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<b>TARGET SUBJECT</b>	<b>LOCATION</b>	<b>ATTACHMENT</b>	<b>PAGE</b>
HUERTA RESIDENCE	1670 ½ Murchison St, Los Angeles, California	A-1	48
AMEZCUA RESIDENCE	5860 ½ Loveland Ave, Bell Gardens, California	A-2	52
SANDOVAL RESIDENCE	1680 Tremont Ave, Apt. #5, Los Angeles, California	A-3	56
MONTES RESIDENCE	851 New Depot Street Apt. #7, Los Angeles, California	A-4	58
SALAS RESIDENCE	1664 Murchison St, Los Angeles, California	A-5	62
MIRANDA RESIDENCE	1542 Evergreen St, Los Angeles, California	A-6	68
PAGAN RESIDENCE	1413 Murchison St, Los Angeles, California	A-7	71
HERNANDEZ RESIDENCE	1611 Murchison St Apt. #2, Los Angeles, California	A-8	74
RUIZ RESIDENCE	1450 Tremont St, Los Angeles, California	A-9	76
J.GONZALEZ RESIDENCE	1517 Ricardo St, Los Angeles, California	A-10	77
LOPEZ RESIDENCE	415 S. Pomelo Ave., Apt. #B, Monterey Park, California	A-11	79
SUBJECT VEHICLE	2012 Black Toyota Camry 4-door California License Plate 6YOL886	A-12	79
NUNEZ RESIDENCE	429 S. Russell Ave., Unit B, Monterey Park, California	A-13	84

**AFFIDAVIT**

I, Lazaro I. Ortega, being duly sworn, declare and state as follows:

**I. TRAINING AND EXPERIENCE**

1. I am a police officer with the Los Angeles Police Department assigned to a Criminal Gang Enterprise Squad at the Los Angeles Field Office of the FBI, which conducts investigations into gang activity, in conjunction with the FBI Los Angeles Metropolitan Task Force on Violent Gangs, a multi-agency federal, state, and local gang task force (hereinafter "LAMTFVG"). Currently, I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, as a Task Force Officer ("TFO") for the FBI, and empowered by law to conduct investigations of and to make arrests for federal felony offenses.

2. As a police officer I have participated in investigations of various crimes, to include, assault, murder, robbery, burglary, gang activity, narcotics trafficking, and death investigations. As a TFO, I have been assigned to investigations targeting organizations involved in drug trafficking offenses and street gangs in the Central District of California (CDC). For the past four years, I have primarily been working investigations targeting violent street gangs

involved in the possession with intent to distribute, and distribution of controlled substances; firearms violations; conspiracy to engage in racketeering; as well as the conspiracies associated with these offenses, in violation of 21 U.S.C. § 841(a)(1), 21 U.S.C. § 846, 21 U.S.C. § 856(a)(1), 21 U.S.C. § 860, 18 U.S.C. §§ 922(a)(1), (g), 18 U.S.C. § 924(c), 18 U.S.C. § 1951, 18 U.S.C. § 1959, and 18 U.S.C. § 1962. Since graduating from the Los Angeles County Sheriff's Department, I have discussed the topics of gangs, gang subculture, and gang members' methods of operations with other experienced Special Agents and Law Enforcement Officers, and interviewed numerous gang and drug informants about gang and drug subcultures. I have also investigated the illegal activities of the Mexican Mafia, its members, and all other persons that facilitate criminal activities at the direction of the Mexican Mafia, including members and associates of the various "sureño" (i.e., Southern California gangs that pay allegiance to the Mexican Mafia). I have interviewed numerous gang members affiliated with the Mexican Mafia (in addition to several current and former Mexican Mafia members) regarding the various aspects of the organization including the rules, primary activities, structure, and goals.

3. My experience as a TFO includes, but is not limited to, conducting physical surveillance, interviewing witnesses and

subjects, executing search and arrest warrants, and operating informants. I have received training in, and am experienced in, the investigation of violations of federal law, including violations of federal drug conspiracy laws. I have participated in several gang investigations involving the organized distribution of illegal drugs. I have participated in numerous controlled drug/gun purchase operations using informants; monitored multiple gang/narcotics related Title III wiretap interceptions; participated in countless physical and electronic surveillances; and have participated in numerous state and federal arrests for drug and violent crime related offenses. I have participated in the execution of several probation and parole searches of drug and gang offenders, and numerous search warrants, most of which have resulted in the seizure of illegal drugs, weapons, proof of racketeering, and other evidence of federal and state criminal violations. I have also supervised and assisted in the supervision of the activities of several informants who have provided information, collected gang/drug intelligence, and conducted controlled purchase operations, resulting in federal and state prosecution of gang, drug, and/or firearm offenders.

4. The facts set forth below are based upon (1) my own personal observations; (2) reports and information provided to me or the FBI by other law enforcement agents or government

agencies; (3) other documents obtained during the course of the investigation; (4) Confidential Human Source (CHS) debriefings; (5) evidence cultivated through other search warrants related to this investigation; and (6) my review of consensually recorded telephone calls and consensually recorded meetings, both by listening to actual recordings and reading summaries. All of the below-described dates, drug and currency amounts, and times-of-day are approximate.

## II. PURPOSE OF AFFIDAVIT

5. Based on the evidence obtained in this investigation to date, and as described further below, I believe there is probable cause to believe that the physical properties associated with the individuals FRANCISCO HUERTA, aka "CISCO" ("**HUERTA**"), FERNANDO AMEZCUA, aka "SOLO" ("**AMEZCUA**"), LUCIO SANDOVAL JR., aka "BOUNCER" ("**SANDOVAL**"), RAYMOND MONTES, aka "BABY" ("**MONTES**"), JERRY SALAS, aka "INDIO" ("**SALAS**"), DANIEL MIRANDA, aka "RACCOON" ("**MIRANDA**"), ASHLEY PAGAN, aka "CROOK" ("**PAGAN**"), JOSE HERNANDEZ, aka "ISRAEL URBINA" ("**HERNANDEZ**"), PEDRO RUIZ, aka "MINOR" ("**RUIZ**"), JUAN CARLOS GONZALEZ, aka "FAT ASS" ("**J.GONZALEZ**"), GILBERT LOPEZ, aka "BETO" ("**LOPEZ**"), and DAVID NUNEZ, aka "GORDO" ("**NUNEZ**") (Collectively, the "**TARGET SUBJECTS**") contain evidence of various forms of federal criminal activity.

6. On December 3, 2014, a Grand Jury returned a sealed racketeering indictment in the case of United States v. Manuel Larry Jackson, et al. (CR 14-0684). A copy of that Indictment will be provided to the court in a sealed envelope at the same time this warrant is presented and is incorporated by reference as if attached hereto. The forty-five count Indictment charges 38 defendants, including the TARGET SUBJECTS, with racketeering, narcotics, and firearms offenses. Some of the acts referenced in this affidavit were also included in the Indictment.

7. Count One of the Indictment charges that beginning on an unknown date, and continuing to on or about December 3, 2014, Manuel Larry Jackson, aka "Cricket" ("Jackson"), Victor Barrios, aka "Grizzly," aka "Ghost" ("Barrios"), Mark Anthony Johnson, aka "Boo Boo" ("Johnson"), **HUERTA, AMEZCUA**, Art Hernandez, aka "Comamo" ("A. Hernandez"), Jesus Doran, aka "Creeper" ("Doran"), Jose Luis Lizarraga, aka "Night Owl" ("J. Lizarraga"), **SANDOVAL, SALAS, MONTES**, Miguel Morales, aka "Moreno" ("M. Morales"), Oscar Flores, aka Zinc ("Flores"), **MIRANDA, LOPEZ**, Mario Wetmore, aka "Lil Mario" ("Wetmore"), Enrique Martinez, aka "Butter" ("Martinez"), **PAGAN**, Jesus Ibarra, aka "Jesse" ("Ibarra"), Bryan Salgado, aka "Veneno" ("Salgado"), Albert Morales, aka "Lil Bronco" ("A. Morales"), David Smith, aka "Crow," aka "Negro" ("Smith"), and Joel Matthew Monarrez, aka "Vago" ("Monarrez"), Luis Ortiz, aka "Face," aka "Huero"

("Ortiz"), **HERNANDEZ**, Jesus Rodriguez, aka "Slave"  
("Rodriguez"), **RUIZ, J. GONZALEZ**, Desiree Rivera ("Rivera")  
(collectively, the "Racketeering Defendants") and others known  
and unknown to the Grand Jury conspired to conduct the affairs  
of the Hazard criminal enterprise, through a pattern of  
racketeering offenses, in violation of Title 18, United States  
Code, Section 1962(d).

8. Count Four of the Indictment charges that beginning on  
an unknown date and continuing to on or about December 3, 2014,  
the Racketeering Defendants, **NUNEZ**, and other named and unnamed  
defendants conspired to distribute and possess with intent to  
distribute controlled substances, in violation of 21 U.S.C.  
§§ 846, 841(a).

9. The TARGET SUBJECTS have also been named in other  
counts in the indictment. HUERTA has been charged with other  
narcotics offenses in Counts 15, 17, 20, and 36. SANDOVAL has  
been charged with other narcotics offenses in Counts 6 and 8.  
MONTES has been charged with violent crime in aid of  
racketeering in Count 3 and a firearm offense in Count 45.  
HERNANDEZ has been charged with another narcotics offense in  
Count 37. RUIZ has been charged with another narcotics offense  
in Count 40. NUNEZ has been charged with other narcotics  
offenses in Counts 33 and 35.



10. This affidavit is submitted in support of search warrants for evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Section 846 (conspiracy to distribute, and possess with intent to distribute, controlled substances), Title 18, United States Code, Sections 1956 and 1957 (conspiracy to launder monetary instruments and laundering of monetary instruments), and Title 18, United States Code, Section 1962(d) (conspiracy to commit racketeering offenses) (hereinafter, collectively the "Target Offenses") for the residences a vehicle described in ATTACHMENTS A-1 to A-13, as those items are set forth in ATTACHMENT B (hereby incorporated), and are collectively referred to as the "SUBJECT PREMISES":<sup>1</sup>

TARGET SUBJECT	LOCATION	ATTACHMENT	PAGE
HUERTA RESIDENCE	1670 ½ Murchison St, Los Angeles, California	A-1	48
AMEZCUA RESIDENCE	5860 ½ Loveland Ave, Bell Gardens, California	A-2	52
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<sup>1</sup> Although the indictment does not include NUNEZ in Count One, the racketeering conspiracy, NUNEZ is charged in Count Four, the drug conspiracy, with the Racketeering Defendants. As described further herein, NUNEZ is also affiliated with a sureño gang and has committed prior activities in support of the Hazard enterprise. Therefore, I believe there is probable cause that evidence of racketeering crimes will be found in NUNEZ's residence.

SALAS RESIDENCE	1664 Murchison St, Los Angeles, California	A-5	62
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11. This affidavit also seeks a warrant to allow law enforcement members executing arrests of all the Racketeering Defendants to search the bodies of the Racketeering Defendants for tattoos evidencing membership in or association with the Hazard criminal enterprise (to include the Hazard gang, the Mexican Mafia, and affiliated sureño gangs) and to photograph those tattoos, as named in Attachment A-14, in the way described herein:

a. For male Racketeering Defendants, law enforcement may search for tattoos above the waist and below mid-thigh.

b. For Rivera, the only female Racketeering Defendant, law enforcement may search for tattoos above the base of the neck, on the arms, up to the neck, and below mid-thigh.

12. This affidavit does not set forth all of my knowledge or summarize all of the investigative efforts in this investigation; the affidavit sets forth only the facts that support probable cause to search the requested locations, as well as relevant background information. Where conversations are referred to herein, they are related in substance and in part based on conversations between fellow Agents, TFOs, other law enforcement personnel, or myself. Any observations referenced herein that I did not personally witness were relayed to me in oral and/or written reports by members of surveillance teams from the LAMTFVG, members of the LAMTFVG, LAPD Officers, LAPD Detectives, and other police agencies. All figures, times, and calculations set forth herein are approximate. Unless otherwise specified, weights of controlled substances listed below are based on either forensic analysis conducted by the Drug Enforcement Administration (DEA) or the Los Angeles Police Department (LAPD). All weights are approximate, and are based on net figures unless otherwise specified. This affidavit sets forth only the facts necessary to establish probable cause for the requested search warrants and does not purport to summarize the entire investigation.

**III. BACKGROUND ALLEGATIONS REGARDING GANG ACTIVITIES  
AND DRUG TRAFFICKERS**

13. Based on my training and experience, as well as the training and experience of other investigators in this case with whom I have consulted, especially LAPD Hollenbeck Division's gang expert officers and gang detectives, I am familiar with the modus operandi of persons involved in criminal street gangs, specifically, the Hazard gang (hereinafter "Hazard") and the illegal distribution of narcotics and firearms, as well as the terminology used by persons involved in those enterprises. I am aware that persons involved in illicit distribution of controlled substances or firearms often attempt to conceal their identities as well as the location(s) at which drug/firearm transactions take place. For example, lookouts will stand outside of location(s) involved in the distribution of controlled substances or firearms to observe and specifically look for law enforcement officers or surveillance units in the area. Persons involved in illicit distribution of controlled substances or firearms are also known to have vehicles, properties, utilities, and other items purchased/rented in the names of others in order to conceal the association of drug/firearm activities with financial transactions. I know that individuals engaged in organized drug distribution/sales and firearm sales often maintain extensive contact with persons

from whom they receive drugs/firearms and with whom they distribute these drugs/firearms.

