

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES OF AMERICA**

**CRIMINAL COMPLAINT**

**v.**

**UNDER SEAL**

**MANUEL ESTRADA,**  
a/k/a "Arturo Soto"  
a/k/a "Manuel Esparza"  
a/k/a "Manny,"  
**and the defendants on the attached list**

CASE NUMBER:

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief. From in or about at least 1999, and continuing to the present, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants herein,

did knowingly and intentionally conspire with each other and with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a);

all in violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent with Immigration and Customs Enforcement ("ICE") and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

\_\_\_\_\_  
Signature of Complainant  
DANIEL NAGY  
Special Agent, Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

September 16, 2008 at Chicago, Illinois  
Date City and State

MICHAEL T. MASON, U.S. Magistrate Judge \_\_\_\_\_  
Name & Title of Judicial Officer Signature of Judicial Officer

1. **OSCAR BANDA** (“BANDA”), a/k/a “Marco Bermudez” a/k/a “Perro” a/k/a “Balin” a/k/a “El Perro Balin;”
2. **MARTHA ELIZABETH CAMPA RIVERO** (“CAMPA”), a/k/a “Martha Campa;”
3. **MIGUEL CASTANEDA GOMEZ** (“CASTANEDA”), a/k/a “Juan M. Casaneda” a/k/a “Miguel G. Castalleda” a/k/a “Miguel Castanetda” a/k/a “Miguel G. Castenada” a/k/a “Miguel G. Catasneda” a/k/a “Miguel C. Gomez” a/k/a “Miguel CA Gomez” a/k/a “Pitufu;”
4. **ANDRES CHIQUIN** (“CHIQUIN”), a/k/a “Luis M. Castro” a/k/a “Andres Chiquini” a/k/a “Andres Chiqini” a/k/a “Andres Chiquinis” a/k/a “Omar Torres” a/k/a “Manuel Castro” a/k/a “Pelon;”
5. **VERONICA GARCIA ARANA** (“GARCIA”), a/k/a “Betty;”
6. **GERARDO GUZMAN MARTINEZ** (“GUZMAN”), a/k/a “Chilango” a/k/a “Ricardo Cedillo” a/k/a “Rene Pezano” a/k/a “Ricardo Martinez” a/k/a “Geraldo Guzman Martinez” a/k/a “Geraldo Guzman” a/k/a “Rijoberto Salveda;”
7. **CLAUDIA LARA** (“LARA”);
8. **MANUEL LOPEZ PEREZ** (“LOPEZ”), a/k/a “Manuel Lopez” a/k/a “Manuel’s Father;”
9. **ULYSES MARTINEZ** (“MARTINEZ”), a/k/a “Ulises Martinez” a/k/a “Uliss Martinez” a/k/a “Cuauhtemoc Martinez” a/k/a “Cuauhtemoc U. Martinez” a/k/a “Cuauhemoc U. Martinez” a/k/a “Cuauhemoc Martinez” a/k/a “Cuahtemo Martinez” a/k/a “Ramon Figueroa” a/k/a “Pedro Alvarez” a/k/a “Cuaderno;”
10. **HECTOR MEDINA** (“MEDINA”), a/k/a “Primo;”
11. **CAMILO MENDEZ** (“MENDEZ”), a/k/a “Camilo Mendez Rodriguez” a/k/a “Camilo;”
12. **JORGE ABEL MIRANDA** (“MIRANDA”), a/k/a “Jorge Miranda” a/k/a “Tellet” a/k/a “Payaso” a/k/a “Travieso;”
13. **ELIAS TRINIDAD MUNOZ** (“MUNOZ”), a/k/a “Blue” a/k/a “Azul;”
14. **HORACIO NEVAREZ ARRELLANO** (“NEVAREZ”), a/k/a “Hector Flores” a/k/a “Hector Martinez” a/k/a “Saul Solono” a/k/a “Saul A Solano” a/k/a “Saul Solano” a/k/a “Saul S. Arellano” a/k/a “Horatio Narvarez” a/k/a “Horatio Arellano” a/k/a “Horacio Arellano” a/k/a “Arellano Nevarez” a/k/a “Horacio A. Nevarez” a/k/a “Hoaracio Nevarez” a/k/a “Raul Soliz” a/k/a “Raul S.Soliz” a/k/a “Nevarez Arellano” a/k/a “Jose G. Solis” a/k/a “Jose Aguirre” a/k/a “Jose A Solano” a/k/a “Horatio Arrellano” a/k/a “Horatio Arellano” a/k/a “Horatio A Navarez” a/k/a “Horacio Nevarez-Mendoza” a/k/a “Horacio Nevarez-Arellano” a/k/a “Horacio Nevarez-Arelando” a/k/a “Horacio N. Arrellano” a/k/a “Horacio Hevarez” a/k/a “Horacio Arrellano” a/k/a “Horacie Nevarez” a/k/a “Hernandez Alfredo Sollis” a/k/a “Arrellano Nevarez” a/k/a “Arellano Nevarez” a/k/a “Arellano H. Nevarez” a/k/a “Antonio Arellano” a/k/a “Alfredo L. Solano” a/k/a “Saul Solano” a/k/a “Tattoos” a/k/a “Tattoo;”
15. **JOSE LUIS PEREZ** (“PEREZ”), a/k/a “Luis Rojas” a/k/a “Jose N. Rodriguez” a/k/a “Jose L. Rodriguez” a/k/a “Jose L. Perez” a/k/a “Pantufu;”
16. **MARCOS PEREZ CONTRERAS** (“PEREZ-CONTRERAS”), a/k/a “Marcos Perez” a/k/a “Marcos Perez Contereras” a/k/a “Ernesto Flores” a/k/a “Ernesto Alva” a/k/a “Pajaro;”
17. **CARLOS SIORDIA** (“SIORDIA”), a/k/a “Fernando Csiordia” a/k/a “Fernando C. Siordia” a/k/a “Rojo;”
18. **JOSE TEXCA COCONE** (“TEXCA”), a/k/a “Angel Linares” a/k/a “Abraham Texca” a/k/a “Jose Texca” a/k/a “Jose Txca” a/k/a “Angel Torres” a/k/a “Brody;” and
19. **HUMBERTO TREJO** (“TREJO”), a/k/a “Chamaco”



STATE OF ILLINOIS    }  
                                  }  
COUNTY OF COOK       }

**AFFIDAVIT**

I, Daniel Nagy, being duly sworn on oath, depose and state as follows:

**PRELIMINARY MATTERS**

1. 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, and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been employed as a Special Agent (“SA”) with United States Immigration and Customs Enforcement (“ICE”) since approximately February 2006. I have a Bachelor’s degree in Business Management from the University of Denver, Denver, Colorado. I am a graduate of the Federal Law Enforcement Training Center, Glynco, Georgia. In connection with my official duties as a SA with ICE, I investigate criminal violations of the federal immigration laws, including but not limited to, Title 8, United States Code, Sections 1324, 1325, and 1326, and Title 18, United States Code, Sections 1028 and 1546. I have participated in criminal investigations involving the manufacture and distribution of fraudulent immigration documents, driver’s licenses, and other identification documents. I have participated in criminal investigations involving undercover transactions, the execution of search warrants, the review of consensually recorded conversations, and various types of physical and electronic surveillance.

3. I have received specialized training in the enforcement of laws concerning the production and distribution of fraudulent identification documents. I am familiar with the methods in which fraudulent document vendors conduct their businesses, including but not limited to, their methods of manufacturing and distributing fraudulent documents, their use of telephones and digital display paging devices, and their use of numerical codes and code words to conduct their transactions.

4. This affidavit and the complaint and affidavit in *United States v. Jaime Solis*, 08 CR 726 (“Solis complaint affidavit”), which is incorporated by reference in this affidavit, are submitted in support of a criminal complaint and applications for warrants to arrest the following individuals for knowingly and intentionally conspiring with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a); all in violation of Title 18, United States Code, Section 371:

a. **MANUEL ESTRADA** (“ESTRADA”), a/k/a “Arturo Soto” a/k/a “Manuel Esparza” a/k/a “Manny;”

- b. **OSCAR BANDA** (“BANDA”), a/k/a “Marco Bermudez” a/k/a “Perro” a/k/a “Balin” a/k/a “El Perro Balin;”
- c. **MARTHA ELIZABETH CAMPA RIVERO** (“CAMPA”), a/k/a “Martha Campa;”
- d. **MIGUEL CASTANEDA GOMEZ** (“CASTANEDA”), a/k/a “Juan M. Casaneda” a/k/a “Miguel G. Castalleda” a/k/a “Miguel Castanetda” a/k/a “Miguel G. Castenada” a/k/a “Miguel G. Catasneda” a/k/a “Miguel C. Gomez” a/k/a “Miguel CA Gomez” a/k/a “Pitufo;”
- e. **ANDRES CHIQUIN** (“CHIQUIN”), a/k/a “Luis M. Castro” a/k/a “Andres Chiquini” a/k/a “Andres Chiqini” a/k/a “Andres Chiquinis” a/k/a “Omar Torres” a/k/a “Manuel Castro” a/k/a “Pelon;”
- f. **VERONICA GARCIA ARANA** (“GARCIA”), a/k/a “Betty;”
- g. **GERARDO GUZMAN MARTINEZ** (“GUZMAN”), a/k/a “Chilango” a/k/a “Ricardo Cedillo” a/k/a “Rene Pezano” a/k/a “Ricardo Martinez” a/k/a “Geraldo Guzman Martinez” a/k/a “Geraldo Guzman” a/k/a “Rijoberto Salveda;”
- h. **CLAUDIA LARA** (“LARA”);
- i. **MANUEL LOPEZ PEREZ** (“LOPEZ”), a/k/a “Manuel Lopez” a/k/a “Manuel’s Father;”
- j. **ULYSES MARTINEZ** (“MARTINEZ”), a/k/a “Ulises Martinez” a/k/a “Uliss Martinez” a/k/a “Cuauhtemoc Martinez” a/k/a “Cuauhtemoc U. Martinez”

a/k/a “Cuauhemoc U. Martinez” a/k/a “Cuauhemoc Martinez” a/k/a “Cuahtemo Martinez” a/k/a “Ramon Figueroa” a/k/a “Pedro Alvarez” a/k/a “Cuaderno;”

k. **HECTOR MEDINA** (“MEDINA”), a/k/a “Primo;”

l. **CAMILO MENDEZ** (“MENDEZ”), a/k/a “Camilo Mendez Rodriguez” a/k/a “Camilo;”

m. **JORGE ABEL MIRANDA** (“MIRANDA”), a/k/a “Jorge Miranda” a/k/a “Tellet” a/k/a “Payaso” a/k/a “Travieso;”

n. **ELIAS TRINIDAD MUNOZ** (“MUNOZ”), a/k/a “Blue” a/k/a “Azul;”

o. **HORACIO NEVAREZ ARELLANO** (“NEVAREZ”), a/k/a “Hector Flores” a/k/a “Hector Martinez” a/k/a “Saul Solono” a/k/a “Saul A Solano” a/k/a “Saul Solano” a/k/a “Saul S. Arellano” a/k/a “Horatio Narvarez” a/k/a “Horatio Arellano” a/k/a “Horacio Arellano” a/k/a “Arellano Nevarez” a/k/a “Horacio A. Nevarez” a/k/a “Hoaracio Nevarez” a/k/a “Raul Soliz” a/k/a “Raul S.Soliz” a/k/a “Nevarez Arellano” a/k/a “Jose G. Solis” a/k/a “Jose Aguirre” a/k/a “Jose A Solano” a/k/a “Horatio Arrellano” a/k/a “Horatio Arellano” a/k/a “Horatio A Navarez” a/k/a “Horacio Nevarez-Mendoza” a/k/a “Horacio Nevarez-Arellano” a/k/a “Horacio Nevarez-Arelano” a/k/a “Horacio N. Arrellano” a/k/a “Horacio Hevarez” a/k/a “Horacio Arrellano” a/k/a “Horacie Nevarez” a/k/a “Hernandez Alfredo Sollis” a/k/a “Arrellano Nevarez” a/k/a “Arellano Nevarez” a/k/a “Arellano H. Nevarez” a/k/a “Antonio Arellano” a/k/a “Alfredo L. Solano” a/k/a “Saul Solano” a/k/a “Tattoos” a/k/a “Tattoo;”

p. **JOSE LUIS PEREZ** (“PEREZ”), a/k/a “Luis Rojas” a/k/a “Jose N. Rodriguez” a/k/a “Jose L. Rodriguez” a/k/a “Jose L. Perez” a/k/a “Pantuflla;”

q. **MARCOS PEREZ CONTRERAS** (“PEREZ-CONTRERAS”), a/k/a “Marcos Perez” a/k/a “Marcos Perez Contereras” a/k/a “Ernesto Flores” a/k/a “Ernesto Alva” a/k/a “Pajaro;”

r. **CARLOS SIORDIA** (“SIORDIA”), a/k/a “Fernando Csiordia” a/k/a “Fernando C. Siordia” a/k/a “Rojo;”

s. **JOSE TEXCA COCONE** (“TEXCA”), a/k/a “Angel Linares” a/k/a “Abraham Texca” a/k/a “Jose Texca” a/k/a “Jose Txca” a/k/a “Angel Torres” a/k/a “Brody;” and

t. **HUMBERTO TREJO** (“TREJO”), a/k/a “Chamaco.”

5. This affidavit also is submitted in support of applications for warrants to search the following locations (“the Subject Premises”):

a. **Office:** 2456 South Homan Avenue, Chicago, Illinois;

b. **Residence of JAIME SOLIS a/k/a “JAROCHO”:** 3034 South Karlov Avenue, Chicago, Illinois;<sup>1</sup>

c. **Residence of MANUEL ESTRADA a/k/a “MANNY”:** 4057 South

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<sup>1</sup> As detailed in the SOLIS complaint affidavit, JAIME SOLIS has been a member of the St. Lous Crew for several years. SOLIS previously worked as a runner and manufacturer for the Organization. In early 2006, SOLIS became a mid-level supervisor for the Organization, reporting directly to MANUEL ESTRADA.

Albany, Chicago, Illinois;

d. **FOTO STUDIO REYES:** 2542 South Christiana Avenue, Chicago, Illinois; and

e. **FOTO DAVILA INC:** 3604 West 26th Street, Chicago, Illinois.

6. Because this affidavit is being submitted for the limited purpose of obtaining federal arrest warrants and search warrants for the individuals and locations described above, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to obtain arrest and search warrants.

7. For approximately four years, ICE, with the assistance of the Federal Bureau of Investigation (“FBI”), United States Secret Service (“USSS”), Diplomatic Security Service (“DSS”), and Chicago Police Department (“CPD”), has been investigating a criminal fraudulent document vending organization (hereinafter the “Organization”) operating in the “Little Village” area of Chicago, along 26th Street between Albany and Avers. The Organization produces and sells fraudulent identification documents, including resident alien cards (“green cards” or “micas”), social security account number cards (“social security cards”), driver’s licenses, and state identification cards.

8. This affidavit is based on my own investigation, as well as on information that I have learned through communications with other federal, state and local law

enforcement personnel. The information contained in this affidavit also includes, among other things: (a) information provided by confidential informants and sources of information; (b) reports made by law enforcement officers with CPD, and Special Agents and Task Force Officers of ICE, FBI, USSS, and DSS; (c) consensually-recorded conversations; (d) undercover purchases of fraudulent identification documents by cooperating individuals and undercover law enforcement officers; (e) telephone toll records; (f) pen register and trap and trace records; (g) conversations recorded pursuant to Title III Court authorization; and (h) seizures of currency, computers, fraudulent documents, and other fraudulent document implements.

9. On the basis of all of this information, which I have reviewed and believe to be reliable, I submit that the facts contained in this affidavit establish probable cause to believe that from in or about at least 1998, and continuing to the present, in the Northern District of Illinois, Eastern Division, and elsewhere, the following individuals:

**MANUEL ESTRADA** (“ESTRADA”), a/k/a “Arturo Soto” a/k/a “Manuel Esparza” a/k/a “Manny;”

**OSCAR BANDA** (“BANDA”), a/k/a “Marco Bermudez” a/k/a “Perro” a/k/a “Balin” a/k/a “El Perro Balin;”

**MARTHA ELIZABETH CAMPA RIVERO** (“CAMPA”), a/k/a “Martha Campa;”

**MIGUEL CASTANEDA GOMEZ** (“CASTANEDA”), a/k/a “Juan M. Casaneda” a/k/a “Miguel G. Castalleda” a/k/a “Miguel Castanetda” a/k/a “Miguel G. Castenada” a/k/a “Miguel G. Catasneda” a/k/a “Miguel C. Gomez” a/k/a “Miguel CA Gomez” a/k/a “Pitufo;”

**ANDRES CHIQUIN** (“CHIQUIN”), a/k/a “Luis M. Castro” a/k/a “Andres Chiquini” a/k/a “Andres Chiqini” a/k/a “Andres Chiquinis” a/k/a “Omar Torres” a/k/a “Manuel Castro” a/k/a “Pelon;”

**VERONICA GARCIA ARANA** (“GARCIA”), a/k/a “Betty;”

**GERARDO GUZMAN MARTINEZ** (“GUZMAN”), a/k/a “Chilango” a/k/a “Ricardo Cedillo” a/k/a “Rene Pezano” a/k/a “Ricardo Martinez” a/k/a “Geraldo Guzman Martinez” a/k/a “Geraldo Guzman” a/k/a “Rijoberto Salveda;”

**CLAUDIA LARA** (“LARA”);

**MANUEL LOPEZ PEREZ** (“LOPEZ”), a/k/a “Manuel Lopez;”

**ULYSES MARTINEZ** (“MARTINEZ”), a/k/a “Ulises Martinez” a/k/a “Uliss Martinez” a/k/a “Cuauhtemoc Martinez” a/k/a “Cuauhtemoc U. Martinez” a/k/a “Cuauhemoc U. Martinez” a/k/a “Cuauhemoc Martinez” a/k/a “Cuahtemo Martinez” a/k/a “Ramon Figueroa” a/k/a “Pedro Alvarez” a/k/a “Cuaderno;”

**HECTOR MEDINA** (“MEDINA”), a/k/a “Primo;”

**CAMILO MENDEZ** (“MENDEZ”), a/k/a “Camilo Mendez Trejo” a/k/a “Camilo;”

**JORGE ABEL MIRANDA** (“MIRANDA”), a/k/a “Jorge Miranda” a/k/a “Tellet” a/k/a “Payaso” a/k/a “Travieso;”

**ELIAS TRINIDAD MUNOZ** (“MUNOZ”), a/k/a “Blue” a/k/a “Azul;”

**HORACIO NEVAREZ ARRELLANO** (“NEVAREZ”), a/k/a “Hector Flores” a/k/a “Hector Martinez” a/k/a “Saul Solono” a/k/a “Saul A. Solano” a/k/a “Saul Solano” a/k/a “Saul S. Arellano” a/k/a “Horatio Narvarez” a/k/a “Horatio Arellano” a/k/a “Horacio Arellano” a/k/a “Arellano Nevarez” a/k/a “Horacio A Nevarez” a/k/a “Hoaracio Nevarez” a/k/a “Raul Soliz” a/k/a “Raul S. Soliz” a/k/a “Nevarez Arellano” a/k/a “Jose G. Solis” a/k/a “Jose Aguirre” a/k/a “Jose A.Solano;” a/k/a “Horatio Arrellano” a/k/a “Horatio Arellano” a/k/a “Horatio A. Navarez” a/k/a “Horacio Nevarez-Mendoza” a/k/a “Horacio Nevarez-Arellano” a/k/a “Horacio Nevarez-Arelano” a/k/a “Horacio N. Arrellano” a/k/a “Horacio Hevarez” a/k/a “Horacio Arrellano” a/k/a “Horacie Nevarez” a/k/a “Hernandez Alfredo Sollis” a/k/a “Arrellano Nevarez” a/k/a “Arellano Nevarez” a/k/a “Arellano H Nevarez” a/k/a “Antonio Arellano” a/k/a “Alfredo L Solano” a/k/a “Saul Solano” a/k/a “Tattoos” a/k/a “Tattoo;”

**JOSE LUIS PEREZ** (“PEREZ”), a/k/a “Luis Rojas” a/k/a “Jose N. Rodriguez” a/k/a “Jose L. Rodriguez” a/k/a “Jose L. Perez” a/k/a “Pantufila;”

**MARCOS PEREZ CONTRERAS** (“PEREZ-CONTRERAS”), a/k/a “Marcos Perez” a/k/a “Marcos Perez Contereras” a/k/a “Ernesto Flores” a/k/a “Ernesto Alva;” a/k/a “Pajaro;”

**CARLOS SIORDIA** (“SIORDIA”), a/k/a “Fernando Csiordia” a/k/a “Fernando C. Siordia” a/k/a “Rojo;”

**JOSE TEXCA COCONE** (“TEXCA”), a/k/a “Angel Linares” a/k/a “Abraham Texca” a/k/a “Jose Texca” a/k/a “Jose Txca” a/k/a “Angel Torres” a/k/a “Brody;” and

**HUMBERTO TREJO** (“TREJO”), a/k/a “Chamaco;”

defendants herein, did knowingly and intentionally conspire with each other, and with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a); all in violation of Title 18, United States Code, Section 371.

10. Through my training and experience and discussions with other experienced law enforcement officers, I am familiar with the methods and operations of manufacturing and marketing fraudulent identification documents. I know that such fraudulent document vendors regularly keep the following items at places within their control, including their residences, for extended periods of time:

- a. Blank identification documents;
- b. Cutting supplies and packaging;
- c. Cash from the sale of false documents;
- d. Records of sales, including ledgers and tally sheets;
- e. Communications equipment such as cell phones and pagers;
- f. Manufacturing equipment such as computers, scanners, printers,

laminates, identification foil, paper cutters, corner cutters, card stock paper, plastic identification cards, security foil; and

- g. Financial information and statements, books, records, receipts, cash disbursement journals, computers, discs, software, safe deposit box keys, bank statements, tax returns and other records related to the receipt, expenditure and concealment or other disposition of income.

11. Moreover, it has been my experience, and the experience of other law enforcement officers with whom I have consulted, that fraudulent identification document vendors associated with organizations which distribute the vast quantities of fraudulent identification documents involved in this case must invariably keep records and ledgers in order to keep track of identification document disbursements and money collections.

#### **INDEX OF REFERENCES TO VARIOUS DEFENDANTS**

12. The following is a list of those individuals in the criminal complaint and

for whom arrest warrants are sought and the locations for which search warrants are sought, along with the specific paragraphs of this affidavit relating to those individuals:

<b><i>DEFENDANT</i></b>	<b><i>PARAGRAPHS</i></b>
<b>MANUEL ESTRADA</b> (“ESTRADA”), a/k/a “Arturo Soto” a/k/a “Manuel Esparza” a/k/a “Manny”	21, 23, 26(e)(i), 27(c), 30-53, 55(g), 55(m), 56, 66, 67, 72-75, 81(a), 82(d)-(f), 83-85, 103-04, 124, 141(c), 141(f), 141(g), 165-68, 170-73, 175
<b>OSCAR BANDA</b> (“BANDA”), a/k/a “Marco Bermudez” a/k/a “Perro” a/k/a “Balin” a/k/a “El Perro Balin”	26(e)(ii), 52-58
<b>MARTHA ELIZABETH CAMPA RIVERO</b> (“CAMPA”), a/k/a “Martha Campa”	26(e)(iii), 40, 51, 56-58
<b>MIGUEL CASTANEDA GOMEZ</b> (“CASTANEDA”), a/k/a “Juan M. Casaneda” a/k/a “Miguel G. Castalleda” a/k/a “Miguel Castanetda” a/k/a “Miguel G. Castenada” a/k/a “Miguel G. Catasneda” a/k/a “Miguel C. Gomez” a/k/a “Miguel CA Gomez” a/k/a “Pitufo”	26(e)(iv), 59-62
<b>ANDRES CHIQUIN</b> (“CHIQUIN”), a/k/a “Luis M. Castro” a/k/a “Andres Chiquini” a/k/a “Andres Chiqini” a/k/a “Andres Chiquinis” a/k/a “Omar Torres” a/k/a “Manuel Castro” a/k/a “Pelon”	26(e)(v), 48, 63-65, 89, 124
<b>VERONICA GARCIA ARANA</b> (“GARCIA”), a/k/a “Betty”	26(e)(vi), 60-71, 147, 151(c), 151(f)-(k), 153
<b>GERARDO GUZMAN MARTINEZ</b> (“GUZMAN”), a/k/a “Chilango” a/k/a “Ricardo Cedillo” a/k/a “Rene Pezano” a/k/a “Ricardo Martinez” a/k/a “Geraldo Guzman Martinez” a/k/a “Geraldo Guzman” a/k/a “Rijoberto Salveda”	26(e)(vii), 37, 38, 72-76

<b><i>DEFENDANT</i></b>	<b><i>PARAGRAPHS</i></b>
<b>CLAUDIA LARA (“LARA”)</b>	26(e)(viii), 40, 45, 77-80
<b>MANUEL LOPEZ PEREZ (“LOPEZ”), a/k/a “Manuel Lopez”</b>	26(e)(ix), 27(c), 47, 55, 81-84, 141(g), 168, 171, 173, 176
<b>ULYSES MARTINEZ (“MARTINEZ”), a/k/a “Ulises Martinez” a/k/a “Uliss Martinez” a/k/a “Cuauhtemoc Martinez” a/k/a “Cuauhtemoc U. Martinez” a/k/a “Cuauhemoc U. Martinez” a/k/a “Cuauhemoc Martinez” a/k/a “Cuahtemo Martinez” a/k/a “Ramon Figueroa” a/k/a “Pedro Alvarez” a/k/a “Cuaderno”</b>	26(e)(x), 41, 43, 85-90
<b>HECTOR MEDINA (“MEDINA”), a/k/a “Primo”</b>	26(e)(xi), 91-94
<b>CAMILO MENDEZ (“MENDEZ”), a/k/a “Camilo Mendez Rodriguez” a/k/a “Camilo”</b>	26(e)(xii), 95-102
<b>JORGE ABEL MIRANDA (“MIRANDA”), a/k/a “Jorge Miranda” a/k/a “Tellet” a/k/a “Payaso” a/k/a “Travieso”</b>	26(e)(xiii), 39, 49, 89, 101(d), 103-08, 126, 134, 152
<b>ELIAS TRINIDAD MUNOZ (“MUNOZ”), a/k/a “Blue” a/k/a “Azul”</b>	26(e)(xiv), 107(a), 109-113
<b>HORACIO NEVAREZ ARELLANO (“NEVAREZ”), a/k/a “Hector Flores” a/k/a “Hector Martinez” a/k/a “Saul Solono” a/k/a “Saul A. Solano” a/k/a “Saul Solano” a/k/a “Saul S. Arellano” a/k/a “Horatio Narvarez” a/k/a “Horatio Arellano” a/k/a “Horacio Arellano” a/k/a “Arellano Nevarez” a/k/a “Horacio A. Nevarez” a/k/a “Hoaracio Nevarez” a/k/a “Raul Soliz” a/k/a “Raul S. Soliz” a/k/a “Nevarez Arellano” a/k/a “Jose G Solis” a/k/a “Jose Aguirre” a/k/a “Jose A. Solano” a/k/a “Horatio Arrellano” a/k/a “Horatio Arellano” a/k/a “Horatio A Navarez” a/k/a “Horacio Nevarez-Mendoza” a/k/a “Horacio Nevarez-Arellano” a/k/a “Horacio Nevarez-Arelano” a/k/a “Horacio N. Arrellano” a/k/a “Horacio Hevarez” a/k/a “Horacio Arrellano” a/k/a “Horacie Nevarez” a/k/a “Hernandez Alfredo Sollis”</b>	26(e)(xv), 114-117, 134

<b><u>DEFENDANT</u></b>	<b><u>PARAGRAPHS</u></b>
a/k/a "Arrellano Nevarez" a/k/a "Arellano Nevarez" a/k/a "Arellano H. Nevarez" a/k/a "Antonio Arellano" a/k/a "Alfredo L. Solano" a/k/a "Saul Solano" a/k/a "Tattoos" a/k/a "Tattoo"	
<b>JOSE LUIS PEREZ</b> ("PEREZ"), a/k/a "Luis Rojas" a/k/a "Jose N. Rodriguez" a/k/a "Jose L. Rodriguez" a/k/a "Jose L. Perez" a/k/a "Pantufla"	26(e)(xvi), 94, 118-123
<b>MARCOS PEREZ CONTRERAS</b> ("PEREZ- CONTRERAS"), a/k/a "Marcos Perez" a/k/a "Marcos Perez Contereras" a/k/a "Ernesto Flores" a/k/a "Ernesto Alva" a/k/a "Pajaro"	26(e)(xvii), 36, 98, 101, 124-133
<b>CARLOS SIORDIA</b> ("SIORDIA"), a/k/a "Fernando Csiordia" a/k/a Fernando C. Siordia" a/k/a "Rojo"	26(e)(xviii), 134-138
<b>JOSE TEXCA COCONE</b> ("TEXCA"), a/k/a "Angel Linares" a/k/a "Abraham Texca" a/k/a "Jose Texca" a/k/a "Jose Txca" a/k/a "Angel Torres" a/k/a "Brody"	26(e)(xix), 47, 80, 81(a), 139-141
<b>HUMBERTO TREJO</b> ("TREJO"), a/k/a "Chamaco"	26(e)(xx), 54, 79(h), 101(d), 142-147
<b><u>LOCATION</u></b>	<b><u>PARAGRAPHS</u></b>
<b>The Office:</b> 2456 South Homan Ave.	27(a), 54, 68, 94, 148- 153
<b>Residence of JAMIE SOLIS, a/k/a "JAROCHO:"</b> 3034 South Karlov Avenue, Chicago, Illinois.	27(b), 154-162
<b>Residence of MANUEL ESTRADA, a/k/a</b> <b>"MANNY:"</b> 4057 South Albany, Chicago, Illinois	27(c), 163-176
<b>FOTO STUDIO REYES:</b> 2542 South Christiana Avenue, Chicago, Illinois.	27(d), 64(b), 122(c), 130, 145(c), 146(c), 177- 179
<b>FOTO DAVILA INC:</b> 3604 West 26th Street, Chicago, Illinois	27(e), 86(b), 114(b), 115(b), 180-182

CW2

13. On about September 6, 2006, ICE registered as a confidential witness ("CW2") an individual who had sold fraudulent identification documents near 26th Street and California Avenue, in Chicago, Illinois, for the Organization beginning in 1998. CW2 provided detailed information about the members and functioning of the Organization. CW2's information has been corroborated through surveillance, public records, consensual recordings, and other information.

