

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EFRAIN JACOBO

CASE NUMBER: 1:24-cr-00613

**FILED**  
12/19/2024  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**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 or about the below dates, in Joliet, in the Northern District of Illinois, Eastern Division, Efrain JACOBO violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 841(a)(1)	On or about October 24, 2024, knowingly and intentionally distributed a controlled substance, namely, 50 grams or more of methamphetamine
Title 21, United States Code, Section 841(a)(1)	On or about October 30, 2024, knowingly and intentionally distributed a controlled substance, namely, a quantity of cocaine
Title 18, United States Code, Section 922(a)(1)(A)	From on or about October 30, 2024 to November 14, 2024, willfully engaged in the unlicensed business of dealing firearms
Title 21, United States Code, Sections 846, 841(a)(1)	On or about December 18, 2024, knowingly and intentionally attempted to possess with intent to distribute, 500 grams or more of methamphetamine

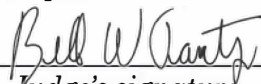
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

  
\_\_\_\_\_  
DANIEL DOMKE  
Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives (ATF)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 19, 2024

  
\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

BETH W. JANTZ, U.S. MAGISTRATE JUDGE  
*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, DANIEL DOMKE, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed by the ATF since December 2022. I was previously employed as a Police Officer with the Village of Glenview, Illinois for over eleven years. As part of my duties, I investigate federal criminal violations related to firearms trafficking, narcotics trafficking, criminal groups or organizations, violent crime related to narcotics trafficking and distribution, and violent crime related to violations of firearm statutes, up to and including homicide.

2. I received approximately twenty-six weeks of criminal investigative training from the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia and graduated from the Criminal Investigator Training Program (CITP) and ATF Special Agent Training (SABT). While at FLETC, I participated in investigations, which included the use of confidential sources and undercover officers, physical surveillance, electronic surveillance, the execution of search and arrest warrants on both physical and digital environments, including the use of court-ordered intercepts of wire and/or electronic communications, dialed number recorders (pen registers), telephone toll analysis, the arrests of drug traffickers, and the analysis of seized records, physical evidence, and taped conversations. These investigations have involved one, or all, of the following crimes: possession,

distribution, possession with intent to distribute, and manufacture of controlled substances, and laundering of monetary instruments. I have also spoken with confidential informants who have extensive knowledge of the inner workings of major narcotics trafficking organizations. Through these investigations and training, I am familiar with the operations of drug trafficking organizations in the United States.

3. I have participated in investigations that have led to the issuance of search warrants involving violations of firearm and narcotic laws. These warrants involved the search of locations including: residences of targets, their associates and relatives, “stash houses” (houses used as drug/money storage locations), cellular/camera phones, and computers. Evidence, searched for, and recovered in these locations has included controlled substances, firearms, records pertaining to the expenditures and profits realized there from, monetary instruments, and various assets that were purchased with the proceeds of the drug trafficking. As part of my duties, I have participated in the execution of multiple federal search warrants.

4. Through my investigations, training, and experience, and my conversations with other law enforcement personnel, I have become familiar with some of the tactics and methods used by narcotic traffickers to smuggle and safeguard narcotics, and to manufacture and distribute narcotics.

5. This affidavit is submitted in support of:

a. a criminal complaint charging that EFRAIN JACOBO has distributed narcotics, in violation of Title 21, United States Code, Section 841(a)(1)

and willfully engaged in the sale of firearms without a license in violation of Title 18, United States Code, Section 922(a)(1)(A) (the “Subject Offenses”).

b. a warrant to search the Apple iPhone 14 assigned call number 224-716-0988 (**Subject Phone**) for evidence of the Subject Offenses; and

c. a warrant to search the storage unit located at 1004 South Milwaukee Avenue, Unit #126, Wheeling, Illinois for evidence, instrumentalities, fruits, and contraband of the Subject Offenses.

d. a warrant to search the white Jeep Gladiator bearing Illinois license plate 3346106B and Vehicle Identification Number (VIN) 1C6HJTAGXNL105770 (**Subject Vehicle**) for evidence, instrumentalities, fruits, and contraband of the Subject Offenses.

