

**ORIGINAL
FILED**

UNITED STATES DISTRICT COURT

AUG 29 2018

for the
Eastern District of California

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
DEPUTY CLERK

United States of America)
v.)
1) DENIS BARRERA-PALMA,)
AKA, "GUNNER,")
2) MARIO GARCIA-VILLANUEVA,)
AKA, "TON," (CONT'D))

Case No.

1: 18 MJ 00150 SKO

Defendant(s)

CRIMINAL COMPLAINT

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

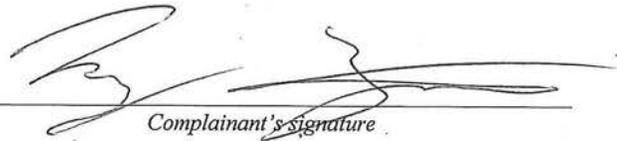
On or about the date(s) of Mar. 2017 - Aug. 2018 (see below) in the county of Fresno in the Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1959(a)(3) Defs. 1, 5, and 6	Assault with a Dangerous Weapon in Aid of Racketeering (May 14, 2018)
18 U.S.C. § 1959(a)(3) Def. 7	Assault with a Dangerous Weapon in Aid of Racketeering (August 12, 2018)
21 U.S.C. §§ 846, 841(a)(1) Defs. 1-5, and 7-15	Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, to wit, Methamphetamine, Cocaine and Marijuana (May 2017 - August 2018)

This criminal complaint is based on these facts:

See attached Affidavit of FBI TFO Ryan Yetter, attached hereto and incorporated herein.

Continued on the attached sheet.



Complainant's signature

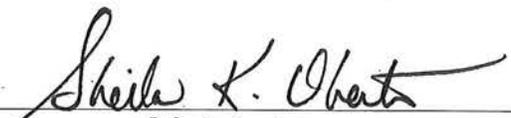
Ryan Yetter, FBI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date:

August 29, 2018



Judge's signature

City and state:

Fresno, California

Sheila K. Oberto

Printed name and title

- 1 DEFENDANTS (CONTINUED)
- 2 3) FRANCISCO LIZANO,
3 AKA, "ACTIVO,"
4 AKA, "JAVI,"
- 4 4) JEFFERSON GUEVARA,
5 AKA, "CHINO,"
- 5 5) EVER MEMBRENO,
6 AKA, "CANECHO,"
- 6 6) EDGAR TORRES-AMADOR,
7 7) LORENZO AMADOR,
8 AKA, "CATRACHO,"
- 7 8) JOSE WILSON NAVARETTE-MENDEZ,
9 AKA, "WILSON,"
- 8 9) DENIS ALFARO-TORRES,
10 AKA, "PAYIN,"
- 9 10) SANTOS BONILLA,
11 AKA, "CUERVO,"
- 10 11) HENRY BONILLA,
11 AKA, "REPOLLO,"
12 AKA, "REPOLLIN,"
- 11 12) CHRISTIAN HIDALGO,
12 AKA, "GUERO,"
13 AKA, "HUERO,"
14 AKA, "WERITO,"
15 AKA, "WHITE BOY,"
- 14 13) MARVIN VILLEGAS-SEGOVIA,
16 AKA, "CHAPARRO,"
- 15 14) BRENDA YAJAIRA MORALES,
17 AKA, "YARI,"
- 16 15) CLAUDIA LIZAOLA,
18 AKA, "MANIAKA,"
- 17 16) OSCAR REYES,
19 AKA, "TAMAGAS"

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10 United States of America

11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

CASE NO.

14
15 Plaintiff,

AFFIDAVIT OF FBI TASK FORCE OFFICER
RYAN YETTER

16 v.

- 17 1) DENIS BARRERA-PALMA,
AKA, "GUNNER,"
18 2) MARIO GARCIA-VILLANUEVA,
AKA, "TON,"
19 3) FRANCISCO LIZANO,
AKA, "ACTIVO,"
20 AKA, "JAVI,"
21 4) JEFFERSON GUEVARA,
AKA, "CHINO,"
22 5) EVER MEMBRENO,
AKA, "CANECHO,"
23 6) EDGAR TORRES-AMADOR,
24 7) LORENZO AMADOR,
AKA, "CATRACHO,"
25 8) JOSE WILSON NAVARETTE-MENDEZ,
AKA, "WILSON,"
26 9) DENIS ALFARO-TORRES,
AKA, "PAYIN,"
27 10) SANTOS BONILLA,
28 AKA, "CUERVO,"

- 1 11) HENRY BONILLA,
AKA, "REPOLLO,"
2 AKA, "REPOLLIN,"
3 12) CHRISTIAN HIDALGO,
AKA, "GUERO,"
4 AKA, "HUERO,"
AKA, "WERITO,"
5 AKA, "WHITE BOY,"
6 13) MARVIN VILLEGAS-SEGOVIA,
AKA, "CHAPARRO,"
7 14) BRENDA YAJAIRA MORALES,
AKA, "YARI,"
8 15) CLAUDIA LIZAOLA,
AKA, "MANIAKA"
9 16) OSCAR REYES,
AKA, "TAMAGAS"

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11 Defendants.
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3 **AFFIDAVIT IN SUPPORT OF COMPLAINT**

4 I, Ryan Yetter, being duly sworn, hereby declare as follows:

5 **I. INTRODUCTION**

6 **A. Purpose of the Affidavit**

7
8 1. I make this Affidavit to support a Complaint charging the following:

9 **COUNT 1 – Assault with a Dangerous Weapon In Aid of Racketeering**

10 On or about May 14, 2018, **DENIS BARRERA-PALMA**, a.k.a. Gunner, **EVER**
11 **MEMBRENO**, a.k.a. Canecho, and **EDGAR TORRES-AMADOR** (hereinafter
12 **“TORRES”**) did assault Victim #1 (H.L.) with a dangerous weapon, to wit a
13 metal pipe (a violation of California Penal Code, Section 245), for the purpose of
maintaining and increasing position in MS-13, an enterprise engaged in
racketeering activity, in violation of Title 18, United States Code, Section
1959(a)(3).

14 **COUNT 2 – Assault with a Dangerous Weapon In Aid of Racketeering**

15 On or about August 12, 2018, **LORENZO AMADOR** (hereinafter **AMADOR**),
16 a.k.a. Catracho did commit assault Victim #2 (I.R), with a dangerous weapon, to
17 wit a knife (a violation of California Penal Code, Section 245), for the purpose of
maintaining and increasing position in MS-13, an enterprise engaged in
racketeering activity, in violation of Title 18, United States Code, Section
1959(a)(3).

18 **COUNT 3 – CONSPIRACY TO POSSES WITH INTENT TO DISTRIBUTE**
19 **NARCOTICS**

20 On or about various dates, but beginning no later than March 2017, Denis
21 **BARRERA-PALMA** (hereinafter **“BARRERA-PALMA”**), aka “Gunner;”
Claudia **LIZAOLA** (hereinafter **“LIZAOLA”**), aka “Maniaka;” Jefferson
22 **GUEVARA** (hereinafter **GUEVARA**), aka “Chino;” Denis **ALFARO-**
TORRES (hereinafter **“ALFARO-TORRES”**), Jose Wilson **NAVARETTE-**
MENDEZ (hereinafter **“NAVARETTE-MENDEZ”**), aka “Wilson;” Mario
23 **GARCIA-VILLANUEVA**, aka “Ton;” Ever **MEMBRENO** (hereinafter
MEMBRENO), aka “Conecho;” Christian **HIDALGO** (hereinafter **“**
24 **HIDALGO”**), aka “Guero;” Santos **BONILLA** (hereinafter **“S. BONILLA”**);
Francisco **LIZANO** (hereinafter **“LIZANO”**); and Marvin **VILLEGAS-**
25 **SEGOVIA** (hereinafter **“SEGOVIA”**); Lorenzo **AMADOR**; Brenda Yajaira
MORALES, aka “Yari” (hereinafter **“MORALES”**); Henry **BONILLA**, aka
26 **“Repollo,”** aka **“Repollin”** (hereinafter **“H. BONILLA,”** and Oscar **REYES** did
27 violate 21 U.S.C. §§ 846, 841(a)(1) (Conspiracy to Distribute and Possess with
Intent to Distribute Controlled Substances, to wit, Marijuana, Cocaine, and
28 Methamphetamine)

1
2 2. At various times relevant to this complaint, Denis **BARRERA-PALMA**, aka “Gunner;”
3 Claudia **LIZAOLA**, aka “Maniaka;” Jefferson **GUEVARA**, aka “Chino;” Denis **ALFARO-TORRES**
4 (hereinafter “**ALFARO-TORRES**”), Jose Wilson **NAVARETTE-MENDEZ**, aka “Wilson;” Ever
5 **MEMBRENO**, aka “Conecho;” Santos **BONILLA**; Francisco **LIZANO**; and Marvin **VILLEGAS-**
6 **SEGOVIA** (hereinafter “**SEGOVIA**”); Edgar **TORRES-AMADOR**; Lorenzo **AMADOR**, a.k.a.
7 Catracho; Mario **GARCIA-VILLANUEVA**, aka “Ton;” Henry **BONILLA**, aka “Repollo/Repollin;”
8 Christian **HIDALGO**, aka “Guero;” Brenda Yajaira **MORALES**, aka “Yari;” and Oscar **REYES**, aka
9 “Tamagas” were members of the Mara Salvatrucha (MS-13) enterprise, a violent criminal street gang
10 (hereinafter referred to as “MS-13”), a criminal organization whose members and associates engage in
11 acts of violence, including kidnapping, murder, narcotics sales, extortion, illegal possession of firearms,
12 and other crimes, often with the purpose of intimidating rival gang members, victims of extortion, and
13 members of the community, and to protect their "turf" and fellow gang members. MS-13, including its
14 membership and associates, constitute an enterprise as defined in Title 18, United States Code, Section
15 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which
16 affected, interstate and foreign commerce. The enterprise constitutes an ongoing organization whose
17 members function as a continuing unit for a common purpose of achieving the objectives of the
18 enterprise.

19 **B. Agent Background**

20 3. I am employed as a Peace Officer with the California Highway Patrol. I have been
21 deputized by the Federal Bureau of Investigation to exercise the powers of enforcement personnel set
22 forth in Section 878, Title 21, and United States Code. As such, I am an “investigative or law
23 enforcement officer” of the United States within the meaning of Title 18, United States Code, Section
24 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of
25 and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).

26 4. I have been a Peace Officer with the California Highway Patrol (CHP) since April of
27 2008. I received basic law enforcement instruction at the CHP Academy from approximately October
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1 2007 through April 2008. I have been assigned to patrol duties in both Los Angeles County and Fresno
2 County in California until September of 2013 when I was assigned to the Fresno County Multi Agency
3 Gang Enforcement Consortium (MAGEC) Task Force. As part of my assignment at MAGEC, I
4 investigated gang crimes; with a specific focus on violent gang crimes, gang related narcotic offenses,
5 and gang related weapons offenses.

6 5. I have been assigned to FBI's Safe Streets Task Force (SSTF) in Fresno, CA since March
7 2017 and received special deputation by the FBI empowering me to conduct investigations of, and to
8 make arrests for, offenses enumerated in Title 18 and Title 21 of the United States code.

9 6. I have participated in numerous investigations of violent crime, drug trafficking
10 organizations, and large-scale street gangs, including criminal gang investigations that have involved
11 court-authorized interception of wire and electronic communications. I have participated in the
12 prosecution of Racketeer Influenced and Corrupt Organization Act ("RICO") violations in this judicial
13 district since December 2017.

14 7. During my assignment to the SSTF, I have been almost exclusively assigned to
15 investigate the Mara Salvatrucha ("MS-13") street gang operating in both Central and Southern
16 California and elsewhere. I am a co-case agent in the instant investigation.

17 8. During the course of my employment, I have spoken with numerous other experienced
18 federal and state investigators who are familiar with the MS-13 enterprise. I have also reviewed legal
19 documents and reports describing MS-13 and its activities. Based on these conversations and review of
20 reports and other documents, and involvement in gang-related investigations, I am aware of MS-13 and
21 the manner in which it operates. I have also participated and assisted in other investigations of MS-13
22 originating in other areas of California.

23 9. I have been qualified as a gang expert witness in California Superior Court.

24 10. I am familiar with the methods, language, structures, and criminal activities of street
25 gangs and transnational gangs, including MS-13, operating in and through this judicial district. I am
26 familiar with street and leadership level extortion collection activities of these gangs. I am familiar with
27 the types and amount of profits made by narcotics smugglers and the methods, language, and terms
28

1 which are used to disguise the source and nature of the profits from their illegal narcotic dealings.
2 During the course of my career, I have personally interviewed numerous gang members and narcotics
3 traffickers. I have participated frequently in the debriefing of a significant number of cooperators,
4 witnesses, confidential human sources (“CHS”), and defendants who had personal knowledge regarding
5 criminal street gang activity, major narcotics trafficking organizations, and other criminal offenses,
6 including violent crimes. Through these efforts, I have become very familiar with the methods used by
7 gang members and narcotics traffickers.

8 11. I have executed numerous search warrants for gang and narcotics investigations, seeking
9 evidence of the trafficking of controlled substances, weapons violations, gang indicia, and violent
10 crimes. I have participated in multiple gang and narcotic investigations which utilized court-ordered
11 interceptions of wire and electronic communications to assist in dismantling violent criminal street
12 gangs and drug trafficking organizations.

13 12. I know from my training, experience, and the current investigation, that MS-13 utilizes
14 cellular telephones and Facebook for communication within the gang in order to organize and plan the
15 gang’s criminal activities, including but not limited to assaults, violence, drug sales. Additionally MS-13
16 utilizes these methods of communication to stay in contact with each other and to promote MS-13
17 business.

18 13. During my review of monitoring and review of legally intercepted phone calls, text
19 messages, Facebook postings, and Facebook messages in this case and previous cases, I have noted
20 several slang terms used in reference to illegally obtained items or illegally possessed items. The
21 purpose of the use of slang during phone calls, Facebook messages, and text messages is to obstruct law
22 enforcement in their investigations.

23 14. In dealing with the Los Angeles Program of the Mara Salvatrucha 13 criminal street gang
24 (MS-13), FBI linguists and experienced MS-13 investigators have advised me that MS-13 goes so far as
25 to mix up syllables in a type of Spanish “pig Latin” as a means of frustrating law enforcement efforts.
26 An example of such syllable reversal is the use of the word “rama” as a substitute for the word Mara.

27 15. I know that MS-13 members are almost exclusively Spanish speaking, and I do not speak
28

1 or understand Spanish. Throughout this investigation, FBI linguists and certified Spanish speaking
2 members of the investigative team have assisted me in communicating with MS-13 members, witnesses,
3 and Confidential Human Sources (CHS), as well as to review Facebook messenger communications and
4 court authorized telephone intercepts.

5 16. It is my opinion, that all defendants named in this affidavit are MS-13 gang members.
6 This opinion is based on my training, experience, knowledge of this investigation, and each individual
7 meeting gang validation criteria including, but not limited to: associating with known MS-13 members,
8 corresponding with known MS-13 members, writing about MS-13, photographs and messages relating
9 to MS-13 on Facebook, the use of graffiti associated with MS-13 and court authorized intercepted
10 telephone phone calls and messages discussing MS-13 activity and business.

11 17. I make this affidavit, in part, based on personal knowledge derived from my participation
12 in this and past investigations and in part, upon discussion of facts and information developed by other
13 agents/detectives involved in this investigation. The information contained in this affidavit is based
14 upon my personal observations and training and, where noted, information related to me by other law
15 enforcement officers and/or agents.

16 18. The information set forth in this affidavit is not intended to detail each and every fact and
17 circumstance of the investigation or all the information known to me and other law enforcement
18 investigators. Rather, this affidavit serves to establish probable cause for the arrest of the above named
19 individuals.

20 **II. SUMMARY OF INVESTIGATION**

21 **A. Background and Structure of MS-13**

22 19. MS-13 in Mendota works closely with MS-13 in Los Angeles. As such, an
23 understanding of MS-13 in Los Angeles is important to an understanding of the operation of MS-13 in
24 Mendota, California.

25 20. Mara Salvatrucha was formed in Los Angeles, California in the mid-1980s by immigrants
26 fleeing the civil war in El Salvador. Once in Los Angeles, they organized themselves into a group called
27 Mara Salvatrucha, which was initially largely composed of Salvadoran immigrants. "Mara" is a Central
28

1 American term for gang or group. "Salva" refers to El Salvador. In the 1990s in Los Angeles, Mara
2 Salvatrucha distinguished itself by committing brutal acts of violence against rival gang members and
3 non-gang members. In the mid-1990s, Mara Salvatrucha became associated with the Mexican Mafia,
4 commonly referred to as "la Eme" (which translates in English to "the M"), and added the number "13"
5 to its name. The number "13" marks the 13th letter of the alphabet: "M." Thus, Mara Salvatrucha
6 became MS-13. While MS-13 originated in Los Angeles, over the years, MS-13 spread as its members
7 were deported to El Salvador and because its members traveled to other locations in the United States
8 and abroad. As a result, in addition to operating in Los Angeles, MS-13 operates nationally and
9 internationally, with more than ten thousand members regularly conducting gang activities in at least 42
10 states and Washington, D.C., and with thousands more conducting gang activities in Central America
11 and Mexico.

12 21. MS-13, nationally and internationally, including Los Angeles, is largely comprised of
13 persons from Central America, including El Salvador, Honduras, and Guatemala. Although each MS-13
14 locale has a common origin, MS-13 in Los Angeles operates differently than in other locales.
15 Notwithstanding, clique names in other parts of the United States are often named for existing cliques in
16 Los Angeles. At times, MS-13 members from other geographic locations travel to Los Angeles to
17 participate in leadership meetings; however, MS-13 in Los Angeles is independent, self-governing, and
18 makes its own decisions. Conversely, MS-13 members in Los Angeles are sometimes called upon to
19 provide input in other parts of the country. Also, MS-13 members in Los Angeles distribute drugs from
20 Los Angeles to other parts of the country.

21 22. In Los Angeles, MS-13 operates under the "Los Angeles Program," which is distinct
22 from programs in El Salvador, Honduras, Guatemala, and other parts of the United States, whereby its
23 leaders and members make all decisions concerning how and when a new person becomes a member of
24 MS-13, how MS-13 operates, when discipline is meted out, when a clique is responsible for paying its
25 extortionate rent payments, the geographical boundaries of each clique, and the identity of the shot
26 callers and leaders. MS-13 operates through subsets, known as "cliques," which are usually named for a
27 street within a clique's territory, or for the neighborhood in which the clique operates. MS-13 has more
28

1 than 10 cliques operating in Los Angeles, including, but not limited to, "Parkview Locos Salvatruchos"
2 and "Francis Locos Salvatruchos."

3 23. A clique adds new members through an initiation ritual known as "jumping in," during
4 which several existing MS-13 members beat up a prospective MS-13 member for 13 seconds. Once
5 jumped in, an MS-13 member is expected to participate fully in MS-13's criminal activities.

6 24. Historically, MS-13 members signified their membership with tattoos reading "Mara
7 Salvatrucha," "MS," "MS-13," or other variations of the gang's name; however the recent trend is for
8 MS-13 members to avoid such tattoos to help avoid detection by law enforcement. MS-13 members
9 typically refer to other members by their monikers, or nicknames, and often do not know fellow gang
10 members' legal names.

11 25. MS-13 members write or paint graffiti in the areas they control to identify the area as
12 controlled by MS-13.

13 26. MS-13 has a self-imposed code of conduct, which is imposed and enforced to maintain
14 compliance among its members. MS-13 enforces its rules and promotes discipline among its members
15 by imposing monetary fines and threatening and committing acts of violence against members who
16 break the rules. This is known as attending court, being "courted," or being "regulated." MS-13,
17 through its leadership or individual cliques, can vote for MS-13 members to be disciplined for violating
18 MS-13's rules or code of conduct. Depending on the severity of the violation, MS-13, through its
19 leadership or individual cliques, will decide whether the violator will receive a beating for 13, 26, or 39
20 seconds, all multiples of 13, and will select at least three to four MS-13 members to administer the
21 beatings, with one member counting aloud the seconds. Additionally, for even more serious violations
22 of MS-13's rules, MS-13, through its leadership or individual cliques, may vote to introduce weapons
23 into the beatings, to include knives, bats and/or pipes. Once an MS-13 member has been disciplined, the
24 individual cliques may also vote to eject the disciplined member from their cliques. If a member is
25 voted out of the clique, he/she must be "jumped out" of the clique, which means that member will
26 receive another beating.

27 27. MS-13 has zero tolerance for members and associates who cooperate with law
28

1 enforcement. Once MS-13 has evidence that someone has cooperated with law enforcement, by
2 receiving and reviewing law enforcement reports or videos of interviews, MS-13 issues a “green light”
3 as to that person, which is an order that if any MS-13 member sees the person who is allegedly or
4 actually cooperating with law enforcement, that person is to be killed on sight.

5 28. MS-13 members also engage in acts of violence against innocent citizens and rival gang
6 members in their territory. Participation in violent acts increases the respect accorded to members who
7 commit violent acts. Additionally, commission of violent acts by MS-13 members enhances the gang’s
8 overall reputation for violence in the community, resulting in the intimidation of citizens in MS-13’s
9 territory.

10 29. MS-13 members sometimes engage in money-making activities for the gang. Individual
11 MS-13 members who sell narcotics are often required to provide a portion of their narcotics proceeds to
12 the shot caller of the clique. This money is used by the shot caller for a variety of purposes, including
13 paying the clique’s “rent” or dues, to the overall MS-13 leader, paying legal fees for MS-13 members in
14 need, helping MS-13 members in need in El Salvador and other points abroad, and purchasing weapons
15 that are maintained by the clique in their territory for protection. If a clique member earns money for the
16 clique by selling drugs or other criminal ventures, and contributes a portion to the shot caller, this money
17 is oftentimes considered their rent contribution to the clique. MS-13 also derives income from the
18 extortion of food vendors who operate in MS-13 controlled territory. On a clique level, the clique shot
19 caller identifies targets for extortion and coordinates which clique member is authorized to collect
20 extortion from each vendor. MS-13 extorts both legitimate and illegitimate businesses alike. These
21 businesses are often owned or run by illegal immigrants, who rarely report this extortion to law
22 enforcement, despite the threats of violence which accompany the extortion.

23 **B. MS-13 in Mendota, Fresno County**

24 30. Starting in July 2015, Homeland Security Investigations, the FBI Central Valley Violent
25 Crime Gang Task Force and detectives at the Multi Agency Gang Enforcement Consortium (MAGEC),
26 made up of local, state and federal law enforcement officers, have learned that MS-13 members in
27 Mendota, California are engaged in murder, assaults, extortion, illegal weapons possession, as well as
28

1 other criminal activity in furtherance of the gang, including but not limited to the selling of illegal
2 narcotics.

3 31. Two cliques of MS-13, the "Vatos Locos Salvatruchos" (VLS) and the "Park View Locos
4 Salvatruchos" (PVLS), have been operating in Mendota and Los Angeles

5 32. In Mendota, the primary rival to MS-13 is the Bulldogs criminal street gang. The MS-13
6 cliques in Mendota, CA view the Bulldogs as a threat to the El Salvadoran community and regularly
7 participate in patrols to attack Bulldog gang members. MS-13 uses this violence to expand its control of
8 Mendota and to rid the town of rival gangs.

9 33. In addition to feuding with rival gang members, they also use violence against their own
10 members to enforce the gang's rules. These rules include, among others, a prohibition against
11 cooperating with law enforcement in the investigation and prosecution of any criminal case, especially
12 those involving fellow gang members. An example of a recurring use of violence to enforce MS-13
13 rules is the imposition of a 13-second "beat-down" by fellow gang members during a gang meeting as
14 punishment for an infraction.

15 34. MS-13 members in Mendota, CA have a hierarchy within each clique. The lowest of the
16 members are referred to as "Parros." Parros take orders from higher ranking gang members and are
17 responsible for doing errands and committing crimes on behalf of the gang. The next level, above
18 Parros, are "Chequeos." Chequeos also take orders from higher ranking gang members. Chequeos are
19 also responsible for fighting with rival gang members and expanding the gang's territory. Parros and
20 Chequeos take orders from "Homeboys." Homeboys are the leaders, or shot callers, of the gang and
21 direct the gang's activity. Before an MS-13 member can become a Homeboy, they must commit three
22 confirmed murders that benefit the gang.

23 35. As a whole, MS-13 is united and members are not confined to committing crimes in their
24 specific cliques or territories. This phenomenon has been clearly evidenced with MS-13 enterprise
25 members in Mendota. While PVLS and VLS are the two primary cliques, MS-13 members in Mendota
26 have demonstrated on more than one occasion that they work collectively and commit crimes together
27 with other MS-13 members. As part of the investigation, law enforcement has intercepted numerous
28

1 Facebook messages which demonstrate communication and collaboration between the Fulton Locos
2 Salvatruchos (“Fulton”), Francis Locos Salvatruchos (“Francis”), Dalmacias Locos Salvatruchos
3 (“DCLS”), VLS, and PVLS cliques.

4 36. The collaborative criminal efforts of the individual cliques, gives each individual clique
5 the force multiplier of the collective resources and manpower.

6 37. MS-13 gang members in Mendota often receive instructions from higher ranking
7 members in Los Angeles, Santa Maria, and Oakland. Many times, these instructions involve traveling to
8 Los Angeles or Oakland to support MS-13 criminal activities, including conducting assaults, helping
9 wanted subjects travel to escape law enforcement, and transporting drugs and firearms for MS-13
10 members. MS-13 members in Mendota must follow clearly established rules of the gang or face
11 discipline.

12 38. On December 21, 2017, a search warrant was executed at 1048 Quince Street in
13 Mendota, CA. The residence was frequented by validated¹ MS-13 gang members. Investigators found
14 hand written MS-13 rules. The rules (paraphrased and translated) stated:

- 15 a) At no time will we extort for personal benefit.
- 16 b) Will not steal within our territory.
- 17 c) Will attend all clique and program meetings.
- 18 d) To make a “Homie” we need to ensure where he is from and that he has no
19 ties to the rivals. They need to comply with the points of the hood. They need to conduct
20 three “hits” and be a Chequeo for four years.
- 21 e) Will take all responsibility of costs related to funerals, arrests, or injuries.
- 22 f) Maintain communication with all elements, especially with the
23 coordination of runners.
- 24 g) Conduct efficient patrols of our territory.

26 ¹ “Validated gang member” is a term commonly used in state criminal proceedings and means that the person has
27 met the agency’s criteria for classifying an individual as a member of a criminal street gang as defined in California Penal
28 Code Section 186.22(f). In my experience, law enforcement agencies require between 2 and 5 of the following criteria to be
present to validate a person as a gang member. The Fresno County Sheriff’s Department “validates” individuals as gang
members when two (2) criteria are present.

- 1 h) Maintain a stock and always have a way by priority of maintaining
2 weapons.
- 3 i) Will not bother the residents within our sector as long as they don't
4 misbehave.
- 5 j) Determine and protect the limits of our territory.
- 6 k) Report all business to the hood.
- 7 l) Will implement discipline. The individual being disciplined as well as the
8 one implementing the discipline will carry out without talking about things.
- 9 m) Will stay alert to identify any type of infiltration within the clique's
10 territory.
- 11 n) Will remain observant to ensure no element diverts from the line
12 established.
- 13 o) Will not drink unless told otherwise or it will be corrected.
- 14 p) All Homies who decide to leave the Francis will lose rents and be in a
15 difficult situation.
- 16 q) Respect each other as Homies from the Francis that we are, will not throw
17 away words, respect each other's family and girlfriends.
- 18 r) Will not spend the click's money on anything personal or will be corrected
19 and removed from charge.
- 20 s) Report accounts every last or beginning of the month.
- 21 t) Every Homie that loses a gun will be corrected and will have to respond.
- 22 u) Be mindful of the memory of the fallen Homies, their moments of silence,
23 and their families.

