

SEAL UNITED STATES DISTRICT COURT

for the
Southern District of California

FILED

MAY 26 2017

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

One iPhone 7+, serial number F2LSQDR6HG00

Case No.

APPLICATION FOR A SEARCH WARRANT

17MJ1647

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Southern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

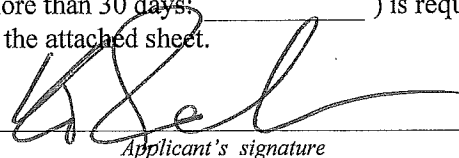
The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 371	conspiracy
18 U.S.C. § 2312	foreign transportation of stolen vehicles

The application is based on these facts:

See attached Affidavit of Kraig Palmer

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days; _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Kraig Palmer, CHP Investigator

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/26/17

City and state: San Diego, California



Judge's signature

Hon. Jan M. Adler, U.S. Magistrate Judge

Printed name and title

I, Kraig Palmer, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigator with the California Highway Patrol ("CHP"), and have been employed as a peace officer with CHP since December 2009. I am currently assigned to the San Diego Regional Auto Theft Task Force ("RATT") and have been since May 2014.

2. I attended and graduated the 2009 CHP academy where I received training in law enforcement functions including general investigations, vehicle theft investigations, narcotics enforcement, and officer safety issues. I have attended and received over 500 hours of training outside of the CHP from the California Narcotics Association, the Western States Auto Theft Investigators Association ("WSATI"), among others. I have also provided training in the areas of fraud, auto theft and organized criminal enterprises for the WSATI investigators conference, Arizona Gang Investigators Conference, and other law enforcement and private industry conferences. I have also provided training to law enforcement and private industry personnel in the areas of fraud, auto theft, credit card/identity theft, credit card manufacturing, and organized criminal enterprises.

3. I worked as an investigator for approximately one year in Los Angeles County as the CHP West Los Angeles felony investigator. I was assigned as a plain

1 clothes investigator on the Orange County Auto Theft Task Force for approximately two
2 years, before being assigned as an undercover operator/investigator on RATT.

3
4 4. I have personally investigated over 500 auto theft investigations, some of
5 which involved complex criminal enterprises conducting Vehicle Identification Number
6 switching, illegal exportation, narcotics trafficking and other crimes. I have personally
7 investigated cases involving; kidnapping, attempted murders, stolen vehicles, chop shops,
8 fraud, counterfeiting, conspiracy, international exportation, narcotics trafficking, and
9 other crimes. As an undercover operator I have personally purchased stolen vehicles and
10 narcotics. I have authored over 50 search warrants, resulting in the successful prosecution
11 of criminals and recovery of stolen property and evidence. I have testified as an expert in
12 the areas of rental vehicle operations, rental vehicle thefts and auto theft investigations in
13 state court. I am currently cross designated with the Federal Bureau of Investigations
14 Organized Crime Squad.

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17 5. This affidavit is made in support of an application to search the following
18 cellular telephone:

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21 a. One black iPhone 7+, FCCID: BCG-E3087A, serial number
22 F2LSQDR6HG00 (hereinafter referred to as "**Subject Telephone**");
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24 for items that constitute evidence, fruits, and instrumentalities of violations of federal
25 criminal law, namely, violations of 18 U.S.C. § 371 (conspiracy) and 18 U.S.C. § 2312
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1 (foreign transportation of stolen vehicles), occurring from January 1, 2016 to April 30,
2 2017, as described more specifically in Attachment B.

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4 6. The facts in this affidavit come from my personal observations, my training
5 and experience, and information obtained from other agents and witnesses. This affidavit
6 is being submitted for the limited purpose of establishing probable cause for the issuance
7 of the requested search warrant. As such, this affidavit does not contain all of the facts
8 and circumstances learned during this investigation.
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10

11 7. Based on my training and experience and the facts as set forth in this affidavit,
12 there is probable cause to believe that violations of 18 U.S.C. § 371 and 18 U.S.C. § 2312
13 have been committed by the user of the **Subject Telephone**. There is also probable cause
14 to believe that a search of the **Subject Telephone** (as more particularly described in
15 Attachment A) will reveal evidence of these crimes (as more particularly described in
16 Attachment B).
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20 **PROBABLE CAUSE**