14. CW2 has multiple arrests for advertisement and promotion of fraudulent identification documents and disorderly conduct, including the following: On about June 16, 1997, CW2 was arrested by CPD for disorderly conduct. On about July 29, 1997, the charge was stricken from the docket. On about July 18, 1997, CW2 was arrested by CPD for disorderly conduct. On about August 29, 1997, the charge was stricken from the docket. On about August 2, 1997, CW2 was arrested by CPD for disorderly conduct. On about September 9, 1997, the charge was stricken from the docket. On about December 2, 1997, CW2 was arrested by CPD for disorderly conduct. On about January 9, 1998, the charge was stricken from the docket. On about December 3, 1997, CW2 was arrested by CPD for criminal trespass to land. On about December 31, 1997, the charge was stricken from the docket. On about July 14, 1998, CW2 was arrested by CPD for disorderly conduct. The disposition of the charge is unknown. On about May 13, 2006, CW2 was arrested by CPD for displaying/promoting

fraudulent identification. On about June 29, 2006, the charge was stricken from the docket. On about September 24, 2006, CW2 was arrested by CPD for displaying/promoting fraudulent identification. On about November 21, 2006, the charge was stricken from the docket.

15. CW2 assisted ICE in this ongoing criminal investigation in exchange for parole status in the United States. As of today's date, Subject Phone CW2 has received \$1500 compensation in exchange for his/her cooperation in the investigation. The government authorized Subject Phone CW2 to participate in illegally soliciting and selling fraudulent identification documents in conjunction with this criminal investigation only at the direction and authorization of the government and for the sole purpose of furthering this criminal investigation. ICE advised Subject Phone CW2 that his/her cooperation with the government will not protect him/her from prosecution if he/she engages in criminal activity not authorized by ICE and/or the United States Attorney's Office. ICE also advised Subject Phone CW2 that he/she may face criminal charges for illegally soliciting and selling fraudulent identification documents before he/she began cooperating with the government. On about May 22, 2007, Subject Phone CW2 was processed for removal and was subsequently deported from the United States to Mexico.

16. Pursuant to Subject Phone CW2's consent and court orders signed by the Chief Judge or an acting chief judge in the Northern District of Illinois, telephone calls

occurring to and from the telephone used by Subject Phone CW2 ("Subject Phone CW2") were intercepted from about March 5, 2007, through about May 22, 2007.

CW3

17. On about January 17, 2008, ICE met with CW3, who has sold fraudulent identification documents near 26th and California for the Organization since about 1998. CW3 provided detailed information about the members and functioning of the Organization. CW3's information has been corroborated through surveillance, public records, consensual recordings, and other information.

18. CW3 has multiple arrests for advertisement and promotion of fraudulent identification documents, possession of narcotics, theft, and traffics violations, including the following convictions: On about October 3, 2004, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On about December 13, 2004, CW3 was convicted of the charge and sentenced to two years' probation. On about November 17, 2004, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On about January 18, 2005, CW3 was convicted of the charge and sentenced to one year probation. On about May 27, 2006, CW3 was arrested by CPD for attempted possession of less than fifteen grams of heroin. On about June 19, 2006, CW3 was convicted of the charge and sentenced to one day imprisonment. On about June 3, 2006, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On about June 29, 2006, CW3 was convicted of the charge and

sentenced to two days' imprisonment. On about October 28, 2007, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On about December 20, 2007, CW3 was convicted of the charge and sentenced to twenty days' imprisonment.

19. CW3 is assisting ICE in this ongoing criminal investigation in the hopes of eventually obtaining lawful permanent resident status in the United States. ICE has granted CW3 a temporary stay of deportation from a January 6, 2008, final order of removal. As of today's date, CW3 has received \$500 compensation in exchange for his/her cooperation in the investigation. The government has authorized CW3 to participate in illegally soliciting and selling fraudulent identification documents in conjunction with this criminal investigation only at the direction and authorization of the government and for the sole purpose of furthering this criminal investigation. ICE has advised CW3 that his/her cooperation with the government will not protect him/her from prosecution if he/she engages in criminal activity not authorized by ICE and/or the United States Attorney's Office. ICE also has advised CW3 that he/she may face criminal charges for illegally soliciting and selling fraudulent identification documents before he/she began cooperating with the government.

20. Pursuant to CW3's consent and court orders signed by the Chief Judge or an acting chief judge in the Northern District of Illinois, telephone calls occurring to

and from the telephone used by CW3 ("Subject Phone CW3") have been intercepted from about January 30, 2008, through the present.

**COURT-AUTHORIZED INTERCEPTION OF WIRE COMMUNICATIONS**

21. On April 27, 2007, and May 25, 2007, the Chief Judge and an acting chief judge in the Northern District of Illinois authorized the interception of wire communications over Target Phone 4, used by MANUEL ESTRADA.

22. On April 16, 2008, United States District Court Acting Chief Judge William J. Hibbler authorized the interception of wire communications over Target Phones 5 and 11, used by JAIME SOLIS.

23. On May 21, 2008, United States District Court Chief Judge James F. Holderman authorized the continued interception and initial wire communications over Target Phones 5 (used by JAIME SOLIS), 13 (used by MANUEL ESTRADA), and 18 (used by JAIME SOLIS).

24. On June 24, 2008, United States District Court Chief Judge James F. Holderman authorized the continued interception of wire communications over Target Phones 5, 13, and 18.

25. Pursuant to the court orders signed by the Chief Judge and acting chief judges, telephone calls occurring to and from the following telephones were intercepted for the following periods of time:

<b>PHONE</b>	<b>USER</b>	<b>DATES OF INTERCEPTION</b>
Target Phone 4 (773) 879-4088	Manuel Estrada	April 27, 2007, through June 23, 2007
Target Phone 5 (773) 627-2415	Jaime Solis	April 16, 2008, through May 15, 2008, and May 21, 2008, through July 23, 2008
Target Phone 11 (773) 822-6535	Jaime Solis	April 16, 2008, through May 15, 2008
Target Phone 13 (773) 964-0122	Manuel Estrada	May 21, 2008, through June 19, 2008, and June 26, 2008, through July 23, 2008
Target Phone 18 (773) 499-1198	Jaime Solis	May 21, 2008, through June 19, 2008, and June 24, 2008, through July 23, 2008

### **OVERVIEW OF THE ORGANIZATION**

26. Interceptions of communications on Subject Phone CW2, Subject Phone CW3, and Target Phones 4, 5, 11, 13, and 18 – along with surveillance, debriefing of CWs, seizures, post-arrest statements of individuals in the Organization such as document vendors, consensually-recorded conversations, undercover purchases of documents and other investigative methods revealed the following information:

a. The Organization’s methods are well-established. The portion of the Organization that operates primarily on the corner of St. Louis Avenue and 26th Street in Chicago, Illinois (“the St. Louis Crew”) operates from about 10:00 a.m. to 8:00 p.m., seven days a week, and involves the following participants:

i. A “miquero,” “micero,” “solicitor,” “vendor,” or “seller” is a person standing on the street using hand gestures and verbally announcing to

pedestrians and vehicles that he/she has identification documents for sale. A miquero advises customers of the cost of the identity documents and the location of a photography shop – usually FOTO STUDIO REYES, located at 2542 South Christiana Avenue, Chicago, Illinois, or FOTO DAVILA INC, located at 3604 West 26th Street, Chicago, Illinois – to obtain photos for the documents. A miquero takes the order, photo, and payment from the customer. The St. Louis Crew typically employs about 8-10 miqueros, and CW3 reports he/she services approximately five customers per day. Miqueros charge customers between \$110 - \$150 for a set of fraudulent documents and keep any profit after paying the office approximately \$50 to make the documents. A set consists of a social security card and a photo identification card. If the customer wants a social security card by itself, the charge is approximately \$40.

ii. A “runner” is a person who transports the money and the customer’s information to the manufacturer at the “office.” Some runners transport the order, photo, and payment from the miquero to the manufacturer. There may be multiple levels of runners between the miquero and the manufacturer. The St. Louis Crew typically employs about 2 runners.

iii. A “manufacturer” is a person who actually creates the fraudulent identification documents out of a residence that is a document production facility the Organization calls the “office,” using equipment such as typewriters, laminators, paper cutters, computers, and printers to produce false identification

documents with authentic results. The St. Louis Crew typically employs at least 2 manufacturers. There may be one or two manufacturers working in an office at any one time. The Organization has the ability to manufacture a fraudulent state identification card (state ID) or a fraudulent driver's license (DL) from most of the 50 United States. Customers most commonly request fraudulent state identification cards or driver's licenses from Indiana, Wisconsin, Ohio, Texas, Illinois, or Michigan. The Organization also manufactures various Mexican identification cards.

b. In just one location in the area of St. Louis Avenue and 26th Street alone, there are as many as five to ten illegal aliens at any one time selling fraudulent documents. When these sellers locate a customer, they obtain the photograph and personal information such as name and address that the customer wants on a particular card. Once these sellers have accumulated such information from enough customers, one of the sellers will send that information to the "office" where the false documents are made.

c. Miqueros in the St. Louis Crew send their customers to either FOTO STUDIO REYES, located at 2542 South Christiana Avenue, Chicago, Illinois, or FOTO DAVILA INC located at 3604 West 26th Street, Chicago, Illinois, to have their photos taken for the fraudulent documents. After the photo is taken, the miquero usually will meet the runner at a predetermined location in Chicago, Illinois, away from 26th Street, to exchange orders, money, and documents. Currently, the

Organization uses either the intersection of South Keeler Avenue and 25th Street in Chicago, or South Avers Avenue and 32nd Street in Chicago, as locations to meet.

d. Members of the Organization are primarily of Mexican descent, but the nationality of the Organization's customers vary. Customers have requested green cards for the following countries: Mexico, Columbia, Guatemala, Ecuador, El Salvador, Jamaica, Poland, Czech Republic, Albania, Russia, and China. The vast majority of the fraudulent document transactions are conducted in either Spanish or English language. If a customer does not speak Spanish or English, the customer will generally bring a friend or family member, who can communicate in either Spanish or English, to act as a translator. Customers also include Caucasian and African-American individuals believed to be United States citizens. Law enforcement is unaware of any occasion in which this Organization declined selling fraudulent identification documents to a customer who had sufficient money to purchase the documents.

e. During the investigation, agents have identified some principal members of the Organization and their roles. Law enforcement has identified some individuals who produce or manufacture the fraudulent identification documents, some street level vendors who market or distribute the fraudulent identification documents, and some leaders of the Organization. Law enforcement also has identified some locations of manufacturing, marketing, and distribution of the fraudulent identification documents. According to Subject Phone CW2 and/or CW3, these individuals have the

following main nicknames and roles in the St. Louis Crew:

- i. **MANUEL ESTRADA** (“ESTRADA”), a/k/a “Manny,” is the current leader.
- ii. **OSCAR BANDA** (“BANDA”), a/k/a “Perro” a/k/a “Balin,” is a miquero.
- iii. **MARTHA ELIZABETH CAMPA RIVERO** (“CAMPA”) is a miquero.
- iv. **MIGUEL CASTANEDA GOMEZ** (“CASTANEDA”), a/k/a “Pitufo,” is a miquero.
- v. **ANDRES CHIQUIN** (“CHIQUIN”), a/k/a “Pelon,” is a miquero.
- vi. **VERONICA GARCIA ARANA** (“GARCIA”), a/k/a “Betty,” is a miquero and manufacturer.
- vii. **GERARDO GUZMAN MARTINEZ** (“GUZMAN”), a/k/a “Chilango,” is a miquero.
- viii. **CLAUDIA LARA** (“LARA”) is a miquero.
- ix. **MANUEL LOPEZ PEREZ** (“LOPEZ”), Manuel Estrada’s father, is a miquero and a runner.
- x. **ULYSES MARTINEZ** (“MARTINEZ”), a/k/a “Cuaderno,” is a miquero.

xi. **HECTOR MEDINA** (“MEDINA”), a/k/a “Primo,” is a miquero, runner, and office worker.

xii. **CAMILO MENDEZ** (“MENDEZ”), was a miquero until his arrest on February 18, 2008.

xiii. **JORGE ABEL MIRANDA** (“MIRANDA”), a/k/a “Payaso,” is a miquero.

xiv. **ELIAS TRINIDAD MUNOZ** (“MUNOZ”), a/k/a “Blue,” is a miquero.

xv. **HORACIO NEVAREZ ARRELLANO** (“NEVAREZ”), a/k/a “Tattoo,” is a miquero.

xvi. **JOSE LUIS PEREZ** (“PEREZ”), a/k/a “Pantufila,” is a miquero.

xvii. **MARCOS PEREZ CONTRERAS** (“PEREZ-CONTRERAS”), a/k/a “Pajaro,” was a miquero until his arrest on February 18, 2008.

xviii. **CARLOS SIORDIA** (“SIORDIA”), a/k/a “Rojo,” is a miquero.

xix. **JOSE TEXCA COCONE** (“TEXCA”), a/k/a “Brody,” is a miquero and runner.

xx. **HUMBERTO TREJO** (“TREJO”), a/k/a “Chamaco,” is a miquero.

27. The properties to be searched are linked to this investigation as follows:

a. **Office:** 2456 South Homan Avenue, Chicago, Illinois. This is believed to be the primary location where the Organization manufactures the fraudulent identification documents.

b. **Residence of JAIME SOLIS, a/k/a “JAROCHO:”** 3034 South Karlov Avenue, Chicago, Illinois. This is believed to be the primary residence of JAIME SOLIS and his family, and they spend a significant amount of time at this home.

c. **Residence of MANUEL ESTRADA, a/k/a “MANNY:”** 4057 South Albany, Chicago, Illinois. This is believed to be the primary residence of MANUEL ESTRADA, MANUEL PEREZ and LOPEZ’s wife, and they spend a significant amount of time at this home.

d. **FOTO STUDIO REYES:** 2542 South Christiana Avenue, Chicago, Illinois. This is believed to be one of the two primary business locations where individuals obtain photographs for fraudulent identification documents.

e. **FOTO DAVILA INC INC:** 3604 West 26th Street, Chicago, Illinois. This is believed to be one of the two primary business locations where individuals obtain photographs for fraudulent identification documents.

#### **REPRESENTATIVE SAMPLE OF PERTINENT CALLS**

28. The following are partial summaries of wire communications to and from Subject Phone CW2, Subject Phone CW3, and Target Phones 4, 5, 11, 13, and 18. In

many of the intercepted calls, coded language was used to conceal the true nature of the telephone calls. For some of the calls summarized below, I have placed in brackets my understanding of what is being said during intercepted calls, based on the content and context of the conversations, surveillance, the results of pen register devices, debriefing of CWs, my experience as a law enforcement officer and the experience of other law enforcement officers in this investigation, including the experience of the agents and officers assigned to this case listening to the intercepted conversations as a whole. The times listed for these calls are approximate. In most cases, voice identifications are based on names used during the intercepted conversations, voice recognition that has been accomplished to date by the CWs and by other law enforcement, information obtained from CWs, historical information developed during this investigation, and/or telephone subscriber information. The summaries below do not include all potentially criminal calls intercepted during the period of interception, or all statements or topics covered during the course of the intercepted conversations. They do not represent finalized transcripts and may not represent the entire conversation that occurred between the identified individuals.

29. The language used during most of the intercepted conversations summarized below was Spanish. In such cases, Spanish speaking agents and/or linguists have listened to the calls and translated the conversations into English.

**MANUEL ESTRADA (“ESTRADA”) a/k/a “MANNY”**

30. On March 4, 2007, at approximately 4:04 p.m., Subject Phone CW2 placed a consensually recorded telephone call from Subject Phone CW2 to Target Phone 4. During the conversation, CW2 said, “Listen, do you have some for Meri . . . Merida, Yucatan . . . a license, a license?” MANUEL ESTRADA said, “No buddy, well, just from here, dude. The ones we make.”<sup>2</sup> CW2 said, “You don’t have any?” ESTRADA said, “No buddy.” [I believe that CW2 asked ESTRADA if he could create fraudulent identification cards from the Mexican State of Yucatan, the city of Merida.] CW2 said, “Then of the originals, where from? Which ones do you have?” [I believe that the term “original” is a coded reference for a birth certificate.] ESTRADA said, “From Jalisco, from Hildago, from Puebla, Mexico, from Guerrero.” CW2 said, “The original . . . is from Jalisco, from Puebla, from Mexico City, and from Guerrero.”

31. On March 4, 2007, at approximately 4:29 p.m., CW2 received a consensually-recorded telephone call on Subject Phone CW2 from Target Phone 4. During the conversation, CW2 said, “I’m on my way to the photo store, dude . . . so you can take it.” ESTRADA said, “It’s only these two, then?” CW2 said, “Yes . . . that one I gave you, that one goes here to the photo store.” ESTRADA said, “Why did you give me two envelopes?” CW2 said, “You see, I told the guy to go ahead . . . so that he

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<sup>2</sup> CW2 and CW3 each separately identified an arrest photo of MANUEL ESTRADA as “Manuel.” Also, MANUEL ESTRADA has responded when addressed as “Manuel,” such as in the call summarized in paragraph 75.

writes down the address and the other guy is going to give me the pictures. The picture and . . . the name that's on there is the same person." [I believe that CW2 was referring to FOTO STUDIO REYES on the corner of West 26th Street and South Christiana Avenue. Further, I believe that the miqueros regularly take their customers to FOTO STUDIO REYES to get their picture taken for their fraudulent documents.]

32. On March 4, 2007, at approximately 4:49 p.m., CW2 received a consensually-recorded telephone call on Subject Phone CW2 from Target Phone 4. During the conversation, ESTRADA said, "What did you give me, the first one?" CW2 said, "It's a license, dude, from Mexico City." ESTRADA said, "What did it say?" CW2 said, "From Mexico City, dude . . . F.D., Federal District." [I believe that ESTRADA and CW2 were discussing an order for fraudulent documents.]

33. On March 8, 2007, at approximately 7:39 p.m., CW2 received a consensually-recorded telephone call on Subject Phone CW2 from Target Phone 4. During the conversation, CW2 said, "I'm waiting for the guy at the house. The son of the bitch is not coming. I've already delivered one, dude. I already turned one in. I'm just waiting for the other dude to come, the mother fucker . . ." MANUEL ESTRADA said, "Just pay me, he's your frequent client, dude." [I believe MANUEL ESTRADA was waiting for a customer of CW2 to pick up fraudulent documents he/she had ordered and to pay ESTRADA for them.]

34. On March 13, 2007, at approximately 8:43 p.m., CW2 received a consensually-recorded telephone call on Subject Phone CW2 from Target Phone 4. During the conversation, ESTRADA said, "You don't owe me anything?" CW2 said, "No man. Didn't I pay already, man?" ESTRADA said, "When man? When did you pay me?" CW2 said, "Yesterday, don't play dumb." ESTRADA said, "To me?" CW2 said, "Of course, you and Teleras." ESTRADA said, "You must have paid Teleras. You haven't paid me squat. How many did you pay me." CW2 said, "One man." ESTRADA said, "And the other ones." CW2 said, "What other ones? I already paid Teleras for those. [I believe that ESTRADA was arguing with CW2 about the amount of money CW2 owed the "office" for manufacturing his/her fraudulent documents. Further, I believe that CW2 told ESTRADA that he/she paid another member of the Organization the rest of the money that he owed.]

35. On March 16, 2007, at approximately 12:49 p.m., CW2 placed a consensually-recorded telephone call from the Subject Phone CW2 to Target Phone 4. During the conversation, CW2 said, "Where are you?" ESTRADA said, "At my house." CW2 said, "Can you come down here to twenty-sixth?" [I believe that "26th" is a coded reference for West 26th Street, the primary location used by the street level vendors to sell fraudulent documents.] ESTRADA said, "How many do you have?" CW2 said, "So you can make me some papers." ESTRADA said, "What?" CW2 said, "Some . . . jobs, man. A job." [I believe that "papers" and "job" are coded references for fraudulent

documents.] ESTRADA said, "Give them to Pollo." CW2 said, "You want me to give them to Pollo?" ESTRADA said, "Yeah, give it to him. I'll see him right now." [I believe that ESTRADA told CW2 to give the order for fraudulent documents to "Pollo," another "miquero" who works for the Organization.]

36. On March 16, 2007, at approximately 12:53 p.m., CW2 placed a consensually-recorded telephone call from the Subject Phone CW2 to Target Phone 4. During the conversation, CW2 said, "Man, he said he's not going to see you, man." ESTRADA said, "Tell him to pick it up, that I'll call him right now." [I believe that this call is a continuation of the call summarized above concerning ESTRADA telling CW2 to give an order for fraudulent documents to "Pollo," another "miquero" who works for the Organization.] CW2 said, "The idiot is not here, man." ESTRADA said, "He is going to arrive there with Pajaro's jobs, man." CW2 said, "Look, man. I do want you to come because I'm going to explain to you what this is . . . it's a fucking school certificate." [Further, I believe that CW2's customer is requesting a fraudulent school certificate, possibly a diploma. In addition to fraudulent identification cards and social security cards, I believe that the Organization manufactures various types of diplomas, birth certificates, and job certificates that could be used to gain employment.] ESTRADA said, "No, explain it to him. I'm not going down there, man. Explain it to that guy and he'll explain it to me." CW2 said, "Oh, fucking Manuel. Why not, man? You're a lazy ass, man." [I believe that CW2 wants ESTRADA to come down to West

26th Street to see the specific “school certificate” that CW2's customer is requesting.]

37. On April 28, 2007, at approximately 9:20 a.m., an incoming call was received at Target Phone 4 from telephone number (773) 559-6487.<sup>3</sup> During the conversation, GERARDO GUZMAN said, “I have three jobs.” [I believe that a “job” is a coded reference for a set of fraudulent documents] ESTRADA said, “And then what, dude?” GUZMAN said, “Make them for me, faggot!” [I believe that GUZMAN asked ESTRADA to manufacture three sets of fraudulent documents] ESTRADA said, “No, fuck, I’m not doing anything, dude.” GUZMAN said, “No fuck, son of a bitch, don’t start with your bullshit, dude.” ESTRADA said, “Send them to Jarocho, dude.” [On about April 24, 2007, ICE executed twelve federal arrest warrants of members of the Organization active in the parking lot of and inside “The Little Village Discount Mall” on 26th Street and Albany in Chicago, Illinois (“the Albany Crew”), in conjunction with *United States v. Leija-Sanchez, et al*, No. 07 CR 224 (J. Pallmeyer). I believe that for about one week following these arrests, ESTRADA used extreme caution when

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<sup>3</sup> On September 12, 2008, wire room monitors compared the voices on telephone number (a) (773) 559-6487 in the April 28, 2007, 9:26 a.m. telephone call described in paragraph 38 and (b) (773) 853-6908 in the August 15, 2008, telephone call described in paragraph 76(a), and determined that the speaker is the same person. Telephone number (773) 853-6908 is subscribed to GERARDO GUZMAN at 3007 South Trumbull Avenue, Chicago, Illinois. According to the Lexis/Nexis database, GERARDO GUZMAN has resided at 3007 South Trumbull Avenue, Chicago, Illinois since December 2007. CW3 has positively identified an arrest photo of GUZMAN as “Chilango.” Also, GUZMAN has responded when addressed as “Chilango,” such as in the call summarized in paragraph 38.

discussing or manufacturing fraudulent documents, and that is why he told GUZMAN to have SOLIS manufacture the fraudulent documents.]

38. On April 28, 2007, at approximately 9:26 a.m., an incoming call was received at Target Phone 4 from telephone number (773) 559-6487. During the conversation, GERARDO GUZMAN MARTINEZ asked, "Why did you hang up on me?"<sup>4</sup> ESTRADA replied, "You did it, stupid." GUZMAN asked, "And now what?" ESTRADA replied, "Didn't I tell you that I'm not doing anything, dude? . . . because it's very hot, it's very difficult, dude, so why do I have to go? I don't even do mine and you think I'm going to go for yours. After all, you do not even pay for them." Later in the conversation, ESTRADA stated, "There is no way I am going to go. . . . I'll tell you, you are stupid, Chilango. How am I going to put myself at risk going there?" GUZMAN replied, "How are you going to be at risk, son of a bitch, if I have the jobs here at my house?" ESTRADA replied, "So what, dude, so what. I haven't gone to the damned office for the same reason." [I believe that GUZMAN called ESTRADA again and requested that ESTRADA pick up his (GUZMAN's) three orders for fraudulent documents. I believe that ESTRADA told GUZMAN that he was not making any "runs" to 26th Street or to the fraudulent document "office" because of the increased

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<sup>4</sup> On September 12, 2008, wire room monitors compared this voice with the voice using (773) 853-6908 in the August 15, 2008 telephone call described in paragraph 76(a), and the monitors believe that the voices are from the same person (GERARDO GUZMAN MARTINEZ).

presence of law enforcement.]

39. On April 29, 2007, at approximately 12:14 p.m., an incoming call was received at Target Phone 4 from telephone number (312) 208-4587.<sup>5</sup> During the conversation, ESTRADA said, “What’s up?” JORGE MIRANDA said, “Hey, I wanted to know if you could do a job for me because this guy doesn’t have any seals, there’s two. This is Payaso, and you see Jarocho doesn’t have any.” ESTRADA said, “No fuck, dude. I’m not doing anything.” MIRANDA said, “I’ve never asked you for a favor, dude.” ESTRADA said, “He doesn’t have any seals?” MIRANDA said, “Who?” ESTRADA said, “Jarocho.” MIRANDA said, “He doesn’t have any, dude.” ESTRADA said, “From where?” MIRANDA said, “They’re from here. It’s two green cards, but the lady wants them with seals because that’s how they’ve sold them to her, and now who knows who has seals, dude.” ESTRADA said, “I’ll call you right back.” [I believe that MIRANDA asked ESTRADA to make him two fraudulent green cards because SOLIS did not have the proper laminate that the customer requested. I further believe

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<sup>5</sup> Telephone number (312) 208-4587 is a prepaid cellular telephone subscribed to Jorge Miranda, 3200 South 49th Avenue, Cicero, Illinois. According to Lexis/Nexis records, Jorge Miranda Tellet has resided at 3200 South 49th Avenue, Cicero, Illinois since April 2007. According to CW3, “Payaso” uses telephone numbers (312) 208-4587 and (773) 556-4587. CW3 has positively identified an arrest photo of JORGE ABEL MIRANDA as “Payaso.” When arrested by CPD on February 7, 2008, JORGE ABEL MIRANDA identified himself to law enforcement as “Payaso.” Also, JORGE ABEL MIRANDA responded when addressed as “Payaso” and written “Travieso” on fraudulent document orders such as in the calls and undercover purchases summarized in paragraphs 39, 101(c), 103, 105, 107(c), and 108.

ESTRADA was still hesitant to manufacture fraudulent documents in light of the April 24, 2007, arrests ].

40. On May 6, 2007, at approximately 2:09 p.m., an incoming call was received at Target Phone 4 from telephone number (773) 879-0325.<sup>6</sup> During the conversation, MARTHA CAMPA RIVERA said, "Make a little blue one, no?" [I believe that a "blue one" is a coded reference for a fraudulent social security card.] ESTRADA said, "Let's see, give it to me." CAMPA said, "Lara...six, thirty-nine...fourteen ...seventy-one)...ten ." ESTRADA said, "Ten. Where am I going to see you?" CAMPA said, "Do you think you can make the other one bluish?" ESTRADA said, "Bluer?" CAMPA said, "Bluer." ESTRADA said, "Let me see if this one has them here...No, I don't have any." CAMPA said, "It's not there to make it bluer?" ESTRADA said, "No." CAMPA said, "You can make that one like that, the one I gave you. Then um, we'll see, we'll see who I send it with." ESTRADA said, "All right then. I'll see you." [I believe that CAMPA was concerned that the blue color of the fraudulent social security card did not match that of an authentic social security card.]