24 39. Through this investigation, I have learned that MS-13 members routinely conduct gang
25 meetings, "jump in" new members, and discipline members in the remote, rural areas of the San Joaquin
26 River east of Mendota.

27 40. Throughout the course of this investigation, I have learned that MS-13 members are
28

1 aware of the MS-13's criminal activities in Mendota and elsewhere and generally have knowledge as to
2 which members have committed certain crimes. I became aware of this knowledge from interviews
3 conducted with arrested subjects, debriefs with CHS', and through reviewed Facebook messages and
4 court ordered telephone intercepts.

5 **C. Purposes of the Enterprise.**

6 41. MS-13 operates internationally, including Mendota, California with the various cliques
7 generally operating within smaller geographic areas. The members and associates of the MS-13 sought
8 to:

- 9 a) Enrich members and associates of MS-13 through, among other things, murder and the
10 distribution of narcotics, including methamphetamine and marijuana;
- 11 b) Preserve and protect MS-13 criminal ventures through the use of violence and threats of
12 violence against members of rival criminal organizations or community members;
- 13 c) Promote and enhance the reputation and position of the MS-13 criminal street gang with
14 respect to rival criminal organizations and other community members; and
- 15 d) Keeping its victims and witnesses in fear of the enterprise and in fear of its members and
16 associates through threats of violence and violence.

17 **D. Means and Methods of the Enterprise.**

18 42. Among the means and methods by which the defendant and their associates conducted
19 and participated in the conduct of the affairs of the enterprise were the following:

- 20 a). Members of the enterprise and their associates committed, attempted and
21 threatened to commit acts of violence, including murder and robbery, to protect and expand the
22 enterprise's criminal operations;
- 23 b). Members of the enterprise and their associates promoted a climate of fear through
24 violence and threats of violence;
- 25 c). Members of the enterprise and their associates used and threatened to use physical
26 violence against various individuals; and
- 27 d). Members of the enterprise and their associates trafficked in various controlled
28

1 substances, including methamphetamine, marijuana, and prescription drugs, which affected
2 interstate commerce.

3 43. Based upon my training and experience, I know that MS-13 members and associates are
4 required to defend their territory and the honor of MS-13 against rival gang members in order to
5 maintain their status in the gang.

6 44. Based upon the foregoing, I believe that Victim #1 and Victim #2 were assaulted by MS-
7 13 gang members because they believed the victims were members of or associated with Mendota
8 Bulldogs. Based on my training, experience and knowledge of this investigation, I know that Bulldog
9 gang members and associates are rivals to MS-13 gang members as discussed more fully herein.
10 Accordingly, based my training, experience, and knowledge of investigation, as well as the sources
11 outlined above, I believe that the rules of MS-13 thus required the MS-13 members to assaulted Victim
12 #1 and Victim #2 to maintain and increase their positions in the MS-13 gang.

13 45. Beginning in 2017 and continuing through the present, the investigative team began to
14 utilize both state and federal Court authorized interceptions of telephones and obtained over 50 search
15 warrants for Facebook accounts. The investigative team used court ordered intercepts and analyzed the
16 information contained in the Facebook accounts as an investigative tool to further identify the structure,
17 command and control and activities of MS-13 in Mendota, California and the Los Angeles area.

18 **III. PROBABLE CAUSE**

19 **A. Count 1 – VICAR Assault with a Dangerous Weapon**

20 46. Based on the information set forth in this section, there is probable cause to believe that
21 DENIS BARRERA-PALAMA, a.k.a. Gunner (“BARRERA-PALMA”), EVER MEMBRENO, a.k.a.
22 Canecho (“MEMBRENO”), and EDGAR TORRES-AMADOR (“TORRES”) assaulted Victim H.L.
23 with a metal pipe (a violation of California Penal Code, Section 245), for the purpose of maintaining and
24 increasing position in MS-13, an enterprise engaged in racketeering activity, in violation of Title 18,
25 United States Code, Section 1959(a)(3).

26 47. Based on evidence gathered during the course of this investigation, I believe that
27 BARRERA-PALMA is an MS-13 gang member at the rank of “Homeboy” and the leader of MS-13 in
28

1 Mendota, CA.

2 48. On or about May 14, 2018, at 3:45PM Mendota Police Officers were dispatched to the
3 area of 5th St. and Puchue St. in the city of Mendota, California after receiving a report of a victim of an
4 assault. Mendota Police Officers learned of an assault near Washington Elementary School, 1599 5th
5 St, Mendota, CA, and that the victim and suspects left the location. Mendota Police Officers were
6 subsequently dispatched to a residence in the city of Mendota and interviewed the victim².

7 49. Mendota Police Sgt. Frank Renteria interviewed the victim, a juvenile herein identified as
8 H.L. H.L. provided the following information:

9 a) H.L. stated he was walking in the area with a juvenile female, herein identified as Z.E.
10 H.L. observed a white Acura driving slowly in the same direction he was walking. The white
11 Acura was occupied by three males. The right front passenger stuck his body out of the window
12 and began to shout, "MS 13!" and "Mara Salvatrucha!"³ H.L. told Z.E. to walk across the street
13 because H.L. thought the males would start problems with him.

14 b) The vehicle continued traveling eastbound and parked near the south curb of 5th St. All
15 three males exited the vehicle and approached H.L. and began asking him what he "claimed."⁴
16 H.L. stated he believed the males were asking if he belonged to a particular gang. H.L. told them
17 he didn't "claim" anything and didn't want any trouble. All three males began to shout "Mara
18 Salvatrucha!" H.L. was punched on the face by one of the males. H.L. began to bleed from his
19 nose and H.L. attempted to defend himself by swinging both fists in the direction of the male that
20 had just punched him. All three males started to assault H.L. by punching him about the face
21 and body. H.L. was knocked to the ground and the males continued to beat him. H.L. was
22 struck on the right forearm with what he believed was a metal pipe. The males stopped attacking
23 him only after school staff walked out to the front parking lot. H.L. last saw the White Acura
24 turning southbound on Oller St.

25 ² The investigation is documented on Mendota Police Department case number 180609 and Fresno County Sheriff's
26 Department case number 1807365.

27 ³ Based on my training and experience and knowledge of this investigation, MS13 gang members will often yell their gang
28 name prior to committing an assault. MS13 members yell their gang name to instill fear and to pledge homage to the gang.

⁴ Based on your affiants training and experience, gang members will often question unknown third parties and ask third
parties what they "claim" as a way to determine if the third parties are part of a rival gang.

1 c) H.L. described one of the attackers as a Hispanic male, approximately 5' 6" in height, and
2 last seen wearing a black shirt and black pants. H.L. described the right front passenger as
3 having a tattoo on his neck and side of face. He was not able to provide a further description of
4 the other attackers. H.L. was not sure who was driving the Acura or which male struck him with
5 the pipe. H.L. told the officers that he believes he might be able to identify the suspects if he
6 saw them again.

7 50. Sgt. Renteria noted H.L. had blood stains on the front of his shirt, abrasion on his right
8 knee, and bruising on both forearms. H.L. had bruising on his right forearm consistent with being struck
9 with a hard cylindrical object.⁵

10 51. While speaking to H.L. at a residence in Mendota, Mendota Police Sergeant Solis noticed
11 H.L.'s choice of dress. H.L. was wearing a backwards black and gray baseball hat, oversized Dickies
12 shorts, white socks pulled up to his knees and an oversized plain white t-shirt. Sergeant Solis noted the
13 clothing style matched gang attire for Bulldog gang⁶ members who currently attend Mendota High
14 School. Sergeant Solis asked H.L. if he [H.L.] was in a gang. H.L. responded by stating he, "doesn't
15 bang," which Sergeant Solis took to mean H.L. didn't consider himself to be a gang member. Sergeant
16 Solis told H.L. his clothing attire [made H.L. look like a gang member]. H.L. responded, "I know."

17 52. Mendota Police Sgt. Renteria interviewed Z.E. at a residence in the city of Mendota.
18 Z.E. provided the following information:

19 a) Z.E. was walking with H.L. when she first observed a two-door white Acura driving past
20 them on 5th St. and she heard the occupants shout "MS 13!" and "Mara Salvatrucha!" at H.L.
21 The Acura parked near the south curb on 5th St. H.L. told Z.E. to wait across the street as he
22 [H.L.] anticipated the occupants of the vehicle were going to start trouble with him.

23 b) Z.E. walked across the street and stood on the north sidewalk of 5th St. Z.E. observed the
24 three males get out of the Acura and approach H.L. The three males assaulted H.L. by punching
25 him about the face. H.L. fell to the ground and one of the males struck H.L. with a metal pipe.

26
27 ⁵ Members of the investigative team viewed photos of H.L. and informed me that the photos reflected injuries consistent with
being struck by a cylindrical, hard object.

28 ⁶ The Bulldog criminal street gang is the primary rival to MS-13 gang members in Mendota, CA.

1 The three males stopped assaulting H.L. when school staff walked out to the front parking lot.
2 Z.E. said the rear passenger of the Acura was in possession of the metal pipe and he [rear
3 passenger] was the one that struck H.L. with the pipe.

4 c) Z.E. described the driver as Hispanic male, standing approximately 5' 5", thin build, in
5 his 20's, wearing a black shirt, black pants. Z.E. described the front passenger as Hispanic male,
6 stating about 5' 5", with a thin build, and was about 18 years old, wearing a green or gray shirt.
7 Z.E. described the rear passenger as Hispanic male, approximately 5' 5" in height, a thin build,
8 about 19 years old, wearing a black shirt and tan shorts. Z.E. recalled that one of the males had a
9 tattoo on his neck. Z.E. said that the tattoo looked similar to a claw mark. Z.E. said she would
10 be able to identify the three males should she see them again.

11 53. Fresno County Sheriff's Deputy Antunez had previously contacted TORRES in a
12 different vehicle (not the Acura) on a traffic enforcement stop in the city of Mendota approximately one
13 month prior to the assault. Deputy Antunez was also aware TORRES was a possible member or
14 associate of MS-13 and had observed TORRES driving a white Acura on approximately five separate
15 occasions.⁷ Based on the information from Deputy Antunez, MPD Sgt. Renteria created a six-pack
16 photo lineup containing a photograph of TORRES.

17 a) On May 14, 2018, H.L. was shown the six-pack photo lineup but was unable to identify
18 the person that assaulted him.

19 b) Also on May 14, 2018, MPD Sergeant Tsaris showed Z.E. the six-pack photo lineup.
20 Z.E. identified TORRES as the person who assaulted H.L. with the pipe.

21 54. Sgt. Renteria spoke to the Washington Elementary school staff members, herein
22 identified as OM and CS, who witnessed the assault. OM and CS provided the following summarized
23 statement:

24 a) OM stated she was inside the main office of the school when she looked out the front
25 door's glass window. She saw several males standing on the sidewalk and appeared as if they
26 were going to start fighting. OM advised her co-worker, herein identified as CS, that there was a
27

28 ⁷ Deputy Richard Antunez conducted a field interview with TORRES on 04-24-2018 documented under FSO report 1806074

1 disturbance outside. OM stated that OM and CS walked to the front parking lot and saw a male
2 wearing a white shirt and dark colored shorts on the ground. OM stated that OM and CS shouted
3 that the school has cameras and the three standing males took off running eastbound on 5th St.
4 OM did not recognize any of the males. OM did not see when the male on the ground was struck
5 with the pipe but did hear a loud thump as they were walking out of the office. OM said the male
6 on the ground walked away eastbound on 5th St.

7 b) CS said that CS was inside the main office of the school when she was advised by OM
8 that there was a disturbance outside of the school involving several males. CS and OM walked
9 outside and saw a male wearing a white shirt and dark colored shorts on the ground. CS stated
10 that CS and OM shouted that the school has cameras and the three males took off running
11 eastbound on 5th St. CS did not recognize any of the males. CS saw the male on the ground
12 walk away eastbound on 5th St.

13 55. Sgt. Renteria viewed the surveillance footage from Washington School and observed the
14 following:

15 a) H.L. was walking eastbound on 5th St past the front parking lot of the school. A white
16 Acura was parked near the south curb of 5th St just ahead of the direction where H.L. was
17 walking from. The three males got of vehicle and approached H.L. The male wearing the black
18 shirt and black pants exited the vehicle from the driver's door and the other two males exited
19 from the right front passenger door. A male wearing a black t-shirt and black pants punched H.L.
20 on the face and H.L. starts backing up. The two other males approached H.L. A male wearing the
21 black shirt and tan shorts pulls out a pipe from his right pocket or waistband area and held the
22 pipe in his right hand. The male appeared to throw the pipe underneath a black vehicle that was
23 parked in the parking lot of the school. The male then ran to left side of vehicle and retrieved the
24 pipe from underneath the vehicle. The male walked towards H.L. along with the other male
25 wearing the gray hooded sweatshirt. All three males rushed H.L., knocking him to the ground,
26 and the male wearing the black shirt and tan shorts hit H.L. with the pipe. School staff went out
27 to the parking lot, and the three males took off running toward the vehicle.
28

1 56. On May 15, 2018, Mendota Police Officers went to 636 Quince St in Mendota, CA,
2 TORRES's residence, and arrested TORRES for the May 14, 2018 assault.⁸ While at TORRES's
3 residence, Sgt. Renteria located a white Acura bearing the CA license plate 7VVM649. The vehicle
4 was determined to be registered to TORRES.⁹ TORRES provided consent to search the Acura and no
5 items of evidence were located.

6 57. Sgt. Renteria was contacted by the renter of the apartment that TORRES resided in,
7 identified as Patricia Grissel Amador Rodriguez, TORRES's cousin. Patricia lived at the apartment with
8 her husband. Patricia provided consent to search the apartment. Mendota Police Officer Kawana
9 located TORRES's cell phone in the apartment.

10 58. TORRES was transported to the Mendota Police Department for questioning. TORRES
11 was read his Miranda rights, he agreed to speak with officers without an attorney, and was questioned
12 about the incident. TORRES denied all involvement in the assault that occurred near Washington
13 Elementary school on May 13, 2018 and denied being an MS-13 gang member. While interviewing
14 TORRES, Sergeant Tsaris noticed TORRES was wearing white Adidas shoes with blue stripes.
15 Sergeant Tsaris noted blue was a common gang color for MS-13 members.

16 59. On May 25, 2018, Fresno County Sheriff's Detectives Macias and Solis re-interviewed
17 Z.E. at her residence in the city of Mendota. Z.E. provided further information about the assault:

18 a) Z.E. stated on the day of the assault, she was walking eastbound on 5th St. with her
19 friend, H.L. They were walking on the sidewalk, on the south side of 5th St., just east of Quince
20 St, when they observed a white two-door vehicle passing them down the street, traveling
21 eastbound. Z.E. said as the vehicle passed them, she observed the occupants of the vehicle
22 looking at them. The vehicle then pulled over to the south side of the road, a few yards down the
23 street from them.

24 b) H.L. told her to go across the street because he [H.L.] thought there was going to be some
25 problems with the occupants in the white vehicle. Z.E. said she walked across the street and
26

27 ⁸ Charges remain pending against Torres in Fresno County Superior Court Case No. F18903275.

28 ⁹ FBI Task Force Officer Cory Hastings conducted a California Department of Motor vehicle search on the CA license plate
on August 07, 2018. The license plate was registered to Edgar TORRES-AMADOR on a 2003 Acura.

1 stood behind a parked pickup truck that had tinted windows. Z.E. then observed the occupants in
2 the white vehicle getting out of their car and running towards H.L.

3 c) Z.E. said the white vehicle was occupied by three males and described them as being
4 young males, between the ages of 17 to 19, 5'-5" to 5'-6" tall, with short dark hair. Z.E. further
5 described them all as possibly being from El Salvador. Z.E. said she remembered the attackers
6 as having a dark skin tone like most of the El Salvadoran people in Mendota.

7 d) Z.E. described the driver as wearing a black t-shirt, and possible blue jeans or black pants
8 (no other identifiers). Z.E. described the front passenger as wearing a gray or greenish t-shirt,
9 with black pants and had a distinct tattoo on the left side of his neck that looked like large claw
10 marks coming down the left side of his neck. The subject appeared to be older than the other
11 three males and had acne on his face. Z.E. described the back passenger as wearing a dark t-
12 shirt, with tan khaki shorts (no other identifiers).

13 e) Z.E. stated that after the three subjects exited their vehicle, they ran up to H.L. and began
14 assaulting him. Z.E. described the assault, by explaining that H.L. was kicked and punched with
15 closed fists by the three suspects. Z.E. remembers seeing the subject with the tan khaki shorts
16 running back to the white suspect vehicle and retrieving a pipe from the car. After getting the
17 pipe, the subject with the tan shorts ran back over and continued assaulting H.L. with the pipe.

18 f) Z.E. stated she looked away momentarily then back again at H.L. and saw that one of the
19 suspects, she wasn't sure who, was now hitting H.L. with the pipe. Z.E. said it was somewhat
20 difficult to tell exactly what each suspect was doing to H.L. during the assault because it was
21 happening so quickly. After the assault, all three subjects ran back to their vehicle. Z.E. stated
22 she recalled seeing the subject with the tattoo on his neck getting into the driver's side of the
23 white vehicle.

24 g) Z.E. said that as the suspects were running back to their vehicle, she remembered hearing
25 one of the suspects yell out "Puro Mara!" Z.E. knew the phrase to represent the MS-13 gang in
26 Mendota.

27 60. Detective Macias asked Z.E. if she remembered being shown a six-pack photo line-up by
28

1 Mendota PD. Z.E. stated she remembered viewing the six-pack lineup. Z.E. was asked of the three
2 subjects she remembered seeing exiting the white two-door vehicle the day of the assault, which subject
3 was the individual she picked out in the photo line-up. Z.E. said she wasn't sure on the subject she had
4 identified that day, but believed it was the guy that had exited the white suspect vehicle with the pipe.
5 Z.E. stated the reason she picked the subject out in the photo line-up was because all the other subjects
6 depicted in the six-pack photo line-up were heavier looking in the face and the subject she had picked
7 out, mostly resembled the person she remembered seeing holding the metal pipe.

8 61. On June 01, 2018, FSO Detectives Solis and Macias contacted Z.E. at her residence in
9 city of Mendota. Detective Macias showed Z.E. a six-pack photo lineup that contained a picture of
10 MEMBRENO. Z.E. refused to sign the lineup admonition form and was unable to identify anyone
11 based on the six-pack lineup. Z.E. stated that the subjects shown in the six-pack looked too old and too
12 light for them to be any of the suspects involved in the assault.

13 62. Z.E. stated the suspect who she remembered having tattoos, looked to be about 26 or 27
14 years old. She said that the other two suspects were in their teens. Z.E. said that the guy with the tan
15 shorts retrieved the pipe from the car prior to running towards H.L. Z.E. said it was difficult to tell if the
16 guy with the pipe actually hit H.L. with it or if it was someone else within the group. Z.E. further
17 described the tattoo she remembered seeing on one of the suspects, as almost looking like a claw like
18 tattoo, positioned in a horizontal angle off the left side of the suspect's neck.

19 63. On June 04, 2018, Fresno County Sheriff's Detective Macias reviewed a copy of a
20 cellphone extraction report that was generated from a black LG GSM Android cellphone. This cellphone
21 was lawfully seized from Edgar TORRES-AMADOR on May 15, 2018, by Mendota Police and
22 documented under report #18-0609. Detective Macias authored a search warrant for the cellular phone.
23 The search warrant was signed by the Honorable Judge Skiles in the Fresno Superior Court on May 21,
24 2018.¹⁰

25 64. Detective Macias reviewed the extraction report and located SMS (Short Message
26 Service) text messages wherein the sender identified himself as "Edgar." Additionally, Detective Macias

27
28 ¹⁰ Agents reviewed the search warrant written by Detective Macias. The search warrant was signed on May 21, 2018 by Judge Skiles in the Fresno Superior Court.

1 located messages wherein the sending party addressed the person who had control of the cellphone at
2 that time, as "Edgar."

3 65. Detective Macias located Facebook Instant Message communications wherein the sender,
4 identified vanity name "Edgar Amador" communicated with vanity name "Denis Barrera."¹¹ The
5 messages were sent and received on the date TORRES was arrested by Mendota Police.¹² Detective
6 Macias translated the following messages from the Spanish language.¹³ The following are the verbatim
7 messages translated to English between TORRES and BARRERA-PALMA:

8 At 9:15AM: BARRERA-PALMA to TORRES, when translated, "What's up."

9 At 2:08 PM: BARRERA-PALMA to TORRES, when translated, "Dog."

10 At 3:19 PM: TORRES to BARRERA-PALMA, when translated, "What's up dog?"

11 At 4:29PM: BARRERA-PALMA to TORRES, when translated, "Don't get lost my hard dog."

12 At 4:29 PM: BARRERA-PALMA to TORRES, when translated, "Everything Ok?"

13 At 4:29 PM: BARRERA-PALMA to TORRES, when translated, "It's to stay alert these days
14 doggie, for us well take care of this problem."

15 66. Based on the above communication and knowledge of this investigation, the investigative
16 team believes BARRERA-PALMA was referring to the "problem" as being the assault of H.L., and that
17 TORRES and BARRERA-PALMA would resolve any issues that arise from the altercation.

18 67. On June 07, 2018, at about 5:20 PM, Fresno County Sheriff's Detectives Macias and
19 Solis conducted a follow up interview with H.L. and H.L.'s residence. Also present during the interview
20 was H.L.'s mother and father.

21 68. H.L. provided additional information about the suspects. H.L. explained at first H.L.
22 thought the suspects were friends of his. H.L. was listening to his music and didn't pay much attention
23 to the suspects at first. H.L. heard the front passenger yell, "What's happening?" H.L. explained to
24

25
26 ¹¹ A review of the Facebook account by law enforcement identified the user of the Facebook account as Denis
Barrera-Palma, aka "Gunner." The investigation has determined that BARRERA-PALMA is an MS-13 gang member at the
rank of "Homeboy" and the leader of MS-13 in Mendota, CA.

27 ¹² According to Mendota Police reports, MPD Officers went to TORRES residence at 3:32 PM on 05/15/2018.

28 ¹³ FSO Detective Macias is fluent in the Spanish and English languages.

1 detectives that he and his family are Salvadoran and he was able to recognize the suspects as being
2 Salvadoran as well because of the way they spoke. H.L.'s family is from the Cabanas area of El
3 Salvador.

4 69. A passenger seated behind the front passenger reached his hand out the front passenger
5 window and waived a hand sign at H.L. that looked like a two finger peace sign.¹⁴

6 70. The suspects pulled over ahead of H.L. and parked on the south side of the roadway just
7 east of the school parking lot. H.L. was concerned about his friend so he told her to leave. Three
8 suspects then got out of the vehicle and began walking towards H.L. H.L. did not see who got out of the
9 driver seat or who got of the passenger seats. The windows of the suspect vehicle were tinted and H.L.
10 did not know if anyone stayed in the vehicle. One of the three suspects was holding a pipe in his hand.
11 H.L. described the pipe as being thick like a vehicle exhaust pipe with green tape wrapped around part
12 of it.

13 71. One suspect walked ahead of the other two. H.L. described the lead suspect as being a
14 Hispanic male with a dark complexion, older and bigger than the other two, in his late twenties, with
15 greasy curly hair, tattoos around his neck and down to his chest. The lead suspect was wearing a dark
16 gray short sleeve "V" neck hoodie with the hood down and possibly dark blue pants.

17 72. H.L. did not get a good look at the other suspects because they were almost walking in a
18 line behind the lead suspect and everything happened too fast. H.L. could only describe the other
19 suspects as being younger than the lead suspect and having a thinner build. H.L. did think one of the
20 other suspects was wearing a light blue shirt.

21 73. The lead suspect did most of the talking and H.L. does not remember what if anything the
22 other suspects said. The lead suspect stated in Spanish, "Que estoy rifando?" (What gang do you belong
23 to?), "Este es Mara, Mara por vida." (This is Mara, Mara for life!)"Tu no eres mierda aqui, te voy
24 enseñar que es una Mara la verda!" (You aren't shit here; I'm going to teach you what a real Mara is!).
25 These terms led H.L. to believe the suspects were members of the street gang Mara Salvatrucha 13 (MS-

26
27 ¹⁴ Based on my training and experience, a common MS-13 gang hand signal consist of pointing ones index and pinky finger
28 pointed upwards, the middle and ring fingers pointed downwards, and having ones thumb rest on top of the middle and ring
finger. This hand sign is commonly referred to "garra" which means claw in Spanish.

1 13).

2 74. It seemed to H.L. that the suspects thought he was from another clique of MS-13 by the
3 way the suspect was questioning him about his gang status.

4 75. H.L.'s father explained to Detectives Macias and Solis the term "rifando" or "rifa," was a
5 term used by gang members to describe a clique of the same gang.

6 76. H.L. thought the suspects may have mistaken him for a member of MS-13 because of the
7 way he was dressed. H.L. was wearing a white T-shirt with blue Dickie shorts, white Nike Airforce
8 sneakers and a pair of long white socks pulled up just below his knees. This clothing is consistent with
9 clothing often worn by MS-13 members.

10 77. H.L. told the lead suspect he did not belong to any gang and tried to calm him down by
11 continuing to say "I'm not anything." H.L. tried to walk past the lead suspect as he continued to calm the
12 suspect down by saying he was not in a gang.

13 78. The suspect touched H.L. as he approached him and H.L. told him in Spanish not to
14 touch him. As H.L. passed the lead suspect, he [the lead suspect] punched H.L. in his face knocking
15 H.L. to the ground. H.L. demonstrated the punch to detectives by making a closed fist with his right
16 hand and punching his open left hand. H.L. did not lose consciousness and immediately got up off the
17 ground. H.L. began fighting with the lead suspect as he tried to back away from the suspects. H.L. felt
18 he was getting the better of the suspect when the other two suspects began hitting him and trying to take
19 him to the ground.

20 79. The suspects knocked H.L. down to the ground and continued hitting him. H.L. saw the
21 suspect with the pipe coming towards him as he lay on the ground. H.L. stated, "I felt like I looked death
22 in the eye, I felt like I was going to die." H.L. covered his head with his arms because he feared the
23 suspects were going to hit him on the head with the pipe. H.L. felt the pipe hitting him on his arms as he
24 blocked the blows from hitting his head.

25 80. Teachers came out of the school and screamed at the suspects, which caused the suspects
26 to run. H.L. believes he would have been more seriously hurt if it had not been for the teachers. One of
27 the teachers told H.L. to come inside the school, but H.L. refused any further assistance because he was
28

1 angry about what had happened. H.L. explained his clothing was covered in blood and he just wanted to
2 go home.

3 81. The suspects ran back to their vehicle and left east on 5th St. to Oller Ave., where they
4 made a south bound turn. H.L. estimates the entire assault lasted two or three minutes.

5 82. On June 11, 2018, Detective Macias and Solis re-contacted Z.E. at her residence in the
6 city of Mendota. Detective Macias showed Z.E. a six-pack photo lineup containing a photograph of
7 BARRERA-PALMA. Z.E. viewed the six-pack photo lineup and was unable to identify anyone in the
8 photographs.

9 83. Detective Macias and Solis also showed the six-pack lineup containing the photograph of
10 BARRERA-PALMA to H.L., who did not identify anyone that assaulted him on May 14, 2018.