21 **A. Background**

22 8. In the summer of 2014, San Diego County was hit with a rash of Jeep
23 Wrangler thefts. According to police reports, almost all the thefts occurred in the middle
24 of the night or early morning, and almost all of the Wranglers were equipped with alarms.
25 Yet no alarms were ever triggered, and there was never any broken glass or other signs of
26 forced entry. Agents from the Regional Auto Theft Task Force ("RATT") were stymied.
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1 9. According to police reports, on September 26, 2014, an individual parked her
2 2014 Jeep Wrangler Rubicon in the driveway of her home in Rancho Bernardo. She
3 returned to the driveway early the next morning to find the Jeep missing. Fortunately, she
4 had recently installed a surveillance camera on her house, and it happened to be trained
5 on the driveway. The surveillance footage revealed that three men stole her Jeep around
6 2:30 a.m. by disabling the alarm and then using a key and handheld device to turn on the
7 engine.
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11 10. Based on the surveillance footage, agents sent Chrysler a list of around 20
12 Jeeps that had recently been stolen in San Diego County and asked whether anyone had
13 requested duplicate keys for the stolen Jeeps. Agents learned that a duplicate key had been
14 requested for nearly every one of the 20 stolen Jeeps. Moreover, nearly every one of the
15 keys had been requested through the same dealership in Cabo San Lucas, Mexico.
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18 11. After disrupting several Jeep thefts and conducting additional investigation,
19 agents learned that the Tijuana-based Hooligans Motorcycle Club (also known as the
20 Hooligan Bikers) was behind the operation.
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1 **B. The Hooligans operate an organized scheme to steal Jeep Wranglers and**
2 **motorcycles and transport them to Mexico**

3 12. In [REDACTED] law enforcement agents identified a confidential source (CS-1)
4 who was a member of the Hooligans Motorcycle Club.¹ According to CS-1, the Hooligans
5 Motorcycle Club is based in Tijuana, Mexico. The Hooligans hold a weekly meeting and
6 members are generally expected to attend when available. After the weekly meeting, the
7 club members ride in groups to a large gathering of stunt riders from the Tijuana area.
8

9
10 13. According to CS-1, there are two distinct groups within the Hooligans
11 Motorcycle Club. One group, "the Dirty 30," of which CS-1 was a part, steals motorcycles
12 and vehicles, and engages in other criminal activities, including the sale of illegal drugs.
13 Members of the Hooligans Motorcycle Club do not become part of the Dirty 30 unless
14 they have committed crimes with, or on behalf of, other Hooligans. The second group is
15 not involved in criminal activity and somewhat paradoxically (as it is aware of the Dirty
16 30) organizes events that are designed to portray a favorable image to the community.
17 (For the remainder of this Affidavit, "Hooligan" and "Hooligans" refer only to members
18 of the Hooligans Motorcycle Club who are part of the Dirty 30.)
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25 ¹ CS-1 has provided reliable information that, in part, has been corroborated by
26 physical surveillance, video surveillance, Facebook messages, audio recorded
27 conversations, text messages, and arrests. CS-1's primary motivation to cooperate is to
28 obtain a lesser sentence associated with pending criminal charges as set forth in Appendix
A. CS-1 has no other criminal convictions and has not been compensated for providing
assistance to law enforcement.

1 14. According to CS-1, each Hooligan has a shirt featuring the Hooligans
2 Motorcycle Club logo or name. There are leaders or “shot callers” who control
3 distribution of the shirt, and thus, membership in the Dirty 30. Each of the leaders operates
4 his own separate group of Hooligans. The groups share intelligence and information about
5 their criminal activities. Hooligans are recruited into one of the groups based on their
6 skills and their familiarity with others in the groups.
7

8
9 15. According to CS-1, Hooligans frequently steal Jeep Wranglers and
10 motorcycles from within San Diego County and transport them to Tijuana, Mexico.
11 Stealing Jeeps and motorcycles involves a division of labor, with some Hooligans acting
12 in multiple roles. According to CS-1, video surveillance, social media messages, social
13 media photographs², and law enforcement observations during several Jeep thefts, a Jeep
14 theft usually follows a four-step process:
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18 a. *First, target the Jeep.* A leader of one of the groups provides his
19 “scouts” with a list of specific Jeeps to target based on model and aftermarket accessories.
20 The scouts then drive throughout San Diego County looking for Jeeps that meet the list’s
21 criteria. Once the scouts target a Jeep, they obtain the Vehicle Identification Number
22 (“VIN”) from the dashboard or the secondary VIN location.
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28 ² See Attachment C for photographs of the Hooligans’ logo and various members
of the Hooligans Motorcycle Club.