14. I am aware that narcotics and firearm traffickers often maintain, on hand, large amounts of U.S. currency, as proceeds of their gun and drug sales, in order to facilitate and finance their ongoing narcotics activities and other businesses, as well as paying for entertainment, living expenses, bills, acquiring assets, and making other purchases.

15. I am aware that it is common for narcotics traffickers to secrete drug paraphernalia and packaging/distribution items, narcotics, firearms, and records of drug/gun transactions in secure locations within their vehicles, residences, the residences of their associates, and residences of family members for ready access and to conceal them from law enforcement authorities.<sup>2</sup> I am also aware that narcotics traffickers

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<sup>2</sup> AUSA Vicki Chou has provided me with the following case citations: "In the case of drug dealers, evidence is likely to be found where the dealers live." United States v. Angulo-Lopez, 791 F.2d 1394, 1399 (9th Cir. 1986) (citations omitted). "When the traffickers consist of a ringleader and assistants, a fair probability exists that drugs will be present at the assistants' residence as well as the ringleader's." Angulo-Lopez, 791 F.2d at 1399 (citations omitted). "[E]vidence discovered by [] officers linking the defendants to a drug scheme provide[s] 'more than a sufficient showing for obtaining the warrant to search [their] ... residence.'" United States v. Fannin, 817 F.2d 1379, 1382 (9th Cir. 1987) (quotation and citation omitted). Also an unpublished decision refers to this common-sense principle as the "residency presumption." United States v. Crowell, 1993 WL 493743, \*2 (9th Cir. 1993) (unpublished).

maintain more than one residence to avoid law enforcement detection.

16. I am aware that persons engaged in narcotics and firearms trafficking conceal in their vehicles and residences the proceeds of drug and firearm transactions to include: large amounts of currency, financial instruments, precious metals and gems, jewelry, and other items of value.

17. I am aware that persons engaged in narcotics trafficking often conceal in their vehicles and residences, various amounts and types of narcotics, scales, vials, blenders, baggies, bindles, cutting agents and adulterants, cutting boards, cutting and mixing tools, large amounts of cash, and other items used in preparing, manufacturing, packaging, distributing, transporting, and selling narcotics.

18. I am aware that persons engaged in gang activity, narcotics distribution, and firearms trafficking keep firearms, magazines, ammunition, weapons cases/bags, and other weapons, in their vehicles, residences, the residences of family members, and in the residences or vehicles of other drug and firearm traffickers/gang members, as well as in easy-to-reach locations in and around their area of operation. I am aware that most firearms kept and/or made accessible to gang members and drug/firearm traffickers are not registered to the subject and the firearm may be modified or serial number obliterated (for

the purpose of evading law enforcement detection/traces). Furthermore, it is common for gang members and drug/firearm traffickers to carry and/or use firearms in furtherance of drug/firearm transactions and other violent crimes.

19. I am aware that individuals involved in narcotics trafficking often maintain records linking them to their trafficking and that these records may include records of narcotics customers and associates, sales, debts, and shipments. The records/documents may include receipts of wire transfer transactions, banking/ATM receipts, shipping receipts from postal and shipping businesses, telephone records, telephone books which identify customers and/or co-conspirators, and photographs of co-conspirators. Even if off-site locations are used to store the above records, some evidence such as safety deposit keys, records, and receipts and/or documents regarding multi-warehouses, storage facilities, mail and answering services may be present. I am aware that the courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, in particular, trafficking in controlled substances.

20. I am aware that individuals involved in gang activity and narcotics trafficking often utilize cellular telephones and other electronic devices to communicate with one another and that these devices often contain indicia of the identity of the

individual and his/her associates, as well as their criminal activity, to include but not be limited to, call logs, voicemail messages, text messages, electronic messages (e-mail), photographs, videos, address books, contact lists, calendars, notes, and ledgers. Additionally, I am aware that individuals involved in gang activity and narcotics/firearm trafficking often utilize social networking websites on the internet, which are commonly accessed via cellular telephones, to communicate with one another, and post comments, pictures, videos, and music related to their membership and activity in the gang and/or their drug/gun trafficking activity.

21. I am aware that narcotics traffickers must work their way up to larger-scale quantities, and as such, narcotics sellers must move up from selling small quantities to selling the larger ones. Moreover, narcotics traffickers engaged in sales of larger amounts of narcotics (for example, quarter, half, and ounce quantities) will develop a network of trusted individuals (or co-conspirators) to minimize the risk of loss associated with the high costs involved in large scale narcotics trafficking. In this respect, narcotics traffickers will not sell larger amounts of narcotics to individuals with whom they are not familiar. This is a result of the higher opportunity costs associated with larger scale distribution such as loss of a larger amount of narcotics if robbed, loss of a large amount



of money if robbed, fear of retribution by fellow gang members and/or narcotics suppliers that will not receive their portion of the proceeds from narcotics sales, and harsher penalties if caught by law enforcement. In addition, this often means that those who are trafficking in larger quantities of narcotics are not new to the business, but have established their contacts and customers over months or years. This also means that once narcotics traffickers have developed their customer base and supply contacts, they continue their criminal activity indefinitely.

21. I also know that individuals who deal illegal firearms and/or narcotics will maintain their inventory of firearms and narcotics at their residences over long periods of time, replenishing as necessary. The inventory is constantly resupplied as the dealers buy and sell firearms and narcotics.

22. My basis for general knowledge about Hazard was obtained from my personal experience when working the gang unit in Ramona Gardens (which is within Hazard territory), open source database research, speaking with more tenured LAPD Hollenbeck Gang Unit Officers, LAPD Hollenbeck Division Patrol Officers, LAPD Hollenbeck Division Detectives, LAMTFVG members, interviews of former and active Hazard members in which I participated, street interviews of Hazard members, community

members within the Hazard territory, and debriefs of Confidential Human Sources (hereinafter "CHS").

23. Based on these sources of information, I understand that Hazard is a multi-generational violent street gang that dominates and primarily operates in an approximate one-square-mile area, bordered by Valley Boulevard to the north, Indiana Street to the east, Marengo Street to the south, and Cornwell and San Pablo Streets to the west, in Los Angeles, California. According to current LAPD Hollenbeck gang officers and my personal knowledge from working the gang unit in RGHD, Hazard has a current estimated membership of approximately 350.

24. I know that Hazard members and associate engage in drug trafficking and a variety of violent crimes to include assaults, burglaries, robberies, intimidation, and murders. I know that Hazard members are governed by a set of unwritten but violently enforced rules. Rules for Hazard members include, for example, a strong prohibition against cooperation with law enforcement. Such cooperation is punished by severe sanctions such as great bodily injury, harm to family members, or even death, as will be further described below. Based on multiple debriefs of numerous CHS, LAPD Hollenbeck Division robbery arrest reports, and LAMTFVG first-hand knowledge of individual Hazard members' criminal activities, Hazard is infamous for its

narcotic distribution activities, violence, hate crimes, and high number of validated Mexican Mafia members.

a. For example, Target Subject SANDOVAL was arrested on November 13, 2010, for violating PC Section 422 (Criminal Threats). The case originated when the victim, a former Ramona Gardens Housing Development (hereinafter "RGHD") resident, got into an argument with SANDOVAL because SANDOVAL was using the victim's girlfriend to transport narcotics. According to the victim, during this argument, SANDOVAL called the victim a "fucking rat" and said "this is my barrio, I am in charge of this area, and I am going to kill you and your family for being a rat. I don't care if I go to jail because from the inside I can call my homies from Hazard and they will come shoot your house." SANDOVAL ultimately pleaded guilty, and for safety reasons, the victim and his family were relocated by law enforcement.

25. In order to enforce control over its territory, Hazard relies on methods to identify its territory and to intimidate other gangs and the local community. I have observed many instances of graffiti used to mark the area controlled by Hazard. I am aware that the graffiti "advertises" Hazard, creates an atmosphere of fear and intimidation within the community, and warns other gangs and certain racial groups to stay away from Hazard territory.

26. I am aware that Hazard graffiti is intended to intimidate rival gangs, drug dealers, and neighborhood residents, and to establish that Hazard "owns" the area of the RGHD. The Hazard graffiti also informs other gangs and residents that the projects are "controlled and inhabited" by Hazard, meaning that only members and associates of Hazard are allowed to sell drugs and "hang out" in Ramona Gardens, unless otherwise approved by Hazard. I have been informed that graffiti in the form of "Hazard," "Big Hazard" "BH," "BH13," "BHR," and "BXH" are among the more common Hazard tags displayed frequently and prominently within the confines of RGHD. In addition, graffiti provides a written roster (monikers) of which Hazard members are the most active within the gang; these rosters are commonly known as "roll calls." Hazard graffiti creates an atmosphere of fear and intimidation in the community.

a. For example, on June 8, 2009, an African American resident of RGHD contacted the LAPD to report graffiti on a wall near her residence. The responding officer reported seeing "Varrio BHR no blacks." (BHR stands for "Big Hazard Rifa," "Rifa" being Hispanic slang for "we control this.")

b. On September 22, 2009, another African American RGHD resident contacted the LAPD to report graffiti on a wall near his residence. Responding officers reported seeing "FUCK NIGGERS" and "BHR" tagged on a wall within the RGHD.

c. On October 21, 2014, Hazard members threatened the murder of members of law enforcement and of individuals cooperating with law enforcement by spray painting, "187 on Cops, Big Hazard" and "187 Ratas."

27. I know that, in addition to utilizing the graffiti described above, Hazard members and associates use tattoos to identify themselves as members of, and display their association with, the Hazard criminal enterprise, as set forth in the Indictment. Common Hazard gang tattoos feature the same "tagging" words noted above along with the biohazard symbol; in addition, tattoos often have references to the Mexican Mafia, such as "13" to illustrate Hazard's alliance and loyalty. Hazard members also wear tattoos that reflect their respective cliques (or subsets of Hazard, often based on geography, age range, or generational membership), which include the "Jokers," "Condors," "Dirty Dogs," "Ricardo Street," "Rascals," "Tiny Jokers," "Little Diablos," and "RG Boys." Hazard members and associates also often have tattoos that reflect their monikers, or nicknames, some of which names are secretive and kept from law enforcement and the public.

28. I am aware that Hazard members frequently commit "branded" criminal acts, in other words, they commit crimes in the name of the gang. Examples of branded criminal acts include: gang members shouting references to Hazard before or

during a crime; gang members demanding property or services because of their membership; gang members killing or attempting to kill members of rival gangs who enter Hazard territory; and gang members attempting to kill law enforcement officers on patrol in RGHD.

a. For example, I testified in Los Angeles Superior Court regarding a 2010 Assault with a Deadly Weapon case involving three Hazard members who stabbed one individual and assaulted three others. The three Hazard members were loitering near Ramona Gardens when they bumped into victim #1 and said "where you from?" (asking what gang the person belonged to). Victim #1 said, "I don't claim." One of the suspects said, "We claim Hazard" and then punched victim #1 in the face. Victim #1 ran into her house and called the police. While inside the house, victim #1 observed the three gang members harass victim #2 and ask him "where you from?" Victim #3 and victim #4 then exited their residence to assist victim #2. The gang members assaulted victims #2, #3, and #4. Victim #2 was stabbed during the melee.

#### **IV. THE MEXICAN MAFIA CRIMINAL ENTERPRISE**

29. In my role as TFO assigned to the LAMTFVG, I have reviewed and assisted with co-authoring federal wiretap applications targeting members and associates of the Mexican Mafia, interviewed current and former FBI SAs and law

enforcement personnel who have investigated the Mexican Mafia, interviewed confidential witnesses and cooperating defendants familiar with the Mexican Mafia criminal enterprise, and attended gang seminars featuring discussions concerning the structure and operation of the Mexican Mafia. From these sources of information and my own training and experience, I have learned the following:

a. The Mexican Mafia, also known as the "Eme" (Spanish for the letter "M") or "La Eme," is a prison gang comprised of current and former members of various Southern California Hispanic street gangs (sureños). The Eme operates through its members, also known as "carnales" or "brothers," and associates, also known as "camaradas." The majority of Mexican Mafia members are incarcerated, mostly in the three main California state prisons devoted to gang members, though some are housed in other institutions, such as county jails and federal prisons.

b. A person can be admitted to the Mexican Mafia while he is in prison (on the "inside") or in the community (on the "outside"). To be considered for membership, an individual must demonstrate a propensity for violence, and must have a long history of criminal activity conducted on behalf of the Eme. A prospective member must be first be sponsored by an Eme member in good standing, who becomes the prospect's "Padrino," or

Godfather. The Godfather is then responsible for schooling the prospect throughout the prospect's career with the Eme. Eme rules dictate that all members of the Mexican Mafia must agree on final admission into La Eme. Once an individual becomes an Eme member, he is considered to be a member for life. Eme members, whether incarcerated or not, are expected to remain loyal to the organization and work to further the goals of the Eme.

c. The Eme is governed by a set of basic rules. One of those rules prohibits members and associates from cooperating with law enforcement. Those who violate this rule are targeted by the organization to be killed. For example, in 1995, two former members of the Mexican Mafia and the family of one of these former members, including an infant, were murdered in El Monte, California, at the direction of the Mexican Mafia because of their cooperation with law enforcement.