11 84. A review of Facebook messages, pursuant to a Court order, showed TORRES and
12 MEMBRENO were together just prior to the assault of H.L.. The date reflected on the messages was
13 May 14, 2018, the date of the assault. The below times were converted based on -7 UTC:

14 At 2:39 PM TORRES to MEMBRENO, when translated, "Where are you at fool?"

15 At 2:41 PM MEMBRENO to TORRES, when translated, "Coming around."

16 At 2:42 PM: TORRES to MEMBRENO, when translated, "Alright fool, that's good."

17 At 2: 48 PM: TORRES to MEMBRENO, when translated, "Let's go to the school,
18 fool?"

19 85. Based upon communication between MEMBRENO and TORRES, I believe that
20 MEMBRENO and TORRES were together just prior to the assault on May 14, 2018. Furthermore,
21 when MEMBRENO wrote, "let's go to the school, fool, MEMBRENO was telling TORRES they should
22 go to the school.

23 86. Between May 24, 2018 and May 25, 2018, agents intercepted a series of Facebook
24 messages between a Facebook Account belonging to MEMBRENO and Facebook "Armando Amador"
25 later identified as belonging TORRES regarding the assault.

26 87. The intercepted communications were interpreted by FBI certified translators and
27 reviewed by agents familiar with this investigation. On May 24, 2018, MEMBRENO and TORRES
28

1 exchanged the following messages:

2 At 10:51 PM: TORRES to MEMBRENO, when translated, "I just arrived to Mendota because I
have court tomorrow in Fresno."

3 At 10:51 PM: MEMBRENO to TORRES, when translated, "For reals dude. How much do you
owe?"

4 At 10: 52 PM: TORRES to MEMBRENO, when translated, "About \$10,000 dude. That son of a
5 bitch demanded it. Because of that asshole I'm left in debt."

6 At 10:53 PM: MEMBRENO to TORRES, when translated, "Ok and did they put that thing on
your leg?"

7 At 10:54 PM: MEMBRENO to TORRES, when translated, "And why did they buy you so much
to get out?"

8 At 10:54 PM: TORRES to MEMBRENO, when translated, "No dude we'll see what happens this
time when I go to court. Tell those crazy guys out there to be careful because the asshole cops
9 have a video I heard."

10 At 10:55 PM: MEMBRENO to TORRES, when translated, "Ok and did they say anything about
me?"

11 At 10:56 PM: TORRES to MEMBRENO, when translated, "No dude."

12 88. Based on my training, experience and knowledge of this investigation, I believe that
13 TORRES was telling MEMBRENO that he [TORRES] arrived back in Mendota to attend court in
14 Fresno on the following day. When TORRES told MEMBRENO, "No dude we'll see what happens this
15 time when I go to court. Tell those crazy guys out there to be careful because the asshole cops have a
16 video I heard." I believe TORRES was telling MEMEBRENO to be careful because law enforcement
17 had a video of the assault. When MEMBRENO asked TORRES, "Ok and did they say anything about
18 me," I believe MEMBRENO was asking TORRES if law enforcement knew he [MEMBRENO] was
19 involved.

20 89. I know TORRES was arrested on state charges pertaining to the May 14, 2018 assault of
21 H.L. and is currently charged in Fresno County Superior Court, case number F18903275. Fresno
22 County Deputy District Attorney Dennis Lewis informed FBI TFO Cory Hastings that from his review
23 of court records, TORRES was present in court on this charge on May 25, 2018. Additionally, based on
24 my training, experience and knowledge of this investigation, I believe that TORRES's reference to
25 \$10,000 in the aforementioned call was a reference to the money that TORRES paid to post bond on this
26 charge. Per court records, TORRES is on a Surety/Bail Bond SV50-4910773 of \$50,000.00 for this
27 offense. It is common for defendants to be required to post a percentage of their total bond amount with
28 a bail bonds company as collateral for the bail bonds company posting the full amount as bond.

1 90. DDA Lewis informed TFO Hastings that court records indicate that TORRES was
2 arraigned on the state assault charges on May 18, 2018, which is typically when the DA's Office would
3 have produced discovery – including the video of the assault – to the defense. I believe that this
4 explains how TORRES knew about the video, which he referenced in this call.

5 91. On May 26, 2018, during intercepted communications on Facebook, MEMBRENO and
6 TORRES continued to discuss TORRES's court case and possibly intimidation to the victim:

7 At 10:43 AM: TORRES to MEMBRENO, when translated, "And yes 2 to 4 years dude."

8 At 10:47 AM: TORRES to MEMBRENO, when translated, "They were going to shit on me
9 those assholes. I'll still get that if I don't win the case. It's possible they give them to me.

10 At 11:15 AM: MEMBRENO to TORRES, when translated, "I don't think so. Look if that dude
11 presents himself to talk in court. Tell us so we can talk to him so that can go away."

12 At 11:28AM: TORRES to MEMBRENO, when translated, "Yes dude and you know that
13 Salvadorian guy."

14 At 12:15 PM: MEMBRENO to TORRES, when translated, "No, but I know his uncle."

15 At 12:31 PM: TORRES to MEMBRENO, when translated, "Yeah that dude is a stupid big
16 snitch.

17 At 12:31 PM: MEMBRENO to TORRES, when translated, "And did you go to court?"

18 At 12:33 PM: TORRES to MEMBRENO, when translated, "Yes I went."

19 At 12:33 PM: MEMBRENO to TORRES, when translated, "And did that dude go?"

20 At 12:33PM: TORRES to MEMBRENO, when translated, "No dude he didn't go to this court. I
21 don't know if he'll present himself at the other I have."

22 At 12:34 PM: MEMBRENO to TORRES, when translated, "When is that one?"

23 At 12:34 PM: TORRES to MEMBRENO, when translated, "July."¹⁵

24 At 12:35 PM: MEMBRENO to TORRES, when translated, "Ok and did they put that thing on
25 your leg?"

26 At 12:35: TORRES to MEMBRENO, when translated, "No dude because I paid the bail... They
27 know I'm not going to leave because it's a shitload of money I have there."

28 ¹⁵ Agents conducted a search of Fresno County Court records and learned TORRES had a pre-preliminary court date in the Fresno Superior Court on July 10, 2018. The matter was continued to July 25, 2018. The court date was continued to August 29, 2018.

1
2 92. Based on my training, experience and knowledge of this investigation, I believe that
3 TORRES was telling MEMBRENO about the court case regarding the assault of H.L. When TORRES
4 told MEMBRENO, "And yes 2 to 4 years," I believe that TORRES was telling MEMBRENO that he
5 [TORRES] was facing a sentence of two to four years in prison for the assault¹⁶. When MEMBRENO
6 responded, "I don't think so. Look if that dude presents himself to talk in court. Tell us so we can talk to
7 him so that can go away," to TORRES, I believe he [MEMBRENO] was telling TORRES that he
8 [MEMBRENO and others] would intimate or kill H.L. so he [H.L.] would not show up for court.

9 93. On June 10, 2018, agents intercepted a series of Facebook messages between
10 BARRERA-PALMA¹⁷, and Edgar TORRES-AMADOR.

11 94. The intercepted communications were interpreted by FBI certified translators and
12 reviewed by agents familiar with this investigation. Listed below are a chronological listing of the
13 communications between BARRERA-PALMA and TORRES:

14 At 12:51 PM: TORRES to BARRERA-PALMA, when translated, "Yeah, dog. I still have
15 courts... We'll see what happens, dog... I have to go again in July."

16 At 1:01 PM: BARRERA-PALMA to TORRES, when translated, "All right, Leto. And what
17 about me, dog, what are those guys? Because yesterday I saw this guy who is a relative of that
18 asshole guy, you know, and he told me to be alert. It was very strange. The guy hinted like it was
19 because of you."

20 At 1:01 PM: BARRERA-PALMA to TORRES, when translated, "Did you say anything about
21 me to those guys, dog?"

22 At 1:04 PM: TORRES to BARRERA-PALMA, when translated, "Nothing, dog. I haven't been
23 responsible for anything. Only that the fucking cop said those guys supposedly have a video.
24 But I have not been responsible for anything.

25 At 1:04 PM: BARRERA-PALMA to TORRES, when translated, "Great, dog. This this is
26 serious, dog. If they ask you who the one in the video is don't say that it's me, that you don't
27 know who it is."

28 At 1:04 PM: BARRERA-PALMA to TORRES, when translated stated, "But if they tell you in

26 • ¹⁶ DDA Lewis, indicated that TORRES is facing a state sentence of between four and eight years on the pending
state assault charge, from which actual prison time served would likely be two to four years.

27 ¹⁷ BARRERA-PALMA has tattoos from the middle area of his neck extending to one side of his neck. The tattoos consist of
two hands praying, lips, and unknown writing. BARRERA-PALMA does not have any tattoos on his actual face.

1 court, because that guy is not going to go to court.”

2 At 1:05 PM: BARRERA-PALMA to TORRES, when translated, “I talked to a relative of that
3 guy and they told me they were going to stop that problem.”

4 At 1:05 PM: TORRES to BARRERA-PALMA, when translated, “I already said that I don’t
5 know anybody, dog, you know. I don’t say anything. Just be alert. If that guy knows he can tell
6 that same guy who told you to be alert you know, because that guy is his nephew.”

6 At 1:06 PM: BARRERA-PALMA to TORRES, when translated, “Yeah, yeah. You know who
7 he is. Oscar Guevara.”

8 At 1:06 PM: TORRES to BARRERA-PALMA, when translated, “I don’t know, dog, who is
9 he?”

10 At 1:07 PM: TORRES to BARRERA-PALMA, when translated, “What Oscar?”

11 At 1:07 PM: TORRES to BARRERA-PALMA, when translated, “Dog.”

12 At 1:07 PM: BARRERA-PALMA to TORRES, when translated, “Oscar
13 is the uncle of the guy we fucked up.”

14 At 1:08 PM: TORRES to BARRERA-PALMA, when translated, “I don’t know who that Oscar
15 Guevara is. Is he the one we call Cudche?...Or which one is he, dog?”

16 At 1:09 PM: TORRES to BARRERA-PALMA, when translated, “But take it easy, dog. I say
17 nothing. If I didn’t say anything when I was locked up, I’m sure not going to say anything when
18 I’m free.”

19 At 1:09 PM: BARRERA-PALMA to TORRES, when translated, “Right doggie. I don’t think
20 that guy will be going to the next court, and maybe the problem you’re involved in will be
21 resolved, dog.”

22 At 1:11 PM: TORRES to BARRERA-PALMA, when translated, “Yeah, dog, because those guys
23 told me 2 to 4 years inside.”

24 At 1:32 PM: BARRERA-PALMA to TORRES, when translated, “That’s serious shit.”

25 At 1:32 PM: BARRERA-PALMA to TORRES, when translated, “Hopefully, it’ll all work out.”

26 At 2:16 PM: TORRES to BARRERA-PALMA, when translated, “Yeah, dog. If I got to jail
27 there’s no problem, but I will go alone. I am not throwing dirt... You relax, nothing will come
28 out of me.”

At 2:17 PM: BARRERA-PALMA to TORRES, when translated, “All right, great, dog... You
Know the same on my part... But we’ll be there, dog.”

At 2:20 PM: TORRES to BARRERA-PALMA, when translated, “Yeah, dog... Just stay alert

1 with that guy... Maybe that guy said that, that's why he's acting weird, like you said... There's
2 he's acting weird."

3 At 2:20 PM: BARRERA-PALMA to TORRES, when translated, "I hope things work out for us."

4 At 2:20 PM: BARRERA-PALMA to TORRES, when translated, "And we get through this
5 problem."

6 At 2:20 PM: BARRERA-PALMA to TORRES, when translated, "Great."

7 At 2:20 PM: BARRERA-PALMA to TORRES, when translated, "Dog."

8 At 2:23 PM: BARRERA-PALMA to TORRES, when translated, "We'll be here... This guy goes
9 too fucking far... They know what the problem is.... That they're poking the beast."

10 At 4:05 PM: TORRES to BARRERA-PALMA, when translated, "Yeah, man... I have an
11 attorney... Maybe that guy can get all of those charges dropped that I was charged with."

12 At 4:29 PM: TORRES to BARRERA-PALMA, when translated, "Yeah, dog, because those guys
13 don't know what's up yet."

14 At 4:43 PM: BARRERA-PALMA to TORRES, when translated, "Great... Yeah, that's what is
15 going to happen."

16 At 8:16 PM: TORRES to BARRERA-PALMA, when translated, "Yeah, dog... It is necessary
17 down them, to beat the shit out of those dudes unit they fainted."

18 95. I have reviewed the surveillance video from the incident. The incident was captured by
19 two cameras at two different angles. The incident occurred approximately 40 yards from each camera.
20 While the height, weight and attire of the suspects are visible in the videos, facial features and other
21 detailed characteristics of the suspects are not clearly visible.

22 96. On August 22, 2018, Fresno County Sheriff's Homicide Detective Adam Maldonado and
23 I reviewed the aforementioned video surveillance footage. Detective Maldonado and I previously
24 interviewed BARRERA-PALMA in person at the Los Angeles Police Department, Rampart Station, on
25 March 22, 2018. Detective Maldonado and I believe the height, weight, and hairstyle of the person
26 depicted in the video initially punching H.L. are consistent with the height, weight and hairstyle of
27 BARRERA-PALMA at the time we interviewed him on March 22, 2018.

28 97. Based on the content of the intercepted Facebook communications between
TORRES and BARRERA-PALMA, I believe that their June 10, 2018 discussion was regarding the

1 May 14, 2018 assault, which occurred at Washington Elementary School, in Mendota, and
2 TORRES was the suspect who struck H.L. in the head with a pipe. I also believe MEMBRENO
3 was one of the suspects based on these interceptions, including those indicating that MEMBRENO and
4 TORRES were together just before the assault, and the message in which MEMBRENO wrote "did they
5 say anything about me" when he and TORRES were discussing TORRES's pending court case on the
6 assault. In addition to the description of one of the suspects having a tattoo on the left side of
7 his neck and face, as well as the content of the conversation, I believe BARRERA-PALMA
8 was also one of the three suspects who confronted H.L. and shouted "Mara Salvatrucha" prior to
9 assaulting him.

10 98. Based on the intercepted Facebook messages, H.L.'s statements, and, the investigation as
11 a whole, I believe that MEMBRENO, BARRERA-PALMA and TORRES assaulted H.L., a suspected
12 member of a rival gang, with a pipe, in furtherance of MS-13.

13 **B. COUNT 2 – VICAR Assault with a Dangerous Weapon – Victim #2**

14 99. As set forth more fully below, on August 12, 2018, Lorenzo AMADOR (MS-13
15 member), a juvenile MS-13 member ("S.S."), and an unidentified third party stabbed I.R., who is a rival
16 gang member.

17 100. On August 12, 2018, at approximately 4:09PM, Mendota Police Department received a
18 call of a stabbing victim in the road at Kate St and 7th St in Mendota, CA¹⁸. Upon the arrival of
19 Mendota Police Officers and Fresno Sheriff's Deputies, it was determined that the victim, I.R., had stab
20 wounds to his back and a contusion to his head. On scene, I.R. in substance and in part, related the
21 following:

22 101. While waiting for a ride on the corner of Kate St. and 7th St., I.R. observed a tan colored
23 SUV (possibly a Chevy Blazer) approaching I.R. as it traveled southbound on Kate St. As the vehicle
24 neared I.R., it slowed, and the right front passenger exited the vehicle with a large knife and charged at
25 I.R. I.R. described the knife as having a blade that was 4 to 5 inches in length. As I.R. turned to run, he
26 observed 2-3 other males exit the vehicle and also charge I.R. The assailants overtook I.R. and began to
27

28 ¹⁸MPD 18-1092

1 beat and stab I.R. I.R. blacked out. The next thing I.R. remembers is waking up in the hospital.

2 102. I.R. informed law enforcement that he is a member of the Mendota Bulldog criminal
3 street gang. He advised Officers on scene that the only motive he can think of for the stabbing is a rival
4 gang targeted I.R.; specifically he mentioned MS-13 as the possible attackers.

5 103. I.R. was only able to provide a physical description for the male with the knife. I.R.
6 described the male that exited the vehicle with a knife as being a Hispanic male, approximately 5'7",
7 dark skinned, wearing dark clothing, and a dark hat.

8 104. I.R. was subsequently transported to Community Regional Medical Center (CRMC) by
9 ambulance where he underwent surgery.

10 105. At 6:17 PM on August 12, 2018, the user of the Facebook account identified by the name
11 "Maycol Lopez," sent a message to Jose NAVARETTE-MENDEZ¹⁹. In the message, Maycol Lopez
12 stated, "Hey, you guys better not go out, because we plucked a chicken." NAVARETTE-MENDEZ
13 replied, "Alright, done."

14 106. Based on my training, experience, and conversations with police officers from the
15 Federal Police in El Salvador who are assisting in this investigation, it is my opinion that this
16 conversation is a reference to Maycol Lopez' involvement in a murder or attempted murder. I know that
17 words referencing cooking or plucking chicken are coded slang terms used by MS-13 gang members to
18 talk about murder and/or attempted murder. In this specific instance, based on the timing
19 (approximately two hours after the stabbing of victim I.R.), and other intercepts which are outlined
20 below, I believe the user of Facebook Maycol Lopez is warning his fellow MS-13 gang member that
21 Maycol Lopez and others attempted to kill I.R.. Maycol Lopez then warns NAVARETTE-MENDEZ
22 that NAVARETTE-MENDEZ should not go out because of the violence that had just been perpetrated
23 by Maycol Lopez and the probable law enforcement response as a result of the violence.

24 107. After receiving this intercept, I reviewed other intercepts from the account Maycol Lopez
25 in an attempt to identify the user of the account. I noted that on July 23, 2018, a Facebook VOIP²⁰ call

26 _____
27 ¹⁹ Members of the investigative team determined that the user of the Facebook account was NAVARETTE-
MENDEZ, based on a court authorized analysis of the contents of the page which included photographs.

28 ²⁰ VOIP is an acronym for "Voice over Internet Protocol," a technology that allows for the delivery of voice communications
over Internet Protocol networks, such as the Internet. As it relates to Facebook, VOIP calling allows live voice

1 was completed between Maycol Lopez and NAVARETTE-MENDEZ. After the call, the user of the
2 Maycol Lopez account sent a Facebook message with the phone number: "559-630-1810".

3 108. Based on my knowledge of this investigation, I know phone number "559-630-1810" to
4 be a phone number used by AMADOR. A review of the Facebook Friends of Maycol Lopez revealed
5 that the user of this account is friends with multiple Mendota MS-13 gang members, including accounts
6 which have been identified by law enforcement as being used by Oscar REYES, NAVARETTE-
7 MENDEZ, AMADOR, Brenda MORALES, and BONILLA. Further review of the Maycol Lopez'
8 account revealed that the profile picture of the Maycol Lopez account is a picture of what appears to be
9 a Hispanic male whose face is concealed by a Chicago Bulls baseball hat. I compared this hat to a hat
10 worn in a picture of AMADOR²¹ which AMADOR posted on his Facebook account "Mejia Mejia" on
11 March 12, 2018. It appears that the two hats are identical.

12 109. On August 15, 2018, I requested FSO Deputy Antunez review voice samples of
13 AMADOR speaking on Target Telephone #6²² a previously recorded call with voice clips sent by the
14 user of the Maycol Lopez account. After comparing the two voices Deputy Antunez concluded that the
15 voices are the same voice based on his recognition of the voices. Based on these facts, it is my belief
16 that AMADOR is the user of the Maycol Lopez Facebook account, and thus the person who claims
17 responsibility for stabbing victim I.R. by his statement, "...we just plucked a chicken."

18 110. At 6:53PM on August 12, 2018, S.S., a juvenile identified by law enforcement as an MS-
19 13 member, used phone 559-630-3865²³ to call ALFARO-TORRES.²⁴ S.S. tells ALFARO-TORRES,
20 "Don't be crossing through Mendota a lot because we plucked a chicken." ALFARRO-TORRES
21 responds, "Oh I see." S.S. then states, "Yeah, there were a lot of us there. I can't explain much, but just
22

23 communication through Facebooks mobile phone applications. Currently, there is no practical method available by which
24 law enforcement can monitor these calls.

25 ²¹ I know the person pictured on the Mejia Mejia account is AMADOR from personal surveillance and a review of
26 prior Field Interview photographs of AMADOR.

27 ²² 559-630-1810, is a phone that is used by AMADOR, as established by physical surveillance on June 6, 2018.

28 ²³ On July 26, 2018 S.S. uses Facebook "Chago Moreno (Santiago moreno)" to send a wire transfer receipt to MS-
13 gang member Jefferson GUEVERA. The receipt contains S.S. full true name and phone number 559-630-3865. The
"Chago Moreno (Santiago moreno)" Facebook account contains numerous "selfie" style photographs of S.S.

²⁴ On Target Telephone #18, which physical surveillance established as being used by ALFARO-TORRES on June
17, 2018.

1 wanted to let you know. I'm just trying to get a ride so I can get out of here, but I don't know if that
2 chicken was just left lying there or died." ALFARO-TORRES then asks, "Was it at the park?" S.S.
3 clarifies, "No, it was on the other side over by the junior. Well I can't give you much
4 information." ALFARO-TORRES advises S.S., "If it was like that, you guys probably shouldn't move."

5 111. I believe, based on my training, experience, knowledge of this case, conversations with
6 the Salvadoran police officers assigned to this case, and the previously discussed intercepts, that this
7 conversation is a conversation in which S.S. is informing ALFARO-TORRES about S.S.'s participation
8 in the attempted murder of I.R. I know that references to cooking or plucking a chicken are coded slang
9 terms used by MS-13 gang members to talk about murders and/or attempted murders. When S.S. states,
10 "Yea, there were a lot of us there. I can't explain much, but just wanted to let you know," I believe S.S.
11 is informing ALFARO-TORRES that it was not just S.S., but a group of MS-13 members who
12 participated in the violent act and that S.S. doesn't want to go into too much detail about the crime over
13 the phone.

14 112. I further believe when S.S. states, "I'm just trying to get a ride so I can get out of here,
15 but I don't know if that chicken was just left lying there or died," that S.S. is conveying that he needs to
16 flee town after his participation in the stabbing as S.S. is not sure if the victim was successfully
17 murdered or if the victim survived. S.S. concludes the conversation by giving a reference of, "by the
18 junior" as the location where the stabbing occurred and then reiterates that he can't say too much on the
19 phone when he states, "well I can't give you much information."

20 113. I know from a conversation with FSO Detective Maldonado that the reference to "by the
21 juniors" refers to a liquor store located at the intersection of Kate and 7th Street which is approximately
22 located across the street from the location where the stabbing occurred.

23 114. At 10:13PM on August 12, 2018, S.S. used Facebook "Chago Moreno²⁵" to contact
24 Target Facebook #23, used by Denis BARRERA-PALMA. The conversation is as follows:

25 S.S.: "What's up dog?"

26 BARRERA-PALMA: "What's going on?"

27
28 ²⁵ 100004251915252, the same account described in footnote 23.

1 S.S.: "Just here with Catracho, and you dog?"

2 BARRERA-PALMA: "Around here also just bored."

3 S.S.: "Same here dog, we are here. They haven't told you anything?"

4 BARRERA-PALMA: "Bel, what happened?"

5 BARRERA-PALMA: "What happened, dog?"

6 S.S.: "Well, a while ago we laid out a dog. It's hot around here right now, dog."

7 BARRERA-PALMA: "All right, all right. How did that shit happen?"

8 S.S. and BARRERA-PALMA: Have a 2 minute and 43 second VOIP call

9 S.S.: "It's hot around here, dog."

10 115. I believe that in this conversation S.S. is meeting his MS-13 obligation to report in to
11 MS-13 leader BARRERA-PALMA on the violent stabbing that he and AMADOR had participated in.
12 S.S. reports in to BARRERA-PALMA that he is, "with Catracho."

13 116. Based on the investigation, I know that the moniker "Catracho" belongs to AMADOR.²⁶
14 I believe S.S. is reporting in on behalf of both AMADOR and S.S. S.S. then asks if other MS-13
15 members have reported in to BARRERA-PALMA about the stabbing when S.S. asks, "They haven't
16 told you anything?" BARRERA-PALMA informs S.S. that he is unaware of what S.S. is talking about
17 and wants details when BARRERA-PALMA states, "What happened, dog?" S.S. informs BARRERA-
18 PALMA that S.S. and AMADOR stabbed a rival Bulldog when S.S. states, "Well, a while ago we laid
19 out a dog²⁷." When BARRERA-PALMA requests details about the stabbing, the two men then
20 complete a Facebook VOIP call. I believe that the purpose of this VOIP call was to discuss the specifics
21 of the attempt to murder I.R. which was carried out by S.S., AMADOR, and other MS-13 members.
22 After the VOIP call is completed, S.S. notifies BARRERA-PALMA of the heavy law enforcement
23 presence when he states, "It's hot around here, dog."

24 117. On August 14, 2018, members of the Investigative Team reviewed pole camera video

25
26 ²⁶ This knowledge is obtained from numerous intercepts which reference "Catracho" being located at a given location, and physical surveillance subsequently observing AMADOR at this location.

27 ²⁷ Spanish speaking Deputy Brianna Leon has informed me that the word used in this sentence ("perrita") is a
28 different word for "dog" than is used when one MS-13 gang member calls another MS-13 gang member "dog." The word "perrita" is a derogatory term reserved by MS-13 gang members as a specific reference to rival Bulldog gang members.

1 from a pole camera located on Kate St south of 8th St. The location of the pole camera is less than two
2 blocks south of the location of the stabbing. At 4:03PM on August 12, 2018,²⁸ a tan Chevy Trail Blazer
3 can be seen driving southbound Kate St, away from the stabbing scene, at a very high rate of speed.

4 118. On previous occasions, prior to the August 12, 2018 stabbing, law enforcement observed
5 both S.S. and AMADOR coming and going from a residence located at 454 Quince St in Mendota, CA.
6 Based on a belief that S.S. and AMADOR were involved in the stabbing, law enforcement began
7 surveillance on 454 Quince St. Upon arrival at the residence, members of the Investigative Team noted
8 that a tan Chevy Trail Blazer (CA License 5AMF795) was parked in the driveway of 454 Quince St.
9 The Trail Blazer appeared to be identical to the one seen in the pole camera video and also matched the
10 description given by the victim.

11 119. On August 14, 2018, Fresno Sheriff's Detective Adam Maldonado conducted a follow up
12 interview with I.R. at CRMC as he recovered from his injuries. I.R. in essence relayed what he had told
13 law enforcement immediately after the stabbing.

14 120. Detective Maldonado asked I.R. if he would be willing to identify the persons who
15 stabbed him if he recognized them in the photo lineups. I.R. advised Detective Maldonado that it was
16 "50/50" on whether he would be willing to identify the suspects if he saw them in a lineup.

17 121. I know from my training and experience that Bulldog gang members are discouraged
18 from assisting law enforcement. It is my opinion that when I.R. said that there is only a 50% chance that
19 he would identify the suspect, he was indicating to law enforcement that it is unlikely that he would
20 identify anyone, as identifying a suspect would violate the rules of I.R.'s own street gang.

21 122. Detective Maldonado showed I.R. two photo lineups. One photo lineup contained a
22 picture of S.S. and one contained a picture of NAVARETTE-MENDEZ²⁹. I.R. told Detective
23 Maldonado that he was unable to identify his attacker from the photo lineups stabbing.

24 123. Detective Maldonado also showed I.R. a photo of the Chevy Trail Blazer that was parked
25

26 ²⁸ A time which is consistent with a probable delay in a reporting party calling 9-1-1 to report I.R. was stabbed and
lying in the road and dispatcher's subsequent delay in processing that information and broadcasting it on the radio.

27 ²⁹ At the time of the photo lineups NAVARETTE-MENDEZ was believed to be a suspect in the stabbing based on
28 the initial intercepts between AMADOR and NAVARETTE-MENDEZ. NAVARETTE-MENDEZ is no longer believed to
have participated in the stabbing.

1 in the driveway at 454 Quince St. I.R. identified the vehicle as being the vehicle the men who attacked
2 him exited from before they beat and stabbed I.R.