6. The facts set forth in this affidavit are based on my personal knowledge, my training and experience, information provided to me by other law enforcement personnel, interviews of a confidential source, review of consensual recordings, and physical surveillance. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JACOBO with distribution of 50 grams or more of methamphetamine and a quantity of cocaine, engaging in the business of selling firearms without a license, and attempted possession with intent to distribute 500 grams or more of methamphetamine, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to

establish probable cause to believe that the defendant committed the offense alleged in the complaint.

7. The investigation to date has included the use of consensually recorded telephone and in-person conversations. Most of these conversations occurred in the Spanish language. The translations and summaries of recorded conversations in this affidavit do not include reference to all of the topics covered during the conversations. Quoted material from the recorded conversations as set forth in this affidavit is taken from draft translations and summaries, not final transcripts. In certain instances, conversations are translated, summarized, and placed in context. My understanding and interpretation of these conversations is based upon draft translations, the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation.

## **I. FACTS IN SUPPORT OF PROBABLE CAUSE**

### ***Background***

8. Since approximately October 2024, law enforcement, including the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and the Bolingbrook Police Department (BPD) have been investigating Efrain JACOBO for narcotics and firearms trafficking.

9. In summary, and as explained in detail below, in or around October 2024, a Bolingbrook Police Department undercover officer (BPD UC) reported to an ATF undercover agent (ATF UC) that Individual A knew an individual, later identified as Efrain JACOBO, that was selling firearms and narcotics. From October 24, 2024 to the present, the UCs have purchased approximately one pound of methamphetamine, 29 grams of cocaine, and seven firearms from JACOBO. The UCs have communicated with JACOBO, who was using the **Subject Phone**, before and after the deals. To all but one deal, JACOBO has driven the **Subject Vehicle** to and from the transactions.

10. Also, as part of the investigation, and as explained in further detail below, law enforcement has identified a storage unit that JACOBO frequently visits. On one occasion, JACOBO was seen counting out what appeared to be cash in the **Subject Vehicle** before entering the unit.

*October 24, 2024 Controlled Purchase of Methamphetamine*

11. On or about October 24, 2024, BPD UC arranged to meet Individual A and JACOBO at a location in Joliet, Will County, Illinois and arranged to purchase one pound of methamphetamine in exchange for \$2,200.

12. According to the audio/video recording and the UCs, at approximately 1603 hours, JACOBO and Individual A arrived at the meet location in Joliet, Will County, Illinois in a vehicle. Individual A and JACOBO arrived in a White Honda with Florida license plate 7825AR. This vehicle was later determined to be a Hertz rental vehicle. Individual A and JACOBO exited the Honda and met with the BPD

UC and ATF UC. JACOBO introduced himself to the UCs as “Efrain.” JACOBO removed a clear plastic bag containing a crystal-like substance. JACOBO handed the substance to the UCs in exchange for the \$2,200. The DEA lab determined the substance was methamphetamine hydrochloride and weighed approximately 452.9 grams. JACOBO told the UCs that he was able to obtain large amounts of methamphetamine as well as cocaine and fentanyl pills. JACOBO stated the price of the methamphetamine would go down if the UCs purchased five pounds or more at a time. JACOBO stated he had ten pounds of methamphetamine he’d sell the UCs for \$1,800 a pound. JACOBO further stated \$1,800 was a good price because he delivered them to Kenosha, Wisconsin and could get \$2,300 to \$2,400 a pound. JACOBO offered to sell the UCs “blue pills” (based on my training and experience, suspected fentanyl) for \$5 a pill and could get 1,000 or more pills. JACOBO asked the UCs if they were interested in a kilo of cocaine and stated he would sell them a kilo of cocaine for \$17,000. JACOBO stated he could get five to ten kilos of cocaine every ten or fifteen days. JACOBO further stated he picked up methamphetamine from Kansas City and delivered ten pounds to Wisconsin. JACOBO stated he currently had ten pounds of methamphetamine at home. JACOBO also stated he had a car with a compartment in which he fits ten pounds under each seat and about \$100,000 to \$200,000. JACOBO also offered to sell firearms to the UCs stating he had two guns for \$1,000 each and a rifle for \$2,500.00. Individual A and JACOBO left the area following the deal.