d. Initially, the Mexican Mafia controlled drug distribution and other illegal activities within the California penal system. However, in later years the Eme has successfully expanded its control of illegal activities outside the California penal system by associating with Latino street gangs throughout southern California, for the purpose of controlling and profiting from the gangs' illegal activities, including drug trafficking. If members of a street gang do not follow the



directions of an Eme member in control of, or attempting to control, that particular street gang or area, then the Eme, through its vast network of incarcerated members and associates, will assault members of the noncompliant gang who are incarcerated within the state and federal penal systems. The ability of Eme members to commit or order murders and other violent acts against prison inmates is the main source of their power. Since many Latino street gang members will likely spend time in the state prison system, the Eme presents street gangs with the choice of submitting to the Eme's direction, while both in and out of prison, or being subject to attacks by Eme members and their associates.

e. The Eme maintains a list, called the "green light" list, which identifies those who are in bad standing with the Eme. People on the list are designated to be killed or attacked by any member of the Eme, or any person working at the direction of the Eme. Individuals can be put on the list for doing something offensive to the Eme. For example, individuals may be put on the list for defecting from the gang, for an unauthorized killing, or for falsely claiming that they had authority or approval of the Eme. Entire street gangs can also be put on the green light list. This may happen, for example, if a gang refuses to pay taxes to the Eme, or otherwise refuses to act at the Eme's direction. In addition to the fear of being

placed on the green light list, there are additional reasons that street gang members take orders from and perform criminal acts for the Mexican Mafia. Some gang members will do "work" for the Eme in order to enhance their reputations as dangerous or connected criminals. Others aspire to become Eme members themselves, and seek to prove themselves worthy of membership. In addition, gang members will sometimes do work for the benefit of the Mexican Mafia in order to make amends for past mistakes or transgressions, or to otherwise put themselves in good standing with the gang.

f. Through fear and intimidation, and its ability to carry out acts of violence in the prison system, the Eme is able to exert control over various street gangs. Through this control, Eme members are able to extort "taxes" on criminal activity, particularly drug trafficking, within the territories of the street gangs. The tax collection system is basically a form of extortion backed by the threat of violence against those who fail to comply with the taxation "program." Typically, leaders of street gangs or other designees under the control of the Eme identify drug traffickers operating in the gang's area, and instruct those traffickers to start paying a portion of their drug trafficking profits to the Mexican Mafia as a tax. These traffickers may or may not be gang members. The gang leader, or other designee appointed by a Mexican Mafia member,

then collects these taxes each week or each month. In return for paying taxes, the drug traffickers receive from the street gangs allied with the Mexican Mafia "protection" so that other criminals do not interfere with their trafficking activity. Failure of a drug trafficker to pay taxes will result in retribution from the Mexican Mafia, such as assaults against the trafficker or his family, or reports to law enforcement of the trafficker's illegal activities. This retribution is typically carried out by street gang members working at the direction of the Mexican Mafia. Of the total amount of tax collected, a portion is paid to the controlling Eme member, and the remainder divided among the gang leader/tax collector and the gang itself. As most Eme members are serving long prison sentences, the money derived from taxes are crucial to them for supporting their families, hiring attorneys, and otherwise exerting power and influence on the outside world. In fact, the primary source of income for a Mexican Mafia member is his collection of taxes on criminal activity within the territory that the member controls.

g. Eme members are physically isolated in their prisons, and are often incarcerated far from the areas that they control. In order to maintain control over criminal activities, they must communicate with other inmates and people outside prison. For contacts outside of prison, Eme members send messages through family members and other willing volunteers who

can meet with them in prison. Eme members also frequently communicate through prison mail, often using trusted surrogates to deliver messages to their operatives outside of prison.

30. The Eme has long standing ties to Mexican Drug Trafficking Organizations (DTOs) and maintains a foothold in the California drug market by utilizing its associates (camaradas) to transport, distribute, and sell the drugs smuggled into the United States by these DTOs. The Mexican Mafia places street gang members in all aspects of the drug distribution network.

31. The FBI/LAMTFVC investigation in this matter involves Mexican Mafia camaradas and drug traffickers who receive methamphetamine and cocaine from Mexico for distribution throughout Los Angeles and beyond. This investigation is directed at the Hazard street gang, the Mexican Mafia members who exert control over the territory of the Hazard street gang, as well as the racketeering activity being conducted by the gang and its associates.

**V. TRAINING AND EXPERIENCE WITH DIGITAL DEVICES**

32. As used herein, the term "digital device" includes any electronic system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, notebook, and tablet computers; personal digital assistants; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart

phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media, such as hard disk drives, floppy disks, memory cards, optical disks, and magnetic tapes used to store digital data (excluding analog tapes such as VHS); and security devices. Based on my knowledge, training, and experience, as well as information related to me by agents and others involved in the forensic examination of digital devices, I know that data in digital form can be stored on a variety of digital devices and that during the search of a premises it is not always possible to search digital devices for digital data for a number of reasons, including the following:

- a. Searching digital devices can be a highly technical process that requires specific expertise and specialized equipment. There are so many types of digital devices and software programs in use today that it is impossible to bring to the search site all of the necessary technical manuals and specialized equipment necessary to conduct a thorough search. In addition, it may be necessary to consult with specially trained personnel who have specific expertise in the types of digital devices, operating systems, or software applications that are being searched.

b. Digital data is particularly vulnerable to inadvertent or intentional modification or destruction. Searching digital devices can require the use of precise, scientific procedures that are designed to maintain the integrity of digital data and to recover "hidden," erased, compressed, encrypted, or password-protected data. As a result, a controlled environment, such as a law enforcement laboratory or similar facility, is essential to conducting a complete and accurate analysis of data stored on digital devices.

c. The volume of data stored on many digital devices will typically be so large that it will be highly impractical to search for data during the physical search of the premises. A single megabyte of storage space is the equivalent of 500 double-spaced pages of text. A single gigabyte of storage space, or 1,000 megabytes, is the equivalent of 500,000 double-spaced pages of text. Storage devices capable of storing 500 or more gigabytes are now commonplace. Consequently, just one device might contain the equivalent of 250 million pages of data, which, if printed out, would completely fill three 35' x 35' x 10' rooms to the ceiling. Further, a 500 gigabyte drive could contain as many as approximately 450 full run movies or 450,000 songs.

d. Electronic files or remnants of such files can be recovered months or even years after they have been downloaded

onto a hard drive, deleted, or viewed via the Internet.

Electronic files saved to a hard drive can be stored for years with little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily-available forensics tools. Normally, when a person deletes a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space, i.e., space on a hard drive that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space, for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a swap or recovery file. Similarly, files that have been viewed on the Internet are often automatically downloaded into a temporary directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently downloaded or viewed content. Thus, the ability to retrieve residue of an electronic file from a hard drive depends less on when the file was downloaded or viewed than on a particular user's operating system, storage capacity, and computer habits. Recovery of residue of electronic files from a hard drive

requires specialized tools and a controlled laboratory environment. Recovery also can require substantial time.

e. Although some of the records called for by this warrant might be found in the form of user-generated documents (such as word processing, picture, and movie files), digital devices can contain other forms of electronic evidence as well. In particular, records of how a digital device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents, programs, applications and materials contained on the digital devices are, as described further in the attachments, called for by this warrant. Those records will not always be found in digital data that is neatly segregable from the hard drive image as a whole. Digital data on the hard drive not currently associated with any file can provide evidence of a file that was once on the hard drive but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave digital data on the hard drive that show what tasks and processes on the computer were recently used. Web browsers, e-mail programs, and chat programs often store configuration data on the hard drive that can reveal information such as online nicknames and passwords. Operating systems can record additional data, such as the attachment of



peripherals, the attachment of USB flash storage devices, and the times the computer was in use. Computer file systems can record data about the dates files were created and the sequence in which they were created. This data can be evidence of a crime, indicate the identity of the user of the digital device, or point toward the existence of evidence in other locations. Recovery of this data requires specialized tools and a controlled laboratory environment, and also can require substantial time.

f. Further, evidence of how a digital device has been used, what it has been used for, and who has used it, may be the absence of particular data on a digital device. For example, to rebut a claim that the owner of a digital device was not responsible for a particular use because the device was being controlled remotely by malicious software, it may be necessary to show that malicious software that allows someone else to control the digital device remotely is not present on the digital device. Evidence of the absence of particular data on a digital device is not segregable from the digital device. Analysis of the digital device as a whole to demonstrate the absence of particular data requires specialized tools and a controlled laboratory environment, and can require substantial time.

g. In addition, in this case, prior electronic and

telephone communications have been conducted in the Spanish language. As a result, segregating files will require translators and will require more substantial time.

33. Other than what has been described herein, to my knowledge, the United States has not attempted to obtain this data by other means.

#### **VI. CONFIDENTIAL HUMAN SOURCES**

34. In this investigation, multiple confidential human sources (hereinafter "CHS" for both plural and singular) were utilized to make controlled purchases of narcotics and/or firearms from subjects of this investigation and collected intelligence on the membership and ongoing criminal activities of the Hazard enterprise. Many of those controlled purchases were made from specific locations in and around Hazard's territory.

35. Investigators utilized a standard set of procedures for the controlled firearms and narcotics purchase operations that were carried out in this investigation. Unless otherwise specified, each of the drug/firearm purchases described below utilized the following safeguards in order to ensure the integrity of evidence. During the controlled purchase operations, CHS were equipped with an audio and/or video recorder and audio transmitter. Only investigators were capable of turning the recorder on and off, and only FBI technicians

could download the contents of any recording; in this manner, CHS were prevented from being able to manipulate recordings. Throughout the investigation, there were no incidents where a CHS prematurely deactivated a recording device. Investigators would activate the recording device at a staging location. Agents and/or TFOs maintained visual observation of a CHS, as much as possible without compromising the investigation, throughout the course of an operation until the CHS entered a building or passed behind an obstruction. Agents and/or TFOs would always search a CHS, CHS' belongings, and/or CHS' vehicle before and after an operation to ensure that the CHS did not have drugs, weapons, or money separate from what was involved in the transaction. Agents and/or TFOs encouraged CHS to, outside of monitoring, maintain contact with gang members and associates who were engaged in ongoing criminal activity.

36. CHS-1: CHS-1 is a documented member of Hazard who began cooperating as an FBI source in 2008; at that time, CHS-1 was on probation for a drug violation committed before CHS-1's cooperation with the government. CHS-1 was terminated as an FBI source that same year because CHS-1 was unable to obtain legal status to remain in the United States. During CHS-1's period of cooperation, CHS-1 provided background information about the membership, structure, and customs of the Hazard gang. CHS-1 identified individuals believed to be Hazard members and/or

associates, and provided information on Eme associates collecting "taxes." CHS-1 positively identified many subjects of investigation from photographs, including Johnson and A. Hernandez. CHS-1 has felony convictions for robbery, possession of a controlled substance, and domestic violence. CHS-1 cooperated in an attempt to receive immigration benefits. I consider the information CHS-1 provided to be reliable because much of it was corroborated through independent source information, information obtained from public databases, and law enforcement investigations. To my knowledge, CHS-1's information has not been found to be false or misleading.

37. CHS-2: CHS-2 has provided information to the FBI since late 2010. CHS-2, who is not a gang member, is currently serving a life sentence in federal prison for a murder committed before CHS-2's cooperation with the FBI. CHS-2 provided information concerning the Mexican Mafia, including about David "Smilon" Gallardo (an individual described in the indictment, inter alia, paragraph 13) who was, at one time, in the same prison facility as CHS-2. CHS-2 has a prior conviction for attempted prison escape and CHS-2 provided information in hopes of being housed in a lower security facility. I have found CHS-2 to be a reliable source of information because much of CHS-2's information has been verified by independent source information and other law enforcement investigation. In

addition, CHS-2's information led to successful controlled drug buys from A. Hernandez.

38. CHS-3: CHS-3 lived in the RGHD area and is an associate of several Hazard members. CHS-3 provided information as an FBI source in 2011, but CHS-3's cooperation was terminated after an arrest for a crime (robbery) committed during CHS-3's cooperation. CHS-3 has numerous prior convictions, including for robbery, theft, domestic violence, and passing counterfeit and forged checks. CHS-3 provided current and historical information on Hazard, identified individuals believed to be Hazard members and/or associates, including Target Subjects SANDOVAL and PAGAN, and provided information on their illegal activities. In addition, CHS-3 participated in several controlled buys in this case, including a controlled buy of methamphetamine from SANDOVAL and CASTILLO. CHS-3 received monetary compensation for ordinary living expenses while cooperating. Despite CHS-3's noncompliance, I found the information from CHS-3 to be reliable because much of it was corroborated by independent source information, other law enforcement investigations, and through the controlled drug buy.

39. CHS-4: CHS-4 began cooperating in 2011 after being arrested by local officers for drug possession and cooperated for leniency in that arrest. CHS-4 is a former user of PCP, and CHS-4 provided information on Target Subjects PAGAN and J.

GONZALEZ, to include that CHS-4 purchased PCP from them. CHS-4 does not have any prior convictions and received monetary compensation for ordinary living expenses while cooperating. I have found CHS-4 to be a reliable source because much of CHS-4's information has been corroborated through physical surveillance, a controlled buy, controlled meets with J.GONZALEZ, and independent source information. CHS-4 was terminated as an FBI source in 2014 due to lack of access to subjects of investigation.

40. CHS-5: CHS-5 is a Hazard member who began cooperating as an FBI source in June 2011. CHS-5 provided information on the Hazard gang and several Target Subjects, including Johnson, A. Hernandez, and AMEZCUA. CHS-5 has felony convictions for drug sales and criminal threats and is currently facing murder charges. CHS-5 was terminated in May 2014 for unauthorized illegal activity. CHS-5 received monetary compensation for living expenses until termination. Despite CHS-5's noncompliance, I found the information from CHS-5 to be reliable because much of it was corroborated by independent source information, other law enforcement investigations, controlled drug buys.