3 124. On August 15, 2018, surveillance resumed at 454 Quince St in Mendota. During the
4 surveillance, an unidentified male entered the Chevy Trail Blazer and drove it away from 454 Quince St.
5 As surveillance followed the Trail Blazer, the driver was observed violating the California Vehicle Code
6 and a traffic stop was conducted on the vehicle. The driver was identified as Martin Moreno. Moreno
7 was determined to be driving under the influence of alcohol and was subsequently arrested.

8 125. A subsequent record check on the Trail Blazer revealed that the vehicle was registered to
9 Maria S. at 454 Quince St. Moreno was advised that the vehicle he was driving in was used in a violent
10 crime and asked if anyone else drives the vehicle. Moreno advised that his son, Jose Andres Moreno S.
11 drives the vehicle on occasion.

12 126. There is no indication or evidence that neither Moreno³⁰, nor Jose Andres Moreno S. are
13 MS-13 gang members or associates. It has been my training and experience during this specific case that
14 MS-13 gang members exclusively commit crimes with other MS-13 gang members. There is no
15 evidence that Moreno or Jose Andres Moreno S. are members of or have any involvement with MS-13.
16 Additionally, there are no intercepts or evidence that would suggest Moreno and/or Jose Andres Moreno
17 S. were involved in the stabbing, which leads me to believe that neither was involved in the stabbing.

18 127. In addition to the statement of I.R. and the pole camera video, I believe that the Trail
19 Blazer driven by Moreno is the Trail Blazer used in the stabbing of I.R. for the following reasons:

20 a. First, S.S. has been seen on surveillance coming/going from 454 Quince St. 454
21 Quince St is the residence which the Trail Blazer is registered to, is the location where
22 surveillance observed the Trail Blazer parked on August 14, 2018, and the location the Trail
23 Blazer was seen driving away from on August 15, 2018;

24 b. Second, the combination of the driver of the Trail Blazer's last name and the
25 name of the Trail Blazer's registered owner make up S.S.'s full name; indicating the driver of the
26 vehicle and the registered owner of the vehicle are S.S.'s parents and that the whole family lives
27

28 ³⁰ Moreno is a Hispanic male, approximately 5'4" tall and fifty years of age.

1 at 454 Quince St.;

2 c. Finally, when asked who else drives the Trail Blazer, Martin Moreno stated that
3 his son, also drives the vehicle. The last names of Jose Andres S.S. and S.S. indicate that Jose
4 Andres S.S. is the brother of S.S.

5 128. The Chevy Trail Blazer was subsequently towed under California Vehicle Code 22655.5
6 as evidence in the August 12, 2018 stabbing of I.R. The Chevy Trail Blazer remains stored in evidence.
7 A California State Search Warrant for the Trail Blazer was signed on August 16, 2018. Service of the
8 search warrant on the Trail Blazer is pending the availability of an evidence team to forensically analyze
9 the Trail Blazer for evidence related to the August 12, 2018 stabbing of I.R.

10 129. Based on the intercepted calls/messages, the victim's statements, and pole camera video,
11 I believe that AMADOR, S.S. and other yet unidentified MS-13 members conspired to and did in fact
12 assault victim I.R., a member of a rival gang, with a knife, in furtherance of MS-13. Based on my
13 training and experience and knowledge of this investigation, I know that MS-13 members increase their
14 standing in the enterprise by committing violent acts. I also know that it is common for MS-13
15 members to attack rival gang members to establish MS-13's power, to protect territory, and/or to disrupt
16 drug trafficking business of rivals.

17 **C. COUNT 3 - Drug Trafficking Conspiracy**

18 ***1) Overview of the MS-13 Enterprise Drug Trafficking Conspiracy***

19 130. Drug sales are an income source for the MS-13 enterprise. Based on my participation in
20 this investigation, I know that the MS-13 drug conspiracy follows a similar pattern.³¹

21 ***a) MS-13 enterprise members pool money to acquire drugs.***

22 131. The first step in the MS-13 drug enterprise is that MS-13 members pool money to buy
23 controlled substances, which they will later resell to benefit the clique.

24 132. For example, as detailed more fully below, in early July 2018 BARRERA contacted
25 fellow MS-13 member Jefferson GUEVARA to determine prices of narcotics in Los Angeles.

26
27
28 ³¹ Details of specific drug transactions, which together form part of the MS-13 drug conspiracy, are described below. This overview is intended solely to provide background for the MS-13 drug conspiracy.

1 GUEVARA told BARRERA-PALMA the current prices for marijuana, methamphetamine, and cocaine.
2 After BARRERA-PALMA learned the prices of narcotics, he messaged Denis ALFARO-TORRES to
3 find out how much money the gang had, and the two agreed to collect more money to buy narcotics in
4 Los Angeles.

5 133. BARRERA-PALMA's conversation with ALFARO-TORRES set off a string of calls and
6 messages among MS-13 members to raise money for the trip to Los Angeles. BARRERA-PALMA
7 asked for money from R.B., "Efrian Rodriguez" (an unknown Facebook user), and Nelson Hernandez.
8 Ever MEMBRENO asked for money from Christian HIDALGO, an unknown individual he referred to
9 as "Abuelo," and Marvin SEGOVIA, then reported his progress to ALFARO-TORRES. Jose
10 NAVARETTE-MENDEZ told Melvin Barrera (BARRERA-PALMA's brother) that he had collected
11 money.

12 ***b) Using pooled money, MS-13 members buy narcotics from sources***
13 ***BARRERA-PALMA approves.***

14 134. Once the MS-13 members have pooled their money, they use the money to buy narcotics.
15 On the July 9 and 10 Los Angeles trip, for example, BARRERA-PALMA called GUEVARA to broker a
16 deal for marijuana and methamphetamine, and the MS-13 members who went on the trip returned with
17 one pound of marijuana and 3.5 grams of methamphetamine.

18 135. Similarly, BARRERA-PALMA must sign off on other members acquiring narcotics. As
19 detailed below, on August 12, 2018, ALFARO-TORRES negotiated a purchase of a pound of marijuana
20 from Facebook user "Efrain Rodriguez." But before ALFARO-TORRES completed the purchase, he
21 messaged BARRERA-PALMA asking for confirmation that ALFARO-TORRES could buy the
22 marijuana. The next day, ALFARO-TORRES confirmed the marijuana deal with "Efrain Rodriguez,"
23 but only after getting BARRERA-PALMA's permission.

24 ***c) The clique gives narcotics to MS-13 members, which the members must***
25 ***resell.***

26 136. The clique must next resell its narcotics, which it does by giving the narcotics to
27 individual MS-13 members for resale. There are two notable features to this step of the MS-13
28 enterprise drug conspiracy.

1 goes back to the clique. It is the gang's money, and not the individual MS-13 member's money.³² The
2 MS-13 enterprise is supported by the individual, \$20 drug sales.

3 *e) The MS-13 members pool the money from drug sales and use it for gang*
4 *activity, including buying more drugs, and supporting jailed members.*

5 141. The money from drug sales is used to support the MS-13 enterprise. The money is pooled
6 to purchase more narcotics for sale. The money is given to incarcerated MS-13 members. The money is
7 used for trips for gang-related activities.

8 142. The individual drug sales, therefore, are crucial to MS-13. And the pattern of repeated
9 sales of drugs in quantities under \$50 not only forms the basis for the MS-13 enterprise drug trafficking
10 conspiracy, but it supports the MS-13 enterprise as a whole in Mendota.

11 *f) MS-13 Members Involved in the Drug Trafficking Conspiracy.*

12 143. The following individuals who are involved in the drug transactions below have been
13 identified as members of the MS-13 enterprise:

14 a. **Denis BARRERA-PALMA**, aka "Gunner." BARRERA-PALMA is the leader
15 of PVLS in the central valley and controls PVLS activity in the MacArthur Park in Los Angeles,
16 CA. BARRERA-PALMA is the user of TT-1, TT-24, TFA-2,³³ and TFA-22. I know based on
17 the intercepted calls and messages as well as the surveillances conducted by the investigative
18 team, that Denis BARRERA-PALMA's role in the MS-13 drug enterprise in Mendota and Los
19 Angeles includes being the head of the drug distribution network. BARRERA-PALMA locates
20 MS-13 sources and coordinates the supply of the marijuana and cocaine to the subordinate
21 members and associates. In my experience, unlike a traditional drug trafficking organization, the

22 ³² The concept of clique property has also been shown by the clique's use of a single car, owned by BARRERA-
23 PALMA. In multiple intercepted messages, MS-13 members have referred to the car as the "clique's car" and have taken
turns driving it on various MS-13 errands.

24 ³³ The Investigative Team has reviewed Facebook communications of BARRERA-PALMA
25 lawfully obtained pursuant to state and federal search warrants. Based on this review, I believe that
26 TFA-2 was used by BARRERA-PALMA because (1) the username (located in the internet address for
the account) includes his middle and last name (Adal BARRERA); (2) the account uses the vanity name
27 Denis Barrera; (3) the profile picture associated with the account is, in fact, that of Denis Adal
BARRERA-PALMA; (4) the user of the account is called "Gunner" (BARRERA-PALMA's moniker)
in messages received by TFA-2; (5) I recognize his Facebook "friends" as other MS-13
28 members/associates; and (6) the user has sent "selfie" type images of BARRERA-PALMA.

1 members do not make a profit off the sales or their transportation of the cocaine and marijuana.
2 All the money is collected and returned to the gang under BARRERA-PALMA's direction. He
3 assigns tasks and duties to individual members as reflected in the calls and observation made in
4 this affidavit. From this profit, BARRERA-PALMA determines what money is used for the
5 future purchases of narcotics as well as what gang expenses can be paid for out of the profits.
6 Devoid in all calls, is any individual member selling for their own profit. BARREA-PALMA
7 directs his subordinate members to carry out the tasks of transporting the narcotics, selling the
8 narcotics and collecting the profit.

- 9 i. I have reviewed communications made in 2017 and 2018 in which I believe
10 BARRERA-PALMA is directing acts of violence, organizing the purchase and
11 transportation of narcotics and coordinating the transfer of gang proceeds to
12 members of the Mexican Mafia. In August, 2018, I was present for an interview
13 of an individual who identified him/herself as an MS-13 member.³⁴ This
14 individual told investigators s/he was a member of PVLS, and reported that
15 BARRERA-PALMA is an MS-13 member. S/he said that BARRERA-PALMA
16 is one of only three MS-13 members in Mendota to hold the rank of "Homeboy."
17 S/he provided information on several gang members which ultimately assisted in
18 the arrest of four other gang members for murder. On March 9, 2018, Fresno
19 County Sheriff's Office Deputies J. Tamayo and K. Sharp stopped a vehicle
20 BARRERA-PALMA was riding in. Deputy Sharp contacted BARRERA-
21 PALMA, who she recognized from prior photographs. BARRERA-PALMA was
22 wearing a black t-shirt, blue jean pants and white Michael Jordan tennis shoes
23 with the "Jumpman" logo. I believe based on my training, experience and
24 speaking with other MS-13 detectives, the "Jumpman" logo is a common symbol
25 in MS-13 gang related attire. MS-13 gang members often wear clothing or

26
27 ³⁴ This individual provided a post-arrest statement after being arrested for a felony violent crime. Much of the
28 information s/he provided was corroborated by other evidence of which I am aware, obtained through other interviews,
collection of physical evidence, intercepted communications, and/or Facebook communications obtained via search warrants.
As such, I found the information to be reliable.

1 possess signs and symbols with this logo due to it resembling their gang hand
2 sign, the devil horns. In addition, during a search of the vehicle, an LA Dodger
3 baseball hat was located inside the vehicle and was then placed on top of the
4 trunk, which BARRERA-PALMA grabbed and put on his head when the stop was
5 over. I believe based on my training, experience and speaking with other MS-13
6 detectives that MS-13 gang members also often wear LA Dodger apparel because
7 their gang originated in Los Angeles and the color of the Dodgers apparel is blue,
8 a color MS-13 claims for its gang. On May 25, 2018, as described above,
9 BARRERA-PALMA participated in an assault with Edgar TORRES-AMADOR
10 and Ever MEMBRANO during which the group yelled several statements
11 professing allegiance to Mara Salvatrucha, such as “this is Mara, Mara for life,”
12 and other statements set forth above. Additionally, in at least one intercepted
13 communications, BARRERA-PALMA refers to himself as a “corridor.” Based
14 on my training and experience and knowledge of this investigation, I know
15 “corridor” references someone who is usually a higher level homeboy who serves
16 as a channel between gang members and the leadership in El Salvador.

17 b. **Mario GARCIA-VILLANUEVA**, aka “Ton.” I know based on the intercepted
18 calls and messages, as well as the surveillances conducted by the investigative team, that
19 GARCIA-VILLANUEVA’s role in the MS-13 drug enterprise is to provide direction to
20 subordinate MS-13 members in regards to who should receive narcotics and keeping accurate
21 documentation regarding the gangs ledgers, which include information such as debts, money
22 collected, and how proceeds are spent. GARCIA-VILLANUEVA has also stored narcotic
23 proceeds and directed members to spend the proceeds for MS-13 activities. In August, 2018, I
24 was present for an interview of an individual who identified him/herself as an MS-13 member,
25 and who is discussed in the previous paragraph. This individual told investigators s/he was a
26 member of PVLS, and reported that GARCIA-VILLANUEVA is a long time MS-13 member.
27 S/he said that GARCIA-VILLANUEVA is one of only three MS-13 members in Mendota to
28

1 hold the rank of "Homeboy." S/he provided information on several gang members which
2 ultimately assisted in the arrest of four other gang members for murder. Additionally, physical
3 surveillance, vehicle GPS, and phone GPS data revealed that GARCIA-VILLANUEVA and the
4 following other MS-13 gang members met at a remote location northeast of Mendota. Those
5 known to be in attendance of this meeting were: Denis ALFARO-TORRES, Denis BARRERA-
6 PALMA, NAVARETTE-MENDEZ, Oscar REYES, Lorenzo AMADOR, Ever MEMBRENO,
7 Henry BONILLA and Mario GARCIA-VILLANUEVA. I know based on my training and
8 experience that these meetings are restricted to only members of MS-13.

9 c. **Henry BONILLA**, aka "Repollo/Repollin." During a review of H. BONILLA's
10 Facebook account, I observed that his profile picture is a picture of MacArthur Park. This image
11 is significant as MacArthur Park is the primary turf of Park View MS-13 and thus this image is a
12 clear indicator of BONILLA's gang affiliation. Additionally, on August 13, 2018, physical
13 surveillance, vehicle GPS, and phone GPS data revealed that H. BONILLA and numerous other
14 MS-13 gang members met at a remote location northeast of Mendota. Those known to be in
15 attendance of this meeting were: Denis ALFARO-TORRES, Denis BARRERA-PALMA,
16 NAVARETTE-MENDEZ, Oscar REYES, Lorenzo AMADOR, Ever MEMBRENO, Henry
17 BONILLA and Mario GARCIA-VILLANUEVA. I know based on my training and experience
18 that these meetings are restricted to only members of MS-13.

19 d. **Denis ALFARO-TORRES**, aka "Payin." I know based on the intercepted calls
20 and messages as well as the surveillances conducted by the investigative team, ALFARO-
21 TORRES role in the MS-13 drug enterprise is to make the delivery of the cocaine and
22 marijuana to the members and collect and account for the money once the narcotics are sold.
23 ALFARO-TORRES runs the day-to-day collection of the proceeds from the sales of the
24 narcotics. I know ALFARO-TORRES is a member of MS-13 based on intercepts and physical
25 surveillance which occurred on August 4, 2018. The intercepts and surveillance demonstrated
26 that MS-13 members Denis TORRES, Denis BARRERA-PALMA, Jose NAVARETTE-
27 MENDEZ, Oscar REYES, Mario GARCIA-VILLANUEVA, Lorenzo AMADOR, Rogelio
28

1 BONILLA, and Christian HIDALGO met in a remote location to collect money from MS-13
2 member Henry BONILLA. Numerous intercepts leading up to this meeting indicated that Henry
3 BONILLA had failed to pay for narcotics, had left the Mendota area without notifying the gang,
4 and was past due on money owed to the gang. The gang initially intended to physically
5 discipline BONILLA, but BONILLA was given additional time to come up with the past due
6 money to avoid a beating. The purpose of the August 4, 2018 meeting was to collect money
7 from BONILLA, or delve out punishment in the event BONILLA could not pay. I am aware
8 from my training, experience, and this current investigation that MS-13 meetings that may
9 involve discipline are restricted to MS-13 members, and thus TORRES' association with the
10 other MS-13 members at this members-only meeting weighs heavily on my opinion that
11 TORRES is an MS-13 member. Additionally, as set forth below, ALFARO-TORRES
12 participates with BARRERA-PALMA and other MS-13 members in drug trafficking.

13 e. **Lorenzo AMADOR** aka "Catracho." I know based on the intercepted calls and
14 messages as well as the surveillances conducted by the investigative team, AMADOR'S role in
15 the MS-13 drug enterprise is to locate customers and to deliver and sell the gang narcotics to the
16 customers and collect the money from the direct sales. I know that AMADOR is a member of
17 MS-13 because he regularly associates with other gang members and wears gang clothing. On
18 April 4, 2018, AMADOR received two picture messages from Nancy Ruiz³⁵. The pictures are of
19 four males who each have their faces covered and each one is carrying a weapon (knife, handgun
20 machete, and baseball bat). One of the males is making an MS-13 hand sign and in the
21 background "13 MS" is tagged on the wall. Based on the photos I believe AMADOR is one of
22 the individuals in the photo. This belief is based on many factors, including the height, weight,
23 build, and completion of the masked man holding the knife. Additionally, my belief is based on
24 the fact that this picture is being sent to AMADOR and the fact that the person holding the knife
25 is wearing a unique hat that AMADOR is known to wear. The distinct hat is a black hat with a
26 red strap and red California Bear on both the front and back. AMADOR is pictured in his

27
28 ³⁵ Associated with Facebook Account 100001915148361

1 Facebook profile picture and other selfie style pictures wearing this exact same hat. When the
2 pictures of the weapon wielding MS-13 members are enlarged and compared to the picture of
3 AMADOR, it is clear to me that the hat worn backwards in the gang picture is the same hat,
4 worn in the same style, as that shown in AMADOR's Facebook profile picture³⁶.

5 f. **Claudia LIZAOLA**, aka "Maniaka." I believe LIZAOLA is a member of MS-
6 13. I base this belief on several factors. According to May 29, 2017, Facebook communications
7 between LIZAOLA and BARRERA-PALMA, LIZAOLA sent a message which read "The other
8 day they asked me, who jumped me to PVLS" followed by the message, "All I remembered it
9 was you, Lil Creeper and I don't know who else." Because of this I know that LIZAOLA was
10 jumped into MS-13 by BARRERA-PALMA. Furthermore, LIZAOLA is in regular contact with
11 MS-13 gang members throughout the prison system coordinating drug trafficking on behalf of
12 the gang.

13 g. **Jose Wilson NAVARETTE-MENDEZ**, aka "Wilson." NAVARETTE-
14 MENDEZ is an MS-13 gang member that sells MS-13 narcotics. NAVARETTE-MENDEZ
15 distributes and delivers the gangs narcotics to other gang members and to narcotics customers of
16 the MS-13 gang. NAVARETTE-MENDEZ is also used to collect money and coordinate the
17 retrieval of money from gang members who have sold MS-13 narcotics. Based on intercepted
18 calls and surveillance, NAVARETTE-MENDEZ has attended MS-13 gang meetings in Mendota.
19 During a Facebook conversation with BERRERA-PALMA, NAVARETTE-MENDEZ sends
20 BARRERA-PALMA a photo of an individual throwing up a gang sign. BARRERA-PALMA
21 told NAVARETTE-MENDEZ that they would deal with the issue at the next meeting. On
22 August 13, 2018, physical surveillance, vehicle GPS, and phone GPS data revealed that
23 NAVARETTE-MENDEZ and numerous other MS-13 gang members met at a remote location
24 northeast of Mendota. Those known to be in attendance of this meeting were: Denis ALFARO-
25 TORRES, Denis BARRERA-PALMA, Oscar REYES, Lorenzo AMADOR, Ever MEMBRENO,

26
27 ³⁶ After reviewing thousands of Facebook pictures and messages for MS-13 gang members, the only person I have seen
28 wearing this distinct hat is the masked knife wielding man, and Amador.

1 Henry BONILLA and Mario GARCIA-VILLANUEVA. I know based on my training and
2 experience that these meetings are restricted to only members of MS-13.

3 h. **Christian HIDALGO**, aka "Guero/Huero/Werito/White Boy." HIDALGO is an
4 MS-13 gang member who sells MS-13 narcotics. HIDALGO distributes and delivers the gang's
5 narcotics to other gang members and to narcotics customers of the MS-13 gang. HIDALGO is
6 also used to collect money and coordinate the retrieval of money from MS-13 gang members
7 who have sold MS-13 narcotics. Based on intercepted calls and surveillance, HIDALGO has
8 attended MS-13 gang meetings in Mendota. HIDALGO is a member of the MS-13 enterprise.
9 On March 9, 2018, law enforcement contacted HIDALGO with other known MS-13 gang
10 members, including Henry Rogelio BONILLA, aka Repollin, Denis BARRERA-PALMA, aka
11 Gunner, and two others. HILDAGO's Facebook account reflects telephone number (559) 210-
12 1097, subscribed to "Cristian Reyes" at HIDALGO's true address, causing agents to believe that
13 it is used by HIDALGO. Based on PRTT records, HIDALGO uses this phone to contact fellow
14 MS-13 members: BARRERA-PALMA, Luis Castillo REYES, and Lorenzo Antonio AMADOR.

15 i. **Santos BONILLA**, aka "Cuervo." S-BONILLA is an MS-13 gang member that
16 sells MS-13 narcotics. S-BONILLA distributes and delivers the gang's narcotics to other gang
17 members and to narcotics customers of the MS-13 gang. S-BONILLA is also used to collect
18 money and coordinate the retrieval of money from gang members who have sold MS-13
19 narcotics. S-BONILLA allowed other MS-13 gang members to use his vehicle for the purpose
20 of picking up a firearm and money. Throughout the course of this wiretap investigation,
21 members from the DOJ SOU unit have observed S. BONILLA during surveillance operations,
22 associating with known MS-13 gang members from Mendota, to include: Oscar Antonio
23 REYES, Denis BARRERA-PALMA, aka "Gunner," Christian Eliseo Reyes HIDALGO, aka,
24 "Guero," Francisco Martinez LIZANO, aka "Activo."

25 j. **Francisco LIZANO**, aka "Activo." LIZANO is a high ranking member of the
26 MS-13 gang in Mendota and is a "Homeboy," which is a leadership role within the gang. Based
27 on my training and experience, and knowledge of this investigation, I know that MS-13 members
28

1 with the rank of "Homeboy" can coordinate assaults and killings within the gang without any
2 other permission. A "Homeboy" would also be able to coordinate and direct other MS-13 gang
3 members in the sales and distribution of narcotics and in the collection of money made from the
4 narcotics sales by the gang's members. LIZANO is a drug source for the MS-13 gang in
5 Mendota and has possessed and distributed cocaine to other MS-13 members. LIZANO allowed
6 MS-13 gang members to use his vehicle to travel to Los Angeles to pick up narcotics which were
7 being purchased with money collected by MS-13 gang members in Mendota. In August, 2018, I
8 was present for an interview of an individual who identified him/herself as an MS-13 member,
9 and who is discussed in the paragraphs (a) and (b) above. This individual told investigators s/he
10 was a member of PVLS, and reported that LIZANO is an MS-13 member. S/he said that
11 LIZANO is one of only three MS-13 members in Mendota to hold the rank of "Homeboy." On
12 May 29, 2017, BARRERA-PALMA had a Facebook messenger conversation with Claudia
13 LIZAOLA. The conversation was obtained pursuant to search warrants written prior to the
14 wiretap investigation. In the course of this conversation BARRERA-PALMA sent a photo to
15 LIZAOLA. The photo is below. Three of the subjects are displaying hand signs that based on my
16 training and experience I believe to be MS-13 hand signs. From my involvement in this case I
17 can positively identify LIZANO in the image. LIZANO is also displaying a MS-13 gang hand
18 sign and is positioned to the far right of the photograph wearing a gray beanie. The other
19 individuals in the photograph can also be seen using MS-13 gang signs and showing their tattoos
20 displaying their affiliation with MS-13. BARRERA-PALMA is also using his hands to make
21 gang signs, and is facing forward without a shirt. The individual wearing a gray hoodie and blue
22 hat behind BARRERA-PALMA is Luis Reyes-Castillo, aka "Molesto," who is an MS-13 gang
23 member with the rank of homeboy and currently in custody on other charges.
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15 k. **Marvin VILLEGAS-SEGOVIA**, aka “Chaparro.”³⁷ VILLEGAS-SEGOVIA is
16 an MS-13 gang member who sells MS-13 narcotics. VILLEGAS-SEGOVIA’S role is to
17 distribute drugs to customers in the Mendota area and to make sure the money from the sales
18 gets to the higher ranking MS-13 members. During several intercepted telephone conversations,
19 SEGOVIA, using number (559) 630-2941, discussed MS-13 gang business, including criminal
20 acts such as possession with intent to distribute controlled substances, with known MS-13
21 members. SEGOVIA continues to use telephone number (559) 630-2941 to regularly
22 communicate with MS-13 members Denis BARRERA-PALMA, Mario GARCIA-
23 VILLANUEVA, Denis ALFARO-TORRES, Ever MEMBRENO and Oscar REYES.

24 i. SEGOVIA also attended an MS-13 gang meeting on August 13, 2018. I
25 know from my training and experience and my participation in this investigation that
26 only gang members who have reached a certain level of trust are allowed to attend

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28 ³⁷ Determined through intercepts and physical surveillance conducting during the current investigation, including call #1218 on Target Telephone #9.

1 these meetings and must be a member of MS-13. The investigative team is aware that
2 SEGOVIA attended this meeting through intercepted phone calls. Specifically, On
3 August 13, 2018, GARCIA-VILLANUEVA, using TT-31, placed a call to SEGOVIA.
4 During the call, GARCIA-VILLANUEVA asked if he was heading there already,
5 SEGOVIA confirmed that he was. GARCIA-VILLANUEVA told SEGOVIA that the
6 thing was going to be by the little beach. SEGOVIA asked if it was the one by the
7 bridge and GARCIA-VILLANUEVA said it was.

8 1. **Oscar REYES**, aka "Tamagas." REYES is an MS-13 gang member that sells
9 MS-13 narcotics. REYES distributes and delivers the gang's narcotics to other gang members
10 and to narcotics customers of the MS-13 gang. Based on intercepted calls and surveillance,
11 REYES has attended MS-13 gang meetings in Mendota.

12 m. **Brenda Yajaira MORALES**, aka "Yari." MORALES acting under the direction
13 of BARERA-PLAMA stores marijuana at her house as well as sells and distributes it to
14 customers at the direction of other MS-13 members. MORALES is an active participant of the
15 MS-13 enterprise in that she has stored marijuana, sold marijuana, and delivered marijuana for
16 the MS-13 enterprise. She associates with and allows MS-13 members access to her residence.
17 She communicates on a daily basis with MS-13 members as well as allows them to store their
18 gang car at her residence. Through the use of pole cameras, physical surveillance, GPS trackers,
19 and GPS data on cell phones, the investigate team has identified MORALES' residence as a
20 routine gathering place for MS-13 members.