13. At the conclusion of the deal, DEA agents who were present at the deal told ATF agents they believed the person accompanying Individual A was named

“JACOBO.” An Illinois driver’s license image search of ‘Efrain Jacobo’ resulted in a positive identification from the UCs as JACOBO.

October 30, 2024 Controlled Purchase of 29 Grams of Cocaine and Two

Firearms

14. Between October 24, 2024 and October 30, 2024, BPD UC and Individual A exchanged phone calls and text messages arranging for the purchase of an ounce of cocaine and two firearms. Individual A told BPD UC that JACOBO would be conducting the deal without Individual A present. Individual A agreed JACOBO would conduct the transaction on October 30, 2024 at the location specified by the UCs in Joliet, Will County, Illinois.

15. On October 30, 2024, at approximately 1341 hours, the BPD UC received an incoming call from telephone number 224-716-0988 (**Subject Phone**). Based on the conversations with JACOBO from the previous transaction, the BPD UC recognized the voice as that of JACOBO. JACOBO informed the BPD UC that he was presently in Elmhurst and would be arriving at the meet location in Joliet in approximately one hour.

16. At approximately 1503 hours, JACOBO arrived at the meet location, in Joliet, Will County, Illinois. The meeting was audio and video recorded. JACOBO was the driver and sole occupant of the **Subject Vehicle**, which was registered to Efrain JACOBO at an address in the 800 block of E. Willow Road, Prospect Heights, Illinois. JACOBO exited the **Subject Vehicle** and met with the BPD UC and ATF UC. JACOBO subsequently produced a clear plastic bag containing a white powder-

like substance, along with two firearms: 1) a semi-automatic Hi Point Model C9, 9mm caliber pistol with an obliterated serial number, and 2) a semi-automatic CBC Model 715P .22 caliber pistol with a serial number that was damaged but was partially legible as EIC4361269. JACOBO handed the white powder-like substance and firearms to the UCs in exchange for the \$3,600. The white powder-like substance field-tested positive for cocaine and weighed approximately 29 grams. JACOBO also showed the UCs two separate clear plastic bags, each being a pound of purported methamphetamine and a separate ounce of purported cocaine. JACOBO attempted to get the UCs to purchase more narcotics that he had in his possession stating he had ten pounds of methamphetamine ready. JACOBO asked the UCs if they had a vehicle with a compartment he could buy or rent because he needed to take three to four kilos of cocaine to Iowa. JACOBO stated he sold the kilos of cocaine for \$20,000-\$22,000 in Iowa. JACOBO asked the UCs if they would be interested in bringing twenty kilos of cocaine from California. JACOBO drove away in **Subject Vehicle** following the deal.

*November 6, 2024 Controlled Purchase of Two Pistols, One Rifle, and Ammunition*

17. Between October 30, 2024 and November 6, 2024, the BPD UC negotiated with Individual A and JACOBO for the purchase of three firearms. According to the BPC UC, on November 5, 2024, at approximately 1402 hours, the BPD UC received an incoming text from the **Subject Phone**. The text was a photo of two handguns. Shortly after the text the BPD UC received an incoming call from the **Subject Phone**. The BPD UC recognized the voice of the caller as JACOBO due

to their previous conversations with JACOBO. In this call, JACOBO informed the BPD UC that he had three firearms for sale, two handguns and one rifle and the total price for the three firearms would be \$4,800. JACOBO informed the BPD UC that he would be dealing directly with JACOBO and not Individual A from now on. JACOBO told the UC he had both cocaine and methamphetamine for sale if the BPD UC was interested. JACOBO stated he would sell the UCs two to three pounds of methamphetamine for \$1,800 a pound. The BPD UC informed JACOBO he would call him back to let him know if he wanted the third firearm or any narcotics.