41. CHS-6: CHS-6 began cooperating in 2011 after being arrested by local officers for drug possession and cooperated for leniency in that arrest. CHS-6 is a former user of PCP, and

CHS-6 provided information on Target Subjects PAGAN and J. GONZALEZ, to include that CHS-6 purchased PCP from them. CHS-6 also provided information on Target Subject and HUERTA. Additionally, CHS-6 participated in several controlled buys in this case, including with J. GONZALEZ. CHS-6 has convictions for theft and possession of a controlled substance. CHS-6 is cooperating in exchange for financial assistance, and has been paid by the FBI for living expenses. I have found CHS-6 to be a reliable source because much of CHS-6's information has been corroborated through physical surveillance, controlled drug buys, and independent source information.

42. CHS-7: CHS-7 is a Hazard member and drug supplier. CHS-7 provided information as an FBI source from late 2010 to early 2011, when CHS-7's cooperation was terminated because investigators discovered that CHS-7 had been selling drugs while cooperating with the FBI.<sup>3</sup> CHS-7 has prior convictions for robbery and drug possession. While cooperating, CHS-7 provided current and historical information on the Hazard gang, identified individuals who are believed to be Hazard members and/or associates, including SANDOVAL, Johnson, and AMEZCUA, A. Hernandez, and J. GONZALEZ and provided information on their illegal activities. CHS-7 received monetary compensation for ordinary living expenses while cooperating. I have considered

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<sup>3</sup> CHS-7 has been charged in the indictment.

the information CHS-7 provided during the cooperation period to be reliable only to the extent it was corroborated by independent source information, other law enforcement investigations, and through the successful controlled buys.

43. CHS-8: CHS-8 is a Mexican Mafia associate who began providing information to law enforcement in late 2010. CHS-8 has numerous convictions, including for robbery, theft, drug sales, false identification to an officer, and bank robbery. While in prison, CHS-8 met several members of the Mexican Mafia. As a result, CHS-8 was able to identify members of the Mexican Mafia, including Jackson, and report on their criminal activities. CHS-8 is receiving monetary compensation for living expenses, and is also cooperating with the FBI as a way to leave gang life. I have found CHS-8's information to be reliable because much of it has been corroborated by independent source information, past and current investigations involving the Mexican Mafia, and recorded meetings. CHS-8 was terminated as an FBI source in mid-2013 due to not having any further access to subjects of investigation.

44. CHS-9: CHS-9 is a member of a sureño gang that is closely affiliated with Hazard. CHS-9 has provided information as an FBI source since mid-2011. CHS-9 provided current and historical information on the Hazard gang and several Target Subjects. CHS-9 has convictions for firearm possession,



attempted robbery, narcotics possession, domestic violence, an obstruction. CHS-9 was receiving monetary compensation for living expenses during cooperation, which was terminated in mid-2013 because of CHS-9's arrest for car theft. Despite CHS-9's noncompliance, I found the information from CHS-9 to be reliable because much of it was corroborated by independent source information, other law enforcement investigations, and through numerous controlled drug buys and meetings.

45. CHS-10: CHS-10 is a member of a sureño gang and was identified during this investigation as a drug trafficker. CHS-10 is currently assisting in a separate investigation, out of HIDTA, targeting a DTO operating in the greater Los Angeles area and provided information in this investigation relating to the drug trafficking activities of the Hazard criminal enterprise. CHS-10 is cooperating with law enforcement in hopes of receiving leniency in relation to his past drug trafficking activities. CHS-10 has prior convictions relating to drug trafficking and voluntary manslaughter. During the course of the separate HIDTA investigation, which is still ongoing, CHS-10 has provided information which has led to the seizure of over 25 pounds of methamphetamine. CHS-10 has also assisted investigators in identifying the participants of this particular DTO. Based on the accomplishments of the HIDTA investigation and information

provided by CHS-10, I believe CHS-10 to be a reliable source of information.

46. CHS-11: CHS-11 lived in the RGHD area and is an associate of several Hazard members. CHS-11 provided information as an FBI source in 2012 and 2013, when CHS-11's cooperation was terminated after law enforcement learned of unauthorized activities relating to CHS-11 repeated attempts to purchase drugs. CHS-11 has prior convictions for grand theft, narcotics possession, and burglary. While cooperating, CHS-11 provided current and historical information on the Hazard gang, and identified individuals believed to be Hazard members and/or associates. In addition, CHS-11 participated in controlled buy with an indicted defendant. CHS-11 received monetary compensation for ordinary living expenses while cooperating. Despite CHS-11's noncompliance, I found the information from CHS-11 to be reliable because much of it was corroborated by independent source information, other law enforcement investigations, and through the controlled drug buy.

47. As described in detail below, the facts set forth in this affidavit provide probable cause to believe that the TARGET SUBJECTS are involved in narcotics trafficking and racketeering activities, and that the TARGET SUBJECTS have been, are being, and will continue to be involved in narcotics trafficking and racketeering activities

## **VII. BACKGROUND OF THE INVESTIGATION**

48. In late 2010, the FBI, in conjunction with LAPD, Hollenbeck Division, Los Angeles County Sheriff's Department, Alhambra Police department, Bureau of Alcohol Tobacco and Firearms, and the Department of Treasury launched an investigation into the criminal activities of the Hazard enterprise. Although Hazard is continuously on law enforcement's radar, the instant investigation began in 2010 when Johnson was involved in what law enforcement believed to be a drug deal gone bad, resulting in shots fired and a car crash on the 10 freeway. Prison letters from ADX Florence were found in Johnson's car from Jackson and another Eme member, Adolfo "Champ" Reynoso, who is known as Jackson's "godfather" in the Mexican Mafia. Jackson is the first named defendant in the indictment and a documented Hazard and Mexican Mafia member.

49. During the course of this investigation, agents and officers, with the assistance of CHS, conducted approximately 37 controlled narcotics and firearms purchases from Hazard members and associates, in and around Hazard territory. Additionally, during this investigation, law enforcement has used a variety of sources to obtain information on Hazard, including, but not limited to, the capture of wire and electronic communications pursuant to Court authorization (T-III investigation), law

enforcement databases, law enforcement reports and information from CHS, and conversations with Task Force members.

50. During the course of the investigation, I extended my knowledge about the membership and culture of Hazard through discussions with CHS, members of the LAMTFVG, and other law enforcement officers primarily from the LAPD's Hollenbeck Division. Multiple CHS have provided information about the organizational structure of the Hazard gang and its drug trafficking organization. Multiple CHS have explained that if an individual wants to be a member of the Hazard gang, they must be "jumped in" by other Hazard members. "Jumped in" has been identified by CHS-1, CHS-2 and CHS-3 as a reference to engaging in a physical fight with other members of the Hazard gang at the same time, which would last for 13 seconds (to signify the thirteenth letter of the alphabet "M", which is used to represent allegiance to the Mexican Mafia). In addition to being "jumped in," a prospective member must conduct a "mission." A "mission" consists of committing a violent act on behalf of the gang, such as a robbery or shooting rival gang members. CHS-5 was "jumped in" when he/she was a teenager. CHS-5 participated in several gang related crimes referred to as "missions" for Hazard in order to demonstrate his/her loyalty towards the gang. According to CHS-5, a prospective member has to have some known association with Hazard territory or have

family ties or other close associations with active members. Hazard members are highly suspicious of potential infiltration by law enforcement.

51. Veteran members of the gang are older and considered as "shot callers" (leaders) and have put in "work." Such "work" has been identified by multiple CHS as a reference to committing murders, robberies, assaults, shootings, the selling of narcotics and other illegal activities on behalf of Hazard. Multiple CHS have further indicated that the completion of this "work" is expected of new Hazard members in order to gain respect (also referred to as "being down for the neighborhood") within the gang. When younger members of the gang go out and perform "jales," which refers to robberies (or other criminal activities generating proceeds), there is an expectation that those individuals will provide the veteran members and "big homies" a "kick back," or portion of the proceeds. A "big homie" is also a veteran of the gang, but may not necessary be as senior in age. "Big Homies" have put in their "work" and often served prison time and thus, are not expected to complete lower-level tasks associated with newer members of the gang. Evidence from this investigation has corroborated these allegations. For example, the FBI has recorded conversations between CHS and members of the Hazard gang where they have ordered shootings against rival gangs and or gang members.

52. Hazard members, like many Mexican mafia affiliated gangs, operate under a "blood in, blood out" rule that prohibits them from leaving the gang unless they are assaulted (i.e. "jumped out") or killed.

53. The control of Hazard territory is maintained and protected by the threatened and actual use of violence by Hazard members. Multiple CHS have reported that in order to sell drugs within Hazard territory, one must either be a member or an associate of the Hazard gang, or a non-member with permission from a member. For example, if an individual unknown to the Hazard gang attempts to sell drugs in the Hazard gang territory, that individual will be told to leave the territory or will risk being assaulted, robbed, and/or killed by Hazard members.

54. Members and non-members of Hazard selling narcotics in Hazard territory also have to pay "taxes" from the proceeds of their narcotic sales which are later used by members of the gang to purchase firearms and narcotics to sell. For example, on March 3, 2011, CHS-3 participated in a controlled narcotics purchase from SANDOVAL. During that controlled purchase SANDOVAL told CHS-3 that \$100.00 in "rent" (tax) was due the first of every month if CHS-3 sold narcotics in RGHD. SANDOVAL added that he collects all the rent in RGHD and sends it up to members of the Mexican Mafia. SANDOVAL told CHS that if CHS knew of anybody

else that wanted to sell in RGHD, SANDOVAL would give them the same terms no matter how much they sold.

55. In addition to trafficking narcotics within their territory, I also know that Hazard members distribute and are responsible for the interstate trafficking of controlled substances, including but not limited to methamphetamine, cocaine, crack cocaine, marijuana, phencyclidine (PCP), and ecstasy. CHS-5 estimated that drug sales comprise the majority of the revenue generated by the Hazard gang.

56. Based on my investigation, I know that Hazard members are also aware of how to manipulate the criminal justice system. Based on my training and experience, I know adult gang members will use juvenile gang members to commit various crimes because, if caught, a juvenile will not be punished as severely as an adult. Similarly, I know it is common for gang members with no prior felony convictions to claim responsibility for weapons or drugs discovered by the police, in the place of gang members with longer criminal histories who actually possessed the contraband. Hazard members will also falsely make complaints on pro-active officers that work in RGHD in order to have them moved to other geographical areas because Hazard members know that excessive complaints for one specific officer will have him/her "benched" (removed from patrol duties) or moved to another patrol division. For example, I recently interviewed

LAPD Officer Matthew Meneses, who, in 2007, was assigned to the Gang Enforcement Detail (GED) at Hollenbeck Division and assigned to the Hazard gang. Sometime in 2007, an unknown person filed a complaint with Hollenbeck Division alleging Officer Meneses conducted an illegal traffic stop. This case was referred to LAPD Internal Affairs Division and the claims were deemed to be unfounded due to the fact Officer Meneses was not working during the time of the alleged incident.

57. Additionally, Hazard members will use female members and associates to transport narcotics and firearms because they believe that there is less of a chance that the police will stop and search a female. For example, on February 8, 2012, Hollenbeck Officers Bueno and Manriquez responded to a call of "assault with a deadly weapon." Upon their arrival, Officers Bueno and Manriquez arrested Doran and his girlfriend, L.E., with three firearms and twenty ounces of marijuana. During their arrest, L.E. told Officers that all the firearms and the marijuana belonged to her. However, Doran was arrested and the charges were later dropped. While at the LAPD Jail Facility, Doran was captured over recorded jail calls bragging to other Hazard members that his girlfriend (L.E.) was "one down hyna (slang for 'girlfriend')." (Based on my training and experience, I believe Doran was telling fellow Hazard members



that L.E. falsely accepted ownership of the firearms and drugs and was "down" (i.e. committed) to Doran and Hazard.

58. From October 2011 to July 2013, the LAMTFVG conducted a T-III investigation targeting different members of the Hazard enterprise, including Johnson, Barrios, and HUERTA, who made thousands of calls and sent/received thousands of text messages, many of which were related to gang activity and/or narcotics distribution. Some of these communications are summarized below in the probable cause section.

59. I have become familiar with the recorded phone calls, recorded audio content, and recorded video content from the FBI's controlled narcotics and firearms purchases in this investigation. I have completed that review by personally participating in the controlled operations, speaking with agents and task force officers who participated in those operations, reviewing those investigators' notes, reviewing the content of recordings, or reviewing the content of debriefings with confidential sources. Where I have relied on investigators' summaries of recorded content, I understand that such summaries may differ from any transcripts that are ultimately produced for such content, as investigators typically refine and sharpen their interpretation of recorded content after repeated review and after becoming more familiar with the underlying investigation.

60. In summary, Hazard members engage in a variety of violent crimes, narcotics trafficking, firearms trafficking, and violent crimes. As a result of their criminal activity, largely based and conducted within the Hazard gang territory, Hazard members victimize and intimidate the community.<sup>4</sup>

### VIII. PROBABLE CAUSE

61. As described in the previous section, Hazard and most other Mexican mafia affiliated gangs operate with a strictly enforced "blood in, blood out" rule. Unless otherwise specified, I have no information that any of the TARGET SUBJECTS who is a validated member of Hazard or another affiliated gang has disavowed his gang. Consequently, based on my training and experience, I believe that all TARGET SUBJECTS who are members of Hazard or an affiliated gang are still active members of that gang.