21 n. **Ever MEMBRENO**, aka "Conecho." MEMBRENO is an MS-13 gang member
22 that sells MS-13 narcotics. MEMBRENO distributes and delivers the gang's narcotics to other
23 gang members and to narcotics customers of the MS-13 gang. MEMBRENO is also used to
24 collect money and coordinate the retrieval of money from gang members who have sold MS-13
25 narcotics. Based on intercepted calls, MEMBRENO is also used by the gang to keep track of
26 narcotics sales and money and to keep some type of documentation or ledger of what money has
27 been used and spent by other MS-13 gang members. MEMBRENO is acting as a treasurer and
28

1 secretary for the gang based on the intercepted calls. Based on intercepted calls and surveillance,
2 MEMBRENO has attended MS-13 gang meetings in Mendota. Through the course of this
3 wiretap investigation MEMBRENO, utilizing Target Facebook #4 and Target Telephone #9, has
4 continually engaged in multiple text and/or voice conversations with other target subjects known
5 by the Investigative Team to be MS-13 gang members. Some of these Targeted Subjects have
6 included Francisco Martinez LIZANO, aka "Activo," and Henry Lara BONILLA, aka
7 "Repollo." Through the course of this wiretap investigation, members from the DOJ SOU unit
8 have observed MEMBRENO during surveillance operations in Mendota, associating with other
9 known MS-13 gang members. Some of these members have included Mario Alexander
10 GARCIA-VILLANUEVA, aka "Ton or Tom," Denis BARRERA-PALMA, aka "Gunner,"
11 Denis ALFARO-TORRES, Lorenzo AMADOR aka, "Catracho," Jefferson GUEVARA, aka
12 "Chino," and Henry BONILLA, aka "Repollo." On May 25, 2018, MEMBRENO participated in
13 an assault on an individual believed to be a rival gang member in which witnesses reported that
14 MEMBRENO and his two fellow assailants yelled "Mara Salvatrucha" during the assault. I
15 believe this assault on a rival gang member and yelling "Mara Salvatrucha" indicates that
16 MEMBRENO is an MS-13 member.

17 o. **Jefferson GUEVARA**, aka "Chino." GUEVARA is a self-admitted MS-13
18 member that has obtained the rank of Homeboy. [REDACTED]

19 [REDACTED]
20 [REDACTED]
21 [REDACTED] Investigators have observed GUEVARA in pictures flashing gang hand signs and
22 investigators have observed GUEVARA meeting with and associating with other known MS-13
23 members. GUEVARA has been intercepted directing other MS-13 members in the commissions
24 of crimes. GUEVARA has sold methamphetamine, and marijuana on behalf of and for the
25 benefit of MS-13. GUEVARA has supplied a firearm to another known MS-13 member during
26 this investigation and collected the proceeds from a residential burglary committed by other MS-
27 13 members during this investigation.

1 2) *Denis BARRERA-PALMA Obtains Methamphetamine from Claudia*
2 *LIZAOLA, which is Picked up by Francisco LIZANO (All MS-13 Enterprise*
3 *Members).*

4 144. According to May 29, 2017, Facebook communications between LIZAOLA using TFA-3
5 and BERRERA-PALMA, LIZAOLA sent a message which read “The other day they asked me, who
6 jumped me to PVLS” followed by the message, “All I remembered it was you, Lil Creeper and I don’t
7 know who else.” Because of this message I know that LIZAOLA was jumped into³⁸ MS-13 by
8 BARRERA-PALMA. LIZAOLA is the user of TFA-3³⁹ and responsible for providing narcotics to MS-
9 13 members, facilitating communications between MS-13 members in custody and those on the streets,
10 and providing money to MS-13 members in custody. I draw these conclusions regarding LIZAOLA’s
11 role based upon intercepted Facebook communications obtained throughout this investigation.

12 145. In May and June 2017, BARRERA-PALMA used TFA-2⁴⁰ to negotiate to obtain
13 methamphetamine from LIZAOLA, the user of TFA-3. BARRERA-PALMA sent LIZAOLA a
14 message, “3 tell him/her to give it to me for 2600”. LIZAOLA, using another Facebook account,
15 replied, “I already asked him, but he doesn't want to, he says it’s not garbage.” BARRERA-PALMA
16 sent another message asking to pay the additional amount later, and that they would continue to get
17 “work” from him, and advised that they would regularly purchase “notebooks.” LIZAOLA suggested
18 that “Daffy” might lend the money. I know, based on my training and experience that when BARRERA-
19 PALMA said “give it to me for 2600”, he was likely referring to buying a pound of methamphetamine

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22 ³⁸ A clique adds new members through an initiation ritual known as “jumping in,” during which several existing
MS-13 members beat up a prospective MS-13 member for 13 seconds. Once jumped in, an MS-13 member is expected to
participate fully in MS-13’s criminal activities.

23 ³⁹ Members of the Investigative Team have determined that LIZAOLA is the user of TFA-3, based on multiple
24 factors which include: numerous selfie style images of LIZAOLA posted to this Facebook profile, those messaging
LIZAOLA address her by her first name (Claudia), LIZAOLA’s Facebook friends consist of numerous MS-13 gang
members, and LIZAOLA routinely communicates with MS-13 members about MS-13 gang business.

25 ⁴⁰ The Investigative Team has reviewed Facebook communications of BARRERA-PALMA lawfully obtained
26 pursuant to state and federal search warrants. Based on this review, I believe that TA-2 was used by BARRERA-PALMA
because (1) the username (located in the internet address for the account) includes his middle and last name (Adal
27 BARRERA); (2) the account uses the vanity name Denis Barrera; (3) the profile picture associated with the account is, in
fact, that of Denis Adal BARRERA-Palma; (4) the user of the account is called “Gunner” (BARRERA-PALMA’s moniker)
28 in messages received by TFA-2; (5) I recognize his Facebook “friends” as other MS-13 members/associates; and (6) the user
has sent “selfie” type images of BARRERA-PALMA.

1 for \$2600.⁴¹ When LIZAOLA told him, “he doesn't want to, he says it’s not garbage”, she is saying that
2 the third party, who is arranging the methamphetamine sale is not going to come down on the price
3 because of the quality of the drugs. When BARRERA-PALMA told her to tell him they would continue
4 to get work from him and buy notebooks, I know that “work” is common slang for narcotics and that
5 notebooks in Spanish is libreta, which people commonly use to describe a pound of narcotics, because it
6 is very close to the Spanish word “libre” which means pound. I know that BARRERA-PALMA is
7 saying that he should get a deal because they are going to buy pounds of narcotics in the future.

8 146. During the next couple of weeks, **TFA-2** used by BARRERA-PALMA and **TFA-3** used
9 by LIZAOLA were used to continue the discussion regarding the drug purchase. BARRERA-PALMA
10 used **TFA-2** to advise LIZAOLA who used **TFA-3** of the amount of money he was sending, when he
11 was sending it, and who would bring it to her. BARRERA-PALMA advised LIZAOLA that “Activo”
12 had taken possession of the drugs and that they had weighed it. Thereafter, BARRERA-PALMA sent a
13 photograph of 15 small packages that appeared to be crystal methamphetamine and messaged, “I got 15
14 out it.” I know that there are 16 ounces in a pound and believe that BARRERA-PALMA advised
15 LIZAOLA that he was short one ounce of methamphetamine.

16 147. When BARRERA-PALMA said that “Activo” had taken possession, I believe he was
17 referring to Francisco LIZANO. Recently a gang member⁴² who was arrested in Southern California
18 told investigators that he was a homeboy with PVLS. This gang member was shown a photo of
19 Francisco LIZANO by a member of the investigative team and identified him as a PVLS gang member
20 from Mendota and that he knew him by the moniker of “Activo.” Also, in Facebook messages
21 intercepted in or about August 2018, Denis BARRERA-PALMA explains that he and "Activo" went to
22 Los Angeles for a gang meeting with Los Angeles and Bakersfield members. Agents conducted
23 surveillance and observed Francisco LIZANO pick up BARRERA-PALMA and travel to LA for the
24 gang meeting on August 19, 2018. Additionally, in call #117 on TT#1, Denis BARRERA-PALMA

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26 ⁴¹ I know that at the time of this conversation that a pound of crystal methamphetamine ranged in price from \$2000
to \$3000. Because of this I believe they are talking about crystal methamphetamine.

27 ⁴² This gang member was arrested for his participation in a gang assault. After being arrested, he provided the names
28 of 5 gang members who participated in a recent murder. Since he provided that information, 4 of the 5 members have been
arrested for murder and 3 have provided corroborating statements during their confessions. Because of this, I believe he is
reliable and provided truthful information.

1 talks with Denis ALFARO-TORRES and tells him that "Activo" is at Rios Park and is driving a really
2 nice Mustang. Agents have conducted surveillance on Francisco LIZANO and observed him driving a
3 newer black Mustang with paper plates. Agents have also observed this black Mustang parked in his
4 driveway at 633 De La Cruz, Mendota, LIZANO's residence. Based on the noted intercepted calls,
5 surveillance conducted and an interview noted above in which LIZANO is identified as "Activo," I
6 believe that LIZANO is the "Activo" that MS-13 members are referencing.⁴³

7 **3) MS-13 Enterprise Members BARRERA-PALMA, GUEVARA, ALFARO-**
8 **TORRES, MEMBRENO, NAVARETTE-MENDEZ, and HIDALGO Work**
9 **Together to Collect Funds from MS-13 Members and Purchase Narcotics to**
10 **Sell – Los Angeles Trip**

11 148. As set forth more fully below, the following drug conspiracy is led by BARRERA-
12 PALMA. BARRERA-PALMA orchestrated the collection of money from ALFARO-TORRES in
13 Mendota for the purchase of marijuana in Los Angeles, through GUEVARA, to bring back to Mendota
14 to sell. I further know that MEMBRENO conspired to collect money with ALFARO-TORRES and
15 HIDALGO in furtherance of this conspiracy. I know that after the money was collected, several MS-13
16 members went to the Los Angeles area to pick up the narcotics, and several came back to Mendota and
17 were stopped by police on their way. These narcotics were ultimately seized by law enforcement during
18 the traffic stop. I believe that these gang members purchased these drugs for the benefit of the MS-13
19 enterprise in Mendota, CA.

20 149. On July 8, 2018, Denis BARRERA-PALMA used TFA-2 to have an ongoing
21 conversation with GUEVARA, using TFA-13,⁴⁴ about purchasing narcotics for MS-13. The
22 conversation started with GUEVARA telling BARRERA-PALMA, "Hey dog the deal is there's no
23 weed. One that's alright is \$400. Yeah dog, but send the money. We are going to get some of the good
24 one from that hommie. We might take a 'Liberta' (pound) of this one that is \$400, but with the other

25 ⁴³ In the approximately two years time I have been investigating Mendota MS-13 members, I am not aware of any
26 other MS-13 members associated with Mendota who uses the moniker of Activo.

27 ⁴⁴ On 06/22/18 at 1504 hours, GUEVARA, using the Facebook profile of Ascencio Ascencio Ascencio, sent a selfie
28 style photograph flashing MS-13 gang signs to the FB profile Noemi Garcia. In checking the selfie photograph with a
booking photograph of GUEVARA, the pictures match and I believe that GUEVARA is the user of the FB account with the
profile name "Ascencio Ascencio Ascencio."

1 hommie we will get the 'Mita' (half pound). Then we'll put half and half, unless you guys want to get it
2 but this one is not that good." BARRERA-PALMA responded, "Alright dog, right now when these
3 guys leave, I'll have them get the money to you." BARRERA-PALMA told GUEVARA, "I just want a
4 joint. But it's up to you, we can sell it around here. So you think we can get the other pound from the
5 other guy?" GUEVARA stated, "Good dog, I already told them to give me the sample. Good dog, but
6 as soon as we have the money we need to get it. Around here, the deal is made with money in hand. If
7 not we are going to get a bad rap and then no one will sell to us." BARRERA-PALMA responded,
8 "Cool, are you going to get something there where you are?" GUEVARA stated, "Yeah but only half
9 pound and an ounce of cricket."⁴⁵ BARRERA-PALMA told GUEVARA, "With the money we are
10 going to get to you, you can get it. We need to get another pound of the same." BARRERA-PALMA
11 stated, "He didn't tell you who was going to go bring it?" GUEVARA responded, "Nope. Hey dog, the
12 ounce of soda⁴⁶ is \$1000 or \$1100." GUEVARA then stated, "And how much money are you guys
13 going to send?" BARRERA-PALMA responded, "Each dog about \$400, the rest they owe."

14 150. I believe this conversation to be the beginning of a conspiracy by multiple MS-13 gang
15 members to gather money made from narcotic sales, pool the money, send the money to Los Angeles,
16 and use the money to purchase additional narcotics for the gang to sell. In this initial exchange,
17 BARRERA-PALMA and GUEVARA discussed the cost and logistics of purchasing a pound of
18 marijuana, an ounce of "cricket" (methamphetamine), and an ounce of "soda" (cocaine). BARRERA-
19 PALMA conveyed to GUEVARA that the members in Mendota are going to get GUEVARA the

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22 ⁴⁵ I believe "Cricket" is a reference to methamphetamine. During the wiretap investigation, Target Subjects have
23 referred to methamphetamine with various terms, including "crystal," "Cri," and "Cri-Cri." Based on the context of these
24 conversations, I believe the term "Cri" and "Cri-Cri," are abbreviated versions of saying "Crystal." Crystal is a word used to
25 describe methamphetamine because of its crystal like appearance. Based on this, I believe when the Target Subjects were
26 discussing "Cricket," they were using a play on the word "Cricket," because it starts with "Cri." They have also used the
27 Spanish word for "cricket," (grillo) to describe methamphetamine. Additionally, they have moved around the syllables of the
28 Spanish word "grillo," to "Ilogri," to describe methamphetamine in other conversations. Based on the context of the
29 conversation, I also believe the subjects were discussing methamphetamine. In the conversation they discuss marijuana,
30 "soda," (which based on my knowledge of this investigation is cocaine) and "Cricket." Based on the nature of the
31 conversation, I believe Cricket is a drug that is not marijuana or cocaine. Therefore, I believe Cricket is a reference to
32 methamphetamine.

33 ⁴⁶ I believe when they use the term soda, they are talking about cocaine. I know the price of \$1000 for an ounce is
34 most consistent with the current price of cocaine.

1 money. BARRERA-PALMA told GUEVARA that BARRERA-PALMA will be sending MS-13
2 members from Mendota to Los Angeles and the group heading to Los Angeles will have the money with
3 them. GUEVARA explained to BARRERA-PALMA that in Los Angeles there is no credit extended
4 when buying narcotics, so GUEVARA needed the money in hand to make the purchase. The intent of
5 the MS-13 members to sell the narcotics is clear to me, based on the quantity being purchased, the
6 context given by the conversations listed below, and the overt statement of BARRERA-PALMA: "...we
7 can sell it around here."

8 151. On July 8, 2018, BARRERA-PALMA used TFA-2 to talk to Denis ALFARO TORRES,
9 user of TFA-18,⁴⁷ about the gang's money collection in preparation to purchase narcotics in Los
10 Angeles. ALFARO-TORRES told BARRERA-PALMA, "Right on, that's cool dog, hey was all the
11 money collected?" BARRERA-PALMA responded, "No dog, but what we have is sufficient. With
12 \$460, that's all we can get right now." ALFARO-TORRES responded, "I'll see how to get the other
13 right now when I eat dog."

14 152. On July 8, 2018, BARRERA-PALMA used TFA-2 to talk further about the gang's
15 money collection to R.B. (100024368854860)⁴⁸. R.B. stated, "Hey that dude is asking when are you
16 going to give him the money?" BARRERA-PALMA responded, "That thing is happening tonight." I
17 believe the "thing" that is happening tonight, is the trip to Los Angeles to use the pooled MS-13 money
18 to purchase additional narcotics.

19 153. On July 8, 2018, Denis BARRERA-PALMA used TFA-2 to continue to try and collect
20 funds to purchase narcotics as he talks to the unidentified user of Facebook "Efrian Rodriguez"
21 (10000125938625). BARRERA-PALMA asked Efrian Rodriguez, "Hey dog. What's up, do you have
22 the money?" Efrian Rodriguez responded, "No, I still don't have it dog?"

23 154. On July 8, 2018, in a continued attempt to collect money, BARRERA-PALMA used

24 _____
25 ⁴⁷ I believe TORRES is the user of the Facebook profile "Denis Torres" (100006371882284), Target Facebook
26 Account #18. In checking the public Facebook post, TORRES posted a selfie style photograph of himself which matches
27 photographs taken by the Fresno Sheriff's Office during field interviews. Additionally, during intercepted messages over
28 Target Facebook Account #18 on July 17, 2018, at 1521, TORRES sent Facebook profile "Migueliyo Cruz" his cellular
phone number of (559) 392-7033 (Target Telephone #18).

⁴⁸ On 7/17/18, DOJ agents conducted surveillance of R.B. and placed a phone call to him at (928) 447-1018 and
observed him answer the phone. When checking cellular phone number (928) 446-0108 in Facebook, it comes back to the FB
profile "Bebesito Ojos Claros." The photographs on the FB profile match DMV pictures of R.B.

1 TFA-2 to contact N.H. (100004810632384) and asked N.H., "Check it out, do you have that?" N.H.
2 responded, "What you gave me yesterday?" BARRERA-PALMA stated, "Yeah." N.H. told
3 BARRERA-PALMA, "Yeah, what happens is that there was a party here at the house yesterday."
4 BARRERA-PALMA responded, "But what the heck? You didn't sell anything?" N.H. told
5 BARRERA-PALMA, "No, but today, we'll see what happens." BARRERA-PALMA told N.H., "All
6 right, but really fool, get on with that very early on."

7 155. I believe this conversation to be a conversation between BARRERA-PALMA and N.H.
8 about narcotics that BARRERA-PALMA provided to N.H. to sell. I believe BARRERA-PALMA was
9 hoping to collect the proceeds from the narcotics sales from N.H. to use those proceeds to buy additional
10 narcotics. N.H. informed BARRERA-PALMA that N.H. was at a party and didn't sell anything.
11 BARRERA-PALMA concluded the conversation by telling N.H. that he needed to, "Get on with that
12 very early on." I believe this closing statement to be an order from BARRERA-PALMA to N.H. to start
13 selling the narcotics early the next day.

14 156. On July 8, 2018, Jose NAVARETTE-MENDEZ used TFA-7⁴⁹ to talk with Maria Bonilla
15 (100022792988332) about the trip to Los Angeles to pick up narcotics. NAVARETTE MENDEZ told
16 Maria Bonilla, "We are on our way out, hopefully everything goes well. Pray that I have a good trip."
17 Bonilla responded, "Take care, even though you know I don't like what you're doing."

18 157. On July 8, 2018, Jose NAVARETTE-MENDEZ used TFA-7 to tell Melvin BARRERA-
19 PALMA (100005253342583) about NAVARETTE-MENDEZ' collection of money in preparation for
20 the trip to Los Angeles to purchase narcotics. NAVARETTE-MENDEZ told Melvin BARRERA-
21 PALMA, "I'm receiving some money here in order to go to Los Angeles."

22 158. On July 8, 2018, Ever MEMBRENO used TT-9 to call Denis ALFARO TORRES on
23 TT-18 (call #1187). MEMBRENO asked ALFARO TORRES where the group is going to meet up.
24 ALFARO TORRES advised MEMBRENO that ALFARO TORRES was passing the gas station now.

25 _____
26 ⁴⁹ I believe that TFA-7 is being used by Jose Wilson Navarrete MENDEZ based upon the following: (1) the user
27 sends several selfie style pictures of MENDEZ from TA-7; (2) the user registered with email address
28 wilson1996mendez@gmail.com, a combination of MENDEZ's date of birth and true name; (3) the user posts pictures
suggesting he is a MS-13 gang member from the Park View clique; (4) the user is friends with numerous MS-13 members;
and (5) the user communicates with MS-13 members about MS-13 business. NAVARETTE-MENDEZ's use of Target
Telephone #10, further confirmed his use of Target Facebook Account #7.

1 ALFARO TORRES advised MEMBRENO that ALFARO TORRES, “needed the money to give it to
2 ‘Loco’⁵⁰” (Denis BARRERA-PALMA).

3 159. On July 8, 2018, Ever MEMBRENO used TT-9⁵¹ to call Marvin VILLEGAS-SEGOVIA
4 on 559-630-2941 (call #1188). MEMBRENO asked SEGOVIA, if SEGOVIA has the money for the
5 weed. SEGOVIA advises MEMBRENO that SEGOVIA only has about \$40, because “Guero”
6 (Christian HIDALGO) had taken the other “tablas” (one ‘tabla’ is \$100 and can mean either \$100 cash
7 or \$100 of narcotics depending on the context of the sentence in which it is used). SEGOVIA
8 elaborated that Guero had taken the other ‘tablas’ too, a total of 5 tablas. MEMBRENO acknowledged
9 what Guero had taken and advised SEGOVIA that MEMBRENO had collected that money. SEGOVIA
10 advised MEMBRENO that SEGOVIA was in Madera and the two agree to call each other later.

11 160. On July 8, 2018, Ever MEMBRENO used TT-9 to call Christian HIDALGO on 559-382-
12 4219⁵² (call #1211). MEMBRENO told HIDALGO that MEMBRENO, needed some money right
13 away. HIDALGO asked MEMBRENO how much MEMBRENO needed. MEMBRENO told
14 HIDALGO that MEMBRENO needed as much as possible since “that guy” (believed to BARRERA-
15 PALMA) was not going to be able to go “up there” (believed to be Los Angeles), so MEMBRENO

16
17 ⁵⁰ I believe that “Loco” is a reference to Denis BARRERA-PALMA. On August 18, 2018, Alfaro-Torres received a
18 call from Christian Hidalgo. The call was intercepted. During the call they discussed driving to Los Angeles at the direction
19 of Denis BARRERA-PALMA. Alfaro-Torres said the “Loco” asked that Hidalgo find a vehicle and drive to Los Angeles
20 because there was “something” that needed to be done. I am aware that in prior communications, BARRERA-PALMA has
21 been referenced as the “Loco.” Additionally, based on the intercept, “Loco” was asking in the capacity of a leader, directing
22 the activity. Based on knowledge of this investigation, I am aware that BARRERA-PALMA is leader of MS-13 in Mendota
23 and elsewhere. As such, he directs what other MS-13 gang members do. Further evidence that BARRERA-PALMA directed
24 the trip to Los Angeles, and therefore is the Loco referenced above, came later during an intercepted message between
25 BARRERA-PALMA, using TA-23, and Alfaro-Torres. During the conversation, BARRERA-PALMA asked who went to
26 Los Angeles. ALFARO-TORRES said, “Guero” (Christian Hidalgo), “Tamagas” (Oscar Reyes) and “Repollo” (Henry
27 Bonilla).

28
29 ⁵¹ On June 8, 2018 at 0426 hours, Facebook Account “Ventura Rivera” (100013061793528) sent a message to Ever
30 MEMBRENO on Target Facebook #4 [100022064131831]. In one of the text messages, Ventura Rivera told MEMBRENO,
31 “send me your number, dude.” Approximately one minute later MEMBRENO responded with the number of, “5593828745”
32 (Target Telephone #9). Target Facebook #4 had been determined by the Investigative Team belonging to MEMBRENO
33 based on multiple factors, which include: selfie style pictures of MEMBRENO being sent from this account; the account
34 being registered under the number 559-382-9941, which through interviews was determined as MEMBRENO’s phone
35 number.

36
37 ⁵² During intercepted calls on 6/18/18, between HIDALGO and Denis BARRERA-PALMA, they discuss
38 HIDALGO picking up BARRERA-PALMA at his residence. Agents conducted surveillance on HIDALGO and observed
39 him picking up BARRERA-PALMA, confirming the calls and confirming that HIDALGO is the user of cellular phone
40 number (559) 382-4219.

1 would have to go. HIDALGO asked how HIDALGO was supposed to get the money. MEMBRENO
2 told HIDALGO that MEMBRENO isn't asking HIDALGO to use money from HIDALGO's own
3 pocket, but instead to use "Chaparro's" (SEGOVIA's) money. HIDALGO told MEMBRENO that
4 Chaparro only had \$40. MEMBRENO advises HIDALGO that MEMBRENO tried to call Chapparo,
5 but Chaparro did not answer. HIDALGO advised MEMBRENO that HIDALGO would call Chapparo
6 right now. MEMBRENO then told HIDALGO that HIDALGO too owed \$40. HIDALGO asked
7 MEMBRENO what HIDALGO owed the money for. MEMBRENO told HIDALGO that HIDALGO
8 owed the money because Chaparro said that HIDALGO, had "gotten them." HIDALGO advised
9 MEMBRENO that HIDALGO had already told Chaparro that HILDAGO would give "it" to Chaparro
10 later on. MEMBRENO then asked HIDALGO if HIDALGO was going to pay MEMBRENO his \$20.
11 HIDALGO confirmed that he would give MEMBRENO the \$20 now. MEMBRENO told HIDALGO
12 that "they" need as much possible. HIDALGO told MEMBRENO that MEMBRENO could go "there"
13 and be back with \$60 and that HIDALGO would tell Chaparro right now. MEMBRENO then told
14 HIDALGO that "they" also needed money to get other "gallina" (believed to be a reference to narcotics
15 other than marijuana). HIDALGO reiterated that he will let Chaparro know right away.

16 161. On July 8, 2018, Ever MEMBRENO used **TT-9** to call Denis ALFARO TORRES on
17 **TT-18**⁵³ (call #1214). ALFARO TORRES asked MEMBRENO if "they" (MEMBRENO and others)
18 got more (money). MEMBRENO told ALFARO TORRES that the only thing more he has gotten is
19 Chaparro's \$40. After some discussion about a missing wallet, ALFARO TORRES asked
20 MEMBRENO if MEMBRENO was going to be able to get the other \$60. MEMBRENO responded by
21 telling ALFARO TORRES that MEMBRENO doesn't know what the problem was, because Guero
22 (HIDALGO) still owed \$40. MEMBRENO then told ALFARO TORRES that MEMBRENO believed
23 that "they" were selling (drugs) at Guero's (HIDALGO's), but MEMBRENO called and "he" (possibly
24 HIDALGO) did not answer. ALFARO TORRES then told MEMBRENO to tell "him" (HIDALGO) to

26 ⁵³ Denis ALFARO-TORRES is listed in this case as UM10 and is using cellular phone number (559) 392-7033,
27 which is listed in this case as TT#18. During surveillance on 6/17/18, ALFARO-TORRES talks about getting gas and
28 picking up Denis BARRERA-PALMA. Agents observe ALFARO-TORRES getting gas and making several calls to
BARRERA-PALMA before picking him up at 310 Holmes in Mendota, determining that ALFARO-TORRES is the user of
cellular phone number (559) 392-7033.

1 come through with \$40.

2 162. On July 8, 2018, Ever MEMBRENO used **TT-9** to call UM223 (“Abuelo”) on 559-698-
3 4489 (call #1201). MEMBRENO told UM223 that MEMBRENO was collecting money and wanted to
4 know if UM223 had the \$20. UM223 advised MEMBRENO that UM223 would have to pay later as
5 UM223 was not in Mendota. MEMBRENO told UM223 to call MEMBRENO when UM223 was back
6 in Mendota.

7 163. On July 8, 2018, Ever MEMBRENO used **TT-9** to call UM223 (“Abuelo”) on 559-698-
8 4489 (call #1231). MEMBRENO asked UM223 for that thing (money). UM223 told MEMBRENO
9 that he would give MEMBRENO \$10 and to head to “Nancy’s.” MEMBRENO told UM223 that
10 MEMBRENO needed \$20 for a thing. UM223 then asked where MEMBRENO was. MEMBRENO
11 told UM223 that MEMBRENO was at the apartments where UM223 lives.

12 164. On July 8, 2018, at approximately 9:00PM, Denis BARRERA-PALMA’s vehicle left
13 Mendota headed to Los Angeles; as indicated by a court ordered GPS tracker which was installed on
14 BARRERA-PALMA’s vehicle. It was unknown at that time who left from Mendota in BARRERA-
15 PALMA’s vehicle, but it was later determined based on GPS data received on Target Telephone #10 and
16 Target Telephone #9, that it was MEMBRENO and NAVARETTE MENDEZ who took BARRERA-
17 PALMA’s vehicle to Los Angeles.