18. According to the BPC UC, on November 5, 2024, at approximately 1734 hours, the BPD UC called the **Subject Phone** and JACOBO answered. The UC informed JACOBO he would purchase all three guns. JACOBO stated the price would be \$4,800 for the three firearms. JACOBO again inquired whether the BPD UC wished to purchase the pounds of methamphetamine. The BPD UC stated he was not interested in the methamphetamine at that time. JACOBO stated he would meet the UCs in Joliet the following day, November 6, 2024, at approximately 1400 hours. JACOBO also offered ammunition for the firearms.

19. According to the BPC UC, on November 6, 2024, at approximately 1228 hours, JACOBO called the BPD UC from the **Subject Phone**. JACOBO stated he would be at the meet location in Joliet at approximately 1500 hours. At approximately 1456 hours, JACOBO called the BPD UC from the **Subject Phone** and informed the BPD UC he was on his way and was approximately a half hour away.

20. On November 6, 2024, at approximately 1600 hours, JACOBO arrived at the meet location in Joliet. The meeting was audio and video recorded. JACOBO was the driver and sole occupant of the **Subject Vehicle**. JACOBO exited the **Subject Vehicle** and met with the BPD UC and ATF UC. JACOBO subsequently removed three firearms from under the rear seat of the **Subject Vehicle**; 1) a semi-automatic DPMS A15 5.56 caliber rifle with serial number FFA051279, 2) a loaded semi-automatic Glock 43 9mm pistol with serial number ADTC652, and 3) a semi-automatic privately made 9mm pistol bearing no serial numbers. JACOBO exchanged the three firearms with the UCs in exchange for \$4,800.

21. According to the audio/video recording and the UCs, during this meeting, JACOBO told the UCs about trips he made to Iowa where he would bring three kilos of narcotics to Iowa and come back with \$50,000-\$60,000. JACOBO stated he gets paid \$2,000 for one pound of meth in Iowa. JACOBO told UCs he was being offered 100 kilos of meth from California for \$3,000 a kilo. JACOBO offered to sell the UCs ten pounds of methamphetamine for \$1,700 a pound. JACOBO also showed the UCs a photo on his phone of an AK-style rifle he offered to sell to the UCs. JACOBO stated he had that firearm and a switch for sale. In my training and experience, a switch is a machine gun conversion device which converts a semi-automatic firearm into an automatic firearm. Based on interest from the UCs, JACOBO stated he would call the person who had the switches for sale.

22. According to the UCs, at approximately 1621 hours, JACOBO walked away from the UCs and made a phone call on his cell phone. After he hung up the

call, JACOBO provided the UCs a price of \$200-\$250 per switch. JACOBO also informed the UCs he had a source of methamphetamine in California. JACOBO asked the UCs if they would be interested in purchasing large amounts of methamphetamine in the amount of 100-200 pounds. JACOBO stated he would be in touch with the UCs and drove away from the meet location in the **Subject Vehicle**.

*November 14, 2024 Controlled Purchase of Two Firearms*

23. According to the BPC UC, on November 8, 2024, at approximately 1729 hours, JACOBO called the BPD UC from the **Subject Phone**. JACOBO informed the BPD UC that he could get 100 kilograms of methamphetamine delivered to the Joliet area in approximately two to four weeks. The BPD UC expressed interest in the 100 kilograms of methamphetamine. JACOBO stated he would charge the BPD UC \$2,900 per kilogram if the BPD UC bought 80 kilograms or more. JACOBO informed the BPD UC that he usually has approximately ten kilograms of methamphetamine and one kilogram of cocaine in storage at all times.