1 b. *Second, get a duplicate key.* The scouts send the VIN for a targeted
2 Jeep back to the leader, who uses the VIN to get a duplicate ignition key. To obtain a
3 duplicate key, the group first needs two codes, both of which are housed in a proprietary
4 key database. The first code corresponds to a pattern used to cut the physical key. The
5 second code is required to program a computer chip within the key to the targeted Jeep's
6 onboard computer. (The computer chip, however, is not programmed using the second
7 code until the time of the theft.) The leader sends the VIN to another Hooligan, who
8 accesses the proprietary database and obtains the desired key codes. That Hooligan uses
9 one of the codes to create a duplicate key for the targeted Jeep Wrangler. The Hooligan
10 then provides the duplicate key to the leader along with the second code, which the
11 Hooligans need in order to program the microchip within the key at the time of the theft.³

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14 c. *Third, steal the Jeep.* With the duplicate key in hand, several "thieves"
15 and "transporters" travel to San Diego County to steal the targeted Jeep. The thieves and
16 transporters often cross into the United States at different times and at different ports of
17 entry to avoid detection by law enforcement. The thieves and transporters generally meet
18 at a location just north of the port of entry before travelling together to the targeted Jeep's
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26 ³ In earlier affidavits, I stated my belief—based on evidence available at the time—that a dealership employee accessed the key codes and provided them to the Hooligans.
27 After viewing additional social media messages, I now believe that one of the Hooligans
28 receives log-in and password information to the proprietary database and accesses the key codes directly from that database.

1 location. After ensuring that there are no police officers or civilians in the area, the thief
2 disables the Jeep's horn and forward flashing lights. Next, the thief opens the Jeep's driver
3 side door using the duplicate key, which activates the vehicle's alarm. Only the rear lights
4 begin flashing, however, as the horn and front lights have been disabled. The thief then
5 quickly connects a handheld vehicle program computer to the Jeep's Onboard Diagnostic
6 System port. The thief puts the duplicate key in the ignition, and using the second code
7 obtained from the proprietary database, programs the microchip in the duplicate key.
8 After the pairing is complete, the Jeep's alarm turns off, and the rear lights stop flashing.
9

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11 d. *Fourth, transport the Jeep to Mexico.* Typically, after the key is
12 programmed, the transporter, who has been acting as a look-out for the thief, enters the
13 Jeep and turns on the ignition. The thief takes the handheld vehicle program computer
14 and gets into a nearby get-away vehicle. The transporter then drives the now-stolen Jeep
15 to Tijuana, Mexico while the thief follows in the get-away vehicle.
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19 16. According to law enforcement reports, conversations with federal and local
20 law enforcement, and other records, the Hooligans, using the system described above,
21 have stolen approximately 150 Jeep Wranglers, worth approximately \$4.5 million, within
22 San Diego County since 2014.
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25 **C. Henry PULIDO and two other Hooligans attempt to transport two stolen**
26 **motorcycles to Mexico**

27 17. According to CS-1, Henry PULIDO—the owner of the **Subject**
28 **Telephone**—is a Hooligan and has engaged in the theft and transportation of vehicles.

1 18. On June 28, 2015, law enforcement officers observed the following:

2 a. At approximately 2:00 p.m., law enforcement noticed two stolen
3 motorcycles parked in front of an apartment complex located at 245 Woodlawn Ave.,
4 Chula Vista, California. According to police reports, the motorcycles—a 2013 Honda
5 CBR 600RR and a Yamaha YZF-R1—were reported stolen on June 27, 2015.
6

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8 b. At approximately 5:00 p.m., a 1985 Nissan Stanza, registered to Juan
9 Castaneda, stopped immediately next to the two stolen motorcycles. Salvador Castillo
10 and Henry PULIDO exited the Nissan Stanza, put on helmets, and approached the stolen
11 motorcycles. Castillo and PULIDO sat on the motorcycles and attempted to start them by
12 hot-wiring the engines. The Nissan Stanza continued driving north on Woodlawn Avenue.
13

14
15 c. Marked units approached Castillo and PULIDO with emergency lights
16 and sirens activated. PULIDO attempted to flee on foot, but was apprehended. An
17 unmarked unit with traffic enforcement lights followed the Nissan Stanza for
18 approximately one block and initiated a traffic stop, at which time the driver, Castaneda,
19 was arrested. Castaneda, Castillo, and PULIDO were booked and interviewed at the Chula
20 Vista Police Department.
21