41. On May 8, 2007, at approximately 3:36 p.m., an outgoing call was placed

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<sup>6</sup> Telephone number (773) 879-0325 is subscribed to MANUEL ESTRADA at 3242 West 38th Place, Chicago, Illinois. According to Lexis/Nexis records, MARTHA CAMPA resided at 3242 West 38th Place, Chicago, Illinois, from March 2004 through July 2004. Also, CAMPA has responded when addressed as "Martha," such as in the call summarized in paragraph 51.

from Target Phone 4 to telephone number (773) 391-1753.<sup>7</sup> During the conversation, ESTRADA said, “That guy does indeed have divorce certificates, right?” [I believe that ESTRADA was referring to a friend who manufactures fraudulent documents, but is unaffiliated with the St. Louis Crew.] ULYSES MARTINEZ said, “I think so, dude.” ESTRADA said, “Ask him right now, all right? I need one.” MARTINEZ said, “He is going to come pick up a fuckin, two plastic jobs right now. I’ll ask him right now and I’ll call you.” ESTRADA said, “All right.” MARTINEZ said, “Give me the information.” ESTRADA said, “Don’t tell him that it’s for me, dude.” MARTINEZ said, “No, I’ll call you.” [Based on information provided by CW2, I believe that ESTRADA’s friend has the software and designs to produce fraudulent documents, such as, fraudulent birth certificates, that are not regularly ordered by customers on 26th Street. According to CW2, ESTRADA will sometimes “subcontract” his fraudulent document orders to his friend because ESTRADA does not have the software or designs to produce the document himself.]

42. On May 11, 2007, at approximately 12:17 p.m., an incoming call was received at Target Phone 4 from Target Phone 5. JAIME SOLIS said, “I need some

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<sup>7</sup> Telephone number (773) 391-1753 is subscribed to ULYSES MARTINEZ at 2530 South Spaulding Avenue, Chicago, Illinois. According to Lexis/Nexis records, from February 2006 through August 2006, Ulises Martinez resided at 2530 South Spaulding, Chicago, Illinois. According to CW3, MARTINEZ uses (773) 391-1753. CW3 has positively identified an arrest photo of MARTINEZ as “Cuaderno.” Also, MARTINEZ has responded when addressed as “Cuaderno,” such as in the call summarized in paragraph 88.

sheets.”<sup>8</sup> [I believe that SOLIS asked ESTRADA to order him blank sheets of fraudulent documents.] ESTRADA said, “I don’t have anymore, man.” SOLIS said, “I have a client that wants twenty, man. And I also wanted some for myself. When are you getting more?” ESTRADA said, “Get the money so I can order them for you, man.” SOLIS said, “My cousin’s husband just got here and that guy is a street vendor over there in Los Angeles. He says that they don’t use a pattern over there anymore, man. I think they make the seals with rollers. I also asked him to hook me up, man.” ESTRADA said, “Uh-huh.” [I believe that SOLIS told ESTRADA about a process that produces a more authentic looking fraudulent document.] SOLIS said, “His buddy is that Perico guy, maybe you’ve heard of him. I think he’s one of the main guys over there. A guy they call Perico.” [I believe that SOLIS is referring to Pedro Castorena-Ibarra, the head of the Castorena Organization, believed to be the largest fraudulent document organization in the United States. Pedro Castorena-Ibarra is currently in federal custody awaiting trial in Denver, Colorado.] SOLIS said, “He says that they’ve already modernized, that they use rollers now, man. That they don’t use the net anymore.” [I believe SOLIS meant that the organization has replaced the process of silk-screen printing with a printing process that uses “rollers.” I believe that

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<sup>8</sup> As set forth in paragraphs 9 and 13 of the SOLIS complaint affidavit, both CW2 and CW3 have identified an arrest photo of JAIME SOLIS as “Jarocho,” a runner and later supervisor for the St. Louis Crew. Also, SOLIS has responded when addressed as “Jarocho,” “Jarocho,” and “Juliana,” such as the calls summarized in paragraphs 33, 46, 60, 62, and 63 of the SOLIS complaint affidavit.

fraudulent document organizations have traditionally used the process of silk-screen printing to replicate the holographic security features found on identification documents.] SOLIS said, “And he’s going to be here for a month. I’m going to talk to him later to see if he could hook us up with the seals to get them at a cheaper price.” [I believe SOLIS is referring to the fact that his cousin’s husband will be in Chicago for a month and may be able to get SOLIS some cheaper document-making supplies from Los Angeles.] ESTRADA said, “Ask him to hook you up with the rollers instead.”

43. On May 15, 2007, at approximately 12:42 p.m., an outgoing call was placed from Target Phone 4 to telephone number (773) 391-1753. During the conversation, ESTRADA said, “I was looking for Gordo. I was going to beat the son of a bitch up.” MARTINEZ said, “Why?” ESTRADA said, “Because he gave me a damn job. But he just pisses me off that he’s so fucking flaky.” MARTINEZ said, “That is why those guys take advantage of things. Why do they sit on the money when it isn’t theirs, anymore?” ESTRADA said, “I’ll tell my buddy, I tell him, you and your buddy can both kiss my ass, dude. Whenever I want, I can give the order for you to get the fuck away from there, dude. You will never stand there again.” [I believe that ESTRADA was frustrated with the performance of several street level vendors and was considering not allowing them to work at the corner of St. Louis Avenue and 26th Street.] MARTINEZ said, “If you want, there. . . a guy that makes stamps, okay?” [I believe “stamps” is a coded reference for the seals or holograms that are placed by

government agencies on legitimate identification cards. The seals are required to make the fraudulent document appear authentic.] ESTRADA said, "For how much?" MARTINEZ said, "The faggot wants it at two per page." ESTRADA said, "Nah, tell him to fuck off. I just ordered some yesterday, man." MARTINEZ said, "From where? From Ipa?" ESTRADA said, "Yeah." MARTINEZ said, "Are you going to have some to sell?" ESTRADA said, "I ordered a small amount of sheets. About some . . . fifty, man." [I believe the two individuals were discussing an order for blank sheets of fraudulent documents that was placed by ESTRADA.] MARTINEZ said, "So you can sell me some, okay? For when I get a client." ESTRADA said, "Yeah." MARTINEZ said, "For how much? Ten or what?" ESTRADA said, "Nalgon gives them to me at ten." MARTINEZ said, "Nalgon gives them at ten?" ESTRADA said, "Yeah man, for ten bucks." MARTINEZ said, "Naglon . . . you get them direct from the supplier." ESTRADA said, "No . . . got another guy that gets them faster. It has been about fifteen days, man. He's still going on about not being able to send them to me. Fuck that, I say his damn connection, man. No more, it's not worth all that shit, man." [I believe that ESTRADA was frustrated with the fact that Naglon was taking two weeks to send ESTRADA his blank sheets of fraudulent documents. Further, I believe that ESTRADA has found a new supplier.] Later in the conversation, ESTRADA said, "We need new people, man." MARTINEZ said, "You should pick them right, dude. And open up the market good." ESTRADA said, "Get rid of all those guys, all those guys,

Nino, get rid of all those guys . . . Those guys think it's a game. They think that nobody knows anything about anything here." [I believe that ESTRADA wanted to fire several street level vendors because they were stealing business from him and they can't be trusted.] MARTINEZ said, "Of course. What happened to the guys from the mall is going to happen to them, right...they need to see like the ones from the mall . . . that is how the whole mess got started because they say that one had already left to Mexico, but he was the one that was stealing jobs." ESTRADA said, "What?" MARTINEZ said, "That a guy was doing jobs here . . . the one they killed over there." [I believe that MARTINEZ was referring to the LEIJA-SANCHEZ fraudulent document organization that operated in the Albany Discount Mall. Further, I believe that MARTINEZ was referring to an individual named "Montes," a former street level vendor for the LEIJA-SANCHEZ organization who was murdered in Mexico for stealing software from the Organization and going into business for himself, as charged in *United States v. Leija-Sanchez, et al*, No. 07 CR 224 (J. Pallmeyer).] MARTINEZ said, "That's what is going to happen here . . .didn't you tell me the other time you already knew who it was over here? Give an order to beat him up so they see he is not made out of plastic!" [I believe that MARTINEZ told ESTRADA to send the street level vendors a message by having someone beat up the individual who was stealing business.]

44. On May 19, 2007, at approximately 11:19 a.m., an outgoing call was

placed from Target Phone 4 to telephone number (773) 875-9196. During the conversation, ESTRADA said, "Make me some blue ones, all right?" Individual B said, "How many?" ESTRADA said, "Like about three." [I believe that ESTRADA asked Individual B to make him three fraudulent social security cards.] Individual B said, "Let me write it down." ESTRADA said, "Pablo Martinez . . . whichever number . . . and the other is Maria del Carmen . . . and the other is Alfredo Matute." Individual B said, "Whatever number for all?" ESTRADA said, "Whichever, yeah." [I believe that ESTRADA told Individual B to make up false social security numbers for all three of the fraudulent documents.] Individual B said, "All right then." ESTRADA said, "I'll drop by and get them right now, man."

45. On May 20, 2007, at approximately 5:20 p.m., an incoming call was received at Target Phone 4 from telephone number (773) 216-5251.<sup>9</sup> During the conversation, CLAUDIA LARA said, "The blue one came out really bad." ESTRADA said, "Why?" LARA said, "Because you know how it's three eighty-five? You put three eighty-one and you didn't put a hyphen." ESTRADA said, "Uhn, fuckin . . . I'll fix it for you right now." LARA said, "Oh, but are you going to take long." ESTRADA said,

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<sup>9</sup> Telephone number (773) 216-5251 is subscribed to CLAUDIA LARA at 2455 South St. Louis Avenue, Chicago, Illinois. According to Lexis/Nexis records, from March 2001 through December 2005, CLAUDIA LARA resided at 2455 South St. Louis Avenue, Chicago, Illinois. According to CW3, "Claudia" uses (773) 216-5251. CW3 has positively identified an Illinois Driver's License photo of CLAUDIA LARA as "Claudia." Also, LARA has responded when addressed as "Claudia" such as in the call summarized in paragraph 80.

“No. I’ll do it right away.” [I believe ESTRADA typed an incorrect number and omitted a hyphen when he manufactured a fraudulent social security card for LARA.]

46. On May 22, 2007, at approximately 9:37 p.m., an incoming call was received at Target Phone 4 from (708) 828-4943. During the conversation, Individual C said, “Listen man, do you have Texas IDs, man?” ESTRADA said, “Yes.” Individual C said, “The lady called me and she needs one, man.” ESTRADA said, “I have the seals and all that.” Individual C said, “Okay, but they come out real nice, man?” ESTRADA said, “Yes, man.” [I believe Individual C asked ESTRADA if he could manufacture a high quality, fraudulent document from the State of Texas. Further, I believe ESTRADA told Individual C that he had the proper laminates to manufacture high quality, fraudulent documents from the State of Texas.]

47. On April 17, 2008, at approximately 7:11 p.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, JAIME SOLIS said, “I’m going to eat with my old lady, dude. If you want, once I’m done eating I’ll do it. It’s probably Brody’s, right? Because that fucker never called me again, dude.” MANUEL ESTRADA replied, “No, they are for Hielo, dude.” SOLIS stated, “Well, let me see, it won’t be that long.” ESTRADA replied, “It’s four of them.” SOLIS stated, “Tell your dad to wait an hour, dude. Until I finish eating.” [I believe that ESTRADA asked SOLIS to manufacture four sets of fraudulent documents for a miquero named “Hielo.” I believe that SOLIS told ESTRADA that he would

manufacture the documents and return them to ESTRADA's father (MANUEL LOPEZ PEREZ ) after SOLIS finished eating dinner.]

48. On April 18, 2008, at approximately 4:48 p.m., an outgoing telephone call was placed from Target Phone 5 to Target Phone 13. During the conversation, JAIME SOLIS stated, "Hey, [Individual B] keeps calling me, dude, because I told him I wanted some white ones." MANUEL ESTRADA replied, "Ask him for ten, okay . . . five of the snow whites?" SOLIS asked, "But is it going to be worth it to you?" ESTRADA asked, "What do you mean?" SOLIS replied, "Is it going to be worth you getting five? The dude is not going to sell us five, dude . . . I'm going to see what's the least he'll sell me." [I believe that both SOLIS and ESTRADA purchase certain supplies to manufacture fraudulent documents from Individual A. I believe that "snow whites" is a coded reference for blank sheets of white permanent resident cards.] ESTRADA asked, "Are you going to buy any?" SOLIS replied, "I don't even, you know that I don't invest in that, dude. If I, if I were to buy any I would buy from Indiana, of . . . consulate, I have a lot of the consulate ones, dude." ESTRADA stated, "Let's get some. I want five of the white ones and about three consulate and two from Indiana. If you want to ask . . . how many do you want? The same, more or less, right?" SOLIS replied, "I am going to ask him for about twenty . . . look, let's ask for twenty of the white ones because I honestly have a lot of consulate ones and from Indiana." ESTRADA asked, "You have those?" SOLIS replied, "Yes, I have the ones for the consulate and Indiana. But I

didn't tell you that the client, Pelon's buddy, gave me some one time and I still have seals from [Individual A]." ESTRADA asked, "The ones you gave me, who were they from? Were they from Pelon's buddy, or from him . . . or [Individual A]s?" SOLIS replied, "From Pelon." [I believe the two men were discussing exactly what was left in their inventory and which supplies they will need to order from Individual A. I also believe that "consulate" is a reference to a Mexican consulate ID card, often referred to as a Matricula. I believe that the "two from Indiana" is a reference to either a State of Indiana driver's license or ID card.] ESTRADA stated, "I believe my customer is going to come down tomorrow, dude." SOLIS asked, "How much do you sell them to him for?" ESTRADA replied, "Twenty." SOLIS replied, "Well, then it's worth it . . . it will be worth it if you buy twenty from him, dude." ESTRADA stated, "Just ask him for ten white ones and five, and five of the other ones, dude." SOLIS replied, "All right, dude, cool." [I believe that ESTRADA was planning to resell part of his order to an unknown customer in order to make a quick profit.]

49. On April 18, 2008, at approximately 7:11 p.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, MANUEL ESTRADA asked, "What's up?" JAIME SOLIS replied, "Tomorrow around midday." ESTRADA asked, "Tomorrow around midday, what?" SOLIS replied, "The papers, dude." ESTRADA asked, "Oh, he does have them?" SOLIS replied, "Yes, tomorrow at noon." [I believe that SOLIS was informing ESTRADA that they would

be meeting with Individual A to purchase supplies needed to manufacture fraudulent documents.] ESTRADA asked, "Did Payaso send anything?" SOLIS replied, "Yes." ESTRADA stated, "The dude is in the gas station like he's waiting for someone." SOLIS said, "Yeah, he did send it." [I believe that ESTRADA was inquiring about the work performance of Payaso, a miquero.]

50. On April 21, 2008, at approximately 10:39 a.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, MANUEL ESTRADA asked, "What's up, dude?" JAIME SOLIS replied, "I'll call you back in forty minutes." ESTRADA stated, "Before twelve because this dude is giving me a hard time." SOLIS stated, "Call me in like forty minutes, dude." ESTRADA replied, "All right." [I believe that the meeting with Individual A did not occur at its originally scheduled time on April 19, 2008. Further, I believe ESTRADA told SOLIS that Individual A was pressuring ESTRADA to meet later that afternoon.]

51. On June 2, 2008, at approximately 5:27 p.m., an incoming telephone call was received at Target Phone 13 from (773) 879-0325. During the conversation, ESTRADA stated, "That dude probably even got it for free." CAMPA replied, "No, I told him it would be fifty." ESTRADA stated, "Oh, yeah, yeah, Martha." [I believe that CAMPA told ESTRADA that she charged her customer \$50 for the fraudulent document.]

**OSCAR BANDA (“BANDA”) a/k/a “PERRO” a/k/a “BALIN”**

52. On May 23, 2008, at approximately 6:53 p.m., an outgoing telephone call was placed from Target Phone 13 to (773) 294-0069.<sup>10</sup> During the conversation, ESTRADA asked, “You want me to make up the birth date or what?” OSCAR BANDA replied, “Which one?” ESTRADA stated, “Jocelyn’s.” BANDA asked, “Oh, it’s not there? It has it, right?” ESTRADA replied, “It doesn’t have it, asshole. If not, I wouldn’t be calling you. I already have them all filled out, they are there, this one is the only one missing.” BANDA replied, “All right then.” [I believe that the two individuals were clarifying an order for fraudulent documents.]

53. On May 23, 2008, at approximately 7:02 p.m., an incoming telephone call was received at Target Phone 13 from (773) 294-0069. During the conversation, ESTRADA asked, “What?” BANDA replied, “It’s April twelve, eighty.” ESTRADA replied, “Hold on. All right then.” [I believe that BANDA provided ESTRADA’s date of birth to place on a fraudulent identification document.]

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<sup>10</sup> Telephone number (773) 294-0069 is subscribed to Armando Romero at 4444 South Mozart Avenue, Chicago, Illinois. According to Lexis/Nexis records, no one by the name of Armando Romero has ever resided at 4444 South Mozart Avenue, Chicago, Illinois. According to CW3, OSCAR BANDA uses telephone number (773) 294-0069. CW3 positively identified an arrest photo of BANDA as “Perro.” On July 11, 2005, BANDA was arrested by CPD and charged with advertising and promoting fraudulent documents. During the booking process, BANDA admitted to a CPD officer that he is also known by his nickname “Perro.” Also, OSCAR BANDA has responded when addressed as “Perro Balin,” and wrote “Perro” on fraudulent document orders, such as in the call and undercover purchase summarized in paragraph 54 and 55(j).

54. On May 27, 2008, at approximately 6:06 p.m., CW3 placed an outgoing telephone call from Subject Phone CW3 to (773) 294-0069, and the call was consensually recorded. During the conversation, BANDANA asked, "What's up dude?" CW3 replied, "That's my Perro Balin. . . Listen, uhm, I'm going to send your jobs with Chamaco. Okay?" BANDANA replied, "Give them to me yourself. Because I don't trust these guys, those fuckers, my friend." CW3 asked, "Are you at Homan?" BANDANA replied, "I'm right here." CW3 stated, "All right, dude. I'll be there." [I believe that CW3 agreed to meet BANDANA near the intersection of Homan Avenue and 26th Street to deliver his completed orders for fraudulent documents. I believe CW3 and BANDANA were not planning to meet at the office itself because at the time this call was made the office was located at 3043 South Keeler, and it had not yet been moved to Homan Avenue.]

55. On June 4, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW4 purchased fraudulent identification documents from BANDANA as follows:

a. On June 4, 2008, at approximately 1:23 p.m., CW4 placed a consensually-recorded phone call to BANDANA at telephone number (773) 294-0069. During the conversation, CW4 stated, "I am looking for something . . . some documents." BANDANA replied, "Ah-ha." CW4 asked, "Can I come over?" BANDANA replied, "Who are you?" CW4 replied, "One of my friends gave it to me. . . Manuel just

gave me your number. It is urgent. . .I need to get them now. I am looking for work because I have to pay my bills. . . . I need the papers.” BANDA asked, “What do you need.” CW4 replied, “The complete set.” BANDA asked, “The mica and social security?” CW4 replied, “Yes, everything.” BANDA asked, “Did he tell you what I charged him?” CW4 replied, “No. He did not tell me how much.” BANDA stated, “The job will cost you one hundred dollars.” CW4 replied, “Oh? Yes? For everything? That’s all right.” BANDA stated, “Call me when you get to California and Cermak. . . . And I will tell you where to meet me.”

b. At approximately 3:37 p.m., CW4 arrived at Church’s Chicken, located at 2806 West Cermak Road, Chicago, Illinois, and met with BANDA, who had arrived at the location driving a maroon Dodge Caravan. This meeting was consensually recorded on audio and video. During the meeting, CW4 provided BANDA with a photo, name, date of birth, and additional identifiers and biographical information needed to manufacture a fraudulent green card and social security card. During this meeting CW4 stated, “Luis Valdez is the name.” BANDA asked, “Is it a Z?” CW4 replied, “Yes, Z and V.” BANDA asked, “The date?” CW4 replied, “Four, twenty-five, seventy.” BANDA asked, “The social security number?” CW4 replied, “The same one.” BANDA stated, “Give me twenty dollars deposit.” CW4 asked, “How long will it take?” BANDA replied, “About two hours.” CW4 asked, “Do I wait for you right here?” BANDA replied, “If you want. . .here or on 26th Street . . .I will call you

when it's ready." BANDA collected a \$20 deposit from CW4.

c. At approximately 3:40 p.m., BANDA departed the area traveling west on Cermak Road. An ICE surveillance team observed BANDA turn south on Christiana Avenue and travel approximately two blocks, at which time BANDA parked the vehicle on the street across from the residence located at 2418 South Christiana. ICE observed BANDA approach a minivan bearing a temporary license plate 79Z9202, which had stopped in front of the 2418 South Christiana. ICE observed BANDA meet with an unknown person sitting in the passenger seat of a minivan. BANDA briefly leaned his head inside the open window of the passenger door. After a brief conversation, BANDA walked away from the minivan and walked through the gangway next to 2814 South Christiana Avenue.

d. At approximately 5:06 p.m., CW4 placed a consensually-recorded phone call to BANDA at telephone number (773) 294-0069 to determine if the fraudulent documents had been manufactured. During the conversation, BANDA stated, "All right. Your order is ready." CW4 asked, "Where do I meet you?" BANDA replied, "At the same place? Okay, at the same place."

e. At approximately 5:28 p.m., CW4 drove to the "Little Village" area of Chicago, Illinois. CW4 exited the vehicle and walked to the Church's Chicken at 2806 West Cermak Road and waited for BANDA to arrive.

f. At approximately 6:05 p.m., BANDA arrived at the restaurant

parking lot driving the same maroon Dodge Caravan. BANDA met with CW4, and this meeting was consensually recorded on audio and video. BANDA stated that he did not have the documents at this time and asked CW4 for an additional picture so BANDA could resubmit the order. BANDA stated, "Look there is one problem. . . When I called you, they were giving me the orders. I am checking them now and I didn't get yours. I don't know if they lost the picture. . . Do you want me to go back? Do you want to give me the other picture and I will deliver it to your house? You could say that was my problem. You know? You see, I will deliver it today. . . I will take it to you today." CW4 asked, "If I wait how long will it take?" BANDA replied, "It would take an hour to an hour and a half." Later in the conversation, BANDA stated, "Well, I am telling you. . . if you want, I will return your twenty dollars and that's the end of it." CW4 replied, "I need it urgently." BANDA stated, "That's what I am telling you. . . you can give me the other picture and I will get it made. . . I need the money and you need the card." At that point, CW4 provided BANDA a second photograph.

g. At approximately 6:10 p.m., while BANDA was still meeting with CW4, an outgoing telephone call was placed from Target Phone 13 to (773) 294-0069. During the conversation, BANDA asked, "What's up, pig?" ESTRADA replied, "Nah, dude. There is nothing here, there's nothing here, uh. . . If you put it in an envelope, it was in one. . . in one of the envelopes." BANDA stated, "No, no, the picture was by itself, dude." ESTRADA replied, "Well, it's not here, dude. It's not in the bags, and it's

not even in what I brought a while ago, dude.” BANDA stated, “I gave it to your dad, dude.” ESTRADA asked, “Jose Felix Murillo, is that the one?” BANDA replied, “No, it’s for Luis, Luis Valdez.” ESTRADA replied, “No, dude. Ask him for the photograph again.” BANDA asked, “Then where do I drop it off for you, dude.” ESTRADA replied, “Call my dad.”

h. At approximately 6:11 p.m., CW4 asked, “What happened?” BANDA replied, “I apologize. . . he lost it.” CW4 asked, “How do we do it?” BANDA replied, “Can you wait? I will be back to bring it to you. I will ask him to get it made quickly.”

i. At approximately 6:13 p.m., the meeting ended, and BANDA departed the area.

j. At approximately, 8:02 p.m., CW4 met BANDA at the Church’s Chicken parking lot. This meeting was consensually recorded on audio and video. BANDA arrived at the restaurant parking lot driving the same maroon Dodge Caravan. BANDA presented CW4 with an envelope containing a fraudulent green card and social security card in the name of Luis Valdez. The name “PERRO” was written in pencil on the outside of the envelope. At this point, CW4 paid BANDA the remaining balance of \$80.

l. CW4 positively identified a November 3, 2004, CPD arrest photo of BANDA as the individual who sold CW4 the fraudulent identification documents on

June 4, 2008.

m. On July 20, 2008, at approximately 6:15 p.m., an incoming telephone call was received at Target Phone 13 from (773) 294-0069. During the conversation, ESTRADA asked, "What?" BANDA replied, "Should I give your dad some money or are you going to come over here?" ESTRADA replied, "No, I'll come by." BANDA stated, "I'm going to send you another one and when you come by you can bring it to me and I'll give you some money, all right?" ESTRADA replied, "All right." [I believe BANDA asked ESTRADA to manufacture another fraudulent document for him. I believe BANDA asked ESTRADA if BANDA should pay ESTRADA or ESTRADA's father, MANUEL LOPEZ PEREZ, for the fraudulent document. I believe LOPEZ acts as a runner for his son, ESTRADA.].

**MARTHA ELIZABETH CAMPA RIVERO ("CAMPA")**

56. On May 29, 2008, at approximately 10:04 p.m., an incoming telephone call was received on Target Phone 13 from (773) 879-0325. During the conversation, ESTRADA asked, "What's up?" CAMPA replied, "Make me a blue one." ESTRADA asked, "What's the name?" CAMPA replied, "Benigno. . . . With G as in golf, uh." ESTRADA asked, "Hold on. Oh, damn . . . what kind of a B? Capital B or lower case?" CAMPA replied, "Benigno. . . They did not tell me that." ESTRADA asked, "Hold on. Benigno what?" CAMPA replied, "Rangel." ESTRADA asked, "What's the number?" CAMPA replied, "Three, eight, nine, twenty-nine . . . fifty-one . . . eighty-seven."

ESTRADA stated, "All right then, I'll take it to you right now." CAMPA replied, "Listen . . . Don't take long with that, so I know what to do?" [I believe that CAMPA placed an order with ESTRADA for a fraudulent social security card.]

57. On May 30, 2008, at approximately 11:39 a.m., an incoming telephone call was received on Target Phone 13 from (773) 879-0325. During the conversation, CAMPA stated, "It's Ana Trejo. Ana, J, Trejo." ESTRADA asked, "The date of birth?" CAMPA replied, "Five, twenty three of eighty eight." ESTRADA asked, "She's the one that went there right now, right?" CAMPA replied, "No, she's the one from the picture." ESTRADA stated, "All right then." CAMPA replied, "Put down J, all right? Ana J." ESTRADA replied, "A, J. Trejo, all right." [I believe that ESTRADA and CAMPA were clarifying an order for fraudulent documents.]

58. On July 14 and 15, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW5 purchased fraudulent identification documents from CAMPA as follows:

a. On July 14, 2008, at approximately 11:37 a.m., CW5 placed a consensually-recorded phone call to CAMPA at telephone number (773) 879-0325. During the conversation, CW5 stated, "I'm calling you because Maria gave me your number and I need to get a job, but I don't have papers right now. I was just wondering if you would be able to help me." CAMPA asked, "Uh, who gave you the number?" CW5 replied, "My girlfriend. Her name is Maria." CAMPA asked, "Maria

who? Maria who?" CW5 replied, "Yeah. She just gave me the number. I was asking around and she said, Oh, I know of a lady. So I just wanted to see if . . . how much it'll cost me and maybe if you'd be able to help me." CAMPA asked, "What is it that you need?" CW5 replied, "Well, I need the alien card and the social." CAMPA replied, "Uh-huh." CW5 stated, "It doesn't matter how much it will cost me, my brother's going to help me out." CAMPA asked, "Mm-hm. So where would we meet each other, or what?" CW5 replied, "Well, you tell me where and I'll go over there." CAMPA asked, "You know how to get to 26th, right?" CW5 replied, "Yes, I do know how to get to 26th." CAMPA stated, "If you want, we can meet at the McDonald's on 26th, then." CW5 replied, "Yes, but the thing is, I can't today. But I can tomorrow. . . Whatever time you want, but it'd be best for me at around one o'clock." CAMPA replied, "Okay. That's fine. Just call me and I'll let you know." CW5 stated, "Okay, I'll call you as soon as I get to 26th." CAMPA replied, "I'll let you know what time but just bring your picture." CW5 asked, "Oh, like what type of picture?" CAMPA replied, "A front profile picture." CW5 asked, "Big or small?" CAMPA replied, "Any size, but it has to be a front profile." CW5 asked, "Front profile? And how much do I need to take with me? I just need the social and the alien card." CAMPA replied, "I don't know how much I gave it to her for, did she tell you?" CW5 stated, "No, no, she didn't tell me much, she was at work." CAMPA replied, "Well, I give them out for eighty. What do you think?" CW5 asked, "That's fine. Is that for both of them?" CAMPA replied, "Uh-huh . . . Just bring all of

you information, all right? Name, date of birth. . .” CW5 replied, “Yes, name, address, okay. So, I’ll be at 26th by one o’clock.”

b. On July 15, 2008, at approximately 12:24 p.m., CW5 placed a consensually-recorded phone call to CAMPA at telephone number (773) 879-0325. During the conversation, CW5 stated, “Oh, Ma’am, it’s me, the girl that called yesterday.” CAMPA replied, “Uh-huh.” CW5 stated, “I’ll be there around one-thirty, would that be all right?” CAMPA replied, “Okay, that’s fine.” CW5 asked, “Okay, as soon as I get to . . . what street did you give me?” CAMPA replied, “26th and Kedzie.” CW5 replied, “26th and Kedzie, okay. I hope I can find it, I’m sure I will.” CAMPA replied, “If not, let me know where you are and I’ll meet up with you wherever you are.”

c. At approximately 1:00 p.m., an ICE Agent searched CW5, who was in possession of a passport style photograph which CW5 had brought with him/her.

d. At approximately 1:10 p.m. ICE Agents drove CW5 to the vicinity of 26th Street and Albany Avenue.

e. At approximately 1:52 p.m., CW5 arrived at the front entrance of Walgreens located at 3045 South Albany Avenue, Chicago, Illinois, and met CAMPA. ICE attempted to consensually-record this meeting with audio and video, but the recording equipment failed. ICE observed CW5 enter CAMPA’s vehicle which was occupied by CAMPA and two children who were seated in the backseat of the vehicle.