24. According to the BPC UC, on November 11, 2024, at approximately 0903 hours, JACOBO sent the BPD UC a photo from the **Subject Phone**. The photo was a picture of a firearm. At approximately 0908 hours, JACOBO called the BPD UC from the **Subject Phone**. JACOBO told the BPD UC he was going to talk to his source of narcotics later in the day and wanted to know if the BPD UC and ATF UC were still interested in purchasing 100 kilograms of methamphetamine. The BPD UC advised JACOBO they were still interested. JACOBO stated he would charge the UCs \$2,900 per kilogram and that the narcotics should arrive in approximately two to

three weeks. JACOBO asked about the pistol he had sent in the photo. JACOBO stated he wanted \$1,100 for the pistol. JACOBO also asked if the UCs were interested in the rifle he previously had shown a photo of during the in-person meeting on November 6, 2024. JACOBO stated the rifle was \$1,700. JACOBO also offered the BPD UC two AR rifles for \$800-\$900 each. JACOBO stated the BPD UC would have to pick them up in Atlanta. JACOBO stated the price would go up to \$1,200-\$1,300 if the BPD UC wanted the rifles delivered.

25. On November 13, 2024, JACOBO contacted the BPD UC from the **Subject Phone** and offered to sell two handguns to the BPD UC for \$2,400. JACOBO agreed to meet the BPD UC at the usual location in Joliet.

26. On November 14, 2024, at approximately 1210 hours, JACOBO sent the BPD UC a text stating 'Listo a las 2:30 con las dos chicas' which translates to 'Ready at 2:30 with the small ones.' Based on previous conversations between the JACOBO and the BPD UC, JACOBO would describe "rifles" as "grandes" or "big" and handguns as "chicas" or "small." At approximately 1448 hours, JACOBO arrived at the meet location in Joliet. The meeting was audio and video recorded. JACOBO was the driver and sole occupant of the **Subject Vehicle**. JACOBO opened the rear door of **Subject Vehicle** and appeared to be removing something from under the rear seat.

27. According to the audio/video recording and the UCs, JACOBO sat down and removed a semi-automatic Taurus GX4 9mm pistol with serial number AGE247825 from his jacket pocket and handed it to the BPD UC. JACOBO removed a semi-automatic Ruger model SR22P .22 caliber pistol with serial number 367-39155

from his other jacket pocket and handed it to the ATF UC. After a short time, JACOBO removed an extra magazine for the 9mm Taurus with five rounds of 9mm ammunition and handed it to the BPD UC. Law enforcement database checks later revealed the Taurus GX4 and the Ruger pistol were previously reported stolen.

28. The UCs and JACOBO discussed JACOBO's connections in the Atlanta area that had switches and rifles for sale. The UCs indicated they may be in the Atlanta area the following week to conduct the purchase. JACOBO stated he would call the subjects in Atlanta to set up the deal.

29. JACOBO also stated the 100 kilograms of methamphetamine should be arriving in the next two weeks. JACOBO indicated the cost would be \$3,000 a kilogram. JACOBO stated if the UCs got 100 kilos of methamphetamine, they'd have four to six weeks to pay off the debt. The ATF UC later provided JACOBO with \$2,400 in exchange for the two firearms, which JACOBO then counted and placed in his pocket.

30. During the deal, a state court authorized vehicle tracker was installed on **the Subject Vehicle**. At approximately 1511 hours, JACOBO entered the **Subject Vehicle** and subsequently left the undercover location.

31. Based on a check of the ATF Federal Licensing System database, JACOBO does not possess a Federal Firearms License (FFL) necessary for engaging in the business of selling firearms.

*December 18, 2024 Methamphetamine Truck Intercept*

32. According to the BPC UC, on December 17, 2024, JACOBO shared tracking information with the BPD UC. The tracking information was for a truck traveling from Texas to Illinois. JACOBO relayed to the BPD UC that the tracking information was for a shipment which contained the previously discussed methamphetamine.