22
23 d. After waiving his Miranda rights, Castaneda admitted that he stole the
24 two motorcycles, picked up Castillo and PULIDO from the San Ysidro Port of Entry, and
25 drove them to the stolen motorcycles so that they could transport the motorcycles to
26 Mexico.
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1 e. After waiving his Miranda rights, Castillo stated that he stole
2 motorcycles for the Hooligans and that another Hooligan organized the Hooligans'
3 motorcycle theft operation. Castillo also admitted that this Hooligan agreed to pay him
4 \$200 to drive one of the two stolen motorcycles from the United States to Mexico along
5 with PULIDO. Castillo admitted that he has personally stolen approximately 50
6 motorcycles and transported them to Mexico.
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10 19. According to the Information filed in Case Number 15-CR-1951-JAH,
11 Castaneda, Castillo, and PULIDO were charged with conspiracy to commit interstate
12 transportation of stolen property, in violation of Title 18, United States Code, Section 371.
13 Castaneda pled guilty to the Information on February 23, 2015, and according to his plea
14 agreement, admitted to "conspir[ing] with Salvador Castillo, Henry Pulido, and others to
15 commit interstate transportation of stolen property" Castaneda further admitted to
16 participating in the theft of seven motorcycles and their transportation to Mexico.⁴
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20 **D. PULIDO is stopped at the San Ysidro Port of Entry with the Subject Telephone**

21 20. On April 30, 2017, Custom and Border Protection ("CBP") officers stopped
22 PULIDO as he attempted to cross southbound into Mexico at the San Ysidro Port of Entry.
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26 ⁴ The United States successfully moved to dismiss the Information without
27 prejudice as to Castillo and PULIDO.
28

1 According to a CBP officer, PULIDO was sent to a secondary inspection area based on a
2 suspicion that he was driving a stolen motorcycle. CBP requested assistance from the
3 California Highway Patrol Foreign Export and Recovery unit to determine whether the
4 motorcycle was stolen. I responded to the San Ysidro Port of Entry, inspected the
5 motorcycle, and determined that the motorcycle was not stolen, but had not been registered
6 for several years.
7

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9 21. After inspecting the motorcycle, I interviewed PULIDO. PULIDO stated that
10 he is still associated with the Hooligans Motorcycle Club. I asked PULIDO for the
11 passcode of the **Subject Telephone**, which he had in his possession at the time he tried to
12 cross the border. PULIDO voluntarily provided the passcode.
13
14

15 22. PULIDO stated that he was on active probation. According to PULIDO's
16 conditions of probation, PULIDO is required to "[s]ubmit person, vehicle, residence,
17 property, personal effects, computers, and recordable media to search at any time with or
18 without a warrant, and with or without reasonable cause, when required by law
19 enforcement, probation or peace officer."
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21

22 23. In PULIDO's presence, I began to review the contents of the **Subject**
23 **Telephone**. During my review, I saw, among other things, photographs of motorcycles
24 in parking structures, Hooligans apparel, and individuals wearing Hooligans apparel. I
25 recognized the parking structure as one from which the Hooligans frequently steal
26 motorcycles.
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1 24. During the course of this investigation, I have personally observed text
2 messages sent between Hooligans that contained photographs of targeted Jeep Wranglers,
3 photographs of Jeep Wranglers' VINs, and maps where targeted Jeep Wranglers were
4 located. Based upon my experience and investigation in this case and my initial review
5 of the **Subject Telephone**, there is probable cause to believe that the **Subject Telephone**
6 that is the subject of this warrant contains evidence of violations of 18 U.S.C. § 371 and
7 18 U.S.C. § 2312. Based upon my experience and training, consultation with other law
8 enforcement officers experienced in narcotics trafficking investigations, and all the facts
9 and opinions set forth in this affidavit, I believe that information relevant to the Hooligans'
10 organized scheme to steal vehicles is stored in the memory of the **Subject Telephone**,
11 including evidence:
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- 17 a. tending to indicate efforts to target, steal, transport, or sell Jeep Wranglers,
18 motorcycles, or other vehicles; cross through ports of entry for the purpose
19 of targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles,
20 or other vehicles; obtain duplicate vehicle ignition keys; obtain codes from
21 a proprietary database; locate or deactivate security devices on Jeep
22 Wranglers, motorcycles, or other vehicles;
23
24 b. tending to identify other facilities, storage devices, or services—such as
25 email addresses, IP addresses, phone numbers—that may contain electronic
26 evidence tending to indicate efforts to target, steal, transport, or sell Jeep
27 Wranglers, motorcycles, or other vehicles; cross through ports of entry for
28 the purpose of targeting, stealing, transporting, or selling Jeep Wranglers,
motorcycles, or other vehicles; obtain duplicate vehicle ignition keys;
obtain codes from a proprietary database; locate or deactivate security
devices on Jeep Wranglers, motorcycles, or other vehicles;

- c. tending to identify co-conspirators, criminal associates, or others involved in targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles;
- d. tending to identify travel to or presence at locations involved in the theft and transportation of Jeep Wranglers, motorcycles, or other vehicles;
- e. tending to identify the user of, or persons with control over or access to, the subject cellular telephone; and
- f. tending to place in context, identify the creator or recipient of, or establish the time of creation or receipt of communications, records, or data above.