According to CW5, during the meeting CW5 provided CAMPA with a passport style photograph. Neither CAMPA nor CW5 had a pen and paper to collect CW5's name, date of birth, and additional identifiers and biographical information needed to manufacture a fraudulent green card and social security card. CAMPA stated that she would telephonically contact CW5 in order to collect the identifiers and biographical information. CW5 did not provide CAMPA a deposit. At approximately 2:00 p.m., CW5 and CAMPA each departed the area.

f. At approximately 2:55 p.m., an outgoing telephone call was placed from Target Phone 13 to CW5's telephone. During the conversation, CAMPA asked, "Uh . . .what name is it?" CW5 replied, "Socorro Ramirez." CAMPA asked, "What is the date of birth?" CW5 replied, "It is July seven, seventy-three." CAMPA stated, "All right, then. I will call you." CW5 asked, "Sorry, how long will it take?" CAMPA replied, "About an hour."

g. At approximately 4:30 p.m., CW5 received a telephone call from telephone number (773) 879-0325. CW5 recognized the voice of the caller as CAMPA. This call was not recorded. According to CW5, during this call, CAMPA stated that the fraudulent documents were ready to be picked up and asked CW5 to meet her at the McDonald's located at the corner of 26th Street and Kedzie Avenue.

h. At approximately 4:45 p.m. ICE Agents took CW5 to the vicinity of 28th Street and Kedzie Avenue and CW5 walked north on Kedzie Avenue to the

McDonald's restaurant located at 2609 South Kedzie Avenue in Chicago, Illinois.

i. At approximately 5:43 p.m., CW5 received a telephone call from (773) 879-0325. This call was not recorded. According to CW5, during this call CAMPA stated that she did not feel comfortable meeting CW5 at the McDonald's restaurant and asked CW5 to meet her at the intersection of 25th Street and Kedzie Avenue. CW5 agreed to meet CAMPA at this location.

j. According to CW5, at approximately 5:50 p.m., he/she arrived at the intersection of 25th Street and Kedzie Avenue and observed CAMPA's Mazda Protégé parked in a parking spot on 25th street at the northeast corner of 25th street and Kedzie Avenue. CW5 approached the driver's side window and met with CAMPA who was driving the Mazda. ICE attempted to consensually-record this meeting with audio and video, but the recording equipment failed. According to CW5, during this meeting, CAMPA presented CW5 with an envelope containing a fraudulent green card and a fraudulent social security card in the name of Socorro Ramirez. CW5 paid CAMPA \$80 for the fraudulent documents and CAMPA departed the area in her vehicle.

k. At approximately 6:00 p.m., ICE agents met with CW5 at a predetermined staging location where I recovered the fraudulent documents, transmitter, body recorder, and video recorder. CW5 positively identified a 2007 surveillance photo of CAMPA as the individual who sold CW5 the fraudulent identification documents on July 15, 2008.

**MIGUEL CASTANEDA GOMEZ (“CASTANEDA”) a/k/a “PITUFO”**

59. On June 29, 2008, at approximately 1:29 p.m., an incoming telephone call was received at Target Phone 5 from (708) 250-7901.<sup>11</sup> During the conversation, MIGUEL CASTANEDA GOMEZ asked, “So where do I drop off the jobs?” SOLIS replied, “No, no I’ll call you, so that you leave them there at Central Park. At Central Park and Twenty-four.” [I believe that the conversation involved the delivery of fraudulent documents from CASTANEDA to SOLIS.]

60. On June 30, 2008, at approximately 11:44 a.m., an outgoing telephone call was placed from Target Phone 5 to (708) 250-7901. During the conversation, SOLIS asked, “Where are you?” CASTANEDA replied, “Here on... Lawndale and Twenty-six.” SOLIS stated, “You’re going.” CASTANEDA said, “No dude, I’m here, working but there aren’t any jobs.” SOLIS said, “So you’re not working.” CASTANEDA replied, “No, I’m not working, . . .” [I believe that CASTANEDA was describing to SOLIS the lack of fraudulent document business that day.]

61. On July 1, 2008, at approximately 12:23 p.m., an outgoing telephone call was placed from Target Phone 18 to (708) 250-7901. During the conversation, SOLIS

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<sup>11</sup> Telephone number (708) 250-7901 is subscribed to Jose L. Castaneda at 2232 South 50th Avenue, Cicero, Illinois. According to the Lexis/Nexis database, Jose L. Castaneda has resided at 2232 South 50th Avenue, Cicero, Illinois, since December 2005. CW3 positively identified an arrest photo of CASTANEDA as “Pitufo.” Also, CASTANEDA has responded when addressed as “Pitufo,” such as in the call summarized in paragraph 61.

said, "I was telling you, I want you guys in the morning, Pitufu. I don't have people in the morning, that's when there is work, dude." CASTANEDA replied, "No problem, but I am going to go in the afternoon, to see if anything comes up, dude, because . . . ." SOLIS stated, "And you come, too, dude so that you can ...so you can pay something for the rent, even if it's fifty dollars each, dude." CASTANEDA said, "I will come down now, now, and give me after, after my sister gets here...." [I believe that SOLIS was explaining to CASTANEDA how he needed more workers to solicit fraudulent documents in the morning, when a majority of customers are in the area.]

62. On July 22, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW6 purchased fraudulent identification documents from CASTANEDA as follows:

a. On July 22, 2008, at approximately 11:18 a.m., CW6 placed a consensually-recorded phone call to CASTANEDA at telephone number (708) 250-7901. During the conversation, CW6 stated, "How can I acquire some papers to be able to work? I have an appointment this afternoon." CASTANEDA replied, "We can't talk about this, man. . . Where do we meet?" CW6 replied, "Well, uh . . . I don't know. You tell me." CASTANEDA stated, "We can meet here. We can meet on Kostner. Is that fine?" CW6 asked, "On Kostner?" CASTANEDA replied, "And Cermak." CW6 asked, "Kostner and Cermak?" CASTANEDA replied, "Uh-huh." CW6 asked, "What do you need me to bring, sir?" CASTANEDA replied, "Nothing, we'll talk about it there."

CW6 replied, "Okay, sounds good."

b. At approximately 1:25 p.m., CW6 received a telephone call from CASTANEDA. This call was not recorded. According to CW6, during this call CASTANEDA requested that CW6 meet him at La Chiquita grocery store located at the northeast corner of Cermak Road and 50th Avenue. At approximately 1:42 p.m., CW6 arrived at La Chiquita grocery store located at 4926 Cermak Road in Cicero, Illinois, parked his/her vehicle in the parking lot, and waited for CASTANEDA to arrive.

c. At approximately 1:43 p.m., CASTANEDA arrived and CW6 invited him to enter his/her vehicle. This meeting was consensually recorded on audio and video. CASTANEDA stated, "You know what? There are a lot of cops around and they went to my house about two days ago, dude. . . That's why I told you not to talk to me like that." CW6 replied, "Oh, no well I didn't know, dude. I'm sorry. . . The thing is that my uncle sent me and I got lost." CASTANEDA asked, "Did he tell you how much it was going to be?" CW6 replied, "He said something like ninety, or eighty." CASTANEDA stated, "Right now, it's going to be one hundred bucks, dude, because it's really rough out."

d. At approximately 1:57 p.m., CW6 met with CASTANEDA in CW6's car. The meeting was recorded on audio and video. During this meeting, CW6 provided CASTANEDA with the photograph, name, date of birth, and additional

identifiers and biographical information needed to manufacture a fraudulent green card and social security card. CASTANEDA then collected a \$50 deposit from CW6. During the transaction, CASTANEDA asked, "Let's see, what's your name? Write down your name and date of birth. . . right there, right there on the envelope." CW6 asked, "Do you need one or two pictures?" CASTANEDA replied, "I'll give it back to you. When I return everything, I'll also return the pictures to you. I need half the money." CW6 asked, "How much did you tell me it was?" CASTANEDA replied, "One hundred dollars. . . Let's go. I'm going to tell you where to wait for me. I'm just going to stop for a beer. Can you stop please?" CW6 replied, "You did me the favor of bringing me here." CASTANEDA stated, "Yeah, but I'm telling you that I have to be careful because those guys already have me targeted. Once they start, they don't leave you alone." When CASTANEDA returned to the car after making a purchase at a liquor store, CW6 asked, "Will this be done fast?" CASTANEDA replied, "In about an hour and a half, dude. It's because it needs to be done at the office and stuff, you know?" CW6 replied, "Yes." CASTANEDA stated, "And you are not the only one. There are about two or three more. Understand?" CW6 asked, "What's your name?" CASTANEDA replied, "Pedro Armendariz." CASTANEDA asked, "What did they tell you my name was?" CW6 replied, "No, they didn't tell me a name." CASTANEDA replied, "That's good. . . Look, when I call you. . . Turn this way and go from here to there." CW6 asked, "Do I make a right?" CASTANEDA replied, "Yes, but when I call

you we will meet right there. . . but not at La Chiquita. Go straight past the train tracks and park half way down the street.” CW6 replied, “Yeah, yeah.” CASTANEDA stated, “You can park at the church and I’ll see you there.”

e. At approximately 3:35 p.m., CW6 placed a consensually-recorded telephone call to CASTANEDA at telephone number (773) 250-7901. During the conversation, CASTANEDA stated, “Hey, I’m on my way already, hold on.” CW6 asked, “So, from La Chiquita towards the front of the church?” CASTANEDA stated, “Park right there in front of the church where I told you. Don’t mention any names.” CW6 replied, “Sounds good.”

f. At approximately 4:07 p.m., CASTANEDA arrived at the meeting location, entered CW6's vehicle, and presented CW6 with an envelope containing a fraudulent green card and a fraudulent social security card in the name of Efrain Diaz. This meeting was consensually recorded on audio and video. CW6 paid CASTANEDA the remaining balance of \$50 for the fraudulent documents and CASTANEDA departed the area on foot. During the transaction, CW6 asked, “Did it come out okay?” CASTANEDA replied, “Well if it came out bad, it’s because you are ugly. . . the computer can’t perform miracles.” CW6 stated, “Yeah, it’s good.” CASTANEDA asked, “So, is there any extra cash for me, for this?” CW6 replied, “No, man, I don’t have any extra cash on me. I need the money.” CASTANEDA stated, “I’m going to call you at this number tomorrow. You’re not a cop, right, dude?” CW6 replied, “Nah.”

g. CW6 positively identified an October 11, 2007, CPD arrest photo of CASTANEDA as the individual who sold CW6 the fraudulent identification documents on July 22, 2008.

**ANDRES CHIQUIN (“CHIQUIN”) a/k/a “PELON”**

63. On February 9, 2008, at approximately 2:49 p.m., CW3 placed an outgoing telephone call to (773) 351-9507 on Subject Phone CW3, and the call was consensually recorded.<sup>12</sup> During the conversation, CW3 asked, “Where are you, Pelon?” CHIQUIN replied, “Here at the carwash, dude. . .The one on 28th. What’s up?” CW3 asked, “Well, so I can give you something, to give you a job. . . I’m here on Central Park. Should I take it to you over there?” CHIQUIN replied, “Go to Millard, dude. I’m on my way right now.” [I believe that CHIQUIN agreed to meet with CW3 to pick up his completed fraudulent document.]

64. On February 13, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW7 and CW8 purchased fraudulent identification documents from CHIQUIN as follows:

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<sup>12</sup> Telephone number (773) 351-9507 is an AT&T pre-paid cellular telephone with no subscriber information. According to CW3, CHIQUIN uses (773) 351-9507. CW3 has positively identified an arrest photo of CHIQUIN as “Pelon.” When arrested by CPD on February 7, 2008, CHIQUIN identified himself to law enforcement as “Pelon.” Also, CHIQUIN responded when addressed as “Pelon,” provided the name “Pelon” to customers, and written “Pelon” on fraudulent document orders, such as in the calls and undercover purchases summarized in paragraphs 63, 64(a), 64(e), and 64(h).

a. On February 13, 2008, at approximately 1:55 p.m., CW7 and CW8 drove to the “Little Village” area of Chicago, Illinois, parked near the corner of 26th Street and South Spaulding Avenue, and walked to the corner of South St. Louis Avenue and 26th Street. At approximately 2:22 p.m., CHIQUIN drove past CW7 and CW8 and used a hand gesture to solicit them to purchase fraudulent documents. CW7 and CW8 acknowledged and approached CHIQUIN’s vehicle which CHIQUIN had parked in the middle of St. Louis Street about 100 yards North of 26th Street. The meeting was consensually recorded on audio and video. During the meeting, CHIQUIN stated, “What do you want?” CW7 replied, “I would like a mica. I was told to ask for Pelon.” CHIQUIN said, “That’s me. Come on get in the car. Do you have a car?” CW7 said, “No. Isn’t the place around the corner?” CHIQUIN answered, “No. Get in the car. Go in the back seat with my little girl.” CW7 asked, “What is the price?” CHIQUIN said, “How much did they tell you it would cost?” CW7 replied, “The last time I was here . . . they told me, it depended on . . . you know, what I want is to get the one that will not be rejected . . . to get the one with the laser.” Later in the conversation, CW7 asked, “Listen . . . Listen, if in the future . . . how, I know more buddies who want to get one.” CHIQUIN said, “I will give you my phone number.” CW7 asked, “All right. What do you call it...will you be able to get me some licenses?” CHIQUIN said, “Yes.”

b. At approximately 2:26 p.m., CHIQUIN and CW7 and CW8 arrived

at FOTO STUDIO REYES. While inside FOTO STUDIO REYES, an unidentified female employee asked, "What would you like?" CW7 said, "I need to have some photos taken." The employee said, "Please come this way." CHIQUIN said to CW7, "When we go outside I need to get your information." CW7 said, "Oh? Okay." At this point the employee asked CHIQUIN, "Are you taking any more photos?" CHIQUIN responded, "No. That's all." The employee asked CW7, "The photos and what else?" CW7 said, "No, that's all." CW7 asked, "No, it's all right. How much is it?" The employee responded, "Ten." CW7 asked the employee, "Do you have a receipt? The receipt?" The employee giggled. CW7 asked again, "No? You don't have a receipt?" The employee said, "No." CW7 said, "Don't be a bad sport...do you have a napkin or Kleenex you can give me? Please." The employee said, "Here you are. Thank you."

c. While the CWs were waiting for the photographs to be developed, CHIQUIN received a telephone call on his cell phone. The following was consensually recorded via the CWs' recording devices. CHIQUIN answered the call and said, "Hello? The guy is on the way. Look, I will bring it to your house. Which kind? I will bring it over to your house. I will take the guy over and I will bring it to your house. You don't have to come out. All right then. All right. All right." [I believe that CHIQUIN received a call from one of his customers and was discussing fraudulent document related business.] After the photographs were developed, the female photo studio employee placed the photographs in a manila envelope and handed the envelope to

CW5. The female employee also placed a separate set of photographs in a different manila envelope and handed that envelope to CHIQUIN. [I believe that the employee was providing CHIQUIN photos CHIQUIN needed for a different customer's fraudulent document order.]

d. At approximately 2:31 p.m., and outside the photo studio, CHIQUIN asked, "What do you want . . . you want to buy a mica?" CW7 said, "No. We want a social security and a mica." CHIQUIN said, "Give me the photos . . . and I will go drop it off. What I am going to do is make it on the computer....it will look fucking good. I will call in about forty minutes." CW7 said, "All right. Give me a good price then I will bring you more." CHIQUIN said, "Um-hm. You see, you won't believe it but for this kind...we usually don't sell these in the street for this price . . . because we fucking get them made to another bastard. It's one hundred and eighty dollars . . . you will get it for one hundred and thirty dollars." CW7 asked, "Where do we meet?" CHIQUIN said, "Around here . . . will tell you where to meet me." CW7 did not pay CHIQUIN a down payment in this meeting.

e. At approximately 2:49 p.m., CW3 received an incoming telephone call from (773) 351-9507 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 asked, "How many do you have so far, Pelon?" CHIQUIN responded, "Two. . .Where are you, dude?" [I believe that CW3 was asking how many orders for fraudulent documents CHIQUIN had taken so far that day, and

that CHIQUIN had taken two orders for fraudulent documents. I also believe CHIQUIN's "two" orders were the CWs' order and the order for the other customer whose photo CHIQUIN received while in FOTO STUDIO REYES, as described in paragraph 64(c) above.] CW3 replied, "I came over here to deliver some jobs." CHIQUIN asked, "Are you really working?" CW3 said, "On the street. I'm barely going out to the street." CHIQUIN said, "Don't be a jackass. They're right there. . . . the ones from Imma." [I believe that "Imma" is a coded reference for Immigration and that CHIQUIN was alerted to the presence of ICE agents in the vicinity of 26th Street and St. Louis in Chicago, Illinois.] CW3 asked, "Where are they?" CHIQUIN responded, "In the, in the, in the Blazer." [I believe CHIQUIN noticed a green Blazer with tinted windows in the vicinity of 26th Street and St. Louis in Chicago, Illinois, and I know that on this date and time, an ICE vehicle, matching the exact description provided by CHIQUIN, was at the corner of 26th and St. Louis.] Later in the conversation, CHIQUIN told CW3, "I already let those dudes know, dude. All of those dudes are already at their homes." CW3 asked, "What Blazer?" CHIQUIN responded, "It's right there, right there, right there. . . . it's a Blazer. It's . . . there are some doctors. It's a green one with windows, windows. . . . You can't see anyone inside, but they're there." [I believe that "doctors" is a coded reference for law enforcement.]

f. At approximately 2:57 p.m., CW3 received an incoming telephone call from (773) 351-9507 on Subject Phone CW3, and the call was consensually

recorded. During the conversation, CHIQUIN asked CW3, “Did you already see them, Chinto.” [I believe that “them” is a reference made to the ICE vehicles that were present in the area.] CW3 responded, “Yeah, I already saw them, dude. Where are you?” CHIQUIN replied, “Over here, I came to, to deliver a job.” [I also believe that CHIQUIN was near 26th and St. Louis and CHIQUIN was delivering an order of fraudulent documents to a customer.]

g. At approximately 3:19 p.m., CW7 received a call from telephone number (773) 351-9507. This call was consensually recorded. CW7 asked, “Hello? . . . What happened? . . . Is it ready?” CHIQUIN said, “Yes, it’s ready.” CW7 asked, “Okay. Then we’ll . . . do we meet on Christiana? I came over here to eat at a restaurant. I am on the way back.” CHIQUIN asked, “Where?” CW7 said, “I am the sandwich place. What’s the name? . . . It’s on 26th . . . 26th.”

h. At approximately 3:44 p.m., CW7 approached CHIQUIN in his car at the Burger King parking lot. The meeting was consensually recorded on audio and video. CHIQUIN presented CW7 with a small manila envelope, which originally contained passport style photos from FOTO STUDIO REYES. The envelope now contained a fraudulent green card and fraudulent social security card, each bearing the name and date of birth that CW7 requested, along with the extra passport style photos. On the outside of the envelope was written the names “Pelon” and “Alejandro Martinez,” and the date of birth “12-13-66.” [I know that street level vendors regularly

write their nickname on their customer's envelopes to prevent their orders from getting lost or switched with another order at the "office," and to help the office workers know which street level vendor ordered the documents and which vendor should be charged for the documents to be manufactured.] CW7 asked CHIQUIN how to contact him in the future in case they needed additional fraudulent documents. CHIQUIN wrote the telephone number (773) 351-9507 next to his name on the manila envelope. CW7 paid CHIQUIN \$130 cash for the fraudulent documents and returned to their vehicle. CW7 and CHIQUIN departed the area. No further surveillance was conducted.

i. CW7 and CW8 each positively identified a November 3, 2007, CPD arrest photo of CHIQUIN as the individual who sold them the fraudulent identification documents on February 13, 2008.

65. On July 1, 2008, at approximately 9:01 p.m., an outgoing telephone call was placed from Target Phone 18 to (773) 351-9507. During the conversation, SOLIS asked, "Buddy, ask your client if on the Jorge Contreras Davila. . . is it six, thirty-seven or six eighty-seven? The green card number." CHIQUIN replied, "The number on the green card? You can't make it out?" SOLIS replied, "Yeah, the last three on the Jorge Avila." CHIQUIN asked, "All right. The number on the green card, right?" SOLIS replied, "I'm making it for you. What is the number on the green card? The last three numbers." [I believe SOLIS and CHIQUIN were confirming an order for a fraudulent green card.]

**VERONICA GARCIA ARANA (“GARCIA”), a/k/a “BETTY”**

66. On May 26, 2008, at approximately 1:04 p.m., an incoming telephone call was received at Target Phone 5 from (773) 255-6005.<sup>13</sup> During the conversation, SOLIS asked, “When are you coming over to give me some?” [I believe that SOLIS is having an extramarital affair with GARCIA.] GARCIA replied, “Oh, you asshole.” SOLIS stated, “What? Really, stupid Betty.” GARCIA replied, “Don’t be fucking around, dude. I’m very sick, dude, I’ll get you sick.” SOLIS stated, “Listen, I need you to get a hold of a Corel.” [I believe that SOLIS was referring to Corel, a company that manufactures graphics and productivity software including WordPerfect and a photo-editing software program called Paint Shop.] GARCIA asked, “Because, why, don’t you have that anymore or what’s up?” SOLIS stated, “Yeah but the thing is that I’m going to give Manuel back the corner because he’s just bothering me, dude and I already told him. So I can put up my machines now and I’m letting you know that . . . [I believe that SOLIS asked GARCIA to help him acquire the Corel software so he could install the program on his own computer and return the Organization’s computer to ESTRADA.] GARCIA asked, “For what, dude?” SOLIS replied, “Because I’m missing the Corel so

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<sup>13</sup> Telephone number (773) 255-6005 is subscribed to VERONICA GARCIA at 2456 South Homan Avenue, Chicago, Illinois. According to CW3, “Betty” uses telephone number (773) 255-6005. CW3 positively identified a Illinois Secretary of State ID photo of VERONICA GARCIA, as “Betty.” Also, GARCIA has responded when addressed as “Betty” and “Veronica” such as in the calls and undercover transactions summarized in paragraphs 66, 68, 71, 151(f), 151(g), 151(h), and 151(j).

I can put my . . . ” GARCIA stated, “All right. No well, if you want, uh . . . what was I going to tell you? I will buy it . . . Well with what ever I have left. I bought . . . . another one . . . Do you have Photoshop?” SOLIS asked, “Well then there you go. Look, I buy the Corel, will you give me the disc?” GARCIA replied, “All right.” [I believe that GARCIA told SOLIS that she recently purchased a software program called “Photoshop.” I believe SOLIS agreed to buy the Corel software and asked GARCIA to lend him the “Photoshop” software so he could install the program on his computer. I believe the Organization uses software programs such as Corel Paint Shop and Adobe Photoshop to manufacture fraudulent identification documents.]

67. On July 14, 2008, at approximately 1:29 p.m., an outgoing telephone call was placed from Target Phone 13 to (773) 255-6005. During the conversation, GARCIA asked, “Are you going to take a long time?” ESTRADA replied, “No, I’m almost finished. . . Hey, but this guy did not have anything, Okay? Only the name and the address. It didn’t even have the date of birth.” GARCIA asked, “There was no date of birth?” ESTRADA replied, “No.” GARCIA asked, “Shit! Did you do it?” ESTRADA replied, “Well, yeah. You told me to make everything up and so I did.” GARCIA stated, “This guy is really stupid. Let me call him and I’ll call you right back, yeah?” ESTRADA replied, “Tell him to put the date of birth and the zip code. He just put the address.” GARCIA stated, “All right. . . He doesn’t even have the town?” ESTRADA replied, “No. . . it only says Alan Manjares. . . Twenty-six, forty-nine, West George

Street. That's all it says." GARCIA stated, "Oh, let me call." [I believe that at the time of this call GARCIA was acting as a miquero for the Organization. I further believe that during this call ESTRADA instructed GARCIA to call her customer and get the additional biographical information and identifiers that ESTRADA needed to complete the fraudulent document.]

68. On July 16, 2008, at approximately 12:10 p.m., an incoming telephone call was received at Target Phone 18 from (773) 255-6005. During the conversation, JAIME SOLIS asked, "Where are you?" GARCIA replied, "Eating here at home." SOLIS stated "I'm going . . . have something." GARCIA asked, "Are you bringing something?" SOLIS replied, "Yes dude. Oh, son of a bitch, I think I'm dizzy. Can you believe that... can you believe that from carrying the stupid things, from coming and going I woke up in a lot of pain." [I believe that SOLIS was complaining about moving the equipment that he uses to manufacture fraudulent documents into GARCIA's house. believe that at the time of this call GARCIA's residence at 2456 South Homan Avenue was the new location of the Organization's "office."] GARCIA replied, "Yes." SOLIS stated, "Son of bitch, I'm used to not doing anything, Betty." GARCIA asked, "How fast can you get here?" SOLIS replied, "I'm just barely going to pick up jobs now. I have four or three. In about ten or five minutes." GARCIA asked, "How many do you have?" SOLIS replied, "Four." [I believe that SOLIS told GARCIA that he was bringing four new orders for fraudulent documents.] GARCIA asked, "All right.

Listen, dude, shall we put everything upstairs or downstairs?” SOLIS replied, “Yes. Anywhere you want. Whatever is easier for you.” GARCIA stated, “Well you bring them and I will work on them, no?” SOLIS replied, “Of course.” [I believe GARCIA asked SOLIS where she should set up the equipment to manufacture the fraudulent documents. I believe that SOLIS was in the process of training GARCIA to work at the “office” and manufacture fraudulent documents for the street level vendors.]

69. On July 17, 2008, at approximately 12:13 p.m., an outgoing telephone call was placed from Target Phone 18 to (773) 255-6005. During the conversation, JAIME SOLIS stated, “There is only one job, but the truth is that it’s been there for two hours so you’ll have to make it fast. Okay?” GARCIA replied, “Who? You?” SOLIS stated, “You, dude. What are you doing?” GARCIA replied, “I came to have breakfast. . . Why don’t you go? It’s open.” [I believe that SOLIS asked GARCIA to manufacture a fraudulent document in an expeditious manner. I believe GARCIA instructed SOLIS to go over to the “office” and create the document himself because she had left the residence unlocked.] SOLIS stated, “Well, I can leave it there because I have to do some stuff. The dude is just going to have to wait. I will leave it there under the garage.” GARCIA asked, “In the back?” SOLIS replied, “Yes.” [I believe that SOLIS told GARCIA that he would leave the order under the garage door for her to retrieve after she finished her breakfast.]

70. On July 17, 2008, at approximately 12:50 p.m., an incoming telephone call

was received at Target Phone 18 from (773) 255-6005. During the conversation, GARCIA asked, “Hey, what is it.” JAIME SOLIS replied, “The number is . . . It’s a white one. The number is three, twenty-six . . . our, five, five . . . six, fifty.” GARCIA asked, “So it’s a white one, right?” SOLIS replied, “Yep.” [I believe SOLIS instructed GARCIA to manufacture a fraudulent social security card bearing the number 326-45-5650.]

71. On July 18, 2008, at approximately 1:53 p.m., an outgoing telephone call was placed from Target Phone 18 to (773) 255-6005. During the conversation, JAIME SOLIS asked, “What happen? Did you give it to him?” GARCIA replied, “I’m almost done.” Later in the conversation, SOLIS asked, “Did you give him the job or not?” GARCIA replied, “I’m finishing it up, dude.” SOLIS stated, “Get out of here, dude. I told you at one-thirty, it is already two, Betty.” GARCIA replied, “Get out of here, dude. I told you I was eating, dude. What’s the problem?” SOLIS stated, “He told me that he wanted it and that the customer wanted it at one-thirty because he had been waiting for a fuckin’ long time.” [I believe that SOLIS was frustrated that GARCIA had not manufactured the requested fraudulent document by the 1:30 P.M. deadline.] GARCIA asked, “So they don’t want it anymore?” SOLIS replied, “Make it and let’s find out if he takes it.” GARCIA stated, “All right. It’s going to be ready, dude. It would only be the blue one.” [I believe that “blue one” was a coded reference for a social security card.]

**GERARDO GUZMAN MARTINEZ (“GUZMAN”) a/k/a “CHILANGO”**

72. On May 21, 2007, at approximately 4:52 p.m., an incoming call was received at Target Phone 4 from telephone number (773) 559-6487. During the conversation, GERARDO GUZMAN MARTINEZ said, “I have two white ones.” ESTRADA said, “They’re all the way to eighty, man. Right now when I go over there, man.” [I believe that GUZMAN told ESTRADA that he had an order for two fraudulent green cards. Further, I believe that ESTRADA told GUZMAN that he was on Interstate Highway 80, south of Chicago.] GUZMAN said, “How long ‘til you get here.” ESTRADA said, “Well, in about an hour and a half, two hours.” GUZMAN said, “No way! That’s too much time. . . on eighty, not in fuckin’ Indiana, man.” ESTRADA said, “No, man. I’m doing something.” GUZMAN said, “One of them is for the old lady, man, that came out wrong. You did it wrong.” ESTRADA said, “What was wrong with it.” GUZMAN said, “The name, I think, man, and the age.” [I believe that GUZMAN was frustrated because the last fraudulent document that ESTRADA manufactured for GUZMAN contained an error and ESTRADA was stuck in traffic on I-80.]