18 165. On July 9, 2018, there were numerous intercepts and GPS data for BARRERA-
19 PALMA’s vehicle and the Target Telephones which indicated MEMBRENO and NAVARETTE-
20 MENDEZ had met up with GUEVARA and other MS-13 gang members in Los Angeles and obtained
21 narcotics.

22 166. On July 9, 2018, BARRERA-PALMA, using **TFA-2**, sent a message to GUEVARA,
23 using Target Facebook Account #3, which read, “Are you still there?” GUEVARA responded, “Yes, we
24 are on the way to grab the weed.” BARRERA-PALMA then asked if it was going to happen, referring to
25 the drug deal. GUEVARA responded, “Yes, we are going to go take a look at it, but it cost 1100.”
26 BARRERA-PALMA then wrote, “Alright, man it is expensive and do you have the cash?” GUEVARA
27 wrote, “No, I have 1000, but I can get another 100.” Based on these messages, I believe that GUEVARA
28

1 had obtained the money collected by BARRERA-PALMA, MEMBRENO, ALFARO TORRES, and
2 NAVARETTE-MENDEZ and was on his way to purchase the drugs.

3 167. On July 9, 2018, at approximately 7:00PM, as BARRERA-PALMA's vehicle returned
4 from the Los Angeles trip, the Investigative Team directed Officers from the California Highway Patrol
5 to initiate a traffic stop in the area of California Interstate 5 near the Gorman Off-ramp. As a result of
6 the vehicle stop, officers located approximately 1 pound of marijuana and 3.5 grams of
7 methamphetamine. During the stop it was determined that MEMBRENO was the driver of BARRERA-
8 PALMA's vehicle and he was accompanied by MS-13 gang members -- an uncharged co-conspirator,
9 NAVARETTE-MENDEZ, L. AMADOR, and J. GUEVARA. The marijuana and methamphetamine
10 were seized and MEMBRENO and the uncharged co-conspirator were cited for drug-related crimes and
11 released at the scene.

12 168. On July 10, 2018, Jose NAVARETTE-MENDEZ used TFA-7⁵⁴ to tell Paola GUEVARA
13 (Target Facebook #11)⁵⁵, "The problem is that last night we came from there. I was there for 2 nights
14 broke without money and without a place to sleep. Last night the cops got us with several things and
15 took it."

16 169. On July 10, 2018, Ever MEMBRENO used TFA-4⁵⁶ to contact Denis ALFARO
17 TORRES (Target Facebook Account #18). MEMBRENO told ALFARO TORRES, "No man, you saw
18 what happened yesterday, man. I have to start working with everything so I can pay for that as soon as
19 possible dog." ALFARO TORRES responded, "Yeah dog, and how much did they put on you?"
20

21 ⁵⁴ I believe that TA-7 is being used by Jose Wilson Navarrete MENDEZ based upon the following: (1) the user
22 sends several selfie style pictures of MENDEZ from TA-7; (2) the user registered with email address
23 wilson1996mendez@gmail.com, a combination of MENDEZ's date of birth and true name; (3) the user posts pictures
24 suggesting he is a MS-13 gang member from the Park View clique; (4) the user is friends with numerous MS-13 members;
25 and (5) the user communicates with MS-13 members about MS-13 business. NAVARETTE-MENDEZ's use of Target
26 Telephone #10, further confirmed his use of Target Facebook Account #7.

27 ⁵⁵ On 6/18/18 at 1429 hours, GUEVARA sent a selfie style photograph to Denis BARRERA-PALMA. I recognize
28 these photos to be that of GUEVARA. Additionally, in a Facebook message on 06/29/18 at 1627 hours, GUEVARA sent
29 Denis BARRERA-PALMA her cellular phone number (323) 618-3322. In a Facebook message on 7/24/18 at 1505 hours,
30 GUEVARA sends Rosy GARCUA her cellular phone number of (323) 618-3322.

31 ⁵⁶ On 6/4/18 at 1508 hours, MEMBRENO (Josue Rivera) sent an old black and white photo of himself to Facebook
32 profile name "Elva Henriquez Reyes." MEMBRENO then sent a second message saying the photo was from when he was in
33 Honduras. Comparing the black and white photograph and a FI photograph from FSO, they appear to be the same person. On
34 7/11/18 at 0843, MEMBRENO sent a FB message with FB Jairo Membreno which was a picture of a United States of
35 America Employment Authorization ID card in the name of Ever J Membreno Rodriguez with a DOB of 02/08/99.

1 MEMBRENO stated, "No man, three charges, but I mean that's not a problem here. Yeah, but I'm
2 going to start with that guy. I'll pay it off in about a month and a half."

3 170. On July 10, 2018, Ever MEMBRENO used TFA-4 to contact Facebook user "Paola
4 Gutierrez" (100013270566416). MEMBRENO told Paola Gutierrez what a terrible day it's been, "Very
5 bad, it's been one of the worst." Paola Gutierrez responded, "Why?" MEMBRENO told Paola
6 Gutierrez, "I don't know but it went really bad. I lost about \$15,000 in one moment." Paola Gutierrez
7 asked MEMBRENO how he lost so much. MEMBRENO responded, "Because of my car."

8 171. On July 10, 2018, Denis BARRERA-PALMA used TFA-2 to send Paola GUEVARA
9 (TFA-11) a message: "The homies didn't say anything, but the cops stopped them on the freeway, they
10 lost a pound of weed an ounce of cold." The two then discuss how fortunate it was that the group of
11 MS-13 members was not arrested during the traffic stop.

12 172. I believe that all of these intercepts on July 10, 2018, further indicate that this group of
13 MS-13 members collectively conspired to obtain and transport the drugs, as they collectively express
14 their loss of the drugs. MEMBRENO relates that he has "three charges," which I believe to be "charges"
15 that are assigned by the gang. In order to work off his "charges," MEMBRENO must pay back the
16 money lost as a result of law enforcement's seizure. MEMBRENO estimates it will take him
17 approximately a month and a half to pay back the loss. It is my belief that MEMBRENO has been
18 "charged" by the gang with the loss of the drugs because he was the driver of the vehicle and ultimately
19 responsible for the pooled gang money and subsequently purchased narcotics. This is evidenced when
20 Paola Gutierrez asked MEMBRENO how he lost so much in one night and MEMBRENO responded,
21 "Because of my car." I believe that MEMBRENO is attempting to convey that the vehicle was his
22 responsibility and under his control, and thus he is responsible.

23 **4) MS-13 Enterprise Members S. BONILLA, BARRERA-PALMA and LIZANO**
24 **are Involved in a Cocaine Transaction**

25 173. On July 1, 2018, Agents learned through surveillance and intercepted communications
26 pursuant to authorized orders for wire and electronic intercepts that S. BONILLA and BARRERA-
27 PALMA were occupants in the gray Honda Civic traveling back from Los Angeles towards Mendota. At
28

1 17:09 hours, surveillance observed the Honda return to Mendota and stop at the Valero gas station.
2 Surveillance identified S. BONILLA as the driver of the vehicle and BARRERA-PALMA as the
3 passenger. At 5:20PM, the two then drove to Mendota Pool Park located near Mendota, a known
4 hangout for MS-13 gang members in Mendota.

5 174. At 5:24PM, a call was intercepted over **TT-11**, used by S. BONILLA,⁵⁷ to 559-371-
6 2014,⁵⁸ used by Francisco LIZANO. During the call, S. BONILLA said "They are asking for
7 "colaciones". I don't know if you have any?" LIZANO said, "What?" S. BONILLA said "They are
8 asking for "colaciones" (snacks) to see if there were any" LIZANO said "The candy?" to which S.
9 BONILLA affirmed. There was an audio glitch in the call, but soon after the glitch S. BONILLA was
10 heard saying "Let me ask here then, hold on" followed by "How much are you going to want?" In the
11 background another voice, presumed to BARRERA-PALMA is heard saying "Bring us a forty." S.
12 BONILLA then said "They want a forty here at Rio Park." LIZANO followed by saying "Let me call
13 this guy to see if he is at the house to bring it." Based on my training and experience and knowledge of
14 this investigation, I believe when S. BONILLA asked for "colaciones", which translates to "snacks," he
15 is asking for narcotics. When LIZANO asked if he wanted "candy" I believe he was asking him if he
16 wanted cocaine. I know that during this investigation, members of MS-13 primarily sell marijuana and
17 cocaine. When S. BONILLA told LIZANO that they wanted 40, I know that he is asking for \$40 worth
18 of narcotics.

19 175. Surveillance units went to LIZANO's residence in Mendota, CA. LIZANO's vehicle was
20 observed parked outside the residence.

21 176. At 5:39PM, another call was intercepted over **TT-11**, used by S. BONILLA and
22 LIZANO. During the call, LIZANO asked "Are you all there still?" S. BONILLA said "Yes." LIZANO
23

24 ⁵⁷ On June 16, 2018, during an intercepted call over State TT #11, the user of 559-371-4091 was identified during
25 the call as "Santos." During subsequent intercepted calls, the user of the phone reported he was at the Laundry mat in
Mendota, CA. Surveillance was conducted and observed Santos BONILLA at the Laundry mat. A traffic stop was later
conducted and Santos BONILLA was identified during the stop, confirming he was the user of the phone.

26 ⁵⁸ On 7/1/18, agents conducted surveillance at 633 De La Cruz on LIZANO based on intercepted calls with cellular
27 phone number (559) 371-2014 and Santos BONILLA about a drug transaction. Agents observed LIZANO and eventually
had a FSO Deputy conduct a traffic stop where cocaine was located in LIZANO's possession. Based on the surveillance and
intercepted phone calls, along with a phone call placed to the phone during the traffic stop, agents determined that LIZANO
28 was also the user of cellular phone number (559) 371-2014.

1 said "So, right now I will head over there. I will just go pick it up over there." S. BONILLA said "We
2 are at the park. Here just past the last bridge." LIZANO said "Alright, all set." S. BONILLA said
3 "Alright." During this call, I know that S. BONILLA and LIZANO are continuing to coordinate moving
4 the narcotics to the park, presumably for BARRERA-PALMA.

5 177. Surveillance continued following LIZANO. Surveillance observed LIZANO leaving his
6 residence in his vehicle. Surveillance followed LIZANO to 307 Rios St. in Mendota, CA. LIZANO
7 parked his vehicle and walked into the garage of the residence. Minutes later, LIZANO exited and
8 returned to his vehicle. LIZANO then drove away. Investigators followed LIZANO towards the park
9 where S. BONILLA and BARRERA-PALMA were waiting.

10 178. A law enforcement stop was conducted on LIZANO prior to his arrival at the park by
11 Fresno Sheriff's Deputy Tamayo. During the contact, LIZANO confessed that he was in possession of
12 cocaine. During a search, Deputy Tamayo discovered four small baggies that each contained suspected
13 cocaine. Based on my training and experience and having worked street level drug investigations in the
14 past, I am aware the quantities of cocaine base recovered were approximately \$10 each. The four
15 baggies would be considered a "40" as requested by S. BONILLA. LIZANO's understanding that the
16 narcotics were not for personal use, and his intent to distribute the cocaine to BARRERA, S. BONILLA,
17 and others, is supported by the quantity and packaging of cocaine found in LIZANO's possession during
18 the traffic stop.

19 **5) ALFARO-TORRES and SEGOVIA Engage in a Cocaine Transaction that**
20 **Takes Place at Burger King**

21 179. On July 14, 2018, ALFARO-TORRES, using TT-18, received a call from an uncharged
22 individual, D.R., who ordered \$40 worth of cocaine. ALFARO-TORRES then arranged for Marvin
23 VILLEGAS-SEGOVIA to provide the cocaine to D.R. at a local Burger King. On July 14, 2018,
24 ALFARO-TORRES, using TT-18, received a call (#524) from D.R. During the call, D.R. asked
25 ALFARO-TORRES for 40. Immediately after this call, ALFARO-TORRES, using TT-18, called (#527)
26 559-630-2941,⁵⁹ used by Marvin VILLEGAS-SEGOVIA. During the call, ALFARO asked if SEGOVIA

27
28 ⁵⁹ On July 18, 2018, BARRERA-PALMA called 559-630-2941 to arrange to purchase cocaine. Agents believed this
number was used by SEGOVIA based on prior surveillance of him and intercepted calls. Agents conducted surveillance of

1 has any “snow” or “candy”.⁶⁰ SEGOVIA confirmed that he does. ALFARO-TORRES told him that
2 somebody wants “40.” He then told SEGOVIA that he will call him and let him know where to meet. I
3 believe that ALFARO-TORRES was directing SEGOVIA to bring \$40 of cocaine to a customer of
4 ALFARO-TORRES.

5 180. After this call, ALFARO-TORRES, using TT-18, placed a call (#529) D.R. and told him
6 to go to the Burger King on the other side of 180. D.R. agreed and told ALFARO-TORRES that he is
7 driving a Honda. After this call, ALFARO-TORRES placed another call (#531) to SEGOVIA and
8 directed him to meet the guy, who he identified as “la Pupusa” at the Burger King.

9 181. At 5:52PM, surveillance units, which were sitting in the parking lot of Burger King
10 observed SEGOVIA arrive at the parking lot and get into a vehicle with D.R. for a brief moment. After
11 this, both men departed the parking lot in different vehicles. After SEGOVIA left the parking lot,
12 ALFARO-TORRES, using TT-18, placed a call (#535) to D.R. and asked if he “got it” and D.R.
13 confirmed that he did. A brief surveillance was conducted of D.R. after the meeting at Burger King. He
14 was traffic stopped approximately 30 minutes after the meet and was fully identified by law
15 enforcement. During the stop, law enforcement did not locate any narcotics, but an extensive search was
16 not conducted. I believe that when SEGOVIA got in the vehicle of D.R., he exchanged the cocaine for
17 the money they agreed upon. I believe this because of the follow up call in which D.R. confirmed that he
18 had “got it.”

19 **6) MS-13 Enterprise Members, Including REYES, VILLEGAS-SEGOVIA,**
20 **ALFARO-TORRES, and HIDALGO, Conspire to Distribute Narcotics.**

21 182. On June 30, 2018; Oscar REYES receives a call from ALFARO-TORRES. ALFARO-
22 TORRES asks if the Old Man (Mario GARICA-VILLANUEVA) is there (referring to the residence
23 where REYES, HILDAGO and GARCIA VILLANUEVA all live together, 307 Rios in Mendota).
24
25

26 SEGOVIA and observed he met with BARRERA-PALMA, as was discussed on the call with 559-630-2941. This confirmed
27 SEGOVIA was the user of the phone.

28 ⁶⁰ Based on my training and experience, I know that individuals engaged in drug trafficking commonly use slang
terms when referring to various narcotics. I also know that “snow” is commonly used slang for cocaine. I also know, based
on this investigation that gang members in Mendota, CA, have called cocaine “candy”

1 ALFARO-TORRES asks REYES if REYES had any “candies”⁶¹ that ALFARO-TORRES had given to
2 REYES. REYES replies yes. ALFARO-TORRES told REYES to give ALFARO-TORRES 40 and
3 ALFARO-TORRES will give it to REYES once HUERITO (CHRISTIN HILDAGO) arrives later.
4 REYES asks if AFLARO-TORRES was coming there (REYES location). ALFARO-TORRES said he
5 was on his way.

6 183. I know based on the MS-13 enterprise in this investigation that they distribute cocaine
7 and marijuana. Based on their written rules as well as phone calls intercepted during this investigation,
8 MS-13 members are not allowed to use drugs except marijuana. This call demonstrated the working of
9 the MS-13 enterprise. REYES had been previously supplied with the MS-13 enterprise’s cocaine by
10 ALFARO-TORRES to sell. ALFARO-TORRES directs REYES to give him 40 dollars-worth of
11 cocaine, and ALFARO-TORRES will have HILDAGO drop off the money later. In a call 12 minutes
12 later, ALFARO –TORRES raises the amount to 60 dollars’ worth of cocaine and says he would return it
13 to him later on. ALFARO-TORRES calls three minutes later and tells REYES to come outside.
14 REYES advised he was just putting his shoes on and ALFARO-TORRES tells REYES to hurry because
15 they had to go drop that thing off (cocaine). Based on this call, it’s clear ALFARO-TORRES needs to
16 make a delivery of the cocaine and REYES is going to go with him. This call demonstrates how three
17 MS-13 enterprise members are involved in this one transaction of a conspiracy to sell cocaine.

18 184. On July 2, 2018, REYES calls UF181, who, based on this investigation appears to live at
19 307 Rios with REYES. During the call REYES tells UF181 that he wants 40 by the fence, and tells
20 UF181 that she should drop it off. I believe this is a call in which REYES has a narcotics customer
21 waiting and needs UF181 to bring REYES 40 worth of cocaine to complete the sale.

22 185. On July 17, 2018, Marvin VILLEGAS-SEGOVIA aka CHAPARRO asks if REYES had
23 got “that” already. REYES tells SEGOVIA that REYES has not, and REYES explains that the guy had
24 to give them 80 bucks now because of the delay in payment. SEGOVIA then asked how much the guy
25 owed. REYES told SEGOVIA that he owed 60, but they were going to make him pay 80 instead.
26 SEGOVIA asked if the guy gave the money for the one. REYES said yes, but he was going to make him
27

28 ⁶¹ I know that during this investigation, MS-13 members have called cocaine both soda and candy or candies.

1 pay 80 instead. REYES says it (money) was not going to be for him but for the clique. SEGOVIA said
2 yes.

3 186. This call demonstrates both REYES and SEGOVIA are conspiring together to sell the
4 MS-13 cocaine and are charging a customer that owes money for narcotics, 20 dollars for being late in
5 their payment to the gang. REYES identifies that extra \$20 belongs to the gang. The collection of this
6 debt materializes, as outlined below, on July 20, 2018.

7 187. On July 20, 2018, Oscar REYES, conspired with SEGOVIA to distribute narcotics to a
8 third unknown individual at a laundromat in Mendota, California.

9 188. On July 20, 2018, REYES, using TT-4,⁶² placed a call to UM181. During the call
10 REYES asked UM181 to bring, “a forty of the shiny one” to the laundromat near 180. UM181 advised
11 that he would head right over.

12 189. Approximately two minutes later, REYES, using TT-4, placed a call to SEGOVIA.
13 During the call, REYES told SEGOVIA to come to the laundromat on 180. REYES said that he had 60
14 and that a third party wanted to give him 80. The two agreed to meet at the laundromat.

15 190. Approximately two minutes after the previous call, UM181 called REYES and told
16 REYES that UM181 was on the side street waiting. REYES advised that he would be there shortly.

17 191. Approximately ten minutes after the previous call, surveillance units arrived on scene and
18 observed REYES, using TT-4, as REYES received a call from SEGOVIA. During the call, the two men
19 discussed where they were going to meet. At the same time, surveillance units observed REYES in the
20 doorway of the laundromat talking on the phone. Soon after the call ended, REYES walked around the
21 side of the building to SEGOVIA’s vehicle and agents observed REYES lean into the passenger window
22 of SEGOVIA’s vehicle. The investigative team then observed REYES go into the laundromat for a
23 moment and return with money in his hand, which REYES handed to SEGOVIA.

24 192. Based on the intercepted calls, I believe REYES was simultaneously collecting the \$80
25 dollar drug debt that was mentioned in the call on July 17, 2018 with SEGOVIA and also conducting a
26

27 ⁶² On 6/10/18, DOJ agents conducted surveillance on REYES based on intercepted Facebook messages that he sent.
28 During the surveillance, agents placed phone calls to REYES and observed him pick up his phone after calling cellular phone
number (559) 800-1678 (TT-4)

1 new sale of either cocaine or methamphetamine with an unknown buyer. As previously discussed, on
2 July 17, 2018, REYES and SEGOVIA had discussed a narcotics customer who was late in making his
3 \$60 dollar payment, and now would owe \$80. I believe the \$80 collected by REYES and immediately
4 given to SEGOVIA on July 20, 2018 is that previously discussed drug debt and accompanying late fee.
5 Simultaneously, REYES was arranging a delivery of \$40 worth of the “shiny” from UM181. I know of
6 both methamphetamine and cocaine being referred to as having a “shiny” quality; however, since MS-13
7 in Mendota, and REYES specifically, has routinely sold cocaine, I believe the “shiny” to be cocaine.
8 Based on UM181’s call to REYES in which UM181 advises that UM181 is on a side street near a tree,
9 and REYES responding that REYES will meet UM181 there, I believe REYES successfully retrieved
10 the cocaine from UM181 and provided it to a narcotics customer in the laundry mat.

11 193. On July 27, 2018, Oscar REYES calls UF181 and tells her that he needs a 40 for the guy.
12 UF181 acknowledges and states that she can be there in 5 minutes. REYES tells UF181 to call the guy
13 and then meet the guy where the car is parked. UF181 agrees. REYES asks that it (narcotics) be so-so.
14 UF181 said okay.

15 194. I believe this conversation demonstrates REYES using UF181 to prepare 40 worth of
16 cocaine and deliver it to an unknown male at a spot that the UF181 is familiar with.

17 195. On August 3, 2018, Denis ALFARO-TORRES asks REYES if REYES has the talco
18 (powder) over there. REYES advises ALFARO-TORRES that REYES has three hits. ALFARO-
19 TORRES then states that “they” need a 40 over there. REYES asks where ALFARO-TORRES needs
20 the delivery. ALFARO-TORRES asks if REYES can take it. REYES instructs ALFARO -TORRES to
21 have the customer go to the little park since he (REYES) could go there. ALFARO-TORRES agrees.

22 196. This call demonstrates ALFARO-TORRES and REYES working together to sell the MS-
23 13 enterprise cocaine. Based on my participation in this investigation I know the park being referenced
24 as the location where the delivery of the narcotics is to take place to be the small park located at Bass
25 Ave and SR-33 in Mendota. Through the course of this investigation surveillance units have observed
26 REYES at this park on numerous occasions.

27 197. This sampling of intercepts demonstrates how REYES sells and transports cocaine for the
28

1 MS-13 enterprise. Additionally, the intercepts demonstrate that REYES also collects money owed to the
2 enterprise and stores cocaine at his residence, and that he acts in unison with other MS-13 members in
3 operating this aspect of MS-13's drug trafficking operation.

4 **7) Brenda Yajaira MORALES Works with Other MS-13 Members to Engage in**
5 **Drug Trafficking.**

6 198. MORALES has both sent and received a number of messages indicating she is engaged
7 in drug trafficking with other MS-13 members. On June 14, 2018, MORALES, using Target Facebook
8 #10, had a text message conversation with MS-13 member Jose NAVARETTE-MENDEZ, using Target
9 Facebook #7. During this conversation, NAVARETTE-MENDEZ sent a message to MORALES that
10 read, "The Guero [Spanish for "white guy"] asks if there's weed." MORALES responded, saying,
11 "Yes." NAVARETTE-MENDEZ then sent a message to MORALES, saying "He's going to knock,"
12 which MORALES replied back, "I'm not there." NAVARETTE-MENDEZ then replied, "Alright."
13 Later in their conversation, MORALES sent a text message to NAVARETTE-MENDEZ that read, "I'm
14 almost there. Is Nancy there?" NAVARETTE-MENDEZ answered back by replying, "yes."
15 MORALES then sent a message to NAVARETTE-MENDEZ that read, "Please tell Nancy to give it to
16 him."

17 199. I know from my participation in this investigation that MORALES's sister is Nancy
18 Dayanna Morales, who lives with MORALES based on the above conversation. Therefore, I believe
19 that MORALES arranged for her sister, Nancy, to provide marijuana which was stored at their
20 residence. Specifically, when NAVARETTE-MENDEZ told MORALES that the white guy was "going
21 to knock" for the weed, MORALES responded that she wasn't there but that "Nancy" could give it to
22 him. Since Nancy is MORALES's sister who lives with MORALES, I believe MORALES was
23 indicating that even though she was not home, Nancy could give the weed to the "guero." Therefore,
24 completing the drug transaction between herself and another MS13 member.

25 200. Other intercepted conversations indicate that MORALES is involved in marijuana
26 distribution to other MS-13 members as well. On June 19, 2018, MORALES, using Target Facebook
27 #10, sent a message to MS-13 member R.E., using Target Facebook #17. In the message, MORALES
28 asked, "Hey, how did you tell me it was on this?" MORALES then sent a photograph of a green

1 substance on a scale. I recognize from my training and experience in drug investigations that the
2 photograph was of buds of marijuana. The scale in the photo read 1.04, indicating that the marijuana
3 weighed 1.04 grams. R.E. responded, "it has to read 3.5" and told MORALES to weigh the marijuana
4 again and send him another picture. I know from my training and experience that drug dealers will often
5 weigh their narcotics on a scale before distributing them. I therefore believe that when MORALES sent
6 R.E. a photograph of 1.04 grams of marijuana on a scale, and R.E. told MORALES that it had to read
7 3.5, R.E. was instructing MORALES on how to prepare marijuana to be sold. Also during these
8 messages MORALES explains that she took this marijuana from a bag that those "guys" stored in her
9 garage. I believe those guys is in reference to MS13 members that MORALES allows to store marijuana
10 at her house. This belief is supported by intercepted communications which are laid out more fully
11 below, and indicate MORALES allows MS-13 members to store items at her residence.

12 201. In an effort to stimulate conversations on the court authorized intercepts on MORALES's
13 Facebook and cellular phone, Fresno Sheriff's Detectives contacted MORALES at her residence. Agents
14 had learned through intercepts that MORALES had recently traveled to Oakland and stayed with R.E.
15 In response to intercepted communications, surveillance units watched R.E.'s residence and saw
16 MORALES leaving R.E.'s residence in Oakland. After MORALES returned to Mendota, detectives
17 contacted MORALES and questioned her about her relationship with R.E. and her knowledge of the
18 murder that R.E. is suspected of having committed. During the interview, MORALES lied to detectives,
19 telling them she had not seen R.E. for more than a year. She denied having any knowledge of R.E.'s
20 involvement in a murder.

21 202. MORALES' willingness to lie to detectives further demonstrates her allegiance to MS-13
22 and its members.

23 203. On June 24, 2018, MORALES, using Target Facebook #10, sent a Facebook message to
24 an unknown male with the Facebook vanity name "Ernesto Hidalgo Reyesreyes" (100008231437375).
25 MORALES stated, "I went to drop off some weed over there where the buddy lives and it was as if your
26 car passed by."

27 204. On June 26, 2018, MORALES utilized Target Telephone #7 to engage in a text
28

1 conversation with an unidentified male (UM-37), who was using phone number (559) 776-4732. During
2 their text conversation, MORALES sent a text message to UM-37, asking him what the price of a ½
3 pound of “tamo” would be. Based on conversations with Officers from the National Police of El
4 Salvador, who are experts in regards to MS-13, they believe that word “tamo,” based on their
5 understanding of the Spanish slang used by MS-13 gang members, was a reference to marijuana. The
6 next message MORALES received from UM-37 was about an hour later, in which UM-37 texted,
7 “Hello, how is it? Did it pass? If you want we can talk tomorrow, what do you think?” Based upon the
8 above conversation, along my training, experience and knowledge, I believe that MORALES asked UM-
9 37 for a ½ pound of marijuana. Specifically, MORALES asked how much a ½ pound of marijuana
10 would be, then an hour later UM-37 asked MORALES, “How is it. Did it pass?” I believe that UM-37
11 was asking MORALES how she felt about the quality of the ½ pound of marijuana, which he had sold to
12 MORALES.

13 205. MORALES use of the word “tamo” is a play on the word Mota for marijuana. This term
14 has been used by several other MS13 members during this investigation. This is a code word used by
15 MS13 members and again demonstrates MORALES’ involvement with MS-13.

16 206. On June 21, 2018, Brenda Yajaira MORALES sold marijuana to AMADOR.