PROCEDURES FOR ELECTRONICALLY STORED INFORMATION

25. It is not possible to determine, merely by knowing the cellular telephone's make, model and serial number, the nature and types of services to which the device is subscribed and the nature of the data stored on the device. Cellular devices today can be simple cellular telephones and text message devices, can include cameras, can serve as personal digital assistants and have functions such as calendars and full address books and can be mini-computers allowing for electronic mail services, web services and rudimentary word processing. An increasing number of cellular service providers now allow for their subscribers to access their device over the internet and remotely destroy all of the data contained on the device. For that reason, the device may only be powered in a secure environment or, if possible, started in "flight mode" which disables access to the network. Unlike typical computers, many cellular telephones do not have hard drives or hard drive equivalents and store information in volatile memory within the device or in

1 memory cards inserted into the device. Current technology provides some solutions for
2 acquiring some of the data stored in some cellular telephone models using forensic
3 hardware and software. Even if some of the stored information on the device may be
4 acquired forensically, not all of the data subject to seizure may be so acquired. For devices
5 that are not subject to forensic data acquisition or that have potentially relevant data stored
6 that is not subject to such acquisition, the examiner must inspect the device manually and
7 record the process and the results using digital photography. This process is time and
8 labor intensive and may take weeks or longer.

12 26. Following the issuance of this warrant, I will collect the subject cellular
13 telephone and subject it to analysis. All forensic analysis of the data contained within the
14 telephone and its memory card will employ search protocols directed exclusively to the
15 identification and extraction of data within the scope of this warrant.

18 27. Based on the foregoing, identifying and extracting data subject to seizure
19 pursuant to this warrant may require a range of data analysis techniques, including manual
20 review, and, consequently, may take weeks or months. The personnel conducting the
21 identification and extraction of data will complete the analysis within ninety (90) days,
22 absent further application to this court.

25 **REQUEST FOR SEALING**

26 28. This is an ongoing investigation of which the targets are unaware. It is very
27 likely, based upon the above, that evidence of the crimes under investigation exists on
28

1 computers and other devices subject to the control of the targets. There is reason to
2 believe, based on the above, that premature disclosure of the existence of the warrant will
3 result in destruction or tampering with that evidence and seriously jeopardize the success
4 of the investigation. Accordingly, it is requested that this warrant and its related materials
5 be sealed until further order of the Court.
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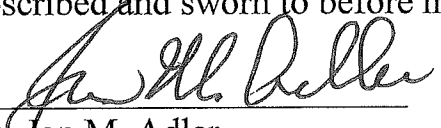
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8 **CONCLUSION**
9

10 29. Based on the foregoing, there is probable cause to believe that the items
11 identified in Attachment B have been used in the commission of a crime and constitute
12 evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 371 (conspiracy) and
13 18 U.S.C. § 2312 (foreign transportation of stolen vehicles) and will be found at the
14 telephone to be searched as provided in Attachment A.
15
16

17 Respectfully submitted,
18


19 
20 Kraig Palmer
21 Investigator, CHP
22

23 Subscribed and sworn to before me on May 26, 2017
24

25 
26 Hon. Jan M. Adler
27 United States Magistrate Judge
28

1 **APPENDIX A – ADDITIONAL INFORMATION**

2 1. The Ninth Circuit has recognized the government’s privilege to protect the
3
4 identity of its informant and any “information that would tend to reveal the identity of the
5 informant.” *United States v. Napier*, 436 F.3d 1133, 1136 (9th Cir. 2006) (holding that a
6
7 district court did not err by refusing to unseal the attachment to a search warrant affidavit
8 that included identifying information of a confidential informant); *cf. United States v.*
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10 *Forrester*, 616 F.3d 929, 942 (9th Cir. 2010) (“a defendant does not have a right to
11 redacted portions of a wiretap application if the government is able (and willing) to defend
12 the warrant without relying on the redacted information”). None of the information set
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14 forth in this Appendix A is being submitted to establish probable cause. Thus, the United
15 States intends to provide only a redacted version of Appendix A in discovery.
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ATTACHMENT A

One black iPhone 7+ cellular telephone FCCID: BCG-E3087A and serial number F2LSQDR6HG00 currently in the possession of the California Highway Patrol at the Border Division Investigative Services Unit, 9330 Farnham Street, San Diego, California 92123.