#### A-1 HUERTA RESIDENCE

62. HUERTA is a documented Hazard member and is believed to be an enforcer and drug dealer for Hazard. CHS-6 participated in four controlled narcotics purchases from HUERTA between August 2011 and December 2012. CHS-6 met HUERTA at the HUERTA RESIDENCE at the beginning of each controlled buy. In

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<sup>4</sup> For a sampling of relevant evidence demonstrating the existence of the Hazard criminal enterprise, and an example of the type of additional evidence sought pursuant to this warrant, please see Exhibit 1, attached hereto.

addition, two of the transactions occurred at the HUERTA RESIDENCE. For instance, on August 25, 2011, HUERTA sold CHS-6 methamphetamine and PCP at the HUERTA RESIDENCE. On September 7, 2011, HUERTA sold methamphetamine to CHS-6 at the HUERTA RESIDENCE.

63. Then, on or about October 25, 2011, HUERTA sold approximately 6.8 grams of methamphetamine for \$270 to CHS-6 during an audio-video recorded meeting. HUERTA met CHS-6 at the HUERTA RESIDENCE, then drove with CHS-6 to pick up the drugs from another individual that HUERTA said was in Del Mar. Upon return, HUERTA weighed out the drugs at HUERTA RESIDENCE and was recorded saying "here's two balls right there." From my training and experience, I understand that to refer to two "eight balls". An eight ball is a street term used to refer to an eighth of an ounce of drugs, which is equal to approximately 3.5 grams. Two eight balls, or approximately 7 grams, is consistent with the quantity given by HUERTA to CHS-6. Earlier during the transaction, HUERTA was also recorded stating that he was "working with fire" and not garbage and telling CHS-6 that he/she could make a lot of money.

64. HUERTA was also intercepted numerous times during the T-III investigation. HUERTA made thousands of calls and sent/received thousands of text messages; many of which were related to gang activity and/or narcotics distribution.

a. For example, on September 14, 2012, Barrios called HUERTA and said, "Hey the homies got some vato right there in Hazard Park. They say he is claiming to be Mouse from the street but Mouse passed away holmes." HUERTA said, "I'll go over there right now." Barrios said, "His name is [M.B.] and he's asking a lot of questions and shit." HUERTA said again that he would go over there. From my training and experience, I know that gang members will frequently check the status of one another's gang membership and status within the gang, in part to check on whether any gang members have become informants for law enforcement.

b. On September 19, 2012, HUERTA called Barrios to tell him that some "fool" was spying. HUERTA later said, "If he wants his car, I'm telling you he's gonna have to give us one tagged up....If not, we'll tag it up and that's it holmes. Fuck him." Barrios said, "yea, whatever you want to do." From my training and experience and knowledge of the investigation, I believe that in the above conversation, HUERTA was discussing a car he had taken as a tax and was demanding one that had a clean "VIN" ("tagged up" refers to current registration tags).

65. As described in the next subsection, HUERTA's current association with Hazard members has recently been confirmed. In addition, HUERTA RESIDENCE is in Hazard territory.

66. HUERTA's criminal history includes the following convictions:

a. 2001 conviction for PC 273.5 (Inflict Corporal Injustice Spouse/Cohabitant), for which he was sentenced to 60 months probation and 270 days jail.

b. 2007 conviction for Vehicle Code (VC) Sections 10851 and 496D (Taking Vehicle Without Owner's Consent/Vehicle Theft, and Possession of a Stolen Vehicle), for which he was sentenced to 16 months prison

c. 2013 conviction for VC Sections 10851 and 666.5 PC (Vehicle theft with priors), for which he was sentenced to 2 years prison.

Indicia of Residence

67. In April 2014, HUERTA was arrested at HUERTA RESIDENCE for failing to report to court, and was sentenced to 10 days county jail.

68. HUERTA RESIDENCE is located within Hazard controlled territory. HUERTA was contacted by Hollenbeck gang officers on September 20, 2014 in front of his residence for associating with another Hazard member. When questioned by Officers, HUERTA stated that he has been living at 1670 ½ Murchison (HUERTA RESIDENCE) for the past ten years.

69. On October 26, 2014, HUERTA was again contacted in front of his residence during a probation compliance check.

HUERTA was in compliance with his probation and again stated that he is still living at 1670 ½ Murchison Street, Los Angeles, California (HUERTA RESIDENCE).

70. Utilizing department resources (DMV database) HUERTA's residence was verified on his California's drivers license which he updated on September 19, 2014 to 1670 1/2 Murchison Street, Los Angeles, California 90033 (HUERTA RESIDENCE).

**A-2 AMEZCUA RESIDENCE**

71. AMEZCUA is a documented Hazard member and is believed to be the shot-caller for Hazard following the arrest of Barrios. AMEZCUA's role in this case was verified through recorded jail calls with Jackson ranging from August 2013 to present. From these calls, it appears that AMEZCUA operates as Jackson's "secretary" (Mexican Mafia term used for facilitator). In the recorded calls, AMEZCUA advised Jackson of current issues and politics both in RGHD and of surrounding gangs. AMEZCUA also discussed collecting "taxes" for Jackson from Hazard members in RGHD.

79. For example, on May 2, 2014 during a recorded prison call between AMEZCUA and Jackson, Jackson told AMEZCUA that "Old Man Rube" was at Men's Detention Center and the "Snitch" was being housed in San Diego. AMEZCUA told Jackson that the Homies were tripping because AMEZCUA was helping out Jackson only and not "Tio" or "J" (referring to Mexican Mafia members Danny

"Danny Boy" Pina ("Pina") and Jose "Joker" Gonzalez ("Joker")). AMEZCUA said that they have to help out everyone because they're one of the same.

a. From my training and experience and knowledge of this investigation, I believe AMEZCUA was discussing how he collected proceeds from the sales of narcotics from drug dealers and/or gang members operating within territory controlled by Jackson and was discussing with Jackson who to "help" or pay. I believe that the conversation indicated that the money collected was being given only to Jackson or his representative.

72. On July 17, 2014 during a recorded prison call, AMEZCUA told Jackson the girl "Irma" had the wrong address. AMEZCUA told Jackson that "Irma will drop it off to him". Irma told AMEZCUA to let Jackson know not to worry about anything, that "it's in good hands and to just be patient". Jackson told AMEZCUA that a "homie" (gang member) from Ontario (believed to be the Ontario Black Angels gang) was getting out in 30 days and was going to get in contact with AMEZCUA upon his release. AMEZCUA asked Jackson if he could put in a good word for AMEZCUA because people were saying that AMEZCUA and Jackson were touching "D" and "J"'s funds (referring to Pina and Joker) and a lot of people were not happy with that. Jackson reassured AMEZCUA and told him that he (Jackson) would take care of it.

a. From my training and experience and knowledge of this investigation, I believe that this was another conversation discussing AMEZCUA's collection of proceeds from the sales of narcotics from drug dealers and/or gang members operating within territory controlled by Jackson and who the proceeds were going to. I believe that AMEZCUA was expressing concern that other gang members were accusing him of collecting money that should go to people other than Jackson.

73. On October 14, 2014 during a recorded prison call between AMEZCUA and Jackson, Jackson told AMEZCUA that he needed AMEZCUA to go talk to the homies and tell them to respect Jackson's family. Jackson told AMEZCUA that the homies drove by his mother's house and were yelling "Hazard," and his mom got upset about them disrespecting the neighborhood. Jackson told AMEZCUA that the homies were in a blue car; AMEZCUA told Jackson that he knew who did it and told Jackson that he would take care of it. AMEZCUA told Jackson that there was a party on the block where Jackson's mom lives and they had free beer, so most likely the homies were drunk and didn't know where Jackson's mom lives. Before hanging up, AMEZCUA told Jackson that the "Godfather" called and that he (AMEZCUA) was going to work on getting all that together.

a. I believe the above-referenced telephone call is a demonstration of how AMEZCUA is a shot caller and enforcer for



Hazard. The conversation also evidences that AMEZCUA serves as Jackson's mouthpiece and uses Jackson's status to control the Hazard gang and other gangs operating within territory controlled by Jackson.

74. Pen register analysis indicates AMEZCUA was in frequent contact with Racketeering Defendants Johnson, Jackson and Barrios during the period of February 2011 through November 2012.

75. AMEZCUA's criminal history includes a 2009 felony conviction for violating PC Section 520 (Extortion), for which he was sentenced to two years state prison.

Indicia of Residence

76. In November 17, 2014, members of the LAMTFVG responded to 16344 Ladysmith Street, Hacienda Heights, California, which was AMEZCUA's last known address according to DMV records (address as of May 18, 2013). Upon arriving at the address on Ladysmith, agents discovered a 2002 Red Chevrolet Utility truck parked in the driveway bearing license plate 11048H1. The vehicle's DMV information indicated that the truck was registered to AMEZCUA with an address of 5860 ½ Loveland Street in Bell Gardens, California (AMEZCUA RESIDENCE). SA Iglesias and his team cancelled their surveillance at Ladysmith and responded to AMEZCUA RESIDENCE. Upon arriving, they discovered a white GMC utility truck bearing license plate 7U79041. The

vehicle's DMV information indicated that the truck was registered to AMEZCUA with an address of 5860 ½ Loveland Street in Bell Gardens (AMEZCUA RESIDENCE address).

77. At approximately 7:47 AM, agents observed AMEZCUA and a juvenile female believed to be AMEZCUA's daughter exit the rear residence (5860 ½ Loveland Street) and enter the white utility truck. AMEZCUA departed in the white utility truck with the juvenile female and dropped her off at Bixby Elementary school. The task force members discontinued their surveillance and determined that AMEZCUA was living at AMEZCUA RESIDENCE with his family.

**A-3 SANDOVAL RESIDENCE**

78. SANDOVAL is a documented Hazard member. Multiple CHS have identified SANDOVAL as a "tax collector" operating inside RGHD. CHS-5 also identified SANDOVAL as someone in competition for the shot-caller position prior to Barrios that became AMEZCUA's. Furthermore, SANDOVAL sold methamphetamine multiple times to a CHS. For example, on March 2, 2011, CHS-3 called SANDOVAL in a recorded telephone call and, using coded language, asked for two ounces of methamphetamine. SANDOVAL indicated a price of \$2,500 and explained that CHS-3 should come over with money and wait at SANDOVAL's house while he got it from the source. They agreed to meet the next day. On March 3, 2011, CHS-3 went to SANDOVAL's prior residence, and then the CHS,

SANDOVAL, and SANDOVAL's girlfriend left to meet "J" in a parking lot where SANDOVAL got and returned with the methamphetamine. On the recording, SANDOVAL is captured telling the CHS that he will need to pay \$100 in tax every month.

79. As described in the next section, recent surveillance indicates that SANDOVAL is living in Hazard territory and still likely selling controlled substances.

80. SANDOVAL's criminal history includes the following felonies:

a. 2007 conviction for H&S Section 11379 (Transportation of a Controlled Substance), for which he was sentenced to three years probation and 120 days jail.

b. 2011 conviction for PC Section 422 (Threaten Crime with the Intent to Terrorize), for which he was sentenced to three years probation and 28 days jail. This is the incident involving SANDOVAL earlier described in the background section in which SANDOVAL threatened a victim after the victim got into a fight with SANDOVAL because SANDOVAL had recruited the victim's girlfriend to transport drugs.

#### Indicia of Residence

81. On November 10, 2014, officers from the LAPD's Hollenbeck Division contacted SANDOVAL while he was walking away from SANDOVAL RESIDENCE. Because officers had not seen SANDOVAL in the area of RGHD recently, officers detained SANDOVAL pending

an injunction violation. During the detention, officers asked SANDOVAL what he was doing in the area of SANDOVAL RESIDENCE (RGHD territory). SANDOVAL told officers that he moved back to the neighborhood with his girlfriend and was now living at 1680 Tremont Avenue, Apartment #5 (SANDOVAL RESIDENCE).

82. On November 21, 2014, the U.S. Marshals conducted surveillance at SANDOVAL RESIDENCE in an attempt to locate SANDOVAL. The residence is situated in Hazard territory. Graffiti is visible throughout the neighborhood claiming "Hazard 13." During surveillance, SANDOVAL was seen going in and out of apartment #5. In addition, multiple individuals were observed loitering around apartment #5. Two individuals went into apartment #5 for less than one minute on different occasions. Based on my training and experience, I know that this activity is consistent with narcotics sales in that narcotic users enter and exit narcotic locations rapidly in order to get their narcotics and not be seen or arrested by law enforcement.

**A-4 MONTES RESIDENCE**

83. MONTES is a documented Burlington Locos gang member who had aligned with Jackson and Barrios during the investigation. On August 31, 2012, CHS-11 reported to agents an incident with Barrios involving MONTES. According to CHS, Barrios had approached him/her indicating that there was a possible raping incident and that other "cases" had been brought

to Barrios' attention regarding the Tiny Boys. Tiny Boys is a Hispanic gang in the Boyle Heights who claim the area of Cesar Chavez to north, 1<sup>st</sup> Street to the south, Soto Street to the east, and the 5 freeway to the west. The Tiny Boys gang has many rival gangs, including Hazard. CHS's wife knew who the rumored perpetrators were and pointed the house out to Barrios after Barrios picked up the CHS and CHS's wife with another individual in the car. The authorized wiretap intercepted a conversation in which Barrios called MONTES and said he had "marked it" for him. (Referring to the house.) According to the CHS, Barrios said they were going to "blast those fools." Then, MONTES called Barrios to arrange to meet. Later that night, a group of teens in the vicinity of the marked house (St. Louis and Cesar Chavez which lies within Tiny Boys gang territory) reported to law enforcement that a car "full of gang members" pulled up to them and asked where they were from. Someone in the car asked if they were sure they were not from "Tiny Boys." The next day, Barrios was intercepted calling Jackson to tell Jackson that Barrios and MONTES had gone to some "places" and would fill Jackson in.