33. On December 18, 2024, BPD UC received a tracking alert that the truck was due to arrive at a shipping facility located in Bolingbrook, Illinois. ATF Special Agents and Bolingbrook Police personnel went to the shipping facility once the truck arrived. According to management at the shipping facility, the tracking information was for ten pallets. Management at the shipping facility allowed ATF Special Agents and Bolingbrook Police personnel to come onto the business property and inspect the shipment.

34. Shipping facility personnel unloaded the truck containing the expected shipment. Bolingbrook Police personnel walked their drug detection K9 around the shipment. The pallets were all close in proximity. According to the K-9 handler, the K-9 alerted to multiple pallets within the shipping order. All ten pallets contained what looked like landscaping bricks.

35. ATF Special Agents and Bolingbrook Police personnel removed the bricks from the pallets. Several of the bricks on the interior of the stack of bricks appeared misshapen. The misshapen bricks were broken open to reveal a canister

inside. The canisters contained a crystal-like material. The contents of a canister were later field tested and tested positive for methamphetamine.

36. Each pallet contained twenty-one bricks that each contained a canister containing methamphetamine. One canister containing methamphetamine weighed approximately 2.19 pounds. In total, the combined weight of the canisters containing methamphetamine was approximately 459.9 pounds.

*Storage Unit in Wheeling, Illinois*

37. During the undercover purchase of three firearms from JACOBO on November 6, 2024, JACOBO made the comment to the UCs that he was presently living in Rockford, Illinois. During this conversation, JACOBO also stated he had a storage unit in Des Plaines and Wheeling. In my training and experience and involvement in this investigation, I believe the context of the conversation suggests JACOBO was referring to storage units in Des Plaines, Illinois and Wheeling, Illinois.

38. On November 12, 2024, a state court judge authorized a trap and trace device on the **Subject Phone**. According to T-Mobile, the **Subject Phone** is an Apple iPhone 14, IMEI number 358393412668482. On November 15, 2024, the trap and trace device showed phone calls to telephone number (515) 227-6603, registered to a phone out of Fort Dodge, Iowa.

39. On November 16, 2024, a state court-authorized vehicle tracking device installed on the **Subject Vehicle** showed that at approximately 0700 hours, the **Subject Vehicle** left his residence in Belvidere, Illinois and drove approximately 300 miles to Fort Dodge, Iowa. After spending just a short time in Fort Dodge, the

**Subject Vehicle** drove the approximate 300 miles back toward the northern suburbs of Chicago. The **Subject Vehicle** drove past his residence in Belvidere, Illinois and drove directly to CubeSmart Self Storage, located at 1004 South Milwaukee Avenue, in Wheeling, Illinois. The **Subject Vehicle** only stayed at the CubeSmart Self Storage locker for a few minutes before leaving the area. As noted above, JACOBO previously talked to the UCs about selling cocaine and methamphetamine in Iowa.

40. In my training and experience, subjects involved in the illegal sales of narcotics and firearms will keep the narcotics, firearms, and proceeds in self-storage units. This is a technique to insulate themselves and their home from the illegal activity. JACOBO drove approximately 5-6 hours to Iowa, stayed for a short time, and then drove back 5-6 hours. In my training and experience, I believe JACOBO dropped off a large quantity of narcotics to a customer in Iowa and then returned with the proceeds, which he put in the storage unit.

41. On November 18, 2024, at approximately 1:39 p.m., JACOBO called BPD UC from the **Subject Phone**. Among other things, JACOBO told the UC that he got rid of five pounds of meth in Iowa.

42. On November 18, 2024, the vehicle tracking device showed that at approximately 1937 hours, the **Subject Vehicle** again visited the CubeSmart Self Storage, located at 1004 South Milwaukee Avenue, in Wheeling, Illinois. The **Subject Vehicle** stayed at the storage unit for approximately 20 minutes and then left the area.