ATTACHMENT B

The following evidence to be searched for and seized pertains to violations of Title 18, United States Code § 371 (conspiracy) and § 2312 (foreign transportation of stolen vehicles) and is limited to:

1. Communications, records, or data including but not limited to emails, text messages, photographs, audio files, videos, or location data from January 1, 2016, to April 30, 2017:
 - a. tending to indicate efforts to target, steal, transport, or sell Jeep Wranglers, motorcycles, or other vehicles; cross through ports of entry for the purpose of targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles; obtain duplicate vehicle ignition keys; obtain codes from a proprietary database; locate or deactivate security devices on Jeep Wranglers, motorcycles, or other vehicles;
 - b. tending to identify other facilities, storage devices, or services—such as email addresses, IP addresses, phone numbers—that may contain electronic evidence tending to indicate efforts to target, steal, transport, or sell Jeep Wranglers, motorcycles, or other vehicles; cross through ports of entry for the purpose of targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles; obtain duplicate vehicle ignition keys; obtain codes from a proprietary database; locate or deactivate security devices on Jeep Wranglers, motorcycles, or other vehicles;
 - c. tending to identify co-conspirators, criminal associates, or others involved in targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles;
 - d. tending to identify travel to or presence at locations involved in the theft and transportation of Jeep Wranglers, motorcycles, or other vehicles;
 - e. tending to identify the user of, or persons with control over or access to, the subject cellular telephone; or

1 f. tending to place in context, identify the creator or recipient of, or establish
2 the time of creation or receipt of communications, records, or data above.

3 which constitute evidence, fruits, or instrumentalities of the theft of Jeep Wranglers and
4 motorcycles from the Southern District of California and their transportation to Mexico,
5 in violation of 18 U.S.C. § 371 (conspiracy) and 18 U.S.C. § 2312 (foreign transportation
6 of stolen vehicles).
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ATTACHMENT C

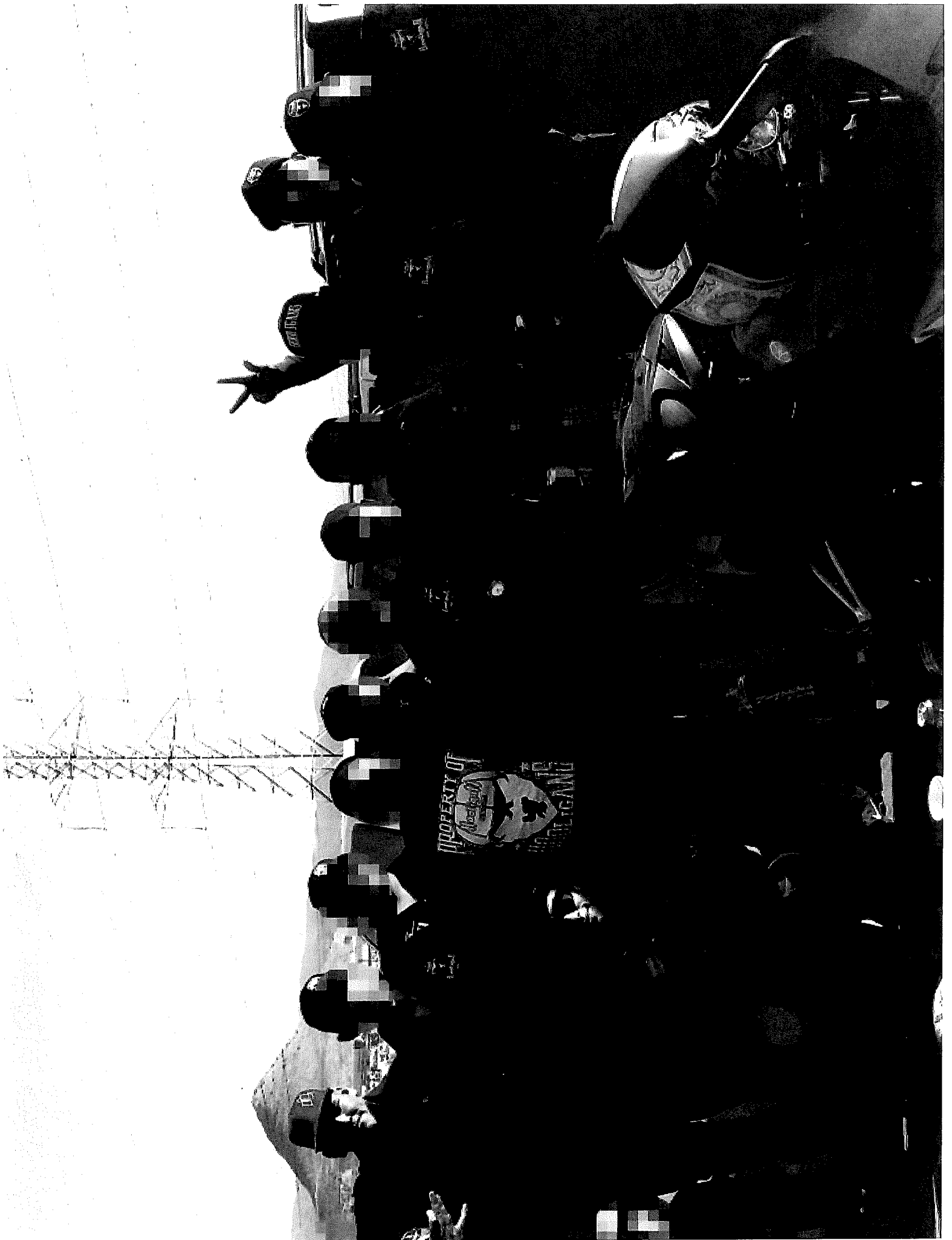
1. Hooligan Bikers logo
2. Photograph of Mario Alberto Echeverria-Ibarra (left) and Jimmy Josue Martinez (right)
3. Photograph of Jimmy Josue Martinez (top left), Adan Esteban Sanchez Aguirre (top right), and Reynaldo Rodriguez (bottom)
4. Photograph of Jimmy Josue Martinez (center left, red hat), Adan Esteban Sanchez Aguirre (center, black hat), and Mario Alberto Echeverria-Ibarra (center right, red hat)
5. Photograph of Mario Alberto Echeverria-Ibarra (top left) and Henry Irenio Pulido (bottom)
6. Photograph of Adan Esteban Sanchez Aguirre (center), Jimmy Josue Martinez (second from left, glasses), and Henry Irenio Pulido (right, red hat)