84. On September 1, 2012, MONTES was arrested with a loaded 9mm semi-automatic gun with two fully loaded magazines. MONTES's brother and another individual, all Burlington Locos members, were in the car. MONTES said he had the gun for his

protection. Later that night, Barrios texted "Irene": "Babee got busted with a heater were trying 2 getem out." (Believed to be referring to MONTES being arrested with a gun and them trying to bail MONTES out from jail.) From my knowledge of this investigation, I know that MONTES's gang moniker is "Baby." MONTES was subsequently convicted of carrying an unregistered gun.

85. MONTES also has a prior 2006 arrest for attempted murder. According to the police report, MONTES fired shots at other Latino males after asking where they were from.

86. MONTES has also been intercepted in conversations evidencing his participation in the broader conspiracy. For example, on February 13, 2013, Barrios told MONTES that Jackson had been pulled over and they discussed whether some guy who was trying to meet with Jackson had led law enforcement to him. On March 1, 2013, Barrios called MONTES and asked to borrow his car to drive to the projects (and not the Volvo b/c it's "hot" and the cops know it). From my training and experience, I know that gang members will often switch the vehicles they drive in order to avoid detection by law enforcement.

87. MONTES has had recent communication with Barrios, who is incarcerated at the Los Angeles County Jail. I believe these conversations evidence MONTES's continued involvement with and promotion of the racketeering enterprise. For example, on

October 4, 2014, Barrios called someone believed to be MONTES. Barrios greeted the individual as "Baby," the known moniker for MONTES. During this recorded call, MONTES advised Barrios that if he ran into that "Guy who sings" (referring to an inmate that is cooperating with law enforcement), not to talk to him or even look at him. MONTES further told Barrios that "they" (referring to law enforcement) were just waiting for him to do it.

a. Based on my knowledge of this investigation, I believe MONTES and Barrios were referring to CHS-5 (also incarcerated at LACJ) and MONTES was telling Barrios not to assault CS-5 and pick up an additional criminal charge.

88. On October 18, 2014, during a recorded jail call between MONTES and Barrios, Barrios asked MONTES for a "big favor." Barrios asked MONTES if he could call "P" from Florencia and talk to his old lady because "they have something for him." Barrios asked MONTES if he remembered when "they ordered that thing" from Barbie, his (MONTES') old neighbor. MONTES confirmed and said "yes." Barrios told MONTES that he really needed "that" picked up because he wanted to give that money to his mom.

a. Based on my training, experience and knowledge of this investigation, I believe Barrios was asking MONTES to pick-

up narcotics from "Barbie," sell the narcotics, and deliver the proceeds to Barrios' mother.

Indicia of Residence

95. Utilizing the California Department of Motor vehicles database, law enforcement learned MONTES was residing at 851 New Depot Street, Apartment #7, Los Angeles, California (MONTES RESIDENCE). MONTES also provided the MONTES RESIDENCE to Officers on October 10, 2014 when he turned himself into the Los Angeles County Jail for 3 misdemeanor warrants.

89. On November 13, 2014, members of the LAMTFVG conducted surveillance at the MONTES RESIDENCE. In the course of this surveillance, task force officers did not observe MONTES exit his residence, so they decided to use a ruse to confirm occupancy. TFOs approached the second floor of the property where apartment #7 was located and knocked on the front door. TFO Villasenor immediately identified MONTES as the individual who answered the door.

**A-5 SALAS RESIDENCE**

90. SALAS is a documented Hazard member (with documented gang tattoos). During the investigation, SALAS was intercepted talking to Barrios and HUERTA about gang activity, including enforcement and taxes. For example, on September 19, 2012, SALAS was intercepted talking to Barrios about how "youngsters" needed to learn "the hard way" because they were "drawing heat"



for doing dumb stuff like tagging. On October 4, 2012, SALAS told Barrios that another conspirator told him that a jura (cop) had a "green light" and that was why law enforcement presence had increased. On February 18, 2013, SALAS and HUERTA were intercepted discussing how "Chuckie" needed to be taken care of for talking to law enforcement.

91. SALAS has also been intercepted talking about narcotics trafficking. For example, on February 4, 2013, HUERTA asked SALAS about the status of a PCP source, asking in coded language "tell him we're thirsty dog." (From my training, experience, and knowledge of this investigation, I know that the subjects in this investigation commonly use "water" or "agua" as coded terms to describe PCP.)

92. On February 12, 2013, HUERTA asked how much for a "tiner" and SALAS said he would do it and to "tell them 60." On February 18, 2013, HUERTA called SALAS and asked how much for "an eighth;" SALAS confirmed for "crystal" and said "120." He also said he had some of the "that other shit." On February 21, 2013, HUERTA told SALAS to supply him with "any kind of water" because "they will buy anything right now and pay for it."

93. On August 28, 2014, at approximately 1:27 pm, Jackson placed an outgoing call from the San Bernardino County Detention Facility to 213-640-1852, a number AMEZCUA previously provided

to Jackson for SALAS on August 18, 2014.<sup>5</sup> During this recorded call, SALAS told Jackson that he just missed "John" (we have not yet identified "John" but believe him to be a narcotics dealer) and that John was "gonna get something going for you. Couple of weeks or a week." Jackson replied that he was glad. Jackson and SALAS then talked about AMEZCUA, and Jackson told SALAS, regarding AMEZCUA, "J and D were up there saying they weren't, you were keeping 'feria' (money)." SALAS told Jackson that he told one of AMEZCUA's runners that "no one is taking care of homie." Jackson complained to SALAS, "These last few months have been fucking tight man." Jackson later told SALAS, "See when you can touch down with Bo. The sooner the better." SALAS acknowledged and later confirmed with Jackson, "I get at 'sucunado' (Spanish for brother in law)." Jackson acknowledged and told SALAS, "He's the main one. Anytime you really, emergency, you need me to call, just let him know, and he'll, uh, let the ruca (Spanish for wife/girlfriend) know, and I'll get right on it. When the time comes, mother fucker, I'm right here. That's when I'll step up." SALAS acknowledged and told Jackson, "I'm gonna get rid of this thing right here...and about three to four days I'll give the new one to Boo Boo." Jackson acknowledged and the call terminated.

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<sup>5</sup> I have also listened to these telephone calls and recognize SALAS's voice from prior wire interceptions and personal contact in the field.

a. During this call, I believe that Jackson was complaining to SALAS about having minimal money in his account. When SALAS told Jackson that John was "gonna get something for you," I believe this most likely refers to narcotics, which are sold in detention facilities for three or more times their street value. Since the "something" still had to be obtained, I believe that it was not money or a care package since that could be obtained almost immediately, as opposed to narcotics which would have to be purchased and then concealed. SALAS and Jackson then discussed how AMEZCUA was suspected of pilfering some of the rent from Mexican Mafia and Hazard members "D" and "J," whom I believe to be Pina and Joker, prior to AMEZCUA being able to clear his name. I believe that SALAS's comment to AMEZCUA's runner could refer to AMEZCUA and other Hazard members not taking care of Jackson by providing him with rent money. When Jackson told SALAS, "I'm right here. That's when I'll step up," I believe that Jackson was reassuring SALAS of his status and influence as a Mexican Mafia member, and that if SALAS were to get in trouble with other gang members or Mexican Mafia members, Jackson would back SALAS and remedy the issue. Lastly, at the end of the call, I believe that SALAS was telling Jackson that he was going to get a new phone number and would give the number to "Boo Boo." From my training and experience and knowledge of the investigation, I know that Mexican Mafia

associates such as SALAS and narcotics dealers frequently obtain new phones and new phone numbers in order to thwart law enforcement investigative techniques. Finally, I believe this call demonstrates that SALAS reports to Jackson on Hazard members such as AMEZCUA, executes Jackson's orders by talking to individuals such as Bo, and that SALAS is in a leadership position within the Hazard gang due to his access to Jackson.

94. On September 9, 2014, at approximately 9:22 am, Jackson placed an outgoing call from the San Bernardino County Detention Facility to SALAS on the same number, 213-640-1852. During this recorded call, SALAS asked Jackson, "What's up with Adam? Is he helping you out?" Jackson asked SALAS, "Who?" and SALAS responded, "Adam from the hood." Jackson replied, "Fuck no. That mother fucker..." SALAS told Jackson, "Someone was telling me that he was out there saying, you know, he was helping out..." Jackson interjected and told SALAS, "Nah, nah. Don't let that mother fucker do nothing." SALAS acknowledged and Jackson continued, telling SALAS that Adam was "a cold dope fiend." SALAS acknowledged and Jackson instructed SALAS, "He must be trying to use my name because he aint sent a fucking thing." Jackson instructs SALAS to "put a stop to that" and SALAS responded, "Ok." Jackson then told SALAS, "You know what these mother fuckers doing Indio. You know how they are. They'll start saying oh yeah, give me this for homie. Yeah,

yeah mother fuckers. Fuck all that. Yeah, somebody else told me that to."

a. Based on my training, experience, and knowledge of the investigation, I believe that in this call, SALAS was informing Jackson that Adam was claiming to be assisting Jackson financially and was therefore using Jackson's name to further his own interests. Jackson confirmed that Adam had not sent Jackson any money and instructed SALAS to "put a stop to that." Based on CHS debriefs and conversations with law enforcement officers, I know that individuals who use a Mexican Mafia member's name without permission to collect rent are threatened, assaulted, or even killed. As such, I believe that Jackson was instructing SALAS to confront Adam and tell Adam to stop using Jackson's name. If Adam refuses to do so and Jackson learns that Adam is still profiting from using Jackson's name, I believe that Jackson will order SALAS to assault Adam. This call demonstrates that SALAS is currently in a leadership position as Jackson's camarada, as evidenced by Jackson giving SALAS instructions and SALAS acknowledging to Jackson that he will execute Jackson's instructions regarding Adam.

95. SALAS's criminal history includes the following felonies:

a. March 5, 2002 conviction for Felon in Possession of a Loaded Firearm. SALAS was sentenced to 3 years felony probation.

b. November 15, 2004 conviction for possession of a controlled substance and identity theft. SALAS was sentenced to 16 months state prison.

c. January 10, 2006 conviction for robbery. SALAS was sentenced to 2 years state prison.

Indicia of Residence

96. On December 1, 2014, Officers from the Hollenbeck Parole Compliance Unit (PCU), conducted a ruse and acted as if they were conducting a welfare check at SALAS RESIDENCE. Upon their arrival, PCU Officers observed and immediately recognized SALAS exiting the front door of SALAS RESIDENCE. SALAS appeared to secure the residence before walking away towards Murchison Street. Officer Marmolejo made contact with SALAS and explained that they were conducting a welfare check on a fictitious individual. During this interview, SALAS told Officers that he lives at 1664 Murchison Street (SALAS RESIDENCE). SALAS RESIDENCE is in Hazard territory.

A-6 MIRANDA RESIDENCE

97. MIRANDA is a documented Hazard member (with documented gang tattoos). According to CHS-5, MIRANDA served as an enforcer (and gun carrier) for Hazard during the course of this

investigation. CHS-11 reported that on August 6, 2012, MIRANDA was involved in a shooting in the City Terrace area. From my training, experience, and knowledge of this investigation, I know that the City Terrace area is a rival gang territory for Hazard. Witnesses in the area reported hearing shooting. Subsequently, on August 14, 2012, SALAS reported to Barrios using coded language in an intercepted telephone call that MIRANDA had gotten busted after a high-speed chase, and that MIRANDA had shot at a light, thereby attracting law enforcement attention.

98. MIRANDA's criminal history includes the following felonies:

a. 2003 conviction for possession of a loaded firearm while in possession of narcotics. MIRANDA was sentenced to 2 years state prison.

b. 2007 conviction for car theft. MIRANDA was sentenced to 16 months state prison.

c. 2013 conviction for car theft and felony evading. MIRANDA was sentenced to 425 days county jail and 3 years felony probation.

99. From my training and experience and knowledge of the investigation, I know that car thefts are a common enterprise of Hazard members. For example, as part of the above mentioned 2003 conviction, MIRANDA was caught driving the stolen vehicle

in RGHD. Furthermore, the crime of Grand Theft Auto is one of the gang related crimes that Hazard members commit, often as part of "missions" against rival gangs and their members so that the cars are not traceable to them. Hazard members also sell stolen vehicles to gain profits for the gang, often to purchase weapons or narcotics for the gang. As previously discussed, Hazard is a "blood in, blood out" gang, and I have not learned that MIRANDA has left the gang. In addition, MIRANDA RESIDENCE is in RGHD, making it extremely unlikely that MIRANDA could continue to reside there if he were not a continuing part of the Hazard enterprise. Therefore, I believe that MIRANDA is a continuing member of the racketeering enterprise and that there is probable cause to believe that evidence of the Target Offenses will be found in the MIRANDA RESIDENCE.