43. On November 19, 2024, the vehicle tracking device showed that at approximately 1250 hours, the **Subject Vehicle** again visited the CubeSmart Self Storage, located at 1004 South Milwaukee Avenue, in Wheeling, Illinois. The **Subject Vehicle** stayed for a short time and then left the area.

44. JACOBO's storage unit visits on November 18 and 19, 2024 occurred within a short amount of time of each other and on both occasions, he spent very little time there. Through my training and experience and knowledge of this case, JACOBO is selling large amounts of narcotics and illegal firearms, and these visits are indicative of using the storage unit to store illegal items and/or proceeds.

45. According to CubeSmart Self Storage, JACOBO is renting out unit #126. On November 22, 2024, a pole camera was then installed with a view of the outside of Unit #126 at the CubeSmart Self Storage.

*November 23, 2024 Storage Unit Visit*

46. On November 23, 2024, the vehicle tracking device showed that at approximately 1445 hours, the **Subject Vehicle** traveled to the CubeSmart Self Storage, Unit #126. Video from the pole camera showed the **Subject Vehicle** arrive at the storage unit and park. Though it is not clear, the video appeared to show JACOBO counting out piles of cash on the dashboard of the **Subject Vehicle**. The ATF UC that conducted each deal with JACOBO saw the pole camera footage and positively identified the person entering the storage unit as JACOBO. When JACOBO exited the driver's seat of the **Subject Vehicle**, he unlocked and entered the Unit #126 without anything in his hands.

47. After approximately three minutes inside the storage unit, JACOBO reappeared and went to the back driver's side door of the **Subject Vehicle**. JACOBO stood outside the **Subject Vehicle** and appeared to be doing something under or around the rear seat. The rear seat is the location where JACOBO removed the contraband from during two previous sales of firearms and narcotics to the UCs.

48. After approximately two minutes, JACOBO reentered the storage unit. It appeared JACOBO was carrying a smaller object in his left hand, possibly a stack of cash. JACOBO was in the unit for a couple of minutes, then returned and entered the driver's seat of the **Subject Vehicle**. JACOBO sat in the **Subject Vehicle** for a short time, then exited the **Subject Vehicle** and reentered the storage unit. It did not appear that JACOBO was carrying anything at this time. At approximately 2:58 pm, JACOBO exited the storage unit, secured the lock on the unit, reentered the **Subject Vehicle** and left the area.

*December 12, 2024 Storage Unit Visit*

49. According to video from the pole camera, on December 12, 2024 at approximately 3:48 pm, the **Subject Vehicle** arrived at the CubeSmart Self Storage #126 unit location. The **Subject Vehicle** parked in front of storage unit #126 and nobody exited the vehicle until approximately 4:06 pm. At that time, JACOBO, as identified by the ATF UC who witnessed the video, exited the **Subject Vehicle** and entered the storage unit carrying nothing visible in his hands. JACOBO remained in the storage unit for several minutes before emerging from inside with two bags in his possession. JACOBO opened the rear driver side door of **Subject Vehicle** and placed

the bags in the interior of **Subject Vehicle**. JACOBO secured the storage unit door, entered the **Subject Vehicle** and left the area.

*The Subject Vehicle*

50. Based on my training and experience, I know vehicles driven by individuals engaged in the sale of narcotics and illegal firearms may contain narcotics, illegal firearms, the financial proceeds from their sale, and other contraband.

51. On October 30, 2024 JACOBO used the **Subject Vehicle** to deliver cocaine and two firearms to UCs. On November 6, 2024, JACOBO used the **Subject Vehicle** to deliver three firearms to UCs. On November 14, 2024 JACOBO used the **Subject Vehicle** to deliver two firearms to UCs. On November 23, 2024, JACOBO was also seen counting out what appeared to be cash on the dashboard of the **Subject Vehicle**.

52. On November 16, 2024, a state-authorized vehicle tracking device showed the **Subject Vehicle** travel approximately 300 miles to Fort Dodge, Iowa, and stay for only a short time before driving approximately 300 miles directly to a storage unit rented by JACOBO.