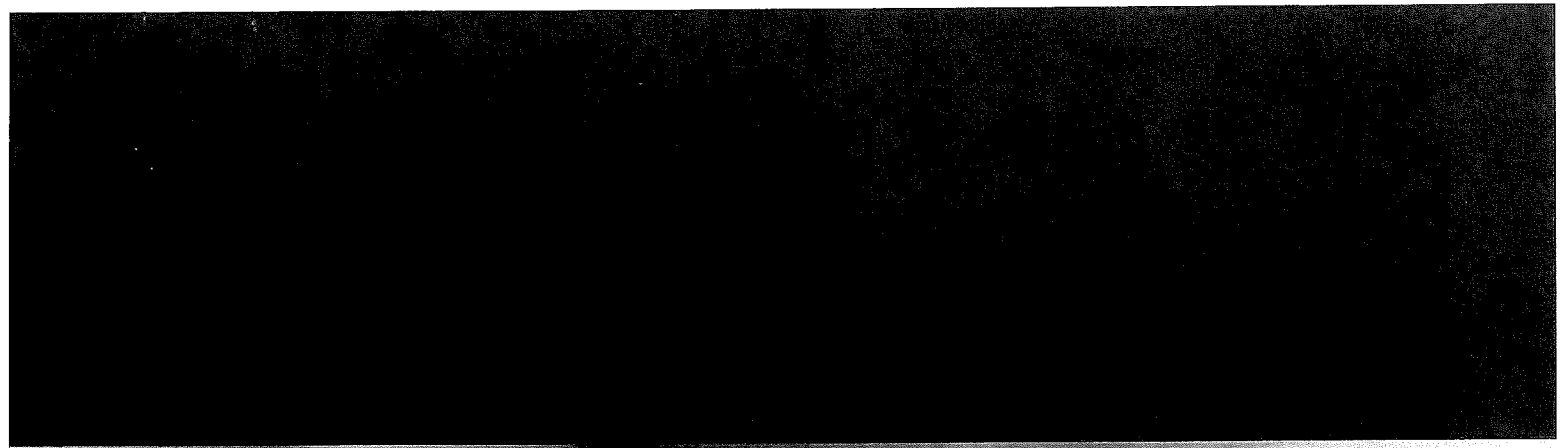












NOT FOR PUBLIC VIEW**UNITED STATES DISTRICT COURT**for the
Southern District of California**SEALED**In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
One iPhone 7+, serial number F2LSQDR6HG00

Case No.

17MJ1647**SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Southern District of California
(identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before 6/8/17 (not to exceed 14 days)
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to Hon. Jan M. Adler
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .Date and time issued: 5/26/17 @ 10:12 a.m.

Judge's signature

City and state: San Diego, California

Hon. Jan M. Adler, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

One black iPhone 7+ cellular telephone FCCID: BCG-E3087A and serial number F2LSQDR6HG00 currently in the possession of the California Highway Patrol at the Border Division Investigative Services Unit, 9330 Farnham Street, San Diego, California 92123.