Indicia of Residence

100. LAPD Officer Sergio Leyva is assigned to the Housing Authority for the City of Los Angeles (HACLA) office in RGHD. In the course of his duties he continuously monitors approximately 30 video cameras in and around RGHD. I recently interviewed Officer Leyva and learned that from November 14, 2014 through November 19, 2014, MIRANDA was observed entering and exiting MIRANDA RESIDENCE between the hours of 12:00 p.m. and 12:00 a.m.



**A-7 PAGAN RESIDENCE**

101. PAGAN is a documented Hazard member and a drug dealer. On June 23, 2011, PAGAN arranged the sale of PCP to CHS-4. PAGAN was recorded in telephone calls with CHS-4 before the transaction arranging the transaction. J. GONZALEZ was also present for the transaction but referred the CHS-4 to PAGAN (calling him "Crook") for future arrangements.

102. PAGAN was also intercepted during the T-III investigation. For example, on November 22, 2011, PAGAN called A. Hernandez who said he had some "new ones" at "8" "each." A. HERNANDEZ said it was a Smith & Wesson .45 and a Ruger 9 and that they had two clips each. PAGAN asked if they came from "Griz" (referring to "Grizzly," one of Barrios' monikers). A. Hernandez said no, that Barrios would have charged him two "g's." A. Hernandez also said there was an AK available. PAGAN said he needed a handgun.

103. In addition, on March 1, 2013, HUERTA called PAGAN and asked if he wanted to get some meth ("bull" short for "buya"); he said "Tony" wanted a 40, so if PAGAN put in \$10, he would get a "five one" for PAGAN to just serve them "four little buyas off of that chunk." PAGAN asked when and HUERTA said that "he" was calling HUERTA right now saying "he" wanted it -- "said he wanted a four oh." HUERTA said that he (HUERTA) was in Highland Park and that PAGAN should go to "Injen" (SALAS) and give him an

extra \$10 for a 50 and give "him" four little dimes and they could keep the rest.

a. From my training and experience, I believe that in the above conversation, HUERTA was attempting to capitalize on his narcotics profits by breaking up a large piece of narcotics and packaging it up in smaller denominations.

104. Based on my training, experience, and knowledge of the investigation, I believe PAGAN is still involved in racketeering activity for the Hazard enterprise, likely including narcotics sales. His past (2000 conviction described below) and contemporary involvement with narcotics related offenses indicate a lengthy history with narcotics. In addition, during the investigation, PAGAN demonstrated a close relationship with J. Lizarraga, who is considered one of Hazard's high level narcotics suppliers. As I previously discussed, from my training and experience, I know that it takes time to develop the trust for these types of supplier contacts, and typically indicate that someone has been involved in narcotics for a lengthy period of time, and will likely continue with that livelihood. In addition, PAGAN RESIDENCE is in Hazard territory. Given PAGAN's known affiliation with the Hazard gang, it would be extremely unlikely that he would still be permitted to reside in Hazard territory if he were separated from Hazard. Therefore, I believe that there is probable cause

that evidence of the Target Offenses will be found in PAGAN RESIDENCE.

105. PAGAN's criminal history includes the following felonies:

a. 2000 conviction for H&S Section 11350(A) (Possession of Controlled Substance), for which he was sentenced to two years state prison.

b. 2005 conviction for PC Section 211 (Robbery), for which he was sentenced to four years state prison.

Indicia of Residence

106. On August 8, 2014, Officers from Hollenbeck Division cited and released PAGAN for not having current vehicle registration. PAGAN provided 1413 Murchison Street, Los Angeles, California 90033 (PAGAN RESIDENCE) as his address of residence. PAGAN was driving a 2011 black Volkswagen passat bearing license plate 6TCZ616, which was registered to PAGAN at PAGAN RESIDENCE.

107. On November 11, 2014, Officer Blanco from the Hollenbeck Parole Compliance Unit (PCU) observed PAGAN drive the above referenced vehicle into the driveway of PAGAN RESIDENCE.

108. On December 3, 2014, utilizing department resources, officers verified that PAGAN is still actively residing at PAGAN RESIDENCE. Officers from the LAPD's Hollenbeck Division have seen PAGAN numerous times in the past several weeks and have

observed him drive and park his car in the driveway belonging to PAGAN RESIDENCE.

**A-8 HERNANDEZ RESIDENCE**

109. CHS-11 and CHS-5 identified HERNANDEZ and HERNANDEZ RESIDENCE (in Hazard territory) as a drug source for Hazard members. According to CHS-11, HERNANDEZ sold everything (meth, heroin, cocaine, PCP) and was close to Doran. According to CHS-5, HERNANDEZ supplied drugs at a discount for Hazard members. On March 29, 2013, CHS-5 conducted a controlled buy with HERNANDEZ. Surveillance observed the CHS make contact with HERNANDEZ at HERNANDEZ RESIDENCE. Law enforcement then observed CHS-5 and HERNANDEZ walk to the rear of the apartment complex and enter the detached 2-car garage, though law enforcement did not see the actual exchange. The transaction was audio recorded and the CHS greeted HERNANDEZ as "Mr. Jose," which is HERNANDEZ's first name. Law enforcement searched the CHS before and after the transaction, and obtained half an ounce of methamphetamine from the source after the transaction.

110. HERNANDEZ's criminal history includes:

a. On April 13, 2012, HERNANDEZ was arrested for narcotics sales. This arrest occurred as a result of surveillance at the apartment complex for the HERNANDEZ RESIDENCE after an anonymous complaint regarding drug trafficking. During the surveillance, officers observed a hand

to hand narcotics transaction between HERNANDEZ and a narcotics customer. The narcotics transaction took place at 1611 Murchison Street (the street address for HERNANDEZ RESIDENCE). After the transaction, HERNANDEZ re-entered his apartment (#2). HERNANDEZ was convicted for narcotic sales as a result of this arrest, and was sentenced to 3 years felony probation.

111. Based on HERNANDEZ's continued involvement in drug trafficking, even after his prior conviction, his Hazard affiliation and continued residence in Hazard territory, and the apparent length of time of his narcotics trafficking activity, I believe that HERNANDEZ is still engaged in narcotics trafficking in support of the Hazard enterprise.

Indicia of Residence

112. On December 2, 2014, Officer Marmolejo conducted a probation compliance check at HERNANDEZ RESIDENCE, which is the address on file with probation for HERNANDEZ. Upon arriving at HERNANDEZ RESIDENCE, the door was opened by an individual who identified himself as HERNANDEZ's brother, "Fred." Fred then called out for "Jose" and Officer Marmolejo observed HERNANDEZ emerge from a back bedroom. Officer explained the purpose of the probation check and no further law enforcement action was taken.

**A-9 RUIZ RESIDENCE**

113. RUIZ is a documented Hazard member who was originally part of the RG Boys crew that was jumped in during the course of the investigation. On March 18, 2014, RUIZ participated in a controlled buy with CHS-5. Earlier in the day, RUIZ was recorded in a telephone call with the CHS, arranging to meet. CHS then met with RUIZ and purchased 6.6 grams of methamphetamine for \$240. Agents searched the CHS before and after the exchange and observed RUIZ walking away from the location immediately after the exchange.

114. To date, RUIZ does not have any felony convictions.

115. Based on my training, experience, and knowledge of this investigation, I believe that RUIZ is still participating in racketeering offenses. I believe this because I have no information that RUIZ has left the Hazard gang since March 2014, RUIZ continues to live in Hazard territory, and, given that RUIZ is a member of a younger cohort of Hazard, will be needing to commit crimes as missions to enhance his status in the gang.

Indicia of Residence

116. On November 17, 2014, law enforcement conducted surveillance at RUIZ RESIDENCE. During this surveillance, RUIZ was observed walking out of the front door of RUIZ RESIDENCE then accessed a rear door of the same residence. RUIZ RESIDENCE is in Hazard territory. In addition, from January 2011 to

September 2014, RUIZ was stopped on multiple occasions for gang-related inquiries, and on each of these occasions, he gave the address for RUIZ RESIDENCE as his address. In addition, RUIZ RESIDENCE is listed as RUIZ's address in the CA DMV database

**A-10 J. GONZALEZ RESIDENCE**

117. J. GONZALEZ is a documented Hazard member. J. GONZALEZ sold PCP to multiple CHS during this investigation. Furthermore, CHS information indicated that J.GONZALEZ sold PCP for, and at the direction of, PAGAN. One of the controlled buys involving J. GONZALEZ was summarized above in the PAGAN section. That transaction took place at J. GONZALEZ RESIDENCE. In addition, on June 9, 2011, CHS-6 conducted a controlled buy with J. GONZALEZ. J. GONZALEZ was recorded on a telephone call with CHS prior to the transaction. Law enforcement then saw J. GONZALEZ arrive at J. GONZALEZ RESIDENCE, where he met the CHS. Law enforcement searched the CHS before and after the transaction. CHS obtained a half vial of PCP for \$100 from J. GONZALEZ. The audio recording of J. GONZALEZ captured J. GONZALEZ advising that prices were going up because no one had it and that the person they were getting it from was supplying all of Los Angeles.

118. J. GONZALEZ continues to live in the same residence in Hazard territory. Given his affiliation with Hazard and other controlled substance traffickers for Hazard, and his multiple

prior controlled substance related convictions many years apart, I believe that J. GONZALEZ continues to traffic in controlled substances in Hazard territory, committing continued racketeering offenses, and that there is probable cause to believe that evidence of the Target Offenses will be found in J. GONZALEZ RESIDENCE.

119. J. GONZALEZ has multiple prior narcotics convictions.

a. May 7, 2008 conviction for violation of Health & Safety Code 11350(A) (Possession of Narcotics/Controlled Substance). J.GONZALEZ entered into a deferred entry judgment program.

b. December 6, 2011 conviction for H&S Section 11378.5 (Possession of PCP for Sale). J. GONZALEZ was sentenced to 3 years formal felony probation.

#### Indicia of Residence

120. On December 3, 2014, at approximately 11:30 pm Officer's Bueno and Salazar from the Hollenbeck Division conducted a ruse at J. GONZALEZ RESIDENCE. Officers knocked on the front door of J. GONZALEZ RESIDENCE under the ruse that they had received an emergency 911 call at the above mentioned address. Officer Bueno and Salazar were met at the front door by Juan Gonzalez Sr. and his son Ricardo Gonzalez. While talking to Gonzalez Sr., officers observed J. GONZALEZ appear from one of the rear rooms to the residence. Officers asked Gonzalez Sr.



who else lived at GONZALEZ RESIDENCE in order to verify that everyone was okay. Gonzalez Sr. told Officers that just him and his two sons, Ricardo and J. GONZALEZ, lived there with him. Officer Bueno stated that J. GONZALEZ appeared to have been woken up when he appeared from one of the back rooms.

**A-11 LOPEZ RESIDENCE and A-12 SUBJECT VEHICLE**

121. LOPEZ is a documented Cuatro Flats gang member. Based on information derived from intercepted communications over Jackson's line, as well as information from CHS-10, investigators know LOPEZ to be narcotics dealer who pays Jackson "tax" money generated from the sale of narcotics.

122. On January 5, 2012, LOPEZ was the driver of a motor vehicle (not the same vehicle for which this application is sought) when stopped by Officers Benitez and Contreras of the Montebello Police Department for erratic driving. Upon further investigation, Officer Benitez discovered \$1,085.00 U.S. currency on LOPEZ's person and 2 plastic baggies containing methamphetamine, which LOPEZ admitted was his, inside the driver's side door panel. Officer Contreras found a digital scale and two cellular telephones in the center console area of the vehicle. An additional search by Officer Contreras revealed a loaded Smith & Wesson .380 handgun found between the center console and driver's seat.

a. Based on my training and experience, I know drug dealers often carry items, such as those found on LOPEZ's person and vehicle (i.e. firearm, digital scale, cash, and several phones), to carry out the activities of their drug trafficking operations.

123. Subsequent to the arrest above, and on this same day, Officer Rodriguez, accompanied by other patrol units from the Montebello PD, responded to LOPEZ's prior residence in an attempt to conduct a "consent search" of his residence. When they knocked on the door, they were rudely met by an unknown female who refused to open the door unless the officers produced a search warrant. Since consent was not given, the officers departed the residence.

124. On April 29, 2013, law enforcement conducted a surveillance to monitor a meet between Jackson and LOPEZ. In the course of this surveillance, Los Angeles Sheriff's Department (LASD) Deputy Sanchez conducted a traffic stop on LOPEZ. During the traffic stop, LOPEZ admitted to being a member of the Cuatro Flats gang with the moniker "Beto." LOPEZ was also in possession of six cellular telephones.

a. Based on my training and experience, I know drug dealers often have multiple cellular telephones to thwart law enforcement and hide their illegal activities.

125. On December 1, 2014, law enforcement conducted surveillance of LOPEZ which they initiated at LOPEZ RESIDENCE. They first observed LOPEZ arrive at the LOPEZ RESIDENCE driving a black Toyota Camry with California license plate 6YOL886 (Registered Owner "Angelo O. Tan, 2546 Kansas Avenue, Apt. 101, Santa Monica, CA 90404" and herein after known as the SUBJECT VEHICLE) and park under a carport designated "#2." Approximately one hour later, LOPEZ (driver) and two unidentified passengers departed LOPEZ RESIDENCE in the SUBJECT VEHICLE. Law enforcement observed LOPEZ driving at a high rate of speed and making sudden lane changes without signaling. They also observed LOPEZ traveling at a slow rate of speed on the 10 freeway in open traffic, forcing cars to slow and drive around LOPEZ. LOPEZ then switched over four lanes and accelerated his vehicle to approximately 80 miles per hour. At the end of the surveillance, LOPEZ suddenly parked SUBJECT VEHICLE on Ramona Avenue (in the city of Monterey Park), turned off his headlights, and watched cars as they drove by.

a. Based on my training and experience, and the opinions of those conducting the surveillance, I believe LOPEZ was employing counter surveillance techniques in efforts to thwart and evade law enforcement. Furthermore, I believe this is behavior consistent with individuals engaging in drug trafficking activities.