73. On June 7, 2007, at approximately 5:18 p.m., an incoming call was received at Target Phone 4 from telephone number (773) 559-6487. During the conversation, GUZMAN asked, “A favor, because. . . one from Michigan, okay?” ESTRADA replied, “Huh?” GUZMAN stated, “Have that dude make me one from Michigan.” ESTRADA replied, “He doesn’t have stamps.” GUZMAN stated, “Oh yeah.

No problem. . . put one on that shines.” [I believe ESTRADA told GUZMAN that he did not have the proper “seal” or hologram needed to replicate a fraudulent State of Michigan ID card. I believe GUZMAN instructed ESTRADA to manufacture the fraudulent document and substitute a different “seal” where the State of Michigan hologram would normally be placed.]

74. On June 13, 2007, at approximately 6:41 p.m., an outgoing call was placed from Target Phone 4 to telephone number (773) 559-6487. During the conversation, ESTRADA stated, “Go over there, dude. Over there in the alley where [Individual B] lives.” GUZMAN replied, “Uh-huh.” ESTRADA stated, “Over there where you live. Behind the alley. Throw them there. . . in the rat thing, dude. But right away, dude, before Jarocho gets there dude.” [I believe ESTRADA instructed GUZMAN to put his fraudulent document orders in the agreed-upon hiding place before SOLIS arrived to retrieve the orders.] GUZMAN asked, “In the back of the alley, where?” ESTRADA replied, “In the alley. There in the rat’s box. Put it there.” GUZMAN replied, “Okay.” ESTRADA stated, “Drop it there fast and then you let me know.” [I believe ESTRADA instructed GUZMAN to deliver fraudulent documents to a hidden location in a public alleyway in the event that law enforcement was watching the area.]

75. On June 13, 2007, at approximately 4:52 p.m., an incoming call was received at Target Phone 4 from telephone number (773) 559-6487. During the conversation, GUZMAN stated, “I have four jobs for you, dude.” ESTRADA replied,

“Don’t mess around, dude.” GUZMAN stated, “Quickly, dude. I got them today.” ESTRADA stated, “We are not finished working, dude.” [I believe ESTRADA was completing some personal errands or work at the time of this call and, therefore, was not in the office and available to manufacture GUZMAN’s fraudulent documents.] GUZMAN replied, “Ah, fuckin’ Manuel, asshole, dude. Don’t mess around.” Later in the conversation, GUZMAN asked, “Are you going to make it? So, I could wait, dude. I’m going to pay you, dude. Right away. It’s not a big deal.” ESTRADA replied, “Yes, dude, yes. . . . But soon, like in an hour, dude. So I can call you and tell you where I’ll meet you.” [I believe ESTRADA agreed to meet GUZMAN in one hour to accept his four orders for fraudulent documents.]

76. On August 15, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW9 purchased fraudulent identification documents from GUZMAN as follows:

a. On August 15, 2008, at approximately 2:52 p.m., CW9 placed a consensually-recorded phone call to GUZMAN at telephone number (773) 853-6908.<sup>14</sup>

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<sup>14</sup> On August 14, 2008, CW3 observed GUZMAN walking on 26th Street in Chicago, Illinois. This meeting was not recorded. According to CW3, CW3 asked GUZMAN if he/she (CW3) could borrow GUZMAN’s cellular telephone to make a phone call. GUZMAN handed CW3 a cellular telephone which was assigned telephone number (773) 853-6908. Telephone number (773) 853-6908 is subscribed to GERARDO GUZMAN at 3007 South Trumbull Avenue, Chicago, Illinois. According to the Lexis/Nexis database, GERARDO GUZMAN has resided at 3007 South Trumbull Avenue, Chicago, Illinois since December 2007.

During the conversation, CW9 stated, "I was given your number and wanted to see if you could help me. I lost my job and I'm in a bind because I don't have a job and need to support my kids. I wanted to see if you could help me. . . a blue and white one. I got the number from a friend that got his jobs made by you." GUZMAN asked, "Where are you now?" CW9 replied, "Look, I can meet you on Twenty-Fourth and Pulaski. The only thing is that I need to get some pictures taken first. The guy that recommended you said that you do a really good job." GUZMAN asked, "Pulaski and Twenty-Fourth?" CW9 replied, "Yeah or, or where are you? Where can I see you?" GUZMAN stated, "Well. . . around Forty-Seventh and Pulaski." CW9 replied, "Okay, so then I'll call you in about half and hour when I get the pictures. . . any specific location or place?" GUZMAN stated, "In front of the Walgreen's. . . just call me, call me when you are there."

b. At approximately 4:21 p.m., GUZMAN and CW9 met in the Walgreen's parking lot located at 3943 West 47th Street, Chicago, Illinois. UCA1 was driving the vehicle and CW9 was in the passenger seat. GUZMAN entered the car and sat in the back seat. This meeting was consensually recorded on audio and video. CW9 provided GUZMAN with the photograph, name, date of birth, and additional identifiers and biographical information needed to manufacture a fraudulent green card and social security card. GUZMAN wrote this information on the small manila envelope which CW9 received from FOTO STUDIO REYES when he/she purchased the

passport style photographs. CW9 then provided GUZMAN with a \$70 deposit.

c. During the meeting, GUZMAN stated, "Wait in there." CW9 asked, "How are you? Can you make me a job?" GUZMAN replied, "Yes. What is it that you need?" CW9 stated, "A blue one and a white one, the green card." GUZMAN replied, "Let me take a look at the pictures." CW9 stated, "I can give you the. . . what's it called?" GUZMAN replied, "The information." CW9 stated, "Write it down if you'd like." GUZMAN asked, "What's your name?" CW9 replied, "Oscar Nava. . . April thirteenth of seventy. . . Which ones are the ones you guys have? I was told you have the better ones." GUZMAN replied, "I have the original laser green card. . . It's a little more expensive, but it's better." CW9 asked, "How much will you sell it to me for?" GUZMAN replied, "Honestly, the best I can do is one-thirty. . . you'll be getting the laser green card. . . It'll be good for ten years. You'll also get the social along with the green card." CW9 asked, "All right. How long will it take?" GUZMAN replied, "Well, I'll deliver it to you here in about an hour and a half. . . You have to pay me half and the other half I'll get when I deliver it to you." At this point CW9 provided GUZMAN a \$70 down payment for the document order. At approximately 4:27 p.m., GUZMAN, UCA1, and CW9 departed the area.

d. At approximately 6:24 p.m., GUZMAN and CW9 entered GUZMAN's vehicle, and the meeting was consensually recorded on audio and video. GUZMAN presented CW9 with a manila envelope that contained a fraudulent green

card and a fraudulent social security card in the name of Oscar Nava. CW9 paid GUZMAN the remaining balance of \$60 and exited the vehicle.

e. UCA1 and CW9 each positively identified a February 9, 2008, CPD arrest photo of GUZMAN as the individual who sold UCA1 and CW9 the fraudulent identification documents on August 15, 2008.

**CLAUDIA LARA (“LARA”)**

77. On April 16, 2008, at approximately 6:58 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 216-5251. During the conversation, CLAUDIA LARA stated, “Ah, dude, where is it? It’s . . . it’s Carmen. Can you hear me?” JAIME SOLIS replied, “Carmen.” LARA stated, “Carmen Diaz.” SOLIS replied, “Uh-huh.” LARA stated, “Vega. V as in Victor, E, G, A.” SOLIS replied, “Vega?” LARA stated, “Vega, Ve . . . ga. Like the Vega shoe store.” SOLIS asked, “Number?” LARA replied, “five, eight, three, four, seven, three, six, two, eight. . . . The other one.” SOLIS asked, “The other one?” LARA stated, “Rosa.” SOLIS replied, “Rosa.” LARA stated, “Imelda.” SOLIS replied, “Imelda.” LARA stated, “Cardenas with an S at the end.” SOLIS asked, “S as in Samuel?” LARA replied, “S as in Samuel.” SOLIS asked, “Imelda with an H?” LARA replied, “Rosa Imelda without the H, I as in India.” SOLIS asked, “Number?” LARA stated, “Three, forty-five.” SOLIS replied, “Hold on.” LARA stated, “Three, four five, ninety, zero, nine, four, nine . . . Okie-dokie. There?” SOLIS replied, “There.” [I believe that LARA placed an order for two fraudulent social

security cards.]

78. On April 24, 2008, at approximately 11:37 a.m., an outgoing telephone call was placed from Target Phone 5 to (773) 216-5251. During the conversation, LARA stated, "About my job. That's why I was calling you. I said to myself, this guy doesn't want to talk to me anymore." JAIME SOLIS replied, "Call, call [CW3], because I'm washing right now. So he can go and pick it up." LARA replied, "Okay, Thank you." [I believe that SOLIS told LARA that he would send CW3 to pick up her order for fraudulent documents.]

79. On July 1 and 2, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW10 purchased fraudulent identification documents from LARA as follows:

a. On July 1, 2008, at approximately 10:36 a.m., CW10 placed a consensually-recorded phone call to LARA at telephone number (773) 216-5251. LARA did not answer the telephone call, but she called CW10 back approximately 30 seconds later from telephone number (773) 216-5251, and the call was recorded.

b. During the conversation, CW10 stated, "A friend of mine gave me your number. . .to see if you can help me get something that you helped her out with." LARA asked, "Oh, okay. Where are you now?" CW10 replied, "I'm not in the area right now, I'm by my house. I wanted to see if I could see you tomorrow." LARA stated, "Okay, give me a call." CW10 asked, "How much does it cost, more or less?" LARA

replied, “Well it depends on what you want.” CW10 stated, “I want both, social security card and green card.” LARA replied, “Okay, it’s going to be one twenty . . . call me tomorrow so we can agree on a spot to meet.”

c. On July 2, 2008, at approximately 2:40 p.m., CW10 placed a consensually-recorded phone call to LARA at telephone number (773) 216-5251. During the conversation, CW10 stated, “Hi, good afternoon. This is [CW10's], the [guy/girl] that called you yesterday. . . I’ll be in the area in about 45 minutes.” LARA replied, “Okay.” CW10 asked, “Where would we meet?” LARA replied, “So it can be easier for you, how about around the salon on 25th and St. Louis . . . I’ll go to your car so you won’t have to get out.” CW10 replied, “Okay, okay, sounds good. I’ll call you when I’m there then.”

d. At approximately 3:33 p.m., CW10 and LARA met near the intersection of St. Louis Avenue and 25th Street.

e. The meeting was consensually recorded on audio and video. LARA entered CW10's car and stated, “Well it’s because I saw a cop and said to myself, ‘Maybe I shouldn’t stop.’ I thought you were a cop.” CW10 replied, “Oh come on. How are you? . . . Well my friend told me that at the beginning of this year you had been able to get her a social and a green card and I wanted to see if you could help me. I just got here from Mexico.” LARA asked, “What kind of green card is it that you want?” CW10 replied, “Well, I spoke to you yesterday and you said it would be one twenty.

The one that costs one twenty because that's all I have." LARA asked, "It will be the white green card . . . Did you bring the pictures?" CW10 replied, "Yes, I brought the pictures." LARA stated, "Leave me the name and date of birth." CW10 asked, "Will this work and I'll keep the other ones? Is two enough. . ." According to CW10, at this point CW10 presented LARA with two passport style photographs. LARA replied, "It was supposed to be without glasses." CW10 stated, "I don't have a pen. Would you happen to have a pen?" LARA replied, "Uh, no." CW10 stated, "Or you can call me and I'll give you my information." LARA replied, "Okay, yeah." CW10 asked, "In about how much time, more or less?" LARA replied, "Well about one or two hours." CW10 asked, "And what about the money?" LARA replied, "Well if you like, you can pay me when I give it to you." CW10 asked, "Okay. And do I meet you here at the same spot?" LARA replied, "Yeah. I live over there."

f. At approximately 3:36 p.m., ICE agents observed LARA exit CW10's vehicle and enter the front door of the residence located at 2445 South St. Louis Avenue.

g. At approximately 3:38 p.m., CW10 received a telephone call from telephone number (773) 216-5251. CW10 recognized the voice of the caller as LARA. This call was not recorded. According to CW10, during this call LARA asked CW10 for his/her name and date of birth. CW10 provided LARA with the name Liliana Rodriguez and a birth date of November 20, 1985.

h. At approximately 3:43 p.m., LARA placed a telephone call from (773) 216-5251 to Target Phone 18, and the call was recorded. During the conversation, LARA asked, "Do you have time now?" SOLIS asked, "What's going on?" LARA replied, "So you can make one for me." SOLIS replied, "I'll send Chamaco over by you right now." [I believe LARA called SOLIS to tell him that she had received an order for fraudulent documents. I believe that SOLIS told LARA that he would call HUMBERTO TREJO a/k/a Chamaco and have him pick up the order from LARA.]

i. At approximately 6:50 p.m., LARA received a telephone call at (773) 216-5251 from Target Phone 18, and the call was recorded. During the conversation, LARA asked, "Yes?" SOLIS stated, "It's already in the box." LARA replied, "Okay. Thank you." [I believe that SOLIS informed LARA that he had finished manufacturing her order and had placed the fraudulent documents inside a "box" for her to pick up at a later point in time. According to CW3, the Organization uses a metal electrical box on the west facing wall of the Payless Shoe store as a "dead drop" location. I believe that SOLIS placed LARA'S order for fraudulent documents in this box.]

j. At approximately, 7:16 p.m., CW10 received a phone call from LARA using telephone number (773) 216-5251, and the call was consensually recorded. During the conversation, LARA stated, "Hello, they're ready." CW10 replied, "Oh, okay. So, I'll be there in about fifteen minutes. I'm here on 26th." [I believe that LARA told CW10 that CW10's fraudulent documents were ready to be picked up.]

k. At approximately 7:39 p.m., CW10 arrived at the intersection of St. Louis Avenue and 25th Street, and parked on the 2400 block of St. Louis Avenue. The meeting was consensually recorded on audio and video. After LARA approached the front passenger window of CW10's vehicle, LARA presented CW10 with an envelope containing a fraudulent green card and social security card in the name of Liliana Rodriguez. After receiving the fraudulent documents, CW10 paid LARA \$120.

l. The following conversation took place with LARA standing at the front passenger window talking to CW10 who was seated in the driver's seat of his/her vehicle: CW10 stated, "Thank you so much." LARA replied, "Yes, of course." CW10 asked, "So if I want to come for anything else. . . is this all you sell?" LARA replied, "Uh, driver's license from here, ID's from here." CW10 asked, "How much are those?" LARA replied, "Those are one-thirty. . . but they come out really good."

m. CW10 positively identified a State of Illinois ID photo of LARA as the individual who sold CW10 the fraudulent identification documents on July 2, 2008.

80. On July 8, 2008, at approximately 3:58 p.m., an incoming call was received at Target Phone 18 from telephone number (773) 216-5251. During the conversation, LARA asked, "I want to know if you picked up my job." SOLIS replied, "I haven't gone up there, Claudia." LARA stated, "Man, Jarocho!" SOLIS replied, "That's what you don't understand. Yesterday, Brody got mad because of the same thing. He calls me and says he wants a job done. Well, wait, dude. I'm not going up

there for just one damn job.” LARA asked, “Can I call you later?” SOLIS replied, “Yeah.” [I believe LARA was frustrated because SOLIS had not picked up her order for fraudulent documents. I believe SOLIS explained to LARA that he is not willing to make a “run” to 26th Street for just one order. I believe SOLIS prefers to wait until multiple orders are ready to be picked up, thus limiting his exposure to law enforcement in the vicinity of 26th Street.]

**MANUEL LOPEZ PEREZ (“LOPEZ”)**

81. The following sequence of calls indicates that MANUEL LOPEZ PEREZ is using (773) 879-4088:<sup>15</sup>

a. On April 17, 2008, at approximately 7:11 p.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, JAIME SOLIS said, "I'm going to eat with my old lady, dude. If you want, once I'm done eating I'll do it. It's probably Brody's, right? Because that fucker never called me again, dude." MANUEL ESTRADA replied, "No, they are for Hielo, dude." SOLIS stated, "Well, let me see, it won't be that long." ESTRADA replied, "It's four of them." SOLIS stated, "Tell your dad to wait an hour, dude. Until I finish

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<sup>15</sup> Telephone number (773) 879-4088 is subscribed to MANUEL ESTRADA at 3309 West 38th Place, Chicago, Illinois 60632. According to Lexis/Nexis records, from October 2006 through February 2008, MANUEL ESTRADA resided at 3309 West 38th Place, Chicago, Illinois 60632. CW3 positively identified a June 5, 2008, surveillance photo of MANUEL LOPEZ PEREZ as ESTRADA’s father. Also, LOPEZ has responded when addressed as “Manuel,” and provided the name “Manuel” to customers such as in the undercover purchase summarized in paragraphs 82(a)-(c), and 82(i).

eating.” [I believe that ESTRADA asked SOLIS to manufacture four sets of fraudulent documents for a miquero named "Hielo.” I believe that SOLIS told ESTRADA that he would manufacture the documents and return them to ESTRADA's father after SOLIS finished eating dinner.]

b. On April 17, 2008, at approximately 8:07 p.m., an outgoing telephone call was placed to Target Phone 5 from (773) 879-4088. During the conversation, JAIME SOLIS asked, "I'm here in the parking lot.” An individual later identified as ESTRADA's father, MANUEL LOPEZ PEREZ, stated, "I'm also here. They gave them to me about two hours ago and they're already bothering the shit out of me.” SOLIS replied, "Oh, but I just told Manuel I was going to go eat. It's just that also . . . no, in other words, I'll make them. The thing is that when he told me I said, there isn't anything anymore . . . , there's nothing. I'm going to go see my wife. He said they were Hielo's, right?” [I believe that SOLIS called LOPEZ to confirm that SOLIS would manufacture the fraudulent documents for Hielo, as soon as he finished eating dinner with his wife.]

c. On April 17, 2008, at approximately 8:19 p.m., an incoming telephone call was received at Target Phone 5 from (773) 879-4088. During the conversation, JAIME SOLIS asked, "Hello?” LOPEZ replied, "Yes, well he said one is a license and the other two are ID. And he said, It's stated there. How the hell . . . ?” SOLIS replied, "They don't even state . . . Don't fool yourself.” LOPEZ stated, "It's

stated there on the paper. One states license and . . . " SOLIS replied, ". . . two are fuckin' IDs and the woman's is a white one." LOPEZ replied, "Two fuckin' IDs." SOLIS replied, "Okay. It's set. Tell that son of a bitch. I've . . . told him a shitload of times, state it's a license, a white license! He doesn't remove anything! It's another fuckin' thing that . . . !" LOPEZ stated, "Right now . . . I'm going to show you the papers right now." SOLIS replied, ". . . don't even know how to write! Son of a bitch . . . All right." [I believe that LOPEZ is a runner for the organization, and on this occasion, submitted multiple fraudulent document orders to SOLIS. I believe that SOLIS was frustrated because the street level vendor(s) did not specify which type of fraudulent document he/she wanted.] Later in the conversation, SOLIS stated, "That's why I'm telling you. Because there have been plenty of times when they send in, send in jobs . . . and put in the address and all . . . and they end up being white ones." LOPEZ replied, "I have pens with me so I told him, 'Did you already state what they are?' Because I'm not the one doing them. I'm going to send them off." SOLIS replied, "Son of a bitch . . . Yes, I'll take them over right now. I'm about to finish. I'll send them over right now." [I believe that SOLIS told LOPEZ that SOLIS would deliver the completed fraudulent documents.]

82. On June 5, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW11 purchased fraudulent identification documents from LOPEZ as follows:

a. On June 5, 2008, at approximately 1:16 p.m., CW11 placed a consensually-recorded phone call to Target Phone 4. During the conversation, CW11 stated, "Hello. Yes, good afternoon. Excuse me, sir. I was just calling to find out if this is the number where you can do a job for me." LOPEZ asked, "Yes. But, who, who referred you to us?" CW11 replied, "My friend who had some. . . papers done with you last year. You know what I mean, sir. Some. . . papers." LOPEZ asked, "All right. . . How many jobs are there?" CW11 replied, "Just one, sir." LOPEZ stated, "Meet with me at. . . here downtown around Pulaski and Twenty-Fourth. . . There's a restaurant called, Islas Marias." CW11 asked, "Okay. Uh, how am I going to recognize you, sir?" LOPEZ replied, "When you're arriving. . . call me when you're arriving." CW11 asked, "Okay. Then we'll meet shortly, sir. Excuse me, whom should I ask for?" LOPEZ replied, "Manuel." CW11 asked, "Manuel. And, by the way, how much are they, sir?" LOPEZ replied, "Right now they are one hundred." CW11 asked, "In a few words, one hundred for the green card and the social?" LOPEZ replied, "Oh, so you want both? For work?" CW11 replied, "Uh-huh. Exactly." LOPEZ stated, "Just don't say. . . don't say too much over the phone. It will be one hundred and twenty, for both."

b. At approximately 1:17 p.m., CW11 received a consensually-recorded phone call from LOPEZ using Target Phone 4. During the conversation, LOPEZ asked, "Do you have the information and everything else with you?" CW11 replied, "Yes, sir. How many photographs are you going to need, sir?" LOPEZ replied, "Only one." CW11

stated, "Okay. I'll take it to you, Mr. Manuel."

c. At approximately 2:08 p.m., CW11 arrived at Las Islas Marias located on the southwest corner of Pulaski Road and 24th Street in Chicago, Illinois. At approximately 2:29 p.m., LOPEZ arrived at the restaurant. This meeting was consensually recorded on audio and video. At approximately 2:30 p.m., LOPEZ asked, "How are you doing, young man?" CW11 replied, "Good. Good. What are you charging me for both? How much for both?" LOPEZ stated, "I already told you, right? That's the best price I can give you." CW11 replied, "Come on boss, leave me some money for the train. You know? How about one hundred dollars?" LOPEZ replied, "All right. . . And your information?" The CW11 replied, "Oh . . ." LOPEZ stated, "Come inside. . . get in." CW11 entered the Pontiac Grand AM using the front passenger door. LOPEZ asked, "What's your name?" CW11 replied, "Carlos Jimenez." LOPEZ asked, "Is it written with a Z?" CW11 replied, "Yes . . . April twelfth, nineteen seventy-seven." LOPEZ asked, "The social security?" CW7 replied, "The social number? Can you get me a number from California area? I don't know what number." LOPEZ replied, "I don't know? I have to mention it to them. . . to see if. . ." CW11 stated, "All right. Can you get me a number from this area? That's not a problem." LOPEZ asked, "Is it nineteen seventy-seven?" CW11 replied, "Yes, nineteen seventy-seven. I believe the number for this area starts with a three, right?" LOPEZ replied, "Some make it using six, and some with three, but it does start with three." CW11 asked, "Give me a

number from this area. All right?” LOPEZ replied, “I will call you as soon as it is ready. Then you can come get it.” CW11 replied, “All right, boss. Manuel?” LOPEZ replied, “Yes.” CW11 stated, “It’s a pleasure meeting you.” At approximately 2:32 p.m., CW11 exited the vehicle and departed the area on foot.

d. During the meeting between LOPEZ and CW11, I observed ESTRADA arrive driving a white Chrysler minivan bearing Illinois temporary license plate 627J268. According to LEADS, the vehicle is registered to Manuel Lopez at 2635 South Homan Avenue, Chicago, Illinois. ESTRADA waited inside the minivan until LOPEZ completed the meeting with CW11 . Afterwards, both the minivan and the Grand Am departed the area traveling east on 24th Street.

e. At approximately 2:26 p.m., an ICE Agent drove past the Pontiac Grand AM and the Chrysler minivan which has stopped and parked on 24th Street between Harding Avenue and Springfield Avenue. ICE observed LOPEZ standing on the street talking to ESTRADA through the driver’s side window of the Chrysler minivan.

f. At approximately 2:28 p.m., ICE observed ESTRADA exit the Chrysler minivan and get into the front passenger seat of the Pontiac Grand AM. An ICE Agent then observed LOPEZ get into driver’s seat of the Pontiac Grand AM, and the vehicle departed the area.

g. At approximately 3:33 p.m., CW11 received a telephone call from

LOPEZ from Target Phone 4. This call was not recorded. According to CW11, during this call, LOPEZ stated that he would be arriving shortly at the parking lot located on the southeast corner of Cermak Road and Pulaski Road.

h. At approximately 3:34 p.m., LOPEZ arrived at the parking lot, and CW11 approached and entered LOPEZ's vehicle. This meeting was consensually recorded on audio and video.

i. CW11 asked, "What's up, boss? Is it ready?" LOPEZ replied, "Yes, it's ready." CW11 asked, "How is the quality?" LOPEZ presented CW11 with a fraudulent green card and social security card in the name of Carlos Jimenez and replied, "You know. . . take a look." CW11 stated, "Look at this. . . What about the social security card?" LOPEZ replied, "Here it is." CW11 stated, "It's great. It's ready. You go ahead and count it." At this point, CW11 paid LOPEZ \$100 for the fraudulent documents. LOPEZ replied, "We're done. Call me if you need anything else." CW11 asked, "What else can you get for me?" LOPEZ replied, "You know. . . voter registration cards . . . IDs . . . Licenses from Mexico." CW11 asked, "From what states. . .do you have any from the State of Mexico?" LOPEZ replied, "From Acapulco and other states . . . legal ones." CW11 stated, "All right then. Next time I call you, do I ask for you? Who do I ask for?" LOPEZ replied, "The same way. . . ask for Manuel but don't say anything on the phone."

83. On June 7, 2008, at approximately 4:55 p.m., an incoming telephone call

was received at Target Phone 13 from Target Phone 4. During the conversation, LOPEZ asked, "Listen, do you want. . . that phone number?" ESTRADA replied, "Whose?" LOPEZ replied, "For that. . . the job from yesterday. The bad one." [I believe that "the phone number" was a coded reference for a fraudulent social security number. Further, I believe that the "bad one" was a coded reference for a recently manufactured fraudulent document that contained an error.] ESTRADA stated, "Let's see, pass me the number." LOPEZ stated, "Three, four, eight. . . eighty. . . fifty-six. . .zero, nine." ESTRADA asked, "Did you see it? Have you seen the sheet yet?" LOPEZ replied, "Luis. No, I haven't see it. Luis N. Arreola." ESTRADA asked, "N?" LOPEZ replied, "Yes. Luis N. Arreola." [I believe that the two individuals were clarifying an order for a fraudulent social security cards in the name of Luis N. Arreola with social security number 348-80-5609.]

84. On July 23, 2008, at approximately 1:17 p.m., an outgoing telephone call was placed from Target Phone 13 to (773) 391-1753. [I believe that on or about May 29, 2008, MARTINEZ sold telephone number (773) 391-1753 to ESTRADA, and that LOPEZ was using (773) 391-1753 on this date.] During the conversation, ESTRADA stated, "Hey, call that dude because he forgot the date of birth. Ask him what his nationality is because the last name doesn't seem to be Mexican." LOPEZ replied, "Well it's a green card, my son, which he needs." ESTRADA stated, "That's why. . . it has the nationality. His last name is Umanzor." [I believe that ESTRADA and LOPEZ

were clarifying an order for a fraudulent green card.]

**ULYSES MARTINEZ (“MARTINEZ”) a/k/a “CUADERNO”**

85. On June 11, 2007, at approximately 5:11 p.m., an outgoing call was placed from Target Phone 4 to telephone number (773) 391-1753. During the conversation, MARTINEZ stated, “He doesn’t have stamps.” ESTRADA asked, “Who?” MARTINEZ replied, “The one who made me buy the twenty sheets.” ESTRADA stated, “No buddy. What do I need so many sheets for, dude? Tell him I’ll give him fifty bucks for three sheets.” MARTINEZ replied, “I don’t think so, but let me call him . . . “ ESTRADA stated, “Call me right away because the client is coming from Indiana, so that way I could tell him to come or not.” [I believe that ESTRADA was attempting to manufacture a fraudulent state of Indiana ID card, but did not have the proper hologram. I believe that ESTRADA called MARTINEZ to purchase three “sheets” of fraudulent state of Indiana holograms.]