17 207. On June 21, 2018, at approximately 12:09PM, Yajaira MORALES, using TFA-10,⁶³
18 exchanged several messages with a Facebook user with the vanity name of Esmaily Gomez,⁶⁴ believed
19 to be used by Henry BONILLA. During the exchange, H. BONILLA wrote, “YAJA, Catracho is asking
20 if you’ll sell him a 20.” MORALES responded “yes. Just wait for me, where are you.” H. BONILLA
21 told her that he is at home. MORALES asked him which one and he responded, “where I live.” The two
22 agreed to meet an hour later. A few minutes later, MORALES, using TFA-10, received a message from
23

24 ⁶³ Target Facebook Account #10 had the display name of “Yajaira Morales,” a portion of Brenda MORALES’s true
25 name. Additionally, selfie style posted to the account depict the person of Brenda MORALES. A wiretap investigation was
26 conducted of Target Facebook Account #10. In addition to intercepts over MORALES’s Target Telephone #7, messages
27 were intercepted over Target Facebook Account #10 that indicated MORALES was traveling to Oakland to meet with
28 Rigoberto ESCOBAR. Physical surveillance was conducted that revealed MORALES did in fact travel to Oakland to
meeting ESCOBAR, confirming she was the user of Target Facebook Account #10.

⁶⁴ In text #611 on TT#19, BONILLA texts and refers to himself as “Repollin.” On 7/14/18 at 1253 hours, BONILLA
sends a message on his Facebook account (Esmaily Gomez) giving his cellular phone number of (559) 630-3628, which is
TT#19. Because of this I know that H. BONILLA is the user of this account.

1 Lorenzo AMADOR using TFA-9.⁶⁵ The message read, "At what time will he arrive? Tomorrow when
2 they give me the check I'll give him the money." MORALES responded, "It's just that I'm washing and
3 made lunch. Once I finish." Based on these calls, members of the investigative team set up surveillance
4 on 629 4th Court, Mendota, CA, the residence of MORALES. The investigative team observed
5 MORALES get into a silver Honda and drive from her residence to 711 Oxnard, Mendota, CA. Upon
6 arriving, she stopped in front of the residence and investigators observed AMADOR come from the
7 residence and walk to her vehicle. The investigative team observed them meet for no longer than 15
8 seconds. I know that when BONILLA said that Catracho wanted 20, he was telling her that AMADOR,
9 who goes by the moniker Catracho, wanted \$20 worth of narcotics. I believe that MORALES agreed to
10 sell him that amount of narcotics and delivered it later that night. I know meeting with an individual for
11 less than 15 seconds is consistent with a hand to hand drug transaction.

12 208. Based on the intercepted calls, in combination with surveillance, I believe that H.
13 BONILLA and MORALES conspired to provide a controlled substance to AMADOR in violation of 21
14 USC § 841(a)(1), possession with intent to distribute a controlled substance, to wit marijuana and 21
15 USC § 846, conspiracy to distribute or possess with intent to distribute controlled substances.

16 209. On August 20, 2018, Agents intercepted Facebook messages with ALFARO-TORRES
17 talking to MORALES. MORALES is asking ALFARO-TORRES to move the "thing" that they had
18 placed at her house. She advised that the police were chasing someone nearby and she was afraid they
19 would end up searching her house. MORALES also advised ALFARO-TORRES that detectives had
20 been stopping by trying to ask her questions. MORALES arranged to leave the "thing" behind the truck
21 parked at her house. ALFARO-TORRES agreed to have it moved. Based on my training and
22 experience I believe the "thing" is a gun. I believe this based on previous calls with BARRERA-
23 PALMA and others discussing picking up a gun and bringing it back to Mendota and finding a place to
24 store it.

25 210. I also know from physical surveillance, review of pole camera video, and data from a
26

27 ⁶⁵ On 6/21/18 at 2153 hours, AMADOR using his FB profile "Mejia Mejia," sent his cellular telephone number of
28 (559) 630-1810 in a FB message to FB profile "Chago Solorio." In call #16900 on TT#6, AMADOR states that he lives on
Oxnard. Agents know that AMADOR lives at 711 Oxnard, Mendota, and have observed him at that residence.

1 court-ordered GPS tracker that is installed on a vehicle referred to by Mendota MS-13 members as the
2 “clique car,” that the MS-13 “clique car” has been parked at MORALES’s house for at least two weeks.

3 211. As discussed above, I know MS-13 members frequently engage in the sale of narcotics,
4 including marijuana, in furtherance of the enterprise. I therefore believe that there is probable cause that
5 MORALES has distributed, possessed with intent to distribute, conspired to distribute and possess with
6 intent to distribute marijuana in furtherance of the MS-13 enterprise. I also believe MORALES’s actions
7 of storing a vehicle and possibly a gun at her house shows her intent to aid the MS-13 enterprise in its
8 day-to-day criminal operations.

9 **8) MS-13 Enterprise Members BARRERA-PALMA and ALFARO-TORRES Work**
10 **Together to Sell Marijuana in Mendota**

11 212. On August 11, 2018 and August 13, 2018, ALFARO-TORRES, using **TFA-18**
12 exchanged a series of messages with a yet to be fully identified individual who used the Facebook vanity
13 name of “Efrain Rodriguez”, the user of Facebook account # 100001259638625. During these
14 conversations, the two men discussed the sale of marijuana and cocaine.

15 213. On August 11, 2018, at 5:54PM, ALFARO-TORRES, using **TFA-18**, sent the following
16 message to Rodriguez, “Alright, do you know how much a half ounce of coke is running for?”
17 Rodriguez responded, “Depends on how much the thing is, but I’ll find out.” ALFARO-TORRES
18 followed up with “Yeah, help me out with that.” Rodriguez agreed to check it out and then followed up
19 with, “Yeah, I’ll look into it right now brother.” Based on my training and experience I know that when
20 the two men talk about “coke” they are talking about cocaine. I know that the two men are talking about
21 purchasing an amount of cocaine that is more consistent with a purchase with the intent to distribute
22 than an amount used for personal use. Because of this, I believe ALFARO-TORRES and Rodriguez are
23 discussing the purchase of narcotics with the intent to distribute.

24 214. On August 12, 2018, ALFARO-TORRES and Rodriguez discuss the purchase of
25 marijuana. At 12:20PM, ALFARO-TORRES, using **TFA-18**, received a message from Rodriguez which
26 read “Are you going to want the pound of marijuana?” followed by “It’s the crazy kind” and “If you
27 guys move it, I will give you a sample.” ALFARO-TORRES responded, “The money will be ready
28

1 tomorrow” and “Look the money will be ready tomorrow, but the thing will be if these guys like the
2 product. First we have to give them some to try because I don’t know too much about that. If they like it
3 then we will get it.” Rodriguez then said, “Yeah that's fine, I will give you a sample. I will give you a
4 blunt so you can show them and if you want it let me know” followed by “Well yeah, No one can get
5 that product around here. That thing is crazy. Don’t think I’m giving you something that isn’t good. You
6 can try it and only you know if you're going to buy or not.” ALFARO-TORRES responded, “Cool, I will
7 be there around 30 minutes to check it out. Tomorrow I will be with all the guys and hopefully they like
8 it so we can make the deal and that other thing we talked about.” ALFARO-TORRES and Rodriguez
9 then discuss a good time to meet. Based on my training, experience, and knowledge of this investigation,
10 I believe Rodriguez and ALFARO-TORRES were conspiring to distribute marijuana. When Rodriguez
11 asked ALFARO-TORRES, “If you guys move it, I will give you a sample,” he was telling ALFARO-
12 TORRES if ALFARO-TORRES and others would distribute the marijuana Rodriguez would provide
13 ALFARO-TORRES a sample of marijuana. When ALFARO-TORRES responds to Rodriguez, “Look
14 the money will be ready tomorrow, but the thing will be if these guys like the product. First we have to
15 give them some to try because I don’t know too much about that. If they like it then we will get it,”
16 ALFARO-TORRES was telling Rodriguez he will have money ready to buy the pound tomorrow but the
17 deal was contingent on ALFARO-TORRES and others liking the product.

18 215. Later on in the evening, agents intercepted Facebook messages between ALFARO-
19 TORRES and BARRERA-PALMA, using **TFA-23**,⁶⁶ further conspiring to distribute marijuana. At

21 ⁶⁶ Agents identified BARRERA-PALMA as the user of **Target Account #23**. On July 23, 2018, State TT-1, used
22 by Denis BARRERA-PALMA, received a call from a phone used by Margarita VALENCIA. The call was intercepted
23 pursuant to an order to intercept wire and electronic intercepts. During the call, BARRERA-PALMA and VALENCIA
24 discussed the FBI reaching out to inquire about BARRERA-PALMA’s involvement in a Los Angeles area homicide. During
25 the call, VALENCIA told BARRERA-PALMA that he should change his number (State TT-1) and to deactivate his
26 Facebook, specifically referring to the Facebook that bears his name, Denis Barrera, identified as **Target Account 2**. Since
27 July 24, 2018, at approximately 10:02 pm, BARRERA-PALMA stopped using **Target Account 2**. On July 23, 2018, at
28 9:03am, SA Ryan Demmon observed there were Facebook communications between a Facebook used by VALENCIA and
Facebook account ID 100027608350123, Wanako Reyes (**Target Account 23**). This was the first time this account appeared
in the case, indicating the account may be used by BARRERA-PALMA.

26 A wiretap was initiated on Target Facebook Account #23. Intercepts over Target Account #23 also revealed
27 BARRERA-PALMA was the user of this account. Specifically, Agents believed BARRERA-PALMA was the user of the
28 account based on his frequent contacts with VALENCIA, his girlfriend. The content of these communications also revealed
he was the user of this account. Specifically, discussing his current issues he had with VALENCIA.

1 about 9:10PM, ALFARO-TORRES, using **TFA-18**, sent an audio message to BARRERA-PALMA, the
2 user of TFA-23. BARRERA-PALMA and ALFARO-TORRES discussed selling marijuana. During the
3 message ALFARO-TORRES said "Hey [UI] two, he can talk. It's just that, that's the issue about the
4 Tamo he already has the pound here to... he says that nine hundred bucks and the dudes says it's really
5 good" BARRERA-PALMA responded, "What time are you going to let me know if it's going to happen
6 or what?" To which ALFARO-TORRES responded "At night for sure dude." BARRERA-PALMA
7 agreed by saying "Alight fine dog." ALFARO-TORRES told BARRERA-PALMA "Yes he wants the
8 money tomorrow." To which BARRERA-PALMA responded "Fine, it can be done, get it." ALFARO-
9 TORRES confirms with BARRERA-PALMA, "Yes, so I'll tell him yes," and BARRERA-PALMA
10 affirms by saying "Fine."

11 216. Based on intercepted calls and my knowledge of this investigation, I believe ALFARO-
12 TORRES was telling BARRERA-PALMA about getting a pound of marijuana. I believe when
13 ALFARO-TORRES told BARRERA-PALMA about needing the money tomorrow and BARRERA-
14 PALMA responded, "Fine, it can be done, get it," BARRERA-PALMA was affirming to ALFARO-
15 TORRES that BARRERA-PALMA and others could get the money together to buy the marijuana.

16 217. The next day, on August 13, 2018, agents intercepted a series of messages between
17 ALFARO-TORRES and Rodriguez. ALFARO-TORRES and Rodriguez continued to discuss
18 trafficking cocaine. At 1:23PM, ALFARO-TORRES, using **TFA-18**, received a message from
19 Rodriguez which read "How about that other thing? Tell that fool that for 500 I got you some good
20 stuff." ALFARO-TORRES confirmed the deal by sending, "Alright cool. Look, I have to run an errand
21 tonight, but in the morning for sure, but it's a done deal." ALFARO-TORRES followed that message
22 with another which read, "Alright, but don't tell anyone about that fool's stuff. Just you, he and I know
23 about it." Rodriguez agreed by sending, "Yeah, that's stuff is confidential, you know."

24 218. Based on my knowledge of this investigation, coupled with the previous conversation
25 between Rodriguez and ALFARO-TORRES on August 11, 2018, I believe Rodriguez was telling
26 ALFARO-TORRES that he could get a half ounce of cocaine for \$500.

27 219. On August 14, 2018, ALFARO-TORRES, using **TFA-18**, sent a series of messages to
28

1 BARRERA-PALMA which read “What up, dog?” “It was 2000 from yesterday.” and “There was 1,100
2 profit from there.” BARRERA-PALMA asked, “Did they pick it all”, ALFARO-TORRES responded,
3 “Yeah, all of it, dog.” BARRERA-PALMA told ALFARO-TORRES, “That’s good. Hey, and do you
4 have the rest of the money that was leftover?” ALFARO-TORRES affirmed by stating “Yeah” and
5 explaining “It’s 4 tablas.”

6 220. Based on the intercepted Facebook conversation and my knowledge of this investigation,
7 I believe ALFARO-TORRES was telling BARRERA-PALMA about how much ALFARO-TORRES
8 and others made selling drugs. Furthermore, when ALFARO-TORRES told BARRERA-PALMA,
9 “There was 1,100 profit from there,” ALFARO-TORRES was telling BARRERA-PALMA that
10 ALFARO-TORRES and others made from selling drugs. Based on the conversation between ALFARO-
11 TORRES and BARRERA-PALMA on August 12, 2018, about purchasing a pound of marijuana from
12 Rodriguez for \$900, the investigative team believes ALFARO-TORRES and others sold the \$900 pound
13 of marijuana and made \$2000, thus profiting \$1100. I know that when BARRERA-PALMA asked if he
14 has any money left over, and ALFARO-TORRES said he had “4 tablas”, I know that he means \$400. I
15 believe that BARRERA-PALMA is asking ALFARO-TORRES if there is any money left over, because
16 the money belongs to the gang. I believe this is the case, because on August 12, 2018, when the two
17 talked about money, BARRERA-PALMA told him when asked about money, that “it can be done, get
18 it”. This message shows that ALFARO-TORRES did not use his own money to purchase the marijuana
19 and that the profits from the sale are not his, but belong to the gang.

20 221. On August 14, 2018, at 12:00PM, ALFARO-TORRES, using **TFA-18**, exchanged a
21 series of messages with BARRERA-PALMA. ALFARO-TORRES sent “Today I’m coming to deliver to
22 the dudes, so 15 days, okay?” to which BARRERA-PALMA replied, “Today I’m coming to deliver to
23 the kids, so 15 days, okay?” followed by “Fewer.” ALFARO-TORRES clarified “less[?]” BARRERA-
24 PALMA sent a message that read “10.” ALFARO-TORRES agreed, “10, Alright, that’s fine.” Based on
25 my training, experience and knowledge of this investigation, I know that ALFARO-TORRES and
26 BARRERA-PALMA are talking about distributing drugs to be sold by gang members. I know when
27 ALFARO-TORRES said that he is going to deliver to the dudes, he is talking about distributing gang
28

1 drugs to the members of the gang to resell. I know that once they sell these drugs, they will be required
2 to give the proceeds of the narcotics back to the gang. When ALFARO-TORRES asked “so 15 days,
3 okay,” I know that he is asking BARRERA-PALMA the amount of time that the gang members have to
4 sell the narcotics. Based on these messages, I know that they finally agree to give each of the members
5 10 days to sell the narcotics. I know that because they have a time limit, that the proceeds will go
6 directly back to the gang, because if the proceeds were to go to the individual members, it would not
7 matter how long it took them to sell the narcotics.

8 222. I further know the intent is to distribute to the gang for sale, because of another
9 intercepted series of messages. After talking to BARRERA-PALMA, ALFARO-TORRES, using **TT-**
10 **18**, placed a call (#10214) to UM505. During the call ALFARO-TORRES said that he would bring him
11 “two tablas.” UM505 asked when it would be and ALFARO-TORRES told him 10 days. UM505 said he
12 wasn’t sure if he could do that. ALFARO-TORRES told him that they had agreed that everyone would
13 do that. ALFARO-TORRES ultimately agreed to give him one instead of two. I believe this shows that
14 ALFARO-TORRES is following the direction of BARRERA-PALMA, to get the narcotics to the gang
15 to be sold within the next ten days. I believe that UM505 thinks he is unable to do that and ALFARO-
16 TORRES decides to give him less.

17 223. ALFARO-TORRES regularly distributes and monitors the drugs trafficking activity of
18 members of MS-13 in Mendota, CA. On July 15, 2018, ALFARO-TORRES, using **TT-18**, received a
19 call from MEMBRENO. During the call with MEMBRENO, ALFARO-TORRES asked how much he
20 had moved yesterday and MEMBRENO said he had moved three. ALFARO-TORRES asked him what
21 had happened to the 120. MEMBRENO said that he would try to get “Guero” to move them later. I
22 know based on my training and experience and knowledge of this case that he is talking about moving
23 narcotics. I know based on the previously detailed calls, that gang leadership requires that members
24 move a certain amount of narcotics in specific time periods. I believe that ALFARO-TORRES is
25 checking up on the progress of MEMBRENO. When MEMBRENO told him that he would have
26 “Guero” move them later, I believe he is talking about fellow gang member Christian HIDALGO.

27 224. On the same day, ALFARO-TORRES, using **TT-18**, received an incoming call from
28

1 Marvin VILLEGAS-SEGOVIA. During the call, ALFARO-TORRES asked him if he had the money for
2 the "Toma". SEGOVIA and ALFARO-TORRES discuss who SEGOVIA had sold to and how much he
3 owed. They both ultimately agreed that SEGOVIA owed \$40 and would pay later that day or the next.
4 ALFARO-TORRES agreed. I know that "toma" a word that member of MS-13 made up by rearranging
5 the letters of "mota", which is common slang for marijuana.

6 225. On August 13, 2018, ALFARO-TORRES, using **TT-18**, placed a call to an unindicted
7 co-conspirator. The unindicted co-conspirator told him it would be a few more days for the "3 tablas."
8 ALFARO-TORRES said that it was okay and that he would see him at the meeting tonight. I believe
9 that this call shows the unindicted co-conspirator owes money (tablas) to the gang. I believe that it is
10 ALFARO-TORRES' responsibility to collect these drug debts.

11 226. On August 16, 2018, ALFARO-TORRES, using **TT-18**, placed a call to NAVARETTE-
12 MENDEZ. During the call, NAVARETTE-MENDEZ asked where he was and ALFARO-TORRES told
13 him he was heading towards his house. ALFARO-TORRES told him he was coming over with the
14 "puro." I believe that when ALFARO-TORRES said he is bringing over the "puro", he is referring to the
15 narcotics that ALFARO-TORRES and BARRERA-PALMA had discussed distributing before.

16 227. I believe these intercepts show that BARRERA-PALMA directs drug trafficking for MS-
17 13 in Mendota, CA. I believe that ALFARO-TORRES primarily moves the narcotics throughout the city
18 at the direction of BARRERA-PALMA and also keeps track of the drug proceeds for the gang.

19 ***9) MS-13 Enterprise Member Christian HIDALGO's Distribution of Narcotics***
20 ***and Collection of Drug Proceeds for the Benefit of the Enterprise.***

21 228. HIDALGO is an MS-13 gang member that sells MS-13 narcotics. HIDALGO distributes
22 and delivers the gang's narcotics to other gang members and to narcotics customers of the MS-13 gang.
23 HIDALGO is also utilized to collect money and coordinate with other MS-13 gang members the
24 retrieval of money from other gang members that have sold MS-13 narcotics. Based on intercepted calls
25 and surveillance, HIDALGO has attended MS-13 gang meetings in Mendota.

26 229. On June 23, 2018, in call #1319 on TT#1 (Denis BARRERA-PALMA), BARRERA-
27 PALMA and HIDALGO discuss the "old man" (Mario GARCIA-VILLANUEVA) and "Javi"
28 (Francisco LIZANO) and that GARCIA-VILLANUEVA already gave \$100 to LIZANO. BARRERA

1 asks HIDALGO what money he was going to give. HIDALGO tells BARRERA-PALMA that
2 HIDALGO had talked to the "old man" (GARCIA-VILLANUEVA) and that he (GARCIA-
3 VILLANUEVA) said that GARCIA-VILLANUEVA did not have anything and the rest of the money
4 had not been collected. BARRERA then told HIDALGO that they have until next week to collect the
5 money and that there have been too many excuses given. BARRERA advised HIDALGO that
6 HIDALGO would be held accountable because he was responsible for the matter. HIDALGO
7 responded by telling BARRERA that it is not HIDALGO's fault (that the money hasn't been paid), but
8 that it was the "old man's" (GARCIA-VILLANUEVA) fault. BARRERA scolded HIDALGO and told
9 HIDALGO that HIDALGO had until next week to get the matter taken care of.

10 230. Based on my training and experience and my knowledge of this case, I believe that
11 BARRERA, who is the leader of the Park View Locos Salvatruchas (PVLS) MS-13 criminal street gang
12 in Mendota, is working with HIDALGO to collect the narcotics proceeds for the gang.

13 231. On June 28, 2018, in call#296 on TT#9, HIDALGO talks to Ever MEMBRENO and
14 wants MEMBRENO to come over so that they (HIDALGO and MEMBRENO) can go talk to
15 "Inquieta"⁶⁷ (Margarita VALENCIA) and the "old man" (GARCIA-VILLANUEVA). MEMBRENO
16 tells HIDALGO he will reach out to Melvin (Barrera) to get a car. HIDALGO asks where the car for the
17 gang was. MEMBRENO says that it (gang or clique car) was with "Repollo" (Henry BONILLA).

18 232. In this call, HIDALGO is speaking with another MS-13 gang members (MEMBRENO)
19 and they talk about several other MS-13 gang members in Mendota. The call also details the fact that
20 HIDALGO has access to the gang or clique car and wanted access to use the car. I know that a person
21 who was not an MS-13 gang member would not be allowed access to use this car.

22 233. On July 5, 2018, in call #936 on TT#9, HIDALGO and MEMBRENO discuss where
23 their current locations. MEMBRENO tells HIDALGO that he wants to know where HIDALGO is so
24 they (HIDALGO and MEMBRENO) can go drop off the stuff. The two men then discuss meeting later
25 so that they can do this (drop off the stuff). Based on my training and experience and knowledge of this

26 _____
27 ⁶⁷ This moniker is known to me through both intercepts and information provided from LAPD gang detectives who
28 have had personal contact with VALENCIA and intercepted her on a previous wiretap in Los Angeles.

1 investigation, I believe that MEMBRENO wants HIDALGO to go with him to deliver narcotics.

2 234. On July 8, 2018, in call #1211 on TT#9, MEMBRENO and HIDALGO discuss money
3 that HIDALGO owes. MEMBRENO tells HIDALGO that MEMBRENO doesn't necessarily want the
4 money to come from his (HIDALGO's) pocket but from "Chaparro's" (Marvin VILLEGAS-
5 SEGOVIA), who is another MS-13 gang member. HIDALGO says that he has attempted to contact
6 Chaparro. MEMBRENO and HIDALGO discuss how much money Chaparro has and that HIDALGO
7 also owes MEMBRENO \$40. HIDALGO tells MEMBRENO that he will pay what he owes.
8 MEMBRENO says that MEMBRENO needs to get as much (money) as possible and that they needed to
9 get the other "gallina"⁶⁸ (hen). HIDALGO says he understands and will try to get a hold of Chaparro.
10 In a follow-up call (#1225), HIDALGO says that he has collected the money from Chaparro and wants
11 to know if MEMBRENO wants to meet to get the money.

12 235. In this call, I believe that MEMBRENO is collecting drug money from HIDALGO and
13 wants HIDALGO to assist him in collecting drug and gang money from Chaparro (VILLEGAS-
14 SEGOVIA) so that MEMBRENO can purchase additional narcotics (gallina-hen) for the gang.

15 236. On July 15, 2018, in call #1812 on TT#9, MEMBRENO tells HIDALGO that
16 MEMBRENO wanted to check on the thing from yesterday because MEMBRENO found three "hits"
17 and the rest were in a bag. MEMBRENO says that he had not opened the bag. HIDALGO says there
18 were three "hits" and twenty dollars. HIDALGO explains that there was a twenty that was given on
19 credit from Friday. HIDALGO says the other bag was there and MEMBRENO should distribute it.
20 MEMBRENO asks how much it was and HIDALGO says that it was about three "tablas" (\$300 worth).
21 MEMBRENO says he had not seen it and HIDALGO tells him to check it, because it was three tablas.

22 237. In this call, I believe that MEMBRENO and HIDALGO are working together to sell
23 narcotics for the MS-13 gang and they are discussing what the gang has stashed in a certain location.
24 MEMBRENO and HIDALGO discuss how much narcotics are left that belong to the gang, how much
25 money they have, and how much drugs were provided on credit.

26 238. There are several calls on July 17, 2018, between Denis ALFARO-TORRES (TT#18)

27 _____
28 ⁶⁸ Based on my training and experience, and my knowledge of this investigation, I believe "gallina" is a reference to controlled substances other than marijuana.

1 and HIDALGO. During call #16323 (TT#18), ALFARO-TORRES tells HIDALGO that someone is
2 requesting two “ketos.” The MS-13 gang members in this investigation have mixed up the syllables in
3 words in an attempt to talk in coded language. Based on this information, I believe that ALFARO-
4 TORRES was asking HIDALGO for two “tokes,” which is referring to quantities of marijuana.
5 HIDALGO and ALFARO-TORRES discuss if the deal will happen and agree to talk later. During call
6 #1640 (TT#18), ALFARO-TORRES asks if it (the deal) could be done. HIDALGO tells ALFARO-
7 TORRES that “Gucci”⁶⁹ (Luis GUEVARA) has the stuff (marijuana), but that he (GUEVARA) did not
8 have a ride. ALFARO-TORRES advises HIDALGO that GUEVARA is not answering. ALFARO-
9 TORRES then asks HIDALGO where GUEVARA lives so that ALFARO-TORRES can have a third
10 party (UM286) go pick up the marijuana. ALFARO-TORRES and HIDALGO discuss how the deal will
11 happen and if the third party (UM286) knows GUEVARA. In call #1641 (TT#18), HIDALGO tells
12 ALFARO-TORRES that the guy (GUEVARA), lives at 250 Valenzuela, which is the known address for
13 GUEVARA. HIDALGO tells ALFARO-TORRES that GUEVARA already has the thing (marijuana)
14 and to send the third party (UM286) to pick it up.

15 239. This call demonstrates that HIDALGO is working with other MS-13 gang members to
16 distribute narcotics, including marijuana. In this instance HIDALGO is involved in coordinating the
17 narcotics transaction with MS-13 gang members ALFARO-TORRES and GUEVARA.

18 240. On July 18, 2018, in call #1872 (TT#18), HIDALGO asks ALFARO-TORRES if he has
19 the money for the “thing” because he (HIDALGO) had to hand over the money for the homie that was
20 inside (in jail). HIDALGO explains that the money is for “Mole” (Luis REYES-CASTILLO aka
21 Molesto), who is currently in custody in the Fresno County Jail. ALFARO-TORRES and HIDALGO
22 discuss a money transfer and HIDALGO taking a “tabla” (100) the other day. HIDALGO explains that
23 they have to send money to the homie every 15 days and ALFARO-TORRES says okay. During this
24 call, HIDALGO also tells ALFARO-TORRES that “Tamo” (believed to be Eric GUTIERREZ aka
25 Tamal), was in jail and had also called. HIDALGO says that “Tamo” had lost his phone and wanted to
26 talk to BARRERA-PALMA to explain some things.

27 _____
28 ⁶⁹ The investigative team determined Luis GUEVARA to be “Gucci” through intercepts and physical surveillance
conducting during the current investigation, including calls #649 and #653 on Target Telephone #18.

1 241. Based on this call and the overall investigation, I believe that HIDALGO and other
2 Mendota MS-13 gang members are providing money to MS-13 gang members that are in jail.