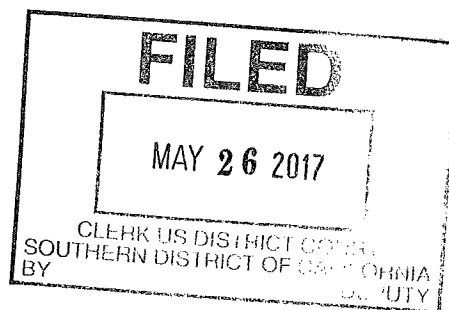
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1. Communications, records, or data including but not limited to emails, text messages, photographs, audio files, videos, or location data from January 1, 2016, to April 30, 2017:
 - a. tending to indicate efforts to target, steal, transport, or sell Jeep Wranglers, motorcycles, or other vehicles; cross through ports of entry for the purpose of targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles; obtain duplicate vehicle ignition keys; obtain codes from a proprietary database; locate or deactivate security devices on Jeep Wranglers, motorcycles, or other vehicles;
 - b. tending to identify other facilities, storage devices, or services—such as email addresses, IP addresses, phone numbers—that may contain electronic evidence tending to indicate efforts to target, steal, transport, or sell Jeep Wranglers, motorcycles, or other vehicles; cross through ports of entry for the purpose of targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles; obtain duplicate vehicle ignition keys; obtain codes from a proprietary database; locate or deactivate security devices on Jeep Wranglers, motorcycles, or other vehicles;
 - c. tending to identify co-conspirators, criminal associates, or others involved in targeting, stealing, transporting, or selling Jeep Wranglers, motorcycles, or other vehicles;
 - d. tending to identify travel to or presence at locations involved in the theft and transportation of Jeep Wranglers, motorcycles, or other vehicles;
 - e. tending to identify the user of, or persons with control over or access to, the subject cellular telephone; or

1 f. tending to place in context, identify the creator or recipient of, or establish
2 the time of creation or receipt of communications, records, or data above.

3 which constitute evidence, fruits, or instrumentalities of the theft of Jeep Wranglers and
4 motorcycles from the Southern District of California and their transportation to Mexico,
5 in violation of 18 U.S.C. § 371 (conspiracy) and 18 U.S.C. § 2312 (foreign transportation
6 of stolen vehicles).
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SEALED



ALANA W. ROBINSON
Acting United States Attorney
ANDREW J. GALVIN
Assistant United States Attorney
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United States Attorney's Office
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Attorneys for United States of America

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN THE MATTER OF THE APPLICATION
OF THE UNITED STATES OF AMERICA
FOR A WARRANT TO SEARCH

ONE IPHONE 7+, SERIAL NUMBER
F2LSQDR6HG00

Case No.

17MJ1647

**MOTION TO FILE DOCUMENTS
UNDER SEAL AND ORDER
THEREON**

UNDER SEAL

COMES NOW the UNITED STATES OF AMERICA, by and through its counsel,
Alana W. Robinson, Acting United States Attorney, and Andrew J. Galvin, Assistant U.S.
Attorney, and hereby moves this Court for an order to seal the search warrant, application
for search warrant, and all attachments in the above-captioned matter, including the
affidavit. The United States requests that this sealing order be in effect until further order
of the Court, with the exception that the United States shall be permitted to make
disclosure to defendants' counsel pursuant to an early disclosure agreement or Fed. R.
Crim. P. 16, and, if there is a conviction, to the

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1 United States Probation Department, for the reasons set forth in paragraph 28 of the
2 affidavit of Kraig Palmer.

3 DATED: 5/26/17

Respectfully submitted,

4 ALANA W. ROBINSON
5 Acting United States Attorney

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7 ANDREW J. GALVIN
8 Assistant U.S. Attorney
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3 UNITED STATES DISTRICT COURT
4 SOUTHERN DISTRICT OF CALIFORNIA

5 IN THE MATTER OF THE APPLICATION
6 OF THE UNITED STATES OF AMERICA
7 FOR A WARRANT TO SEARCH

8 ONE IPHONE 7+, SERIAL NUMBER
9 F2LSQDR6HG00

Case No.

ORDER SEALING DOCUMENTS

UNDER SEAL

10 Upon request of the United States of America, and good cause being shown,
11 IT IS HEREBY ORDERED that the search warrant in the above-captioned matter
12 be filed under seal. IT IS FURTHER ORDERED that the warrant and accompanying
13 documents, including the application and affidavit, be filed under seal (with disclosure
14 permitted to defendants' counsel pursuant to an early disclosure agreement, or to Fed. R.
15 Crim. P. 16, and, if there is a conviction, to the United States Probation Department).
16 IT IS FURTHER ORDERED that the United States' Motion to File Documents Under
17 Seal and this Order be filed under seal until further order of the Court.

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19 DATED: May 26, 2017.

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HONORABLE JAN M. ADLER
United States Magistrate Judge
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