86. On July 10, 2007, for purposes of furthering this criminal investigation, UCA2 and UCA3 purchased fraudulent identification documents from MARTINEZ as follows:

a. On July 10, 2007, at approximately 2:45 p.m., UCA2 and UCA3 parked a vehicle near the intersection 26th Street and Central Park Avenue in Chicago, Illinois and met with MARTINEZ. This meeting was consensually recorded on audio and video. While the UCAs were parking, MARTINEZ said to UCAs, “You’ll

get a ticket there.” UCA2 said, “Huh?” MARTINEZ said, “You’ll get a ticket because it’s the stop.” UCA2 asked, “Where can I find an ID?” MARTINEZ responded, “It’s for the . . . one eighty.” UCA2 asked, “How much?” MARTINEZ said, “One eighty for each.” UCA2 asked, “It’s the driver’s license?” MARTINEZ said, “Driver or ID. You no policeman?” UCA2 said, “No. I need driver’s license, driver’s license and...” MARTINEZ asked, “And ID?” UCA2 said, “I need a social security.” MARTINEZ asked, “Drivers and social? Give me one fifty, it’s okay.” UCA2 asked, “What about the picture?” MARTINEZ said, “It’s ten, eight, eight dollars for two pictures.”

b. At approximately 2:54 p.m., MARTINEZ and UCA2 walked eastbound on 26th Street. MARTINEZ said, “Okay, you go. The, the light.” UCA2 asked, “Where?” MARTINEZ said, “And then you, you the light next and the studio.” UCA2 asked, “What’s the name of the studio?” MARTINEZ said, “Uh . . . Davila.” MARTINEZ said, “Yes, it’s two.” UCA2 asked, “Just tell them two pictures?” MARTINEZ said, “Yes, for ID.” [I believe MARTINEZ directed UCA2 to go to FOTO DAVILA INC to obtain two photos for his fraudulent identification documents.]

c. At approximately 2:58 p.m., UCA2 entered FOTO DAVILA INC while MARTINEZ waited outside. UCA2 said to an unidentified female employee, “With a blue background.” UCA2 to the rear of the photo studio and his/her picture was taken. UCA2 walked to the front of the photo studio and paid the employee \$8.80.

d. At approximately 3:02 p.m., UCA2 departed FOTO DAVILA INC.

MARTINEZ said, "Just wait you inside the, the . . . your truck and put it your name, everything . . . information, and put it inside." UCA2 asked, "What...uh...want to go in the truck?" MARTINEZ said, "Yes, I'm coming, I'm coming." UCA2 asked, "What uh...state can you give me? Can you give me Idaho or Washington?" MARTINEZ asked, "Oh, for Illinois?" UCA2 said, "No, no Illinois." MARTINEZ said, "Let me see, let me talk to my friend. Just stay in the truck." MARTINEZ asked, "Hey my friend, Indiana, Michigan?" UCA2 said, "Indiana, Michigan, what else? I need something close to California. What can you, what can you do?" MARTINEZ asked, "California?" UCA2 said, "No, not California, like I mean Arizona, Idaho." UCA2 asked, "Texas, Michigan?" MARTINEZ said, "Michigan is good?" UCA2 asked, "Can you give me a social from Michigan too?" MARTINEZ said, "Yeah, social and . . . " UCA2 said, "Michigan." MARTINEZ said, "Okay." UCA2 said, "Okay, make it from Michigan." UCA2 asked, "You, you put address and everything, okay?" MARTINEZ said, "Yes." UCA2 said, "I don't know the address." MARTINEZ asked, "What is the name?" Later in the conversation, MARTINEZ said, "Birthday, pounds, driver's license, social." Also later in the conversation, MARTINEZ said, "Give me your signature and the other paper, white. You pay for the ticket. No, no, and the ticket, and the white. You paid in the inside, no? . . . In the white . . . Okay, let me see. Put it here, your signature." UCA2 asked, "You have phone number for you?" MARTINEZ said, "Yes, my business card." MARTINEZ then provided telephone number (773) 391-1753 to UCA2 who

asked, "How long, how long it take?" MARTINEZ said, "Maybe one hour and a half." MARTINEZ also said, "Only, only one deposit for this." UCA2 asked, "How much? . . . . Twenty." MARTINEZ said, "Forty Dollars." At this point, UCA2 gave MARTINEZ a \$20 deposit.

e. At approximately 5:08 p.m., UCA2 and UCA3 met MARTINEZ at the parking lot of the Payless Shoe store, located on the northeast corner of 26th Street and St. Louis Avenue in Chicago, Illinois. This meeting was consensually recorded on audio and video. UCA2 asked, "Everything good, man?" MARTINEZ said, "Yeah." UCA2 said, "Here you go friend." At this point, MARTINEZ handed the UCAs a fraudulent state of Michigan driver's license and a fraudulent social security card, and the UCAs paid MARTINEZ the \$120 balance.

f. UCA2 and UCA3 paid the remainder of the money, which was \$120.00 and retrieved the fraudulent documents.

g. I reviewed a picture of MARTINEZ which was taken from a hidden camera which was worn by a UCA. I compared this picture to a CPD arrest photo of MARTINEZ and concluded it is the same person.

87. On February 1, 2008, at approximately 7:33 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 391-1753. During the conversation, CW3 asked, "What's going on with the stamps?" MARTINEZ replied, "That son of a bitch has not called me back, dude. I told

him . . . you said a sheet of white ones, right? And a sheet of the consulate.” [I believe that “white ones” was a coded reference for white colored immigration resident alien cards and “consulate” was a coded reference for Mexican consulate identification card or “Matricula.”] CW3 said “Yes.” MARTINEZ asked, “The one from Mexico?” Later in the conversation, MARTINEZ said, “Well, I need to see if the other dude is going to ask for seals. If he wants any I will let you know for when, dude. I’ll tell you tomorrow.” [I believe that MARTINEZ was frustrated with a customer who has not responded to his telephone calls, that MARTINEZ did not know which types of fraudulent documents his customer wanted, and that MARTINEZ would tell CW3 if his customer wanted to buy seals for the blank fraudulent documents.]

88. On February 17, 2008, at approximately 1:26 p.m., CW3 received an incoming telephone call from (773) 391-1753 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 asked, “What’s up, Cuaderno?” MARTINEZ asked CW3, “Where are you?” CW3 responded, “Yeah, I’m going to pick up the jobs from that dude’s house. . . . my jobs, well that’s the only one we’ve gotten, I believe.” [I believe that this conversation involved retrieving orders for fraudulent documents.] MARTINEZ said, “Yes, dude. I told you that he called me and said, no. He said, I want to talk to you. Don’t say anything, okay? To anyone, dude. . . . He said, I want to talk to you. He said, let’s, let’s see what we’re going to do. He says, let’s become partners and all that shit.” [I believe that MARTINEZ was describing the fact

SOLIS had discussed promoting MARTINEZ to a partner in the overall sales of fraudulent documents by the St. Louis Crew.]

89. On February 28, 2008, at approximately 10:49 a.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 391-1753. During the conversation, MARTINEZ asked, “How many did you guys get yesterday?” CW3 asked, “Huh?” MARTINEZ asked, “Did he get jobs? No.” CW3 said, “Yes, dude. Pelon got nine. Uh-huh, all at once, dude, with some that came from Ohio. So then they told him that if those are accepted he was going to bank it, dude. Because the entire factory, the one that brought them was the boss, I think. And the, the boss was going to get him in touch with the entire factory. Because they were asking them for the, the green cards. So then he got nine. Payaso also got about ten . . . nine . . . ten . . . But I only got two, dude, and a social for fifty. You see?” [I believe that CW3 and MARTINEZ were discussing the sale of a large volume of fraudulent documents to an individual from Ohio who needed the documents for factory workers who are not authorized to work in the United States. I believe that “bank it” refers to the fact that CHIQUIN a/k/a “Pelon” and MIRANDA a/k/a “Payaso” stood to make a lot of money if the Ohio customer liked the quality of the green cards and purchased them for every worker in the factory.] Later in the conversation, MARTINEZ asked, “And what’s up with Juliana? The corner or not?” CW3 asked, “Are you coming down here or not?” MARTINEZ responded, “Yeah. What is going on with

Juliana? Is he going to keep the corner or not?" [I also believe that "Juliana" is a reference to SOLIS and that MARTINEZ was asking CW3 if SOLIS intended to maintain operational control of the corner of St. Louis and 26th Street.] CW3 said, "I don't know if he's going to keep it or not." MARTINEZ said, "Well he sees that sometimes he gets something and sometimes he doesn't." [I believe that MARTINEZ explained to CW3 that at times SOLIS profits from the management of the sale of fraudulent documents, and at other times the proceeds that are generated are nominal.] CW3 said, "Yes, dude. Just like yesterday, dude, it was about ten from Pelon, another ten from Payaso, twenty. Mine don't count because I didn't pay for them, but sent in about three jobs, I think." MARTINEZ asked, "Who?" CW3 stated, "I mean, he did, did make about thirty jobs, dude." [I believe that CW3 explained that on the previous day the Organization sold thirty sets of fraudulent documents.]

90. On May 22, 2008, at approximately 7:33 p.m., an incoming telephone call was received at Target Phone 18 from (773) 391-1753. During the conversation, MARTINEZ asked, "What man? Why did you make doubles?" SOLIS replied, "Didn't I tell you I had copied the pictures, man?" MARTINEZ stated, "Okay. . . I'll pay you later." [I believe SOLIS and MARTINEZ were clarifying an order for fraudulent documents. I believe that MARTINEZ told SOLIS that he would pay SOLIS the money that he owed him for manufacturing the fraudulent document.]

**HECTOR MEDINA (“MEDINA”) a/k/a “PRIMO”**

91. On April 18, 2008, at approximately 5:58 p.m., an outgoing telephone call was placed from Target Phone 5 to (708) 355-0845.<sup>16</sup> During the conversation, JAIME SOLIS asked, “Hey, what’s going on, dude?” MEDINA replied, “I’m here trying to look for parking, dude.” SOLIS stated, “Oh, I was going to have you go pick up a job, just come in then.” [I believe that SOLIS planned to send MEDINA to pick up an order for fraudulent documents. I believe that MEDINA was looking for a parking spot near the “office” when he received this call, and that SOLIS invited him inside the “office.”]

92. On April 24, 2008, at approximately 11:10 a.m., an outgoing telephone call was placed from Target Phone 5 to (312) 513-9964. During the conversation, JAIME

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<sup>16</sup> Telephone number (312) 513-9964 is a prepaid telephone with no subscriber information. According to CW3, "Primo" uses telephone numbers (312) 513-9964 and (708) 355-0845. CW3 has identified Primo’s voice on calls between Subject Phone CW3 and both (312) 513-9964 and (708) 355-0845. More specifically, on or about September 15, 2008, ICE played the following calls for CW3: an incoming telephone call received on Subject Phone CW3 from (312) 513-9964 that occurred on April 25, 2008 at approximately 7:11 p.m., and an outgoing telephone call placed from Subject Phone CW3 to (708) 355-0845 that occurred on September 13, 2008 at approximately 3:06 p.m. After listening to both calls, CW3 concluded that he/she had spoken to HECTOR MEDINA during both calls. CW3 has positively identified an arrest photo of HECTOR MEDINA as "Primo." Also, the voicemail message for (708) 355-0845 indicates that the phone is used by HECTOR MEDINA. On May 8, 2008, at approximately 6:28 p.m., an outgoing telephone call was placed from Target Phone 5 to (708) 355-0845. The call was answered by the voicemail system on which a female voice stated, “Hello. You have reached Josephine Perez and Hector Medina. I’m sorry we’re not able to take your... [CALL CUTS OFF].” Also, on September 16 2008, wire room monitors compared the voices on telephone numbers (708) 355-0845, (312) 513-9964, and (773) 827-8837, as described in paragraphs 91-93. The monitors determined the speaker is the same person (HECTOR MEDINA)

SOLIS stated, "You owe me big time, dude." HECTOR MEDINA asked, "Why, dude?" SOLIS replied, "You left the fucking laminating machine on, dude." MEDINA replied, "Get the fuck out of here!" SOLIS stated, "Well, yeah. Weren't you the last one that took it out? It's all fried up, man. Oh, man! . . . Huh?" MEDINA asked, "Yeah? Yeah, it did stay on, man?" SOLIS stated, "Yes. No, I'm just kidding, it didn't burn up but it did stay on all night. It looks like the fucking rollers in it are all stuck together because it didn't want to take the . . . either way though, I have another one." MEDINA replied, "All right, cool." [I believe that MEDINA accidentally left the laminator turned on all night long at the "office." I believe that MEDINA occasionally works in the "office" and manufactures fraudulent documents for the miqueros.]

93. On May 31, 2008, at approximately 12:20 p.m., an incoming telephone call was received on Target Phone 18 from (773) 827-8837. Telephone number (773) 827-8837 is prepaid cellular telephone with no subscriber information. During the conversation, SOLIS stated, "Well I'm looking around, dude. I'll see if . . ., dude, to come up with the rent there, in front of the store . . . they're renting the basement there, dude. Five hundred bucks. But . . . I need to find the five hundred bucks." MEDINA asked, "How? What do you mean in front of the store, dude?" SOLIS replied, "In front of the store . . . the other street in front of Trevino's, the liquor store. It's right on the corner, . . . right on the corner." [I believe that SOLIS moved the Organization's fraudulent document "office" to a new location near Trevino's Liquors

located at 4125 West 31st Street in Chicago, Illinois.] MEDINA asked, “Where we buy the beer?” SOLIS replied, “No, no, no, no, no. Behind the street where we live.” [I believe that SOLIS was referring to the old fraudulent document “office,” which SOLIS was in the process of vacating. I know that the old “office” was located at 3043 South Keeler Avenue, Chicago, Illinois, approximately one block away from Trevino’s Liquors.] SOLIS asked, “Right on the corner, you know how the store’s right there?” MEDINA replied, “Yes.” SOLIS stated, “And there is a liquor store, a bar right in front there . . . that’s where, there in front they are renting apartments, five hundred dollars.” MEDINA replied, “Uh-huh.” SOLIS stated, “It’s the basement, it’s good, there’re two bedrooms.” MEDINA asked, “But isn’t the camera over there, dude?” SOLIS replied, “No, the camera is on . . . on the . . . other block . . . on Keeler, dude.” MEDINA asked, “But doesn’t the camera show when someone comes in and goes out?” SOLIS replied, “I don’t know, I’ll check right now.” [I know that CPD mounts surveillance cameras on telephone poles and traffic signals in the “Little Village” area of Chicago. I know that these cameras slowly pan 360 degrees while recording video footage 24 hours a day and seven days a week. I believe that MEDINA was concerned that the entrance to the basement apartment might be in the view of one of these cameras, and he was going to go by the location and check the angle of the surveillance camera to see if it looked like it captured the apartment.]

94. On July 17, 2008, at approximately 7:56 p.m., an outgoing telephone call

was placed from Target Phone 18 to (708) 355-0845. During the conversation, SOLIS stated, “The jobs, put them there below. . . the garage, of the fuckin’ door.” MEDINA asked, “Where are you dude?” SOLIS replied, “I’m here, dude.” MEDINA asked, “So where do I put them dude?” SOLIS replied, “Put them there in the garage, wait for Pantufla. That son-of-a-bitch is bringing another one. . . . In where, it’s below the garage. It’s before a house dude, right?” MEDINA stated, “Yes, the second house from the garage.” SOLIS replied, “All right. And put yours, what is it?” MEDINA stated, “It’s a license, dude. It’s there.” [I believe that SOLIS asked MEDINA to deliver MEDINA’s order and PEREZ’s order for fraudulent documents to the garage located at 2456 South Homan Avenue, the current location of the Organization’s “office.”]

**CAMILO MENDEZ (“MENDEZ”)**

95. On March 8, 2007, at approximately 2:39 p.m., CW2 placed a consensually-recorded telephone call from Subject Phone CW2 to Target Phone 18. During the conversation, CW2 stated, “Camilo?” MENDEZ replied, “Yeah.”<sup>17</sup> CW2 asked, “Do you have my job there?” [I believe that on this occasion, MENDEZ was acting as a “runner” for the Organization.] MENDEZ replied, “They are there in the

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<sup>17</sup> According to CW3, Target Phone 18 was originally owned and used by a CAMILO MENDEZ prior to his arrest by CPD on February 18, 2008. CW3 has positively identified an arrest photo of MENDEZ as “Camilo.” Also, when arrested by CPD on February 18, 2008, as summarized in paragraphs 101-102, MENDEZ provided the name CAMILO MENDEZ to law enforcement upon arrest. Also, MENDEZ has responded when addressed as “Camilo,” such as in the calls summarized in paragraphs 95-99.

parking lot, dude.” CW2 stated, “You should have brought it to me.” MENDEZ replied, “In the metal covering. They are there.” CW2 stated, “You should have brought it to me.” MENDEZ replied, “Fuck no. That dude gave me a big ass package. I had to leave it there.” CW2 asked, “What?” MENDEZ replied, “I had to leave it there . . . in the hiding spot, dude. In the metal covering, dude, is where I left it. . . . It was about six or seven.” CW2 replied, “They are mine.” MENDEZ asked, “All of them?” CW2 replied, “Yes.” MENDEZ stated, “Well, they are there, dude. There in the parking lot.” [I believe that MENDEZ told CW2 that MENDEZ had left CW2 a package containing about six or seven completed orders for fraudulent documents in a location unknown to law enforcement.]

96. On March 10, 2007, at approximately 2:47 p.m., CW2 placed a consensually-recorded telephone call from Subject Phone CW2 to Target Phone 18. During the conversation, CW2 asked, “Where are you, Camilo?” MENDEZ replied, “Here at the Dollar, dude.” CW2 stated, “In which Dollar, dude? Because I’m going to give you two, dude, in case you see Jarocho.” [I believe that CW2 wanted MENDEZ to deliver two fraudulent document orders to SOLIS.] MENDEZ stated, “The jobs are underneath the benches.” [I believe that MENDEZ had hidden the Organization’s orders for fraudulent documents underneath a park bench.] CW2 asked, “You’re going to see him?” MENDEZ stated, “Yeah, dude. But fucking Bori is over there.” CW2 asked, “Where?” MENDEZ replied, “Here he comes now, dude.” [I know that “Bori”

and/or “Boricua” are nicknames that the Organization uses for a particular CPD officer who patrols 26th Street in the Little Village area of Chicago. I believe that MENDEZ had hidden the Organization’s orders for fraudulent documents underneath a park bench, in the event that the CPD officer detained and searched MENDEZ.]

97. On March 21, 2007, at approximately 4:36 p.m., CW2 placed a consensually-recorded telephone call from Subject Phone CW2 to Target Phone 18. During the conversation, CW2 asked, “Where are you, Camilo?” MENDEZ replied, “Here on Homan.” CW2 asked, “On Homan? Listen, the guy from yesterday is going to arrive in the gray pickup. MENDEZ replied, “Oh, the one for the three.” CW2 said, “Well, the one for the three. Listen. Do you know about the car? You do know where I put them, right? Where the glove is?” [I believe that the “glove” was a coded reference for a predetermined “dead drop” location unknown to law enforcement.] MENDEZ replied, “Uh-huh.” CW2 said, “The job is there, give it to him, right? The guy is going to arrive in about ten minutes.” MENDEZ asked, “Where is he going to arrive?” CW2 said, “There at St. Louis.” [I believe that CW2 and MENDEZ were coordinating a delivery of fraudulent documents.]

98. On March 22, 2007, at approximately 11:34 a.m., CW2 placed a consensually-recorded telephone call from Subject Phone CW2 to Target Phone 18. During the conversation, CW2 asked, “Where are you, Camilo Mendez?” MENDEZ replied, “Here on Archer. Why, dude?” CW2 stated, “Because they’re here . . . the

Boricua, dude. . . . He's on Twenty-Sixth." [I believe that "Boricua," a CPD officer was patrolling 26th Street near the corner of St. Louis Avenue. Further, I believe that CW2 was conducting counter-surveillance on behalf of the Organization, and was alerting all the miqueros to the presence of law enforcement.] MENDEZ asked, "Oh, and Pajaro, have you told him already?" CW2 replied, "Yes, I already told Pajaro. He's there, you know. He's there hidden in Pollo's car." MENDEZ replied, "Oh, then I'm not going down there for a while, dude." [I believe MENDEZ was going to wait for the CPD officer to depart the area before arriving at 26th Street to solicit fraudulent documents.]

99. On February 12, 2008, at approximately 3:02 p.m., CW3 placed an outgoing telephone call to Target Phone 18 from Subject Phone CW3, and the call was consensually recorded. MENDEZ stated, "Hello." CW3 replied, "Uh, Camilo." MENDEZ asked, "What's up?" CW3 replied, "Where are you so you can give me the jobs?" MENDEZ replied, "Here in front of the laundromat." [I believe that CW3 agreed to meet MENDEZ near Lavanderia Sunshine next to Payless Shoe store to receive an order for fraudulent documents.]

100. On February 13, 2008, at approximately 6:37 p.m., CW3 received an incoming telephone call from Target Phone 18 on Subject Phone CW3, and the call was consensually recorded. During this conversation, MENDEZ asked, "Do you have any jobs yet?" CW3 replied, "Okay, I'll meet you at 27th and St. Louis." MENDEZ asked,

“27th and St. Louis, in how long?” CW3 replied, “Please go there now.” [I believe that CW3 and MENDEZ agreed to meet to conduct fraudulent document related business. At a location away from 26th Street to avoid the detection of law enforcement.]

101. On February 18, 2008, MENDEZ and MARCOS PEREZ-CONTRERAS<sup>18</sup> were arrested for possession of fictitious identification documents as follows:

a. On February 18, 2008, at approximately 12:10 p.m., CPD officers observed MENDEZ conducting fraudulent document related business in the vicinity of 26th Street and St. Louis Avenue in Chicago, Illinois. The officers followed MENDEZ to the rear entrance of 2635 South St. Louis Avenue, Chicago, Illinois, where he was detained. While detained, MENDEZ said to the CPD officers, “You got me, they’re in the house.” MENDEZ signed a CPD consent to search form for 2635 South St. Louis Avenue, and CPD officers recovered from the premises a typewriter, ten blank social security cards, five fraudulent permanent resident cards, and approximately \$417 in United States currency.

b. While in the residence, CPD officers observed MARCOS PEREZ CONTRERAS discard a small envelope on the ground. CPD officers recovered from the envelope one passport sized photo, and one fraudulent permanent resident card. CPD also recovered approximately \$510 cash.

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<sup>18</sup> For a further discussion of PEREZ-CONTRERAS’s involvement in the conspiracy, see paragraphs 124-133.

c. CPD officers arrested MENDEZ and PEREZ-CONTRERAS, advised them of their Miranda rights, and transported them to CPD 10th District where they were charged with possession of fictitious identification documents. MENDEZ made the following post-arrest statement, "I use the typewriter to make social security cards, but not all the time." As described in paragraphs 102 and 133, MENDEZ and PEREZ-CONTRERAS were convicted of these charges.

d. On February 18, 2008, at approximately 1:04 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 556-4387. During the conversation, CW3 said, "Payaso." MIRANDA responded, "What's going on?" CW3 responded, "Be careful, okay? Because they just took them all." MIRANDA responded, "Fuck no, all of who?" CW3 said, "Oaxaca, Chamaco, Paya . . . uh, Oaxaco, Chamaco . . . Pajaro, Camilo." MIRANDA said, "Son of a bitch," and later asked, "At their house or on 26th Street?" CW3 said, "I think that it was at the Laundromat, dude." MIRANDA replied, "Shit, man, hell no. Son of a bitch. Cool, man. Let's be on top of things, dude." [I believe that this conversation involved the arrest of MENDEZ, PEREZ-CONTRERAS and another individual near the corner of 26th Street and St. Louis, in Chicago, Illinois. I also know there is a laundromat on the corner of 26th Street and St. Louis which the St. Louis Crew uses as a meeting place and dead drop location. A "dead drop" is a term used by law enforcement to describe a predetermined location where a runner and vendor agree to leave fraudulent

document orders for the other to pick up, as opposed to a hand-to-hand exchange of orders which may be more easily detected by law enforcement.]

102. On June 30, 2008, MENDEZ was convicted of the possession of fraudulent identification charge that resulted from his February 18, 2008, arrest, and he was sentenced to one year imprisonment. On August 15, 2008, MENDEZ was released from the Illinois Department of Corrections (“IDOC”) and transferred into ICE administrative custody. MENDEZ is currently in ICE custody pending deportation proceedings.

**JORGE ABEL MIRANDA (“MIRANDA”) a/k/a “PAYASO”**

103. On April 29, 2007, at approximately 12:14 p.m., an incoming call was placed to Target Phone 4 from telephone number (312) 208-4587. During the conversation, ESTRADA said, “What’s up?” MIRANDA said, “Hey, I wanted to know if you could do a job for me because this guy doesn’t have any seals, there’s two. This is Payaso, and you see Jarocho doesn’t have any.” [I believe that MIRANDA is a street level vendor who regularly sends his orders for fraudulent documents to SOLIS. However, on this occasion MIRANDA was forced to call ESTRADA because SOLIS did not want to manufacture jobs right away after the recent arrests described in paragraph 39.] ESTRADA said, “No fuck, dude. I’m not doing anything.” MIRANDA said, “I’ve never asked you for a favor, dude.” ESTRADA said, “He doesn’t have any seals?” MIRANDA said, “Who?” ESTRADA said, “Jarocho.” MIRANDA said, “He

doesn't have any, dude." ESTRADA said, "From where?" MIRANDA said, "They're from here. It's two green cards, but the lady wants them with seals because that's how they've sold them to her, and now who knows who has seals, dude." ESTRADA said, "I'll call you right back." [I believe that MIRANDA asked ESTRADA to make him two fraudulent green cards because SOLIS did not have the proper laminate that the customer requested.]

104. On April 29, 2007, at approximately 12:17 p.m., an outgoing call was placed from Target Phone 4 to Target Phone 5. During the conversation, ESTRADA stated, "Payaso has two, he just called me, dude. That you don't have seals..." SOLIS replied, "I have seals." ESTRADA asked, "You have them?" SOLIS replied, "I have them." ESTRADA stated, "Ask the son of a bitch why he's calling me if you have some." SOLIS replied, "All right, I will call him right now." [I believe that ESTRADA was upset that JORGE ABEL MIRANDA a/k/a "Payaso" had called him on the telephone so soon after the April 24, 2007, arrests. I believe SOLIS is MIRANDA's supervisor, and ESTRADA called SOLIS to inform SOLIS that ESTRADA did not want MIRANDA calling ESTRADA in the future.]

105. On February 3, 2008, at approximately 6:29 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 556-4387. During the conversation, CW3 said, "Payaso," and MIRANDA responded, "What's up?" CW3 asked, "Where are you?" MIRANDA responded, "Here

on 26th and St. Louis, at the laundromat.” CW3 said, “Okay, I’ll call you so you can go out for your job.” [I believe that this conversation involved CW3 delivering fraudulent documents to MIRANDA.]

106. On May 22, 2008, at approximately 6:15 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 556-4387. During the conversation, SOLIS stated, “Hey. Give it to me quickly.” MIRANDA replied, “Julia Moreno.” SOLIS asked, “Whatever number?” MIRANDA replied, “Three, three, one. . . nine, six, two. . . eight, eight, zero.” SOLIS stated, “All right.” [I believe that MIRANDA placed an order for a fraudulent social security card in the name of Julia Moreno with social security number 331-96-2880.] MIRANDA stated, “There’s another one.” SOLIS replied, “Let’s see.” MIRANDA stated, “Emerson Medina.” SOLIS asked, “Medina. Number?” MIRANDA replied, “Three, seventeen. . . four, two, two. . . nine, seventeen.” SOLIS stated, “Cool, buddy.” [I believe that MIRANDA placed an order for a second fraudulent social security card in the name of Emerson Medina with social security number 317-42-2917.]

107. On July 29, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW12 purchased fraudulent identification documents from MIRANDA as follows:

a. On July 29, 2008, at approximately 3:15 p.m., an ICE agent drove CW12 to the vicinity of 27th Street and Homan Avenue. At approximately 3:32 p.m.,

CW12 arrived at the northeast corner of St. Louis Avenue and 26th Street, where he/she observed MIRANDA and ELIAS TRINIDAD MUNOZ seated on a bench next to the sidewalk. This meeting was consensually recorded on audio and video. As CW12 approached the two men, CW12 asked, "Can you help me with something?" MIRANDA replied, "What are you looking for?" CW12 stated, "A green card for my uncle." MIRANDA asked, "Where is he? Do you have a picture? Who told you we were here?" CW12 replied, "I came here last month." MIRANDA asked, "Do you have everything written down?" CW12 replied, "Just the date of birth." MIRANDA asked, "Mario Ramirez, ten, twenty-one, fifty-two. How much did I give you the job for?" CW12 replied, "You gave me a good price." MIRANDA stated, "Yeah, but they go for one-twenty, one-thirty. So, I don't know how much I gave it to you for." CW12 replied, "You gave it to me for one-twenty." MIRANDA stated, "It's going to be two to three hours." CW12 asked, "Okay, should I come back here?" MIRANDA asked, "Would you be able to leave anything now?" CW12 replied, "Yes. How much?" MIRANDA replied, "I don't know, twenty, thirty, whatever." CW12 stated, "Thirty." MIRANDA asked, "Are you a cop?" CW12 replied, "No, of course not." MIRANDA stated, "It's just that we see so many people, we don't remember them all. . . Okay, hold on; Let me give you my number." At approximately 3:35 p.m., CW12 departed the area on foot.

b. At approximately 7:07 p.m., CW12 placed a consensually recorded telephone call to MIRANDA at telephone number (773) 556-4387. During the

conversation, CW12 asked, "I just wanted to know if what I ordered is ready. You said that in three hours, and I don't know if it's ready yet." MIRANDA replied, "They'll bring it shortly. In about ten to fifteen minutes. . . It was for a man, right?" CW12 replied, "Yes. It was for my uncle." MIRANDA stated, "Yeah, let me take a look and see. . . Yeah, you can come over now. I'm at 26th and St. Louis."

c. At approximately 7:56 p.m., CW12 arrived at the corner of St. Louis Avenue and 26th Street and parked his/her vehicle at the Payless Shoe store parking lot. CW12 met MIRANDA in the parking lot, and the two individuals walked east on 26th Street to the Lavanderia Sunshine, located at 3446 West 26th Street, Chicago, Illinois. This meeting was consensually recorded on audio and video. At approximately 7:56p.m., MIRANDA stated, "Let me go inside, I'm going to go get it." CW12 asked, "Okay, where? Inside the shoe store?" MIRANDA replied, "No. Inside the laundromat . . . I'll bring it to you." CW12 stated, "I'll go inside." The two individuals entered the Lavenderia Sunshine, located at 3446 West 26th Street, Chicago, Illinois. MIRANDA stated, "Ramirez Mario." CW12 replied, "Yes." MIRANDA stated, "Here's the social." CW12 replied, "Okay. Thank you very much." Inside the laundromat, MIRANDA presented CW12 with a small white envelope containing a fraudulent green card and a fraudulent social security card in the name of Mario Ramirez. The name "TRAVIESO" was written in black ink on the outside of the envelope. CW12 paid MIRANDA the remaining balance of \$90, walked back to

his/her vehicle, and departed the area.

d. On July 29, 2008, an ICE Agent telephonically contacted CW3 and asked him/her which street level vendor is nicknamed "TRAVIESO." CW3 stated that "PAYASO" also utilizes the nickname "TRAVIESO."

e. CW12 positively identified a February 7, 2008, CPD arrest photo of MIRANDA as the individual who sold CW12 the fraudulent identification documents on July 29, 2008.