3 242. On July 18, 2018, in call #1898 (TT#18), ALFARO-TORRES calls HIDALGO and asks
4 him where he could leave that (money) for HIDALGO. HIDALGO asked if ALFARO-TORRES could
5 leave it (money) hidden somewhere. ALFARO-TORRES explains that he will be out there (Mendota)
6 later.

7 243. Based on this call, I believe that ALFARO-TORRES is leaving the money for HIDALGO
8 to pick up, which is going to be used for the MS-13 gang members in jail.

9 244. On July 21, 2018, in call #2879 (TT#18), ALFARO-TORRES calls HIDALGO and tells
10 him that there was business for “candy” (cocaine). HIDALGO asks where and ALFARO-TORRES tells
11 HIDALGO that is in Kerman and that the request was for forty, but that the buyer would pay twenty for
12 the delivery. HIDALGO said he would go, but had no vehicle, but that it would be worth it if it was for
13 sixty and twenty. ALFARO-TORRES says that he would ask (the buyer). ALFARO-TORRES says
14 that the buyer was “Pupusa” and HIDALGO says to tell him (Pupusa) that he still owes money from the
15 last time HIDALGO had given him some (cocaine). ALFARO-TORRES said that he did not know the
16 guy (Pupusa) owed money and that he would tell him about the money that was owed. ALFARO-
17 TORRES calls back (call #2883) and tells HIDALGO that it will only be forty, plus the twenty more for
18 the delivery. HIDALGO agrees to do the cocaine delivery and says to give him ten minutes.

19 245. Based on my training and experience and my knowledge of this case, I believe that
20 HIDALGO and ALFARO-TORRES are discussing “business” which is drug sales and that they are
21 attempting to sell “candy” which I believe is cocaine. Both ALFARO-TORRES and HIDALGO are
22 working together to get drugs delivered to a customer in Kerman, even charging a delivery fee for the
23 drug delivery. HIDALGO discusses that the buyer owes money from the last cocaine sale, showing that
24 there have been multiple deals with HIDALGO and other MS-13 gang members. ALFARO-TORRES
25 lives in Kerman and it would be easier for him to make a delivery to a drug customer in Kerman, but I
26 believe he does not have narcotics at the time of the call and requests another MS-13 gang member
27 (HIDALGO) to make the cocaine delivery because it will benefit the gang. Most drug dealers will not
28

1 have another drug seller make a deal with their customer and will just have the customer wait until they
2 get resupplied, so as not to lose the drug customer to another drug dealer. In this case, ALFARO-
3 TORRES and HIDALGO are working together as MS-13 gang members to complete the cocaine sale
4 and will do it, because it benefits the gang.

5 246. On July 31, 2018, in call #5460 (TT#18), HIDALGO tells ALFARO-TORRES that they
6 (HIDALGO and others) would be picking up ten dollars from everyone today. HIDALGO says that he
7 would explain to ALFARO-TORRES later because there were a lot of birds and they say they will talk
8 later.

9 247. Based on my training and experience and my knowledge of this investigation I believe
10 that HIDALGO is collecting ten dollars from all of the MS-13 gang members in Mendota, which is a
11 form of gang taxes, and will be used to purchase more narcotics for the gang. When HIDALGO says
12 that there are a lot of birds, I believe that he is referring to a saying "birds on the wire," in reference to
13 law enforcement possibly listening to calls. I believe that HIDALGO wants to meet with ALFARO-
14 TORRES in person so they do not have to talk on the phones and for the purpose of avoiding law
15 enforcement detection for the illegal gang activities that they are doing.

16 ***10) MS-13 Enterprise Members, Including Christian HIDALGO, Mario GARCIA-
17 VILLANUEVA, Denis ALFARO-TORRES, and H. BONILLA are Involved in
18 Narcotics Distribution and Collection/Use of Drug Proceeds to Benefit the
Enterprise.***

19 248. I know based on calls intercepted on TT#31, which I have reviewed during the course of
20 this investigation that TT#31 is used by GARCIA-VILLANUEVA, and that GARCIA-VILLANUEVA
21 is a leader at the status of "Homeboy" within the MS-13 enterprise. This is confirmed in the below
22 listed calls when GARCIA-VILLANUEVA directs the plan for the distribution of marijuana by the
23 gang, and the use of the future profits to provide resources to incarcerated MS-13 members. GARCIA-
24 VILLANUEVA directs MS-13 members on who will receive these proceeds, and directs other MS-13
25 members to distribute more of their narcotics supply, and to prepare members to obtain additional
26 narcotics. These profits are not used to benefit the individual seller and supplier as in a typical narcotic
27 transaction. These sales and subsequent profits are pooled together solely to be used as a shared resource
28 by MS-13 members in Mendota. Intercepted calls outlined in this document, demonstrate the profits

1 from the sales of both marijuana and cocaine are used to fund other gang activities, including a recent
2 trip to Los Angeles to recover a firearm that BARRERA-PALMA had supplied to MS-13 members
3 (including Wilfredo ESPINOZA) who used the gun to commit a murder.⁷⁰

4 249. One example of the pooled proceeds of the narcotics trafficking being used to benefit the
5 gang as a whole, occurred on August 11, 2018. On August 11, 2018, BARRERA-PALMA used
6 TFA#23 to complete VOIP calls and send a series of messages to TFA#18, which is used by ALFARO-
7 TORRES. After a VOIP call between the two, ALFARO-TORRES asked BARRERA-PALMA for “the
8 number, dog.” BARRERA-PALMA responded by sending ALFARO-TORRES the phone number of
9 213-318-1607 (UM500). BARRERA-PALMA stated, “That’s the number of the guy that’s coming
10 down.” BARRERA-PALMA informed ALFARO-TORRES that BARRERA-PALMA already talked to
11 UM500 and UM500 was on his way. BARRERA-PALMA and ALFARO-TORRES then have an
12 additional VOIP call.

13 250. On August 11, 2018, after the Facebook messages listed above, ALFARO-TORRES uses
14 TT#18 to call Mario GARCIA-VILLANUEVA on TT#31. During the call ALFARO-TORRES advised
15 GARICA that a “guy” from Salinas, who ALFARO-TORRES identifies as the brother of MS-13
16 member “Demon Killer,”⁷¹ is requesting one “tabla.” ALFARO-TORRES advised GARCIA-
17 VILLANUEVA that ALFARO-TORRES believes GARCIA-VILLANUEVA should give Demon
18 Killer’s brother \$100 from the gang. GARCIA-VILLANUEVA acknowledges that he knows who
19 ALFARO-TORRES is describing and indicates that HIDALGO has “it” (believed to be the \$100).
20 ALFARO-TORRES advises GARCIA-VILLANUEVA that ALFARO-TORRES is busy, so ALFARO-
21 TORRES will bring Demon Killer’s brother to GARCIA-VILLANUEVA to obtain the \$100.
22 ALFARO-TORRES advised GARCIA-VILLANUEVA that Demon Killer’s brother will arrive to see
23 GARCIA-VILLANUEVA about the \$100 in approximately 45 minutes. GARCIA-VILLANUEVA
24

25 ⁷⁰ ESPINOZA is currently in custody in Los Angeles pending attempted murder charges filed in Los Angeles
26 County Superior Court for a different incident than the referenced murder.

27 ⁷¹ I know from my training, experience, and participation in this investigation that "Demmon Killer" is Park View
28 MS-13 member Eduardo Orellana. This knowledge was obtained from LAPD gang detectives who previously intercepted
and subsequently arrested Orellana on a previous MS-13 wiretap investigation in Los Angeles.

1 states that he will take Demon Killer's brother to a place that is cooler; indicating that GARCIA-
2 VILLANUEVA intends to meet with Demon Killer's brother to provide the requested \$100.

3 251. Approximately four minutes later, GARCIA-VILLANUEVA uses TT#31 to call
4 HIDALGO on 559-382-4219. GARCIA-VILLANUEVA asks HIDALGO where the money is because
5 GARCIA-VILLANUEVA needs a "tabla."⁷² HIDALGO advises GARCIA-VILLANUEVA that there
6 are 4 tablas behind the furniture.

7 252. Later in the evening UM500, who based on the context of intercepted calls is believed to
8 be Demon Killer's brother, calls ALFARO-TORRES on TT#18. UM500 advises ALFARO-TORRES
9 that UM500 is outside. ALFARO-TORRES tells UM500 that ALFARO-TORRES and others are about
10 to arrive.

11 253. I believe this conversation, and the intercepts regarding the drug conspiracy which are
12 laid out in this affidavit, demonstrate how MS-13 members utilize the proceeds of their narcotics
13 trafficking to benefit the MS-13 enterprise as a whole. In this specific instance, an incarcerated MS-13
14 leader's brother (Eduardo ORELLANA) is requesting \$100 from the Mendota MS-13 members. The
15 initial request for the funds goes to MS-13 leader, BARRERA-PALMA. BARRERA-PALMA delegates
16 responsibility in handling the money disbursement to MS-13 member ALFARO-TORRES. ALFARO-
17 TORRES then contacts, GARCIA-VILLANUEVA, who has physical control of and keeps records on
18 the gang's monies. GARCIA-VILLANUEVA, who is one of only three MS-13 leaders at the status of
19 Homeboy in Mendota, makes the decision to utilize the gang's pooled proceeds to provide to
20 ORELLANA's brother, who is a representative of the Salinas MS-13 clique. GARCIA-VILLANUEVA
21 contacts HIDALGO about the logistics of where the gang's money currently is hidden. HIDALGO,
22 who lives at 307 Rios St. with GARCIA-VILLANUEVA, informs GARCIA-VILLANUEVA that
23 GARCIA-VILLANUEVA can find \$400 of the gang's money behind a piece of furniture. Based on the
24 fact that UM500 advises ALFARO-TORRES that UM500 had arrived, I believe that the \$100 of MS-13
25 narcotics proceeds was in fact distributed, through the MS-13 chain of command, to UM500. Thus, this
26

27 ⁷² As noted above, based on my training and experience and knowledge of this investigation the meaning of "tabla"
28 can mean \$100 cash or \$100 in narcotics. Here, I believe "tabla" means money because GARCIA is looking for money and
asks for a "tabla."

1 instance demonstrates how proceeds of MS-13's narcotics sales not only benefit the local clique, but are
2 disbursed throughout the entire MS-13 criminal enterprise and benefit the enterprise as a whole.

3 254. On August 20, 2018, ALFARO-TORRES, using TT-18,⁷³ placed a call to Henry
4 BONILLA. During the call ALFARO-TORRES asked H. BONILLA if H. BONILLA was "going to
5 want more tamo?" and H. BONILLA told him "I want a 50". ALFARO-TORRES responded, "There are
6 only tablas."⁷⁴ H. BONILLA agreed that "one should be good." ALFARO-TORRES confirmed "One
7 then? So I can drop it off today because I have to take that thing with me, because the house where they
8 are got heated."⁷⁵ The two men agreed to meet later that evening. ALFARO-TORRES told H.
9 BONILLA that ALFARO-TORRES would give H. BONILLA a call once ALFARO-TORRES picked
10 up the narcotics. I know that when they use the term "tamo," they are referring to marijuana, as
11 previously explained in this affidavit. I believe that when H. BONILLA agreed to take one tablas, he is
12 telling ALFARO-TORRES that he will take \$100 worth of marijuana.

13 255. Later that same day, at 6:44PM, ALFARO-TORRES, using TT-18, placed a call
14 (#14111) to 559-382-4219, used by HIDALGO.⁷⁶ During the call, the two men talked about how the
15 money from the drug proceeds was going to be divided. ALFARO-TORRES asked, "Hey, did you
16 already drop off the money that we're going to send to Mole?"⁷⁷ HIDALGO replied, "No, because

17
18 ⁷³ During intercepted calls on June 17, 2018, ALFARO-TORRES used Target Telephone #18 to talk about getting
19 gas and picking up Denis BARRERA-PALMA. During surveillance, agents observed ALFARO-TORRES getting gas and
20 making several calls to BARRERA-PALMA before picking up BARRERA-PALMA up at 310 Holmes in Mendota. This led
21 Agents to believe that ALFARO-TORRES was the user of Target Telephone #18. During an intercepted call on August 2,
22 2018, at 1604 hours, ALFARO-TORRES, using TT#18, called the Honduran Consulate's office and identified himself as
23 Denis Rodolfo ALFARO-TORRES and said that he was 28 years old.

24 ⁷⁴ The word "tablas" is used to represent 100, and in this context, I believe "tabla" means \$100 worth of marijuana
25 since ALFARO-TORRES asked H. BONILLA if he wanted more "tamo" (marijuana), and ultimately said there are only
26 "tabla[s]" available.

27 ⁷⁵ MORALES told ALFARO-TORRES that law enforcement had been around her residence (629 4th Court) and she
28 thought they should move "that thing" from her residence because she was worried that law enforcement could come "with a
paper wanting to search" her residence. MORALES had learned that "the cops were out there". MORALES told ALFARO-
TORRES that the cops "might be suspicious about something or they're looking for somebody."

29 ⁷⁶ I conducted a records check on cellular phone number (559) 382-4219, it is associated to the FB profile
30 "Guanakito Idalgo." FSO Deputy Richie Antunez listened to several intercepted MP3 audio files from the FB profile for
31 "Guanakito Idalgo" and intercepted calls from HIDALGO using cellular phone number (559) 382-4219, and determined that
32 this is the same voice, confirming that HIDALGO is the user of FB profile "Guanakito Idalgo. On 07/03/18 at 1918 hours,
33 FB profile Guanakito Idalgo sends a picture to FB Yajaira Morales (TFA#10). The picture shows an El Salvador ID with the
34 name Juan Manuel Idalgo (DOB 1/9/96) and the photo on the ID appears to be an older photograph of Christian HIDALGO.

35 ⁷⁷ Based on reviewing intercepted communications and other information learned throughout the course of the
36 investigation, I know that "Molesto" is a moniker for Luis Reyes-Castillo. I also know that Reyes is an MS-13 member and

1 Viejito is not here yet. He told me that you were going to give me a tabla” ALFARO-TORRES asked,
2 “Did Loco tell you?” HIDALGO replied, “Well yeah. If I’m telling you is because Loco told me.”
3 ALFARO-TORRES asked, “Oh well, if he told then yes, because he told me that it was going to be sent.
4 Are you in Mendota?” HIDALGO said, “I’m at Catracho’s. I came to drop the car⁷⁸ off. Are you
5 coming over?” ALFARO-TORRES said, “Yes, I’ll be right over, okay? I’m going to give you the
6 “tabla” also.

7 256. Based on this call, I know that when ALFARO-TORRES asked HIDALGO if he had
8 dropped off the money for “Mole” he is talking about Luis REYES-CASTILLO, who has the moniker of
9 Molesto. Throughout this investigation, members of the gang have called Molesto “Mole” for short. I
10 also know that gang members regularly put money on his books, because he is currently incarcerated for
11 an assault in which he was a participant in 2017. When HIDALGO said that he hasn’t put money on
12 Luis REYES’s books because “Viejito”⁷⁹ was not there, I believe that he is referring to GARCIA-
13 VILLANUEVA, who lives with HIDALGO at 307 Rios St., Mendota, CA. I know that members of the
14 gang call GARCIA-VILANUEVA “Viejito” which means old man in Spanish. I know when HIDALGO
15 said that “Loco” was going to give him a “tabla” he is saying BARRERA-PALMA has told HIDALGO
16 that ALFARO-TORRES is going to give HIDALGO \$100 for HIDALGO to give to REYES-
17 CASTILLO. I know that members of the gang regularly refer to BARRERA-PALMA as “Loco.” I
18 believe that this call, as well as calls further laid out below, show that members of the gang collect drug
19 proceeds and use some of the proceeds to support members who are incarcerated.

20 257. In response to the above calls, surveillance was conducted at MORALES’ residence, 629
21 4th Court. At 6:54PM, surveillance observed ALFARO-TORRES arrive at 629 4th Court. Surveillance

22
23 that he is also referred to as “Mole.” I know that Reyes is in custody currently and was at the time of the statement.

24 ⁷⁸ Based upon intercepted calls and communications and surveillance, I know that MS-13 members in Mendota
25 share one or two “clique cars.” The members use these vehicles as needed to conduct drug transactions, attend to gang
business in Los Angeles, and other matters.

26 ⁷⁹ On July 27, 2018, HILDAGO places a phone call to Brenda MORALES on TT#7 (Call #11575). During the call,
27 HILDAGO advises MORALES that HIDALGO will place “Viejito” on the phone. A male other than HILDAGO is then
28 placed on the phone and speaks with MORALES. Spanish linguists subsequently reviewed multiple calls on TT#31, which is
known to be used by GARCIA (as established in wiretap affidavit 1:18SW 00328LJO). The linguists conducted a voice
comparison and noted that the male voice referred to as “Viejito” on call #11575 is the same male voice as routinely uses
TT#31 (GARCIA); thus, I am confident that Viejito is a name MS-13 gang members use to refer to GARCIA.

1 units observed HIDALGO come out to ALFARO-TORRES' vehicle and speak with ALFARO-
2 TORRES through the passenger-side window of the vehicle.

3 258. As surveillance observed HIDALGO and ALFARO-TORRES together, GARCIA-
4 VILLANUEVA, using TT-31,⁸⁰ received a call from HIDALGO. HIDALGO initially asked "What
5 about the money for Mole?" GARCIA-VILLANUEVA responded, "What about the tamo?" HIDALGO
6 said, "Everything is going well, both things are good." GARCIA-VILLANUEVA asked "Is Tio there?"
7 HIDALGO replied, "Yes, he is. You tell him to put that down." GARCIA-VILLANUEVA then
8 instructed HIDALGO, "Tell him to put down 2 tablas. No, tell him that you guys have gotten a total of
9 three." HIDALGO asked, "But you have money with you, right?" GARCIA-VILLANUEVA replied,
10 "Yes, but it's going to be 3 with this one that he will give you."

11 259. After talking with GARCIA-VILLANUEVA, HIDALGO put ALFARO-TORRES on the
12 phone to further discuss the transaction. GARCIA-VILLANUEVA started by saying, "Look, they're
13 going to get 3 "tablas" for that stuff, so you can jot it down." ALFARO-TORRES asked, "Are you
14 guys going to get 3 more? Because I have 2 jotted down. Is it three more or three total?" GARCIA-
15 VILLANUEVA explained, "No, look, it's one that Canelo took, one that the other guys took, and this
16 one is going to Mole adds up to 3." ALFARO-TORRES confirmed he understood by saying, "Uh-huh,
17 so it's going to be 3 with this one. Okay, I'll jot it down." GARCIA-VILLANUEVA agrees and then
18 cautions ALFARO-TORRES, "Yes. We'll have to keep an eye on the rest of "material" that is there
19 because we might have to distribute it." ALFARO-TORRES said, "That's okay. I told Huerito
20 [HIDALGO] to let me know whenever you want us to distribute it, but he hasn't given me a set date."
21 GARCIA-VILLANUEVA then said, "You should put something down as soon as possible, old man,
22 because I think there's none available."

23 260. I know based on my training and experience, and knowledge of this investigation that in

24
25 ⁸⁰ I believe that GARCIA is the user of TT-31 based upon the following facts: TT-31 was frequently in contact with
26 the telephone number used by Karen Callejas. Callejas was GARCIA's girlfriend in 2015 when a search warrant was
27 executed at their residence located at 307 Rios, Mendota, California. On July 28, 2018, at 1601 hours, BARRERA-PALMA
28 used TA-23 to message ALFARO-TORRES, "Send me Ton's number." Ton is a moniker for GARCIA. ALFARO-
TORRES responded, "5595360396" (the number of TT-31). On August 12, 2018, agents conducted surveillance on GARCIA
as he was leaving his residence at 307 Rios Street. During the surveillance, calls were intercepted during the wiretap
investigation which corresponded with the surveillance. Agents also determined that the cell phone towers were hitting in the
same places that GARCIA was driving.

1 the above-described calls that ALFARO-TORRES and HIDALGO were calling GARCIA-
2 VILLANUEVA to get clarification on what to do with the clique's money and to ensure that everything
3 is accounted for. I know that when GARCIA-VILLANUEVA said, "they're going to get 3 "tablas" for
4 that stuff, so you can jot it down," GARCIA-VILLANUEVA is telling ALFARO-TORRES that there
5 has been a total of \$300 that has been taken out of the clique's community money. When GARCIA-
6 VILLANUEVA told ALFARO-TORRES he should "jot it down," GARCIA-VILLANUEVA means for
7 ALFARO-TORRES to make sure the gang's ledger which tracks income and expenses is up to date with
8 a withdrawal of \$300, which includes \$100 which will go to incarcerated MS-13 member Reyes-
9 Castillo. When GARCIA-VILLANUEVA said that ALFARO-TORRES should "put something down
10 as soon as possible, old man, because I think there's none available," ALFARO-TORRES was
11 informing GARCIA-VILLANUEVA that they are running low on marijuana and should order more so
12 they don't run out. As this call ended, surveillance units observed H. BONILLA come from the
13 residence and grab a bag from the passenger window of ALFARO-TORRES's vehicle, and take the bag
14 into the residence.

15 261. I believe that H. BONILLA was grabbing the previously discussed \$100 worth of
16 marijuana that ALFARO-TORRES agreed to deliver to H. BONILLA. A short time later, ALFARO-
17 TORRES and HIDALGO both left from 629 4th Court.

18 262. A few minutes after the men departed from 635 Lozano, ALFARO-TORRES, using TT-
19 18, placed an outgoing call to HIDALGO asking him about the amount of available marijuana.
20 ALFARO-TORRES started by saying, "I asked you if you took another "tabla" from the ones that are
21 with the girls and you said no." HIDALGO replied, "Remember you told me to give one to Tamagas?"
22 ALFARO-TORRES then said, "'I asked you, 'did you get the "tabla"? If not, I'll give it to you right
23 now' and you told me, 'No, I didn't.'" HIDALGO explained, "Your problem is that you get worked up
24 right away and don't let anyone to explain first. You asked me first if I got the money for Mole, okay?
25 You asked me, 'Did you get a "tabla"? Because Loco told me to get one and one, okay? That's why I
26 told you that I didn't. Right after, you told me about the weed and Tamagas' money. I gave you
27 Tamagas' weed and money, right?" The two men argue over who owes what "tablas" to who and
28

1 ultimately agree to work it out later.

2 263. In this call ALFARO-TORRES makes reference to HIDALGO taking money from the
3 stash of money which is “with the girls.” I believe this to be a reference to the residence located at 629
4 4th Court, Mendota, CA. I believe this because members of MS-13 are routinely observed at this
5 location and the residence is primarily inhabited by MORALES and her sister. I believe the remainder
6 of this conversation is comprised of the two MS-13 members continuing to account for the gang’s
7 collective money and drugs, including talking about BARRERA-PALMA’s orders to provide money to
8 REYES-CASTILLO. I believe this call further demonstrates how ALFARO-TORRES is responsible for
9 overseeing MS-13’s narcotics trafficking and is subsequently also accountable to the gang for the
10 proceeds derived from that trafficking.

11 264. Soon after this call, ALFARO-TORRES, using TFA-18, sent an audio message, at
12 7:12PM, to H. BONILLA. During the audio message he said, ““Look, put those 6 “tablas” away. And,
13 if anybody comes asking for, don’t take any from there unless you talk to me before. Don’t give any to
14 anyone otherwise, you’ll pay for it, dog. To avoid any misunderstandings, if anybody comes asking,
15 talk to me first. If I give you the okay, then go ahead. If anyone comes asking you, let me know before
16 you give them any.” H. BONILLA responds via audio message, “Alright, man. No worries that will be
17 stashed and available whenever you ask for it.” Based on these audio messages, I know that ALFARO-
18 TORRES is concerned about the disagreement he had with HIDALGO and wanted to make sure that
19 none of the marijuana is moved without his permission. I believe that ALFARO-TORRES is ultimately
20 responsible for keeping track of the narcotics and the drug proceeds for the gang. Based on this call, I
21 believe that the combined amount of marijuana at 629 4th Court, including the amount delivered to H.
22 BONILLA by ALFARO-TORRES totaled \$600 worth of marijuana.

23 ***11) MS-13 Enterprise Members POOL DRUG Proceeds to Benefit the Enterprise.***

24 265. Another example of GARCIA-VILLANUEVA’s leadership role and use of the gang’s
25 profits is demonstrated on August 23, 2018, at 7:14PM (Call #16421 on TT#18), ALFARO-TORRES
26 calls GARCIA-VILLANUEVA. ALFARO-TORRES tells GARCIA-VILLANUEVA that the “loco”
27 (Denis BARRERA-PALMA) asked GARCIA-VILLANUEVA to make a wire transfer to El Salvador
28

1 and that they (ALFARO-TORRES and GARCIA-VILLANUEVA) were each to pay half of the money.
2 GARCIA-VILLANUEVA asked ALFARO-TORRES how much money it was and ALFARO-TORRES
3 says that it was \$150 and it was to be sent for a homeboy from the gang in El Salvador that had been
4 shot. ALFARO-TORRES says that each of them would have to pay \$75. ALFARO-TORRES and
5 GARCIA-VILLANUEVA discuss how much money each has and both agree to split the cost of the
6 money being sent to the gang member in El Salvador. ALFARO-TORRES and GARCIA-
7 VILLANUEVA agree to meet later so that ALFARO-TORRES can get the money from GARCIA-
8 VILLANUEVA.

9 266. On August 23, 2018, at 7:22PM (Call #283 on TT#31), GARCIA-VILLANUEVA calls
10 Christian HIDALGO. GARCIA-VILLANUEVA tells HIDALGO to call "Tio" (Ever MEMBRENO)
11 and to have MEMBRENO add another \$75 for sending it "down there" (El Salvador). GARCIA-
12 VILLANUEVA repeats to HIDALGO three times to have him (MEMBRENO) add \$75 and HIDALGO
13 says that he will put "Tio" on the phone. "Tio" gets on the phone and GARCIA-VILLANUEVA says
14 that he hopes he (Tio) had everything in writing and that he (Tio) needs to get another \$75 which must
15 be sent down there (El Salvador). Tio tells GARCIA-VILLANUEVA that he has three "tablas"
16 (hundred) on his records. GARCIA-VILLANUEVA tells Tio that the \$75 should be sent down there (El
17 Salvador) and that he (Tio) should write it down. Tio tells GARCIA-VILLANUEVA that he will do
18 that and GARCIA-VILLANUEVA tells him not to forget to do the other errand. Tio tells GARCIA-
19 VILLANUEVA that he would see if he could do that now and GARCIA-VILLANUEVA tells him to
20 take off seven to eight "tablas" (hundred) to do the errand. Tio agrees and says ok.

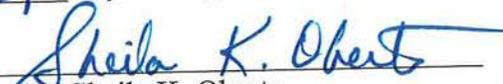
21 267. In these calls GARCIA-VILLANUEVA, directs HIDALGO to utilize more of their
22 pooled money to benefit another MS-13 member in El Salvador. In the call, ALFARO-TORRES
23 explains that the money is for a "Homeboy" and that BARRERA-PALMA authorized it. GARCIA-
24 VILLANUEVA directs MEMBRENO to document the expenditure and also to utilize an additional 7 to
25 8 hundred to complete another task that GARCIA-VILLANUEVA directs MEMBRENO to complete.
26 Based on other calls outlined in this affidavit, MS-⁵⁰⁰13 members in Mendota sell both marijuana and
27 cocaine. The profits from the sales of both these narcotics are used in the same shared resource pool.
28

V. CONCLUSION

270. Based on the foregoing evidence in this affidavit, I conclude there is probable cause to believe that the defendants violated the provisions of Title 18, United States Code, Sections 1959(a)(3) and 2, and Title 21, United States Code, Sections 841 and 846.


Ryan Yetter, Task Force Officer
Federal Bureau of Investigations

Sworn to before me, and subscribed in my presence,
this 29th day of August, 2018.


Honorable Sheila K. Oberto
United States Magistrate Judge