iba a ver él?	Oh, he was going to see him?
RAUDEL	Sí, pos, el a de andar trabajando, no yo.	Yeah, well, he must be working, not me.
ANTHONY	Uu, cabrón. <i>Okay</i> , pues. [Vos al fondo]	Uu, fucker. Okay, then. [Voice in the background]
RAUDEL	Yo ahorita voy, pero, es que el m, m, mugrero lo traigo acá en otro lado, en otro lado. Tengo que pasar por el.	I'm on my way now, but, it's just that I have the c, c, crap somewhere else, somewhere else. I have to go pick it up.
	[Interposición de voces]	[Voices overlap]
ANTHONY	[I/I]. <i>Okay</i> , pues, ahí estoy...	[U/I]. Okay, then, I'm at...
	[Interposición de voces]	[Voices overlap]
RAUDEL	¿Eh?	Huh?
ANTHONY	...en tu casa.	...your house.
RAUDEL	Pues, no en mi casa; ahí en frente. Por ahí te veo, pues.	Well, not at my house; there in front. I'll see you around there, then.
ANTHONY	<i>Bye</i> .	<i>Bye</i> .
RAUDEL	Aquí vengo aquí llegando. <i>Bye</i> .	I'm just getting there. <i>Bye</i> .
	[Fin de la llamada]	[End of call]

76. Based on my training and experience, I believe that Raudel was asking what Anthony (“he”) said about the location of the planned drug deal: “Hey, where, where, where, did he say you were going to meet the one with, the one uh, that one with, the one with the hand.” Anthony was asking Raudel where he wanted to meet the customer. When Raudel says “O, o, over at the big house. As always, over there,” I believe Raudel is telling him at 4425 Inyo Court. I have heard Raudel refer to 4425 Inyo as the big house and 31151 Birkdale Ave. as the little house in other intercepted calls.

77. At approximately 5:56 p.m., agents saw Raudel enter his black Mazda at 2335 Catalpa Way and drive off. Agents followed Raudel to 31151 Birkdale Ave. I saw Raudel get out of his car and walk into the front door of the residence. A few seconds later, the garage light turned on as if someone had just entered it.

78. At approximately 6:20 p.m., Raudel left the residence via the front door, walked to his black Mazda, and opened the trunk. Raudel appeared to place something inside before getting in the driver's side and driving away.

79. At approximately 6:38 p.m., Anthony called Raudel at Telephone -5032 and told him that the guy was arriving and was parking outside. Raudel said he would do that as well and said bye. The following is a transcript of the call and a translation of the call from Spanish to English.

NAME	TRANSCRIPCION	TRANSLATION
	[Comienzo de llamada]	[Beginning of call]
RAUDEL	[Ruido al fondo] Ey.	[Noise in the background] Yeah.
ANTHONY	Ey, ahí ya llego.	Yeah, he's there now.
RAUDEL	¿Onde?	Where?
ANTHONY	Allá a la casa. A la casa grande.	Over at the house. The big house.
	[Interposición de voces]	[Voices overlap]
RAUDEL	¿Está, está adentro o está... o, está llegando. Es el que esta parqueado aquí.	Is, is he inside or is he... oh, he's just getting there. He's the one who is parking.
ANTHONY	Ah...	Uh...
	[Interposición de voces]	[Voices overlap]
RAUDEL	[I/I] eso, pues. <i>Bye.</i>	[U/I] that, then. Bye.
	[Fin de la llamada]	[End of call]

80. At approximately 6:43pm, Anthony called Raudel at Telephone -5032 and asked him if he already saw the customer, and Raudel said that he was doing it. At approximately 6:45 p.m., agents saw Raudel arrive and park in front of 4425 Inyo Court. I also saw a Black Audi

sedan bearing California license plate 7BRN177 parked in front of 4425 Inyo Court. I drove by the vehicles and noticed a passenger seated in the front seat of the Audi sedan. I saw that there was nobody sitting in the driver's seat of the Audi.

81. At approximately 6:51 p.m., surveillance saw a subject come out of the backyard and then I saw a subject get into the driver's seat of the Audi sedan and drive off. Agents followed the Audi to the 880 Freeway. At the freeway, a Fremont police officer initiated a traffic stop of the Audi for committing numerous California Vehicle Code violations.

82. The Fremont officer contacted the driver and front passenger. The passenger was arrested on outstanding warrants, and the driver was cited for driving on a suspended license. The passenger told officers she had drugs concealed on her person, and the officers retrieved those drugs at the jail. Below is a photograph of the package retrieved from the passenger.



83. The officers weighed the package and determined that it was approximately 5.75 ounces. This packaging appears to be substantially similar to the packaging used by the Macias

DTO for larger quantities of drug product. The DEA Western Regional Laboratory tested the contents of the package and concluded that it was heroin.

CONCLUSION

84. Based on the information above, there is probable cause to believe that Raudel Macias, Anthony Macias, Benito Macias, Oscar Macias, and Fawn Larance have violated 21 U.S.C. § 846 (conspiracy to distribute controlled substances) and 21 U.S.C. §841(a)(1), (b)(1)(B) (possession of controlled substances with intent to distribute). Therefore, I request that the Court issue a criminal complaint charging these defendants with these offenses and issue warrants for their arrest.

85. Because this investigation is continuing, disclosure of the complaint, my affidavit, this application, and the attachments thereto would jeopardize the progress of the investigation and potentially endanger the agents and confidential sources working on the investigation. It may also cause the defendant to flee and/or destroy evidence. Accordingly, I request that the Court seal the application, this affidavit, the complaint and supporting papers, except that the Clerk of the Court be directed to provide copies of these documents to the United States Attorney's Office and/or the Drug Enforcement Administration for use in connection with this case.

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

/s/ Luis Leyva via
telephone
LUIS LEYVA
Task Force Officer
Drug Enforcement Administration

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P 4.1 and 4(d) on this 15th day of January, 2021.



HON. ALEX G. TSE
United States Magistrate Judge