108. On August 18, 2008, at approximately 1:50 p.m., CW3 placed an outgoing telephone call to (773) 556-4387 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 asked, "Payaso, do you have jobs?" MIRANDA replied, "No. . . I mean, yes." CW3 stated, "You do? Look, put them in the box, okay? I'll pass by for it right now." [I believe CW3 told MIRANDA to leave his orders for fraudulent documents in the box described in paragraph 79(i).]

**ELIAS TRINIDAD MUNOZ ("MUNOZ") a/k/a "BLUE"**

109. On July 5, 2008, at approximately 7:10 p.m., an outgoing telephone call was placed from Target Phone 18 to (773) 647-5564.<sup>19</sup> During the conversation, MUNOZ stated, "Hey dude I was just there...I am there dude so what? I'm walking on

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<sup>19</sup> According to Virgin Mobile, telephone number (773) 647-5564 is subscribed to ELIAS T MUNOZ. CW3 has positively identified an arrest photo of ELIAS TRINIDAD MUNOZ as "Blue." Also, MUNOZ responded when addressed as "Blue," and provided the name "Blue" to customers such as in the calls and undercover purchases summarized in paragraphs 109, 113(b), and 113(d).

26th.” SOLIS asked, “Huh?” MUNOZ replied, “I am over here, already working dude.” SOLIS stated, “Listen, Blue.” MUNOZ asked, “What’s up?” SOLIS replied, “If you don’t go down early tomorrow, dude, don’t bother standing out there anymore dude . . . seriously, dude.” MUNOZ replied, “Okay, okay, okay, but I am here now dude.” SOLIS stated, “Nah, nah, don’t fuck around Blue, don’t fuck around dude . . . don’t fuck around.” MUNOZ asked, “What, what, what, what?” SOLIS replied, “You are with your buddies somewhere, somewhere else, you could tell by the voice right away. . . Dude, if you don’t go down tomorrow . . .It’s better if you come down early. If you don’t come down early it’s better if you don’t bother stopping by all week, dude. Please.” MUNOZ stated, “Okay, okay, that’s fine, that’s fine. I got what you are saying dude.” [I believe that SOLIS instructed MUNOZ to begin selling fraudulent documents in the mornings.]

110. On July 8, 2008, at approximately 7:46 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 647-5564. During the conversation, SOLIS stated, “Ask your client, the one with the yellow envelope, the one for Elia Rosada if it is twenty-three or twenty-seven, the day.” MUNOZ asked, “Which one, dude?” SOLIS replied, “The one with the yellow envelope.” MUNOZ asked, “The name of the . . . the client that is there. Which one is on there?” SOLIS replied, “Elia Rosado. Ask which day, which day if it’s the twenty-seventh or the twenty-third.” MUNOZ asked, “The social security?” SOLIS replied, “The . . . no, no the date of birth.” MUNOZ

replied, "I will call you back." [I believe that the two individuals were clarifying an order for fraudulent documents. Further, I believe that SOLIS contacted MUNOZ to determine the correct date of birth for MUNOZ's customer.]

111. On July 8, 2008, at approximately 7:52 p.m., an incoming telephone call was received at Target Phone 5 from (773) 647-5564. During the conversation, MUNOZ stated, "Twenty-three, my buddy." SOLIS stated, "Twenty-three. All right, dude, bye." MUNOZ asked, "Hey. Can you bring it to my house, dude?" SOLIS asked, "Where do you live?" MUNOZ replied, "Here on Central Park and Twenty-five." SOLIS stated, "All right, I'll call you when I'm going over there." [I believe that MUNOZ provided SOLIS with his customer's correct date of birth and SOLIS agreed to deliver the fraudulent document to MUNOZ at his home near Central Park Avenue and 25th Street in Chicago, Illinois. According to CW3, MUNOZ lives near Central Park Avenue and 25th.]

112. On July 10, 2008, at approximately 2:28 p.m., an incoming telephone call was received at Target Phone 5 from (773) 647-5564. During the conversation, MUNOZ stated, "Hey, dude. I have a social, dude." SOLIS asked, "Where are you?" MUNOZ replied, "Over here at St. Louis. Let me give you the name, yeah?" SOLIS stated, "Quickly, give me the social for that guy." MUNOZ stated, "Bonfilio." SOLIS asked, "Bonfilio?" MUNOZ replied, "With B as in Bravo." SOLIS asked, "Bonfilio. What else?" MUNOZ replied, "Bonfilio Aveler, V as in Victor." SOLIS asked, "Uh-huh.

The number?” MUNOZ replied, “All right. Make one up.” SOLIS stated, “All right.” [I believe that MUNOZ placed an order for a fraudulent social security card and told SOLIS to make up any social security number for the document.]

113. On August 12, 2008, for purposes of furthering this criminal investigation, UCA4 purchased fraudulent identification documents from MUNOZ as follows:

a. On August 12, 2008, at approximately 5:51 p.m., UCA4 traveled to the vicinity of 26th Street and St. Louis Avenue in Chicago, Illinois. At approximately 5:55 p.m., UCA4 met with MUNOZ. This meeting was recorded on audio and video. UCA4 asked MUNOZ, “Hey do you know where the license guys are?” MUNOZ said, “Yes, young man.” UCA4 asked, “Oh yeah?” MUNOZ said, “Right here.” UCA4 said, “Okay.” MUNOZ asked, “What do you need sir? But don’t take anything out.” [I believe that MUNOZ did not want the UCA to take anything out such as photos or money because MUNOZ did not want to conduct document related business out in public.] UCA4 said, “Oh, a green card.” MUNOZ asked, “A green card, laser?” UCA4 said, “And the social.” MUNOZ said, “The social. I’ll have the social ready in about two hours for one hundred and twenty.” UCA4 asked, “One hundred and twenty?” MUNOZ said, “One hundred and twenty, young man. What do you think?” UCA4 said, “Okay, they told me one ten but oh well.” MUNOZ said, “Okay, sounds good. Let’s go over there.” UCA4 said, “Okay.” MUNOZ asked, “You have the picture and everything?” UCA4 said, “Yes, I have the picture.” MUNOZ asked, “Did you write

down the name and date of birth?" The UCA4 said, "Oh no, not yet." MUNOZ said, "Okay, write down the name and date of birth." UCA4 said, "Okay." MUNOZ said, "Let's go inside, okay?" UCA4 said, "All right."

b. At approximately 6:00 p.m., UCA4 and MUNOZ entered UCA4's vehicle. In the vehicle, MUNOZ asked, "What's your name, young man?" UCA4 said, "Alberto Rodriguez." MUNOZ asked, "It's for you?" UCA4 said, "Yes." MUNOZ asked, "Your telephone number?" UCA4 provided his telephone number. UCA4 said, "December 25, 1957." UCA4 presented MUNOZ the photos and asked, "These are okay, right?" MUNOZ said, "Yes, they are fine." UCA4 asked, "How many, two?" MUNOZ said, "Well, I'll give them back to you." UCA4 said, "Okay, sounds good. In how long . . ." MUNOZ said, "December 25, 1957?" UCA4 said, "Fifty seven, yes." MUNOZ said, "Okay. Okay, sir, I'm going to ask you for a twenty dollar deposit." UCA4 said, "Okay." MUNOZ said, "Okay. December." UCA4 asked, "So in about how long?" MUNOZ said, "In about two hours, young man." UCA4 asked, "Two hours?" MUNOZ said, "Yes. Alberto Rodriguez, right?" UCA4 said, "Alberto Rodriguez, yes. And what's your name?" MUNOZ said, "They call me Blue." UCA4 asked, "Blue?" MUNOZ said, "Yes, sir."

c. At approximately 8:17 p.m., UCA4 arrived at the corner of 26th Street and St. Louis in Chicago, Illinois, to look for MUNOZ and see if his documents were ready. UCA4 met with MUNOZ, and this meeting was consensually recorded on

audio and video. At the corner MUNOZ said, "Come on in, come on in." UCA4 and MUNOZ entered Lavanderia Sunshine. UCA4 said, "I didn't receive the call until now." [I believe UCA4 was explaining that he had just received MUNOZ's voicemail.] MUNOZ said, "Well it's been ready for almost two hours, young man." UCA4 said, "Oh, man, and I'm in a hurry." MUNOZ showed UCA4 the call log on his cell phone and said, "I left you a message. Look, look so you can see I'm not lying to you. Look, this was the first call at seven thirty three." MUNOZ said, "Don't worry about it. The good thing is that you have, you have my number, right?" UCA4 said, "Yes." MUNOZ said, "For the next time." UCA4 asked, "How much, how much is it?" MUNOZ said, "It's one hundred, young man . . . One twenty with the twenty dollar deposit." UCA4 asked, "Give me your, your number." MUNOZ asked, "It didn't come out?" UCA4 said, "No, it says it's private. This is what it shows." MUNOZ asked, "Let's see, you did get the message?" UCA4 said, "Yeah, but I didn't . . . look, you can write it down here."

d. At this point, UCA4 retrieved a business card he had obtained while in STUDIO REYES. MUNOZ asked, "Should I write it on the back?" UCA4 said, "Yes." MUNOZ said, "Let's see." MUNOZ said, "Six, four, seven, fifty five . . . okay?" UCA4 said, "Okay. Six, four, seven, fifty five, sixty four (647-5564.)" MUNOZ said, "Give me a call if you have a problem." UCA4 departed the area with a fraudulent green card and a fraudulent social security card in the requested name of Alberto Rodriguez, and the above mentioned business card. UCA4 stated that MUNOZ wrote

“BLUE” and 1-773-647-5564 on the business card.

e. UCA4 positively identified a February 12, 2007, CPD arrest photo of MUNOZ as the individual who sold UCA4 the fraudulent identification documents on August 12, 2008.

**HORACIO NEVAREZ ARRELLANO (“NEVAREZ”) a/k/a “TATTOO”**

114. On May 7, 2008, for purposes of furthering this criminal investigation, UCA5 purchased fraudulent identification documents from NEVAREZ<sup>20</sup> as follows:

a. On May 7, 2008, at approximately 2:36 p.m., UCA5 parked near the intersection of 26th Street and Lawndale Avenue and exited his vehicle. UCA5 approached an individual who was later identified as NEVAREZ. This meeting was consensually recorded on audio and video, UCA5 asked, “Micas?” NEVAREZ replied, “You want one?” UCA5 stated, “I need one, yeah.” NEVAREZ asked, “Okay. Which. . .you need a resident card, or a state ID or a license drive ?” UCA5 replied, “I need ID. . .State ID card.” NEVAREZ asked, “Yeah. Okay. You got the photos?” UCA5 replied, “My photos?” NEVAREZ stated, “Yeah. I need two little photos.” UCA5 replied, “No. I don’t have any.” Later in the conversation, NEVAREZ stated, “Okay. Right now it costs one hundred dollars . . . right now. Okay? For the ID card.” UCA5 asked, “One

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<sup>20</sup> CW3 has positively identified an arrest photo of HORACIO NEVAREZ ARRELLANO as “Horacio” and “Tattoos.” Also, NEVAREZ responded when addressed as “Horacio,” and “Tattoo,” such as in the calls summarized in paragraphs 116 and 117.

hundred dollars for the ID?” NEVAREZ replied, “Yeah. Okay. Good job! Good job! Guaranteed.” UCA5 replied, “Yeah. Okay. . . I need the ID. . .give me a social security.” NEVAREZ stated, “Okay, but the social security is separate.” UCA5 asked, “How much?” NEVAREZ replied, “Forty dollars.” UCA5 asked, “Forty? Good! It’s a good card?” NEVAREZ stated, “Yeah. Good! Good! Good. . .we need little photos . . .like for passport.” UCA5 asked, “That’s included in the price? Right?” NEVAREZ replied, “No! No! It’s eight dollars for the photos.” UCA5 replied, “How about the. . .then the ID and social security card? One thirty?” NEVAREZ replied, “Okay. All right. I got you . . . Come on . . . let’s go.”

b. At approximately 2:40 p.m., NEVAREZ and UCA5 entered FOTO DAVILA INC. NEVAREZ stated to an unidentified female employee, “Huh, I want some pictures for him.” NEVAREZ stated to UCA5 , “Okay, I already tell her.” UCA5 replied, “Okay.” The employee asked, “For the Mexican passport?” NEVAREZ replied, “He’s not Mexican. It’s for identification.” The employee replied, “Okay.” UCA5 then had his/her picture taken by the employee, returned to the waiting area, and sat next to NEVAREZ. While waiting for the employee to develop the photos, NEVAREZ stated, “I want you to. . . I want you to write me, right here . . . your address and how tall you are? How much you weigh and the color of your eyes. . . color of your hair? So, I can put them in the State ID. Okay?” UCA5 replied, “Okay.” NEVAREZ stated, “That’s for your State ID.” UCA5 asked, “Illinois State or any State?” NEVAREZ

replied, "Illinois State ID." UCA5 asked, "Okay. So, you want the name?" NEVAREZ replied, "Okay. What?" UCA5 asked, "You want the name?" NEVAREZ replied, "Yeah, he get outside. . .we get outside." UCA5 asked, "What's your name?" NEVAREZ replied, "Hector." UCA5 stated, "Nice to meet you."

c. At approximately 2:45 p.m., NEVAREZ and UCA5 exited FOTO DAVILA INC, and walked to UCA5's vehicle.

d. At approximately 2:46 p.m., NEVAREZ stated, "Yeah. I want you to put me. . .your address. So, I could put them in the State ID." UCA5 replied, "Okay. And the name?" NEVAREZ replied, "Yeah. . .Zip code and everything." UCA5 asked, "So, you need my height? My weight? Can you read that?" NEVAREZ stated, "Yeah. I think it's. . . you're five, nine?" UCA5 replied, "No. Six foot." NEVAREZ asked, "How much you weigh?" UCA5 replied, "One hundred and eighty-five pounds." NEVAREZ stated, "Ah-ha. What else I need? What else I need? I need your phone number. So, I can call you." UCA5 replied, "Let me give you that. How long is this?" NEVAREZ replied, "I take an hour and a half. . .two hours." Later in the conversation, NEVAREZ stated, "Yeah. I need. . .I need twenty dollars. So, I can start." UCA5 asked, "Yeah. I can do that. Then it's one thirty? Right?" NEVAREZ replied, "Yeah. It's one thirty, my friend. You give me the rest when I finish." UCA5 asked, "Where am I going to meet you Hector?" NEVAREZ replied, "Maybe. . .I'll meet you on 27th and Central Park or 27th and Kedzie. Right there. You know?" UCA5 replied,

“Hector, thank you.” NEVAREZ asked, “So, you want the social security? Right?” UCA5 replied, “Yeah.” NEVAREZ replied, “I am gonna pick the number and everything. Okay? This is the name? Right?” UCA5 replied, “Yeah. A, T, L, U, R, I.” At this point, UCA5 provided NEVAREZ with a twenty dollar deposit.

e. At approximately 2:50 p.m., UCA5 entered his/her vehicle and pulled away from the parking space. As UCA5 was driving on 26th Street, NEVAREZ approached the UCA5's vehicle and spoke to him/her through the driver's side window.

f. NEVAREZ asked, “Oh, I need your. . .what day you born on? Your birthday?” UCA5 replied, “March one, nineteen, seventy.” NEVAREZ replied, “Good! That's all I need, man. I forgot it.”

g. At approximately 4:16 p.m., UCA5 received a call from NEVAREZ. This call was not recorded. According to UCA5 , during this call NEVAREZ stated that the documents were ready. NEVAREZ requested that UCA5 meet him near the intersection of 28th Street and Kedzie Avenue, in Chicago, Illinois to pick up the fraudulent documents.

h. At approximately 4:48 p.m., NEVAREZ and UCA5 met. This meeting was consensually recorded on audio and video. During this meeting NEVAREZ presented UCA5 with a manila envelope, which contained one fraudulent State of Illinois ID card and one fraudulent social security card. UCA5 paid NEVAREZ the remaining balance of \$110. During this meeting NEVAREZ presented UCA5 a

manila envelope, which contained one fraudulent State of Illinois ID card and one fraudulent social security card. NEVAREZ stated, "Okay. Good my friend. You got it?" UCA5 replied, "It's one . . . I gave you twenty?" NEVAREZ replied, "Yeah." UCA5 asked, "One thirty . . . so, one hundred, right?" NEVAREZ replied, "Yeah." UCA5 paid NEVAREZ the remaining balance of \$110. UCA5 stated, "Okay. Count that for me, please." NEVAREZ replied, "Yeah, it's cool."

i. UCA5 positively identified an April 20, 2008, CPD arrest photo of NEVAREZ as the individual who sold UCA5 the fraudulent identification documents on May 7, 2008.

115. On May 8, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW13 purchased fraudulent identification documents from NEVAREZ as follows:

a. On May 8, 2008, at approximately 2:48 p.m., CW13 drove to the "Little Village" area of Chicago, Illinois and parked near the intersection of 26th Street and Lawndale Avenue. At approximately 2:55 p.m., NEVAREZ approached CW13's vehicle and asked, "What you need, ID?" This meeting was consensually recorded on audio and video. CW13 replied, "Huh, green card. . .green card." NEVAREZ asked, "A green card? Okay, you need a social security, too?" CW13 replied, "Yeah." NEVAREZ replied, "Okay, it's one twenty for both." CW13 asked, "What do you need from me?" NEVAREZ replied, "You got the photos, the little photos?" The CW13 replied, "No."

NEVAREZ stated, "Then you. . .walk down that way. . .come on. Let's go, amigo." CW13 asked, "You also make passports?" NEVAREZ replied, "No, we don't do passports. . .We do only green cards and license drive." CW13 asked, "What about the green card. Can I use it at work. . .because I have to show it to my boss." NEVAREZ replied, "Yeah. Yeah. We do good ones."

b. At approximately 2:58 p.m., NEVAREZ and CW13 entered FOTO DAVILA INC. NEVAREZ stated to an unidentified female employee, "Hi. I need photos for him. . .for the green card. Go over there by the black thing. . .the umbrella." CW13 replied, "Okay. . .what about the social security? Can I use it too?" NEVAREZ replied, "Yes. Yeah. You can use it. You don't have no number, right? I'll get you the number." [I believe NEVAREZ indicated he would create a social security number for CW13.] CW13 stated, "I just came one month ago." NEVAREZ replied, "Yeah? It's okay." CW13 asked, "So you do driver's licenses, too?" NEVAREZ replied, "Um-hm. I do from California, from Illinois, Indiana . . . from Wisconsin." CW13 asked, "From New York?" NEVAREZ replied, "New York? Yeah." CW13 asked, "And birth certificates?" NEVAREZ replied, "Yeah. Birth certificates . . . Yeah, I do that." U/F said to CW13, "It is eight dollars or four for ten dollars. What are you gonna need?" CW13 replied, "Two." At this point, U/F and CW13 exchanged two passport photos for \$8. NEVAREZ stated, "Let's go to your car so you could give me your information."

c. At approximately 3:03 p.m., NEVAREZ and CW13 exited FOTO

DAVILA INC and walked to CW13's vehicle. CW13 stated, "Sit down. Okay, here is the picture." NEVAREZ replied, "Okay, right there. . . put your name and your birthday. I mean. . . you know? The month, the day, and the year. And I want you to write me your phone number. So, that way I call you when it's ready." CW13 asked, "You need the address or no?" NEVAREZ replied, "No! Not the address. . . not for the green card, No. . . Okay. So, I am gonna need twenty dollars." CW13 asked, "How much will it be together?" NEVAREZ replied, "It's gonna be one twenty. . .for the social security and the green card." CW13 replied, "Okay. What about one hundred? I bring you my wife tomorrow." NEVAREZ stated, "Oh, man. . .tomorrow I give you for one hundred dollars." [I believe NEVAREZ offered to give a discount for CW13's wife's fraudulent document order.] CW13 replied, "Oh, give it to me today. . .I got eighty left. . .that's why." NEVAREZ stated, "All right. . .I'll call you like an hour. . .hour and a half." At this point, CW13 gave NEVAREZ a \$20 deposit.

d. At approximately 3:07 p.m., NEVAREZ exited CW13's vehicle and CW13 departed the area.

e. At approximately 5:47 p.m., CW13 observed NEVAREZ walking on the sidewalk of 26th Street near Lawndale Avenue. CW13 pulled into a parking spot on 26th Street and NEVAREZ approached and entered CW13's vehicle. This meeting was consensually recorded on audio and video. NEVAREZ stated, "Yeah, it's not ready. . . I am just waiting about ten minutes. If you want to pick it up already." CW13

replied, “Okay. . . He’s probably calling. That his number.” [I believe NEVAREZ was telling CW13 that the runner was calling.] NEVAREZ replied, “Yeah. Okay.” At this point NEVAREZ answered a cell phone call and said, “What’s up? Oh? Yes. It’s for my guy. . . he’s here with me on 26th and Central Park. In the area of 27th? Okay. Okay.” NEVAREZ stated, “Let’s go over here. . .Millard and 27th. Let’s go.”

f. At approximately 5:49 p.m., CW13 and NEVAREZ pulled away from the parking spot and drove to the intersection of Millard Avenue and 27th Street.

g. NEVAREZ exited the vehicle and met with an unknown “runner” who had parked behind CW13's vehicle. CW13 observed the runner hand NEVAREZ a small manila envelope similar to the envelope which had originally contained CW13's photographs from FOTO DAVILA INC. NEVAREZ then reentered CW13's vehicle and presented CW13 with the manila envelope, which contained one fraudulent green card and one fraudulent social security card. CW13 stated, “Okay. Let me see.” NEVAREZ replied, “Okay?” CW13 asked, “The number is good?” NEVAREZ replied, “Yeah. It’s good, my friend. He’s waiting for me. . . Give me one hundred, man. Come on, amigo.” [I believe NEVAREZ wanted to quickly conduct the transaction with CW13 because the runner was waiting in the car to give NEVAREZ a ride.] CW13 replied, “No! It’s for my son . . . .for the school. You got the deal. . .you got the deal” [I believe CW13 was referencing the fact they had already agreed upon a price and CW13 owed NEVAREZ only the balance of \$80.] At this point CW13 paid NEVAREZ the remaining balance

of \$80 and NEVAREZ exited CW13's vehicle.

h. CW13 positively identified a CPD arrest photo of NEVAREZ as the individual who sold CW13 the fraudulent identification documents on May 8, 2008.

116. On May 20, 2008, at approximately 3:42 p.m., CW3 placed an outgoing telephone call from Subject Phone CW3 to (773) 521-6770, and the call was consensually recorded. According to CW3, NEVAREZ uses (773) 521-6770. During the conversation, CW3 asked, "Is Horacio there?" An unidentified female replied, "Horacio . . . Uh . . . let . . . let me see, let me see if he's in." [I believe the phone was passed to NEVAREZ.] NEVAREZ replied, "Yeah." CW3 stated, "Horacio, your jobs are here already, dude. They are inside the box. Go get them." NEVAREZ replied, "Okay." CW3 stated, "And pass by to bring me mine." NEVAREZ replied, "Okay. Are you on Millard?" [I believe that CW3 told NEVAREZ that their fraudulent documents had been manufactured. Further, I believe that one of the Organization's "runners" had left the manufactured documents in a box at a location unknown to law enforcement. I believe that NEVAREZ agreed to retrieve the fraudulent documents from the "box" and meet CW3 near the intersection of 26th Street and Millard Avenue.]

117. On May 22, 2008, at approximately 3:42 p.m., an incoming telephone call was received on Target Phone 5 from (773) 521-6770. During the conversation, NEVAREZ stated, "What's up, dude? This is Tattoo." SOLIS asked, "What's up?" NEVAREZ replied, "Is it almost done, dude?" SOLIS stated, "I am going to give it to

[CW3].” NEVAREZ replied, “Oh, okay, all right. Thanks, bro.” [I believe that NEVAREZ asked SOLIS if he had finished manufacturing NEVAREZ’s fraudulent documents. I believe that SOLIS told NEVAREZ that CW3 would deliver the fraudulent documents.]

**JOSE LUIS PEREZ (“PEREZ”) a/k/a “PANTUFLAS”**

118. On February 3, 2008, at approximately 3:24 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to (773) 540-6207.<sup>21</sup> During the conversation, CW3 asked, “Pantuflas, where are you?” JOSE LUIS PEREZ replied, “Over here between Homan and Trumbull, man, at the same place, in the alley.” CW3 stated, “Oh, well, just go, go over there in the front, man. I’m headed, headed towards Trumbull, over that way so you can give it to me.” PEREZ replied, “All right then, I’m on my way.” [I believe that CW3 and PEREZ agreed to meet at a location on Trumbull Avenue, in order for CW3 to pick up PEREZ’s order for fraudulent documents.]

119. On April 19, 2008, at approximately 4:53 p.m., an incoming telephone call was received on Target Phone 5 from (773) 540-6207. During the conversation, JOSE

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<sup>21</sup> Telephone number (773) 540-6207 is subscribed to Luis Perez, 4603 South Hermitage Avenue, Apartment 2, Chicago, Illinois. According to Lexis/Nexis records, JOSE LUIS PEREZ has resided at 4603 South Hermitage Avenue, Floor 2, Chicago, Illinois, since February of 2004. According to CW3, "Pantufla" uses telephone number 773-540-6207. CW3 has positively identified an arrest photo of JOSE LUIS PEREZ as "Pantufla." Also, JOSE LUIS PEREZ has responded when addressed as "Pantufla," such as in the calls summarized in paragraphs 118, 121, and 123

PEREZ stated, "Talk to me." SOLIS asked, "What's up?" PEREZ stated, "A white one, dude." SOLIS replied, "Okay, bye." [I believe that PEREZ told SOLIS that he just sold a fraudulent green card and needed to meet SOLIS to deliver the order.]

120. On April 19, 2008, at approximately 7:32 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 540-6207. During the conversation, JOSE PEREZ asked, "What's up?" JAIME SOLIS replied, "Hey, where are you?" PEREZ stated, "I'm here in the laundromat. Here in the parking lot." SOLIS replied, "I'll be there." PEREZ asked, "Are you on your way? So I can give it to the customer." SOLIS replied, "Okay." [I believe that PEREZ told SOLIS that he was waiting with his customer at the laundromat located at the corner of St. Louis Avenue and 26th Street. I believe that SOLIS was calling PEREZ to deliver his completed fraudulent document.]

121. On May 30, 2008, at approximately 5:10 p.m., an incoming telephone call was received on Target Phone 18 from (773) 540-6207. During the conversation, PEREZ stated, "Hey, send me a smurf." [I believe that a "smurf" is a coded reference for a fraudulent social security card.] SOLIS replied, "No, I'm not doing anything. I'm not going to work until tomorrow. I don't want to see you guys standing up over there." PEREZ asked, "Oh, no?" SOLIS stated, "I'm not going to work until tomorrow. But tomorrow I want you to go down early, Pantufla, and on Sunday."