126. Also during this same surveillance operation, law enforcement observed LOPEZ arrive to an empty parking lot located at 2834 Wabash Avenue in the city of Los Angeles. An unidentified male ("UM#1") exited SUBJECT VEHICLE, walked westbound on Wabash Avenue and met with another unidentified male ("UM#2") in front of 2828 Wabash Avenue. Both UM#1 and UM#2 walked back to LOPEZ and entered SUBJECT VEHICLE. LOPEZ, along with UM#1 and UM#2 inside, exited the lot and traveled a short distance eastbound on Wabash Avenue and parked curbside on Wabash Avenue, just east of Evergreen Avenue. UM#2 then exited the right rear passenger seat of SUBJECT VEHICLE causing the dome light to illuminate the interior of the vehicle. Law enforcement observed LOPEZ reach across to the passenger side and hand UM#1 a sandwich size plastic baggie containing an unknown substance. UM#1 took possession of the baggie and reached into his right front pant pocket and handed LOPEZ an unknown object. Law enforcement then saw LOPEZ looking down into his lap area, as if counting money. LOPEZ and UM#1 then shook hands and LOPEZ drove away in the SUBJECT VEHICLE at a high rate of speed.

a. Based on my training and experience, I believe the observations made by law enforcement were consistent with a narcotics transaction. Furthermore, based on LOPEZ's past history of secreting methamphetamine and firearms in his

vehicle, I believe evidence of the TARGET OFFENSES are maintained in LOPEZ RESIDENCE and SUBJECT VEHICLE.

127. LOPEZ's criminal history includes the following felonies:

a. 2007 conviction for transportation of narcotics while having a loaded firearm. LOPEZ was sentenced to 6 years state prison.

b. 2011 conviction for possession of narcotics for sales. LOPEZ was sentenced to 16 months state prison.

Indicia of Residence

128. On or about November 20, 2014, Special Agent Glenn Hotema of the FBI interviewed CHS-10 as to the whereabouts of LOPEZ. CHS-10 advised SA Hotema he knew where LOPEZ lived and would drive by to get the address. Later this day, CHS-10 informed SA Hotema s/he stopped by LOPEZ RESIDENCE and conversed with him. At this time, CHS-10 also identified the SUBJECT vehicle as belonging to LOPEZ.

129. During the surveillance on December 1, 2014, law enforcement began their surveillance at 3:45pm and terminated the surveillance at 9:46pm. Between the hours of 7:10 pm and 9:46pm, LOPEZ was observed arrived and departing LOPEZ RESIDENCE twice.

**A-13 NUNEZ RESIDENCE**

130. NUNEZ is a documented Gage Maravilla gang member who, during this investigation, was identified as a drug source for Alex Padilla (a defendant in the indictment but not a target subject in this affidavit). NUNEZ was also intercepted during the T-III investigation. For example, on September 13, 2012, Padilla called NUNEZ and said he needed to see him because he was "opening up a new pipeline" with some "new camaradas."

131. On September 25, 2012, CHS-5, at the direction of investigators, conducted an in-person meet with PADILLA during which the CHS discussed purchasing up to two ounces of methamphetamine from PADILLA in the near future. After the meet concluded, PADILLA was intercepted telling NUNEZ that he would need two ounces of methamphetamine by the following morning. On September 26, 2012, CHS-5 conducted a controlled buy with PADILLA after which investigators recovered 54.9 grams of actual methamphetamine. During the surveillance of the buy, investigators observed NUNEZ pick up PADILLA in his (NUNEZ's) vehicle, NUNEZ drive PADILLA to the buy location and drop him off, PADILLA re-enter NUNEZ's vehicle, and then NUNEZ drop off PADILLA where PADILLA's vehicle was parked.

132. On October 10, 2012, investigators executed a search warrant at 8940 True Ave, Pico Rivera, CA, NUNEZ's address at the time the search warrant was executed. NUNEZ was the only

occupant in the residence at the time of the search. During the search, investigators recovered two baggies, one containing 34 grams of actual methamphetamine and the other baggie containing 27.6 grams of actual methamphetamine. There were several other empty baggies on the floor next to the toilet which tested positive for methamphetamine. Additionally, Mongols gang paraphernalia was discovered inside of NUNEZ's garage.

133. Shortly after the search warrant was executed at NUNEZ's residence, LA County Probation Supervisor Steve Howell contacted me and provided me with additional information about NUNEZ. Howell mentioned that he recently conducted a probation check at a documented Mongols gang member's (not identified) residence. During the check, the Mongols gang member informed Howell that law enforcement had raided NUNEZ's residence and that NUNEZ was "big" and "everything went through him."

134. NUNEZ has prior felony convictions including:

- a. 1997 felony conviction for battery
- b. 2001 felony conviction for carrying a concealed weapon.

135. On December 2, 2014, investigators conducted surveillance of NUNEZ. During this surveillance, NUNEZ was observed entering a vehicle being driven by C.M. (the vehicle was registered to C.M.) along with another unidentified male (UM). Investigators observed all three occupants exit Medina's

vehicle and enter a building at 2432 Hunter Street, Los Angeles, CA. While conducting surveillance of the building, investigators observed approximately ten individuals enter and exit the building. One of these individuals, believed to be unrelated to C.M., NUNEZ, and the UM, went into the building empty handed. Approximately forty-five minutes after arriving at the building, investigators observed C.M., NUNEZ, and the UM exit the building with a black box. Investigators observed C.M. place a black object in the rear driver's side seat. C.M. then drove to NUNEZ RESIDENCE.

a. From my training and experience and knowledge of this investigation, I believe that the actions of C.M., NUNEZ, and UM were consistent with a narcotics transaction. I know that narcotics are sold in various quantities and that several ounces of narcotics can easily be concealed in the pockets of pants. Bases on wire intercepts of Padilla, I know that NUNEZ has access to multiple pound quantities of methamphetamine which would not be concealable in pants pockets but could be concealed in the black box that seen by surveillance. Additionally, I know that for narcotics purchases of larger quantities (i.e. multiple pounds); it is common for individuals to pool their money together so they can purchase a larger quantity of narcotics at a lower price. As such, it is possible that C.M.,



Nunez, and the UM all pooled their money together to purchase narcotics.

136. Based on wire intercepts, seizures, no information that NUNEZ has withdrawn from his gang, recent association with a known Mongols associate and surveillance observations of activity consistent with narcotics trafficking, I believe that NUNEZ is still engaged in narcotics trafficking and may be storing narcotics at his current address, just as he was when investigators conducted a search warrant at his previous address on True Ave and recovered 61.6 grams of actual methamphetamine.

Indicia of Residence

137. During the December 2, 2014 surveillance, investigators observed C.M. leave the building at 2432 Hunter Street, then back into a driveway at NUNEZ RESIDENCE. Less than a minute later, investigators observed C.M. exit the driveway and followed him to a residence in Whittier, CA. Investigators passed C.M's vehicle and did not observe any occupants in C.M's vehicle after C.M departed the Whittier address. At approximately 3:30 pm, Monterey Park police conducted a ruse and door knocked at NUNEZ RESIDENCE. NUNEZ came to the door and investigators confirmed NUNEZ's identity.

**IX. SEARCHING FOR TATTOOS**

138. As set forth above, I know that members and associates of Hazard and the Mexican Mafia commonly have tattoos to

represent their dedication to the criminal enterprise, to gain respect within the enterprise, and to intimate community members, in an effort to prevent them from cooperating with law enforcement or from otherwise impeding the goals of the criminal enterprise. Indeed law enforcement records I have reviewed in this case indicate that many of the defendants named in the RICO conspiracy (Count One of the Indictment) have been observed having tattoos evidencing membership in and association with the Hazard criminal enterprise. Exhibit 1 contains several examples of tattoos found on some of the Racketeering Defendants.

a. For example, in August 2013, law enforcement observed (and, at that time, photographed) tattoos of Jackson, including a black hand with the letter "m" on his neck, a "13" on his ear, and an Aztec shield on his chest, all of which I know indicate membership in and loyalty to the Mexican Mafia; additionally, Jackson had a "Hazard" tattoo on his stomach, and in May 2012, law enforcement observed (and, at that time, photographed) "Hazard" and "Grande" tattoos on Jackson's arms.

b. In September 2010, law enforcement observed (and, at that time photographed) tattoos of Johnson, including a "Hazard" tattoo on his back and "B" and "H" and "Ramona" and "Gardens" on his legs, right above his knees. A Facebook page associated with MIRANDA displays, in a 2013 posting, a

photograph of MIRANDA, while in state custody, showing a biohazard tattoo on his arm.

c. As additional examples, law enforcement also has documented and photographed tattoos of HUERTA (including "Hazard" and a biohazard symbol on his chest, a biohazard symbol on his arm, and "Hazard t1s," indicating his clique, on his back); AMEZCUA (including a biohazard symbol on his arm, a "BH" and "Tiny Dukes," indicating his clique, on his chest, and a display of the Ramona Gardens projects with a serpent on his torso); and M. Morales (including a biohazard symbol on his arm, numerous "BH" references on his arms, "Ramona Gardens" on his arm, "Hazard" on his back, and "BHR" and "Dirty Dogs," indicating his clique, on his chest and abdomen).

d. Additional reports I have reviewed indicate that law enforcement has observed Hazard criminal enterprise related tattoos on Barrios ("B" and "H" on arms and a biohazard symbol); defendant A. Hernandez ("RG" on arm); Doran ("BH" tattoo); defendant J. Lizarraga ("Hazard" on back); SANDOVAL ("Hazard" on chest); SALAS ("Hazard" on head); MONTES ("B" on torso, indicating tie to Burlington Locos, a sureño gang affiliated with the Hazard criminal enterprise, as alleged in the Indictment); LOPEZ ("Flats" on his torso, indicating tie to Cuatro Flats, a sureño gang affiliated with the Hazard criminal enterprise, as alleged in the Indictment); Martinez ("Hazard"

tattoos); PAGAN ("BH" on ear, "Hazard" on arm and neck); A. Morales (biohazard symbol on chest); Smith ("BH" on hand, "Big Hazard" on neck); and Rivera ("Flats" on leg, indicating tie to sureño gang).

139. Because (a) the reports and photographs I have reviewed are historical, and (b) I know that members and associates may have obtained additional tattoos since the time they were last observed by law enforcement (or have tattoos that have never been observed by law enforcement); and based on (c) my knowledge of the significance of gang tattoos as set forth above and (d) the probable cause finding by the Grand Jury that, as set forth in the Indictment, the Racketeering Defendants were members or associates of the Hazard criminal enterprise, and conspired to conduct the affairs of the Hazard criminal enterprise through a pattern of racketeering activity, I seek a warrant permitting law enforcement to search the bodies of the Racketeering Defendants for tattoos evidencing membership in or association with the Hazard criminal enterprise (to include the Hazard gang, the Mexican Mafia, and affiliated sureño gangs) as follows:

a. For male Racketeering Defendants, law enforcement may search for tattoos above the waist and below mid-thigh.

b. For RIVERA, the only female Racketeering Defendant, law enforcement may search for tattoos above the base of the neck, on the arms, up to the neck, and below mid-thigh.

**X. REQUEST FOR NIGHT SERVICE/NO KNOCK ENTRY**

140. The Affiant further requests that the Court authorize investigators, to include local law enforcement, including but not limited to LAPD and LAPD SWAT, to serve these warrants during the nighttime, as set forth under Fed. R. Crim. Proc. 41(e) (2) (A) (ii). Good cause exists because the above target locations are associated with individuals who are members of, or associates of, a violent criminal street gang with a history of reprisal against rivals, counter-surveillance against law enforcement, ongoing and repeated criminal activity, and firearms possession and trafficking. Given the holding set forth in Gooding v. United States, 416 U.S. 430 (1974) that there is no need for the presence of exigent circumstances in narcotics cases to justify a nighttime search, I believe that nighttime service is warranted in this case.

141. Additionally, in light of the evidence demonstrating the co-conspirators exercise disciplined, systematic procedures to elude detection by law enforcement and immediately alert other gang members when police presence is detected, as well as the resultant safety concerns invoked by the Target Subjects' security practices and extensive weapons possession/trafficking

operations, I am requesting authorization for a "no-knock entry" at the **TARGET LOCATIONS**.

142. Based on the evidence described above, I believe knocking and announcing entry would be dangerous to the agents serving the warrant and would also allow the destruction of evidence.

**XI. CONCLUSION**

143. Based on the facts set forth herein, I submit that probable cause exists to believe **TARGET SUBJECTS** have committed **TARGET OFFENSES**, and that evidence of violations of the **TARGET OFFENSES** will be found at or in the **TARGET LOCATIONS**.

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Lazaro I. Ortega, Task Force  
Officer, Los Angeles Police  
Department, Federal Bureau of  
Investigations

Subscribed to and sworn before  
me this \_\_\_\_ day of December,  
2014.

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THE HONORABLE VICTOR B. KENTON  
UNITED STATES MAGISTRATE JUDGE

Exhibit 1

