122. On August 5, 2008, at the direction of law enforcement and for purposes

of furthering this criminal investigation, CW14 purchased fraudulent identification documents from PEREZ as follows:

a. On August 5, 2008, approximately 3:48 p.m., CW14 placed a consensually-recorded phone call to JOSE PEREZ at telephone number (773) 540-6207. During the conversation, CW14 stated, "I'm calling because I need some papers . . . one of my co-workers told me you do a good job, and he recommended you. He gave me your telephone number." PEREZ asked, "Who?" CW14 replied, "Omar, his name is Omar." PEREZ asked, "Do you need it for today?" CW14 replied, "Yes, friend, for today." PEREZ stated, "We'll meet around six, six-thirty, on St. Louis and 26th. But you need to call me when you are on your way." Later in the conversation, CW14 asked, "Okay, whom am I talking to? They told me your name, but I forgot it." PEREZ replied, "Luis."

b. At approximately 6:42 p.m., CW14 arrived at the northeast corner of St. Louis Avenue and 26th Street, and parked his/her vehicle at the Payless Shoe store parking lot. At approximately 6:43 p.m., PEREZ approached and entered CW14's vehicle. This meeting was consensually recorded on audio and video. PEREZ asked, "What are you going to need?" CW14 replied, "A license." PEREZ asked, "Did they give you the price?" CW14 replied, "A hundred thirty?" PEREZ stated, "Yes. . . okay, let's go over here to the photo place." Later in the conversation, PEREZ stated, "You're going to go in by yourself . . . just tell them you need a picture, front profile."

c. At approximately 6:50 p.m., CW14 exited his/her vehicle and entered FOTO STUDIO REYES. PEREZ remained in CW14's vehicle. At approximately 6:50 p.m., CW14 stated to an unidentified female employee, "I need a picture, front profile for an Illinois driver's license." The employee replied, "Okay, come this way." CW14 stated, "With a blue background." The employee replied, "We don't have a blue background, just white. We can't have blue backgrounds." CW14 stated, "Oh, okay, that's fine." The employee stated, "Come in, have a seat."

d. At approximately 6:54 p.m., CW14 received the passport photographs, exited the photo studio, and reentered his/her vehicle, and provided PEREZ with the photograph. PEREZ asked, "What's your name?" CW14 replied, "Socorro Ramirez." PEREZ recorded this information on the small manila envelope which CW14 received from FOTO STUDIO REYES when he/she purchased the passport style photographs. PEREZ asked, "Okay. Your date of birth?" CW14 replied, "October twenty-fifth . . . seventy-four." PEREZ asked, "Your address?" CW14 replied, "Fifteen, thirteen, W, Jefferson . . . Naperville, Illinois." PEREZ asked, "Uh, height?" CW14 replied, "Oh man, and I just went to the doctor yesterday." PEREZ asked, "Like, five, three?" CW14 replied, "I think so." PEREZ asked, "Weight?" CW14 replied, "One hundred twenty-two . . . One hundred twenty-three." PEREZ asked, "Eyes?" CW14 replied, "Well, brown." PEREZ asked, "Oh, you want a social too?" CW14 replied, "Yes, I lost mine." PEREZ asked, "What's the number for the social?" CW14 replied, "Three,

fifty-seven, ninety-four, fifty-eight . . . I'm missing two numbers, right?" PEREZ replied, "Mm-hmm." CW14 stated, "Zero, five, no . . . fifty-nine. All right?" PEREZ replied, "Okay, head on over to where we were. . . I'll call you when it's ready. It'll be about an hour to an hour and a half." PEREZ and CW14 departed the area.

e. According to CW14, at approximately 8:00 p.m., CW14 received a telephone call from PEREZ using telephone number (773) 540-6207. This call was not recorded. According to CW14, during this call PEREZ stated that the fraudulent documents were ready to be picked up and asked CW14 to meet him at the laundromat located next to the Payless Shoe store.

f. At approximately 8:33 p.m., CW14 arrived at the corner of St. Louis Avenue and 26th Street and parked his/her vehicle at the Payless Shoe store parking lot. CW14 exited his/her vehicle and walked east on 26th Street to the Lavanderia Sunshine, located at 3446 West 26th Street, Chicago, Illinois. This meeting was consensually recorded on audio and video. Inside the laundromat, PEREZ presented CW14 with the same manila envelope that PEREZ originally used to record CW14's biographical information. The manila envelope contained a fraudulent Illinois driver's license and a fraudulent social security card in the name of Socorro Ramirez. CW14 asked, "Where should I give you the money?" PEREZ replied, "You asked me for the social. Give me. . ." CW14 asked, "How much did I give you? (CW14 counts his/her money) One hundred twenty, one hundred and forty." (CW14 hands money to

PEREZ and he hands an envelope to CW14 .) CW14 stated, “Okay friend, thank you very much, all right.” The numbers “007” were written in black ink on the outside of the envelope. According to CW3, “PANTUFLA” uses the nickname “007.”

123. On August 17, 2008, at approximately 5:07 p.m., CW3 placed an outgoing telephone call to (773) 540-6207 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 asked, “Where are you, Pantufla?” PEREZ replied, “I’m heading towards the laundromat.” CW3 stated, “Oh, okay, so you can give me your job.” PEREZ replied, “Okay.” [I believe the PEREZ agreed to meet CW3 to deliver a new order for fraudulent documents.]

**MARCOS PEREZ-CONTRERAS (“PEREZ-CONTRERAS”) a/k/a “PAJARO”**

124. On March 16, 2007, at approximately 10:36 a.m., CW2 received a telephone call from (773) 885-5845 over the Subject Phone CW2 and the call was consensually recorded.<sup>22</sup> During the conversation, PEREZ-CONTRERAS stated, “The old man says he wanted the old license, and you sent it as a white one, dude.” CW2

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<sup>22</sup> Telephone number (773) 885-5845 is subscribed to Andres Mendez-Trejo at 2530 South Spaulding Avenue, Chicago, Illinois. According to Lexis/Nexis records, no one by the name of Andres Mendez-Trejo has ever resided at 2530 South Spaulding Avenue. Lexis/Nexis records do indicate that “Ernesto Flores”– one of Perez-Contreras’s known aliases – resided at 2530 South Spaulding Avenue, Chicago, Illinois, from January 2007 to May 2007. According to CW3, “Pajaro” uses telephone number (773) 885-5845. CW3 has positively identified an arrest photo of MARCOS PEREZ CONTRERAS as “Pajaro.” Also, MARCOS PEREZ CONTRERAS has responded when addressed as “Pajaro,” such as in the calls summarized in paragraphs 126, 127, 130-132,

replied, "Shit! Tell him to wait." PEREZ-CONTRERAS stated, "But Manuel is going to charge me for it, dude." [I believe a customer requested a driver's license, but CW2 accidentally submitted the order to MANUEL ESTRADA as a green card. I believe that PEREZ-CONTRERAS informed CW2 that ESTRADA would charge PEREZ-CONTRERAS an additional fee for manufacturing a second document because CW2 was responsible for the error.] CW2 replied, "No problem with Manuel." PEREZ-CONTRERAS stated, "I'm going to give him a hundred for . . . one ten for . . . ninety plus twenty. I'm going to give him twenty for this one, dude, and I'm not going to charge the old man anything. You can give it to him if you want, dude." CW2 replied, "Yes, dude." PEREZ-CONTRERAS stated, "One ten. We'll give fifty to Pelon . . . either way we only lose ten and ten." CW2 replied, "No problems, even if I have to pay him because we won't lose as much." PEREZ-CONTRERAS stated, Yeah, well either way . . . if he gives it to him we make sixty-five." [I believe that CW2 and PEREZ-CONTRERAS were determining their profit margin after paying CHIQUIN and ESTRADA.]

125. On March 24, 2007, at approximately 2:22 p.m., CW2 received a telephone call from (773) 885-5845 over the Subject Phone CW2 and the call was consensually recorded. During the call, CW2 said, "I came to pick up." PEREZ-CONTRERAS said, "Have you stocked up?" CW2 said, "No, well, just three." PEREZ-CONTRERAS said, "Three came my way." CW2 said, "Yesterday you got a lot." PEREZ-CONTRERAS

said, "I've turned in . . . I've already made five hundred . . . I've left already, I just came to leave the money to avoid problems." [I believe that CW2 was asking PEREZ-CONTRERAS how many sets of fraudulent documents he had sold. Further, I believe that PEREZ-CONTRERAS told CW2 that he had sold three sets of fraudulent documents. I believe that the "miqueros" pay the "office" approximately \$50, as a fee for manufacturing the fraudulent documents. Further, I believe that PEREZ-CONTRERAS's net profit was \$500.]

126. On February 2, 2008, at approximately 1:02 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to (773) 885-5845. During the conversation, CW3 stated, "Pajaro." PEREZ-CONTRERAS asked, "What's up? Who's calling?" CW3 replied, "[CW3]." PEREZ-CONTRERAS asked, "Where are you?" CW3 replied, "Here at the Laundromat. I came to pick up Payaso because he doesn't have a telephone." PEREZ-CONTRERAS asked, "How many?" CW3 replied, "Three." PEREZ-CONTRERAS stated, "I'm going over there, man. Wait for me there." [I believe CW3 told PEREZ-CONTRERAS that CW3 had collected three orders for fraudulent documents. I believe PEREZ-CONTRERAS agreed to meet CW3 to receive the orders and deliver them to the office to be manufactured.]

127. On February 3, 2008, at approximately 2:03 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to (773) 885-5845. During the conversation, CW3 asked, "Pajaro, do you have jobs?" PEREZ-

CONTRERAS replied, “No . . . yes, bring them over.” CW3 stated, “If you have them . . . I’m going to pick them up.” PEREZ-CONTRERAS replied, “They are in the box, dude, yours and mine.” [I believe that PEREZ-CONTRERAS told CW3 that PEREZ-CONTRERAS had left completed sets of fraudulent documents in a predetermined location unknown to law enforcement.]

128. On February 7, 2008, at approximately 5:10 p.m., CW3 received an incoming telephone call from (773) 885-5845 on Subject Phone CW3, and the call was consensually recorded. During the conversation, PEREZ-CONTRERAS stated, “You didn’t give a picture to Jarocho, dude.” CW3 replied, “I’m going to look for it now, son. I did take it out of the car. You don’t worry because I’ll find it.” PEREZ-CONTRERAS stated, “All right, dude . . . because I do, it is urgent.” [I believe that on this occasion, CW3 was acting as the “runner” for the Organization. I believe that PEREZ-CONTRERAS discovered that CW3 had lost the photograph that accompanied PEREZ-CONTRERAS’s order for fraudulent documents.]

129. On February 7, 2008, at approximately 5:14 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to (773) 885-5845. During the conversation, CW3 stated, “I didn’t find it, dude. . . . Ask the customer for another one, dude.” PEREZ-CONTRERAS replied, “That son of a bitch didn’t even leave me a picture. . . . It’s probably in your fucking ashtray.” CW3 stated, “No. I already looked, dude.” PEREZ-CONTRERAS stated, “The picture was there, dude. I

gave it to you like that . . . Son of a bitch. Well let me tell him, all right.” [I believe that CW3 was unable to locate the customer’s missing photograph. I believe that PEREZ-CONTRERAS agreed to call his customer and inform the customer that another photograph was needed.]

130. On February 11, 2008, at approximately 2:55 p.m., CW3 received an incoming telephone call from (773) 885-5845 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 asked, “What’s up, Pajaro?” PEREZ-CONTRERAS replied, “Where are you man?” CW3 stated, “Over here at Reyes, what’s up? Do you have anything?” PEREZ-CONTRERAS replied, “Uh, I have some. . . . but, there’s a client of mine that’s there at Reyes, man. How many do you have so far?” [I believe that CW3 told PEREZ-CONTRERAS that CW3 was at FOTO STUDIO REYES. I believe that PEREZ-CONTRERAS asked CW3 to meet with PEREZ-CONTRERAS’s customer who was also at FOTO STUDIO REYES getting his/her photograph taken in order to gather the customer’s information and photograph.]

131. On February 12, 2008, at approximately 5:09 p.m., an outgoing call was placed from Subject Phone CW3 to (773) 885-5845. During the conversation, CW3 asked, “Pajaro, where are my socials? The social?” PEREZ-CONTRERAS replied, “I already told that guy where it is.” CW3 asked, “But, is it at your house?” PEREZ-CONTRERAS replied, “No man, it’s over there at the laundromat.” CW3 asked, “Oh,

where is it, man?” PEREZ-CONTRERAS asked, “The guy’s there . . . the guy there can give it to you.” [I believe that PEREZ-CONTRERAS manufactured a fraudulent social security card for CW3 and delivered it to a street level vendor who was waiting for CW3 at Lavenderia Sunshine.]

132. On February 17, 2008, at approximately 2:05 p.m., an outgoing call was placed from Subject Phone CW3 to (773) 885-5845. During the conversation, CW3 asked, “Where are you Pajaro?” PEREZ-CONTRERAS replied, “At the laundromat. Are you coming to pick mine up?” CW3 stated, “Yes, I’ll be right there.” [I believe PEREZ-CONTRERAS asked CW3 to meet him at Lavenderia Sunshine to pick up an order for fraudulent documents.] PEREZ-CONTRERAS asked, “Where are you coming from?” CW3 replied, “Here on St. Louis and Thirty-First, man. I should be there soon.” PEREZ-CONTRERAS stated, “A navy blue one passed by, well I’m not sure. All right then, I’ll go get them.” [I believe that “a navy blue one” was a reference to an “unmarked” CPD police car. I know that street level vendors regularly conduct counter-surveillance on behalf of the Organization, especially when the Organization’s “runner” is planning to make a pick-up or a delivery of fraudulent documents.]

133. On May 7, 2008, PEREZ-CONTRERAS was convicted of the possession of fraudulent identification charge that resulted from his February 18, 2008, arrest described in paragraphs 101-102, and he was sentenced to one year imprisonment. On July 17, 2008, PEREZ-CONTRERAS was released from IDOC and transferred into ICE

administrative custody.

**CARLOS SIORDIA (“SIORDIA”) a/k/a “ROJO”**

134. On May 15, 2008, at approximately 12:37 p.m., an incoming telephone call was received on Target Phone 5 from (312) 282-7066.<sup>23</sup> During the conversation, CARLOS SIORDIA stated, “Hey. This is .” SOLIS asked, “What’s up?” SIORDIA replied, “I have something here.” SOLIS asked, “How many do you have?” SIORDIA replied, “I have one consulate ID and a blue one.” SOLIS stated, “Call . . . Look for the other guy, okay?” SIORDIA replied, “You only gave me one number, this one . . . Payaso?” SOLIS replied, “No, not that one. How is the other guy called?” SIORDIA asked, “Tattoos?” SOLIS replied, “Tattoos. Is he with you?” SIORDIA stated, “He is here. Here with me at Central Park.” SOLIS asked, “Okay. He . . . He has one also, right?” SIORDIA replied, “Yeah.” SOLIS stated, “Okay. Come here quickly, here by the church in Central Park. Only one should come up walking.” [I believe that SIORDIA told SOLIS that he and NEVAREZ a/k/a “Tattoo” had orders for fraudulent documents that they wanted to place with SOLIS. I believe that SOLIS agreed to meet one of them at the church located on Central Park Avenue.]

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<sup>23</sup> Telephone number (312) 282-7066 is a prepaid telephone with no subscriber information. According to CW3, “Rojo” uses telephone number (312) 282-7066. CW3 has positively identified an arrest photo of SIORDIA as “Rojo.” Also, SIORDIA has responded when addressed as “Rojo,” and has identified himself as “Rojo” to customers, such as in the calls and undercover purchases summarized in paragraphs 134-136, 138(a), 138(b), and 138(c),

135. On May 22, 2008, at approximately 8:26 p.m., an outgoing telephone call was placed from Target Phone 18 to telephone number (312) 282-7066. During the conversation, SIORDIA answered the phone, "Rojo." SOLIS asked, "Where are you?" SIORDIA replied, "I'm here on 26th." SOLIS asked, "26th and what?" SIORDIA replied, "And St. Louis." SOLIS stated, "Okay, I'm getting there. I'm going to get there." [I believe that SIORDIA and SOLIS agreed to meet near the intersection of 26th Street and St. Louis to conduct fraudulent document related business.] Later in the conversation, SIORDIA stated, "No, but about the money, man. . . I'll give it to you tomorrow, yeah?" SOLIS replied, "No, well, they're already paying the money, man." SIORDIA stated, "That's why, well, it's only a little bit." [I believe that SIORDIA asked SOLIS if he could pay SOLIS for the fraudulent documents at a later date.]

136. On May 24, 2008, at approximately 11:40 a.m., an incoming telephone call was received on Target Phone 5 from (312) 282-7066. During the conversation, CARLOS SIORDIA stated, "It's Rojo. Yesterday, the, the last one from yesterday . . . from yesterday the Mexico . . . It opened up, dude. They brought it to me right now and it opened up right in the middle . . . It detached from the back." JAIME SOLIS asked, "Tell them to put some saliva." SIORDIA stated, "And you know what? And where it says, it was Francisca Jile Sanchez . . ." SOLIS replied, "Uh-huh." SIORDIA stated, "We, we put a J and instead of a J it was a B, B for Bravo. It's Biles. Biles." [I believe that SIORDIA told SOLIS that a customer had returned her fraudulent

document because it contained an error. Further, I believe that the fraudulent document was not laminated properly and the document was peeling apart.] SOLIS replied, "Right now when something comes through we'll make it." SIORDIA stated, "Ok, because uh, I'm just telling you. The guy just brought it to me right now." SOLIS replied, "Yeah, yeah just tell him, just as soon as something comes through, dude . . . I'm not gonna do it until something comes through." [I believe that SOLIS agreed to fix the fraudulent document but wanted to wait for a few more orders first.]

137. On June 19, 2008, at approximately 4:46 p.m., an incoming telephone call was received at Target Phone 18 from (773) 521-5320. During the conversation, SIORDIA stated, "A-N-T-H-O-N-Y. Anthony." SOLIS replied, "Hold on. It's Anthony . . . A-N-T-H-O-N-Y?" SIORDIA stated, "Okay. Torrejon with double R, Torrejon." SOLIS asked, "With a J.?" SIORDIA replied, "Yes, near the end." SOLIS asked, "Phone number?" SIORDIA replied, "Five, five, two . . . eighty-nine, six, eight . . . seven, five." SOLIS replied, "Okay, later." [I believe that a "phone number" is a coded reference for a social security number. I believe that SIORDIA asked SOLIS to manufacture a fraudulent social security card in the name of Anthony Torrejon with the social security number 552-89-6875.]

138. On July 29, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW15 purchased fraudulent identification documents from SIORDIA as follows:

a. On July 29, 2008, at approximately 6:23 p.m., CW15 arrived at the corner of 26th Street and St. Louis Avenue and whistled at SIORDIA, who was walking on 26th Street at the time. SIORDIA walked toward CW15 and solicited CW15 to purchase fraudulent documents. This meeting was consensually recorded on audio and video. At approximately 6:23 p.m., SIORDIA asked, "Which one do you want?" CW15 replied, "Look, it's for a cousin." SIORDIA asked, "The one to work with a social or a license?" CW15 replied, "I want the driver's license." SIORDIA asked, "From Illinois?" CW15 replied, "Yes, but the good one." SIORDIA stated, "Yes, the white one from Illinois. You can have both for a hundred, driver's license and social. Do you have the picture?" CW15 replied, "I already have the picture. Let me see where I put it. Do you have a pen and piece of paper to write down all of the information?" SIORDIA stated, "Let's go to the Dollar Store." CW15 asked, "How long will it take?" SIORDIA replied, "An hour and a half, more or less." At this point SIORDIA and CW15 entered the Dollar Buster Discount Store at 3510 West 26th Street, and SIORDIA purchased a pen. SIORDIA stated, "Put your first and last name. . . day, year, and month of your birth." CW15 replied, "Uh-huh, it's there." SIORDIA stated, "Your address, street name and house number." CW15 asked, "You'll put the social? Will you tell them to put the social?" SIORDIA replied, "We make it up." CW15 stated, "This is his height and weight. . . eye color. . . Black hair." SIORDIA replied, "That's it." CW15 asked, "Are you going to call me or should I call

you?” SIORDIA asked, “Do you have a cell phone?” CW15 replied, “Yeah.” SIORDIA stated, “Can you write down your cell phone number?” CW15 asked, “Can you check it to see if everything is okay?” SIORDIA replied, “Rafael Orozco, right?” CW15 stated, “Uh-huh.” SIORDIA replied, “Okay. . . I’ll call you.” CW15 asked, “What’s your name?” SIORDIA replied, “I’m Rojo. . . they call me Rojo.” SIORDIA and CW15 departed the area.

b. At approximately 8:15 p.m., CW15 received a consensually recorded telephone call from SIORDIA using telephone number (773) 521-6770.<sup>24</sup> During the conversation, SIORDIA stated, “Head over to 26th and St. Louis.” CW15 replied, “Okay.” SIORDIA stated, “At the Payless Shoe store.” CW15 replied, “Yes, for sure.” SIORDIA stated, “I’ll see you there. Look for me there.” CW15 replied, “Okay, Rojo. I’ll see you there.”

c. At approximately 8:45 p.m., CW15 arrived at the corner of St. Louis Avenue and 26th Street and met with SIORDIA, who instructed CW15 to follow him to the alleyway behind the Payless Shoe store. This meeting was consensually recorded on audio and video. The two individuals walked north through the Payless Shoe store parking lot, at which time SIORDIA retrieved CW15's fraudulent documents from a metal box mounted on the west exterior wall of the Payless Shoe

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<sup>24</sup> Telephone number (773) 521-6770 is subscribed to Julia Perez with no address provided.

store. This image was captured on the surveillance camera. The two individuals continued walking north until they reached the alleyway behind the Payless Shoe store. At approximately 8:47 p.m., SIORDIA asked, "A license, right?" CW15 replied, "Yes." SIORDIA stated, "Come over this way." CW15 replied, "Uh-huh." SIORDIA asked, "And one social?" CW15 replied, "That's right." SIORDIA stated, "It should be there." SIORDIA then presented CW15 with a small white envelope containing a fraudulent Illinois driver's license and a fraudulent social security card in the name of Rafael Orozco. The name "ROJO" was written in pen on the outside of the envelope. CW15 stated, "Yes . . . It's fine." SIORDIA stated, "Your pictures are in there. . . Just come by whenever you want." CW15 asked, "Where?" SIORDIA replied, "I'm always on this block. . . St. Louis and 26th." CW15 paid SIORDIA \$100 for the fraudulent documents, walked back to his/her vehicle, and departed the area.

d. CW15 positively identified a June 4, 2007, CPD arrest photo of SIORDIA as the individual who sold CW15 the fraudulent identification documents on July 29, 2008.

**JOSE TEXCA COCONE ("TEXCA") a/k/a "BRODY"**

139. On February 2, 2008, at approximately 12:16 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 316-9456.<sup>25</sup> TEXCA said, "What's up?" CW3 said, "Where do I see you so I can

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<sup>25</sup> Telephone number (773) 316-9456 is subscribed to JOSE TEXCA at 2423 South Central Park Avenue, Chicago, Illinois. According to a Lexis/Nexis inquiry on

give you your job?" TEXCA said, "Where are you, dude?" CW3 said, "Me, here at Home Depot." TEXCA responded, "You are at Home Depot. No, I'm, I'm here at my house, dude." CW3 said, "Okay, I'll take it there." TEXCA said, "All right then, please." CW3 told TEXCA, "I'll call you when I'm outside." [I believe that this conversation involved CW3 wanting to deliver a fraudulent document order to TEXCA, a "runner" for the St. Louis Crew.]

140. On February 19, 2008, at approximately 2:54 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to telephone number (773) 316-9456. During the conversation, CW3 asked, "Where are you, Brody?" TEXCA responded, "Here. . . . at Lalo's. . . . at Sabor Mexico." CW3 said, "Oh. . . . I'll take you the job right now." [I believe that this conversation involved CW3 bringing an order for fraudulent documents to TEXCA who was at Sabor Mexico, a restaurant located at 3515 West 26th Street, Chicago, Illinois. I believe that once TEXCA received the fraudulent documents from CW3, TEXCA was going to take the information to the "office" to have the documents created.]

141. On June 5, 2008, at the direction of law enforcement and for purposes of furthering this criminal investigation, CW16 purchased fraudulent identification

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September 12, 2008, JOSE TEXCA is associated with 2423 South Central Park Avenue, Chicago, Illinois. According to CW3, TEXCA uses (773) 316-9456. CW3 has positively identified an arrest photo of JOSE TEXCA COCONE as "Brody." Also, TEXCA responded when addressed as "Brody," such as in the call summarized in paragraph 140.

documents from TEXCA as follows:

a. On June 5, 2008, at approximately 1:29 p.m., CW16 placed a consensually-recorded phone call to JOSE TEXCA at telephone number (773) 316-9456. During the conversation, CW16 stated, "Listen, they gave me your number. I was looking for a green card and a social." TEXCA replied, "Um-hum." Later in the conversation, TEXCA stated, "There is a buffet place on Cermak and Cicero. A Chinese buffet." CW16 replied, "At the Chinese buffet." TEXCA asked, "Uh-huh. It's on Cermak and Cicero. If you would like. . . around there or something closer to 26th, I don't know where you prefer." CW16 replied, "Yes. It's fine at the Chinese buffet. . . Uh, listen, how much, how much are they?" TEXCA replied, "We'll get together on that subject when we're there." CW16 asked, "I also wanted to know if you want the photograph because I have it with me." TEXCA replied, "Yes." CW16 asked, "All right. And, how will I recognize you?" TEXCA replied, "When we arrive, call me and I'll tell you how I look like."

b. At approximately 2:06 p.m. TEXCA and CW16 met at the Cicero Buffet at 4633 West Cermak Road in Cicero. This meeting was consensually recorded on audio and video. TEXCA asked, "What do you need? How are you?" CW16 replied, "I need a mica and a social security." TEXCA asked, "Do you have the pictures?" CW16 replied, "Gee. I think I forget them." TEXCA stated, "You will need them." CW16 asked, "Do I need to get my pictures taken?" TEXCA replied, "Yes. . . . I am

waiting for another person. I will accompany you. Go ahead and wait here for me. . . There is a photo studio on Cermak. . . we are going to go there. It is nearby.” Later in the conversation, TEXCA stated, “The lady is coming. I have been waiting and waiting for her.”

c. At approximately 2:22 p.m., an outgoing call was placed from Target Phone 13 to telephone number (773) 316-9456. During the conversation, TEXCA stated, “Wait for me because I have to go get the photo, because there is none. I’m going here to, to Meson.” ESTRADA asked, “Where’s that at?” TEXCA replied, “Here by . . . here on Cermak.” ESTRADA asked, “You’re going all the way over there?” TEXCA replied, “Yeah dude, because the [girl/guy] doesn’t have the photo.” [I believe that TEXCA told ESTRADA that CW16 was getting his/her photo taken, and TEXCA asked ESTRADA to wait for TEXCA at the Cicero Buffet, so TEXCA could provide ESTRADA with CW16's order for fraudulent documents.]

d. At approximately 2:23 p.m., TEXCA stated, “Come with me . . . you can trust me.” CW16 replied, “All right.” TEXCA stated, “Please put your seatbelt on. . . they do check in this area.” TEXCA and CW16 entered TEXCA’s vehicle.

e. At approximately 2:30 p.m., TEXCA and CW16 arrived at Erika’s Photo Studio located at 5713 Cermak Road. Both TEXCA and CW16 entered the photo studio and CW16 purchased a passport style photo. TEXCA asked an unidentified employee. “Can you take a passport photo?” The employee replied, “Of course, what

type of passport?” TEXCA stated, “For a mica.” The employee replied, “Yes. The price is fourteen dollars for three photos.” TEXCA replied, “Yes, please.” CW16 asked, “Yes. Do I pay you now?” The employee replied, “No. You pay after I take them.” After this, CW16 paid the employee for the photos.

f. At approximately 2:37 p.m., TEXCA and CW16 departed the photo studio and entered TEXCA’s vehicle. TEXCA asked, “Do you have your information?” CW16 replied, “Yes.” TEXCA stated, “Write it down on the envelope. Write down your name. . . and your date of birth.” CW16 replied, “Maria. . . Garcia.” TEXCA replied, “Here is my card. . . if later on you need it. Mexican, right?” CW16 replied, “Yes.” TEXCA stated, “I will have it ready for you.” CW16 asked, “What time?” TEXCA replied, “About an hour and a half. . . The other guy should be there where we met.” [I believe “the other guy” is a reference to ESTRADA, who I observed meet with TEXCA to pick up the order as described in paragraph 141(g).] TEXCA collected CW16’s photos, name, date of birth, and additional identifiers and biographical information needed to manufacture a fraudulent green card and social security card. TEXCA provided CW16 with a business card in the name of ANGEL with telephone number (773) 316-9456. TEXCA then drove CW16 back to the Cicero Buffet parking lot.

g. At approximately 2:46 p.m., TEXCA and CW16 arrived at the Cicero Buffet and CW16 exited the Dodge vehicle. TEXCA drove to the north end of

the parking lot to a vehicle occupied by ESTRADA and LOPEZ. I observed TEXCA pass ESTRADA what appeared to be a small manila colored envelope. Both vehicles immediately departed the area.

h. According to CW16, at approximately 3:20 p.m., CW16 received a telephone call from TEXCA using telephone number (773) 316-9456. This call was not recorded. According to CW16, during this call TEXCA stated that the documents were ready to be picked up. TEXCA stated that he was waiting for CW16 at the Cicero Buffet.

i. According to CW16, at approximately 3:37 p.m., CW16 placed a telephone call to TEXCA at telephone number (773) 316-9456. This call was not recorded. According to CW16, during this call CW16 stated that he/she had arrived and was currently standing in front of the Cicero Buffet.

j. At approximately 3:41 p.m., TEXCA and CW16 met in the Cicero Buffet parking lot. This meeting was consensually recorded on audio and video. TEXCA asked, "Maria Garcia?" TEXCA presented CW16 with a fraudulent green card and social security card in the name of Maria Garcia. CW16 replied, "Yes. I thought it would take longer." TEXCA replied, "I ask them to rush . . . they rushed." CW16 asked, "How much do I owe you?" TEXCA replied, "One hundred twenty. . . Here are your three photos. This is a different type of job. . . the picture is printed on the plastic." CW16 paid TEXCA \$120. CW16 asked, "Huh?" TEXCA replied, "They only



























