53. Because, as explained above, the **Subject Vehicle** is associated with the target in this case and is used to deliver narcotics and firearms, there is probable cause to believe the **Subject Vehicle** contains evidence of violations of the Subject Offenses.

*The Subject Phone*

54. Based upon my training and experience, I know that cellular phones may contain relevant evidence of the narcotics offenses, including text messages made or received from the **Subject Phone** that are located in the memory of the **Subject Phone**, which messages may provide information regarding the identities of, and the methods and means of operation and communication used by, the participants in the narcotics offenses. Moreover, digital photographs located in the memory of the **Subject Phone** may contain images of the tools or participants involved in the narcotics and firearms offenses. Moreover, digital photographs stored in the **Subject Phone** may contain images of the user of the **Subject Phone**, the user's associates (including persons involved in or knowledgeable about the subject offenses), places frequented by the user of the phone leading up to and during the subject offenses, and locations and instrumentalities used in committing the Subject Offenses.

55. In addition, based on my training and experience, I know that information stored within a cellular phone may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, the information stored within a cell phone can indicate who has used or controlled the cell phone. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, contacts lists, instant messaging logs, and communications (and the data associated with the

foregoing, such as date and time) may indicate who used or controlled the cell phone at a relevant time. Further, such stored electronic data can show how and when the cell phone and its related account were accessed or used. Such “timeline” information allows investigators to understand the chronological context of cell phone access, use, and events relating to the crime under investigation. This “timeline” information may tend to either inculcate or exculpate the cell phone account owner.

56. Additionally, information stored within a cell phone may indicate the geographic location of the cell phone and user at a particular time (*e.g.*, location integrated into an image or video sent via email or text message to include both metadata and the physical location displayed in an image or video). Stored electronic data may also provide relevant insight into the cell phone owner’s state of mind as it relates to the offense under investigation. For example, information in the cell phone may indicate the owner’s motive and intent to commit a crime (*e.g.*, communications relating to the crime), or consciousness of guilt (*e.g.*, deleting communications in an effort to conceal them from law enforcement). Unless this data is destroyed, by breaking the cell phone itself or by a program that deletes or over-writes the data contained within the cell phone, such data will remain stored within the cell phone indefinitely.

57. Based upon my training and experience, I know that information maintained by cellular telephone providers may include records of calls made to and from the telephone number(s) associated with the **Subject Phone**. As such, the cellular phone numbers and identities of the cellular telephone companies obtained

from a search of the **Subject Phone** would enable the government to obtain information from the cellular telephone companies revealing calls made to and from the **Subject Phone** during the course of the commission of the narcotics offenses.

58. Through experience as a law enforcement officer and through the experience of other law enforcement officers as conveyed to me, I have learned that individuals involved in criminal offenses, including conspiracies to possess and distribute narcotics and traffic firearms, commonly use cellular telephones as a means to communicate, as JACOBO has here with the UCs. Individuals involved in criminal offenses including conspiracies to possess and distribute narcotics and traffic firearms also often store telephone numbers and names or nicknames of fellow conspirators on their telephones and the telephones also reflect recent call history. Finally, individuals often use text messaging and digital photographs in furtherance of their criminal activity that are stored on cellular telephones. Because, as explained above, the **Subject Phone** is associated with the target(s) in this case, because there was telephonic communication leading up to the narcotics and firearms transactions, and because, in my experience and in the experience of other agents, defendants use telephones to contact co-conspirators, there is probable cause to believe the **Subject Phone**, described further in Attachment A-2, contain evidence of violations of the Subject Offenses.

## II. SPECIFICS REGARDING SEARCHES OF ELECTRONIC STORAGE MEDIA

59. Based upon my training and experience, and the training and experience of specially trained personnel whom I have consulted, searches of evidence

from electronic storage media commonly require agents to download or copy information from the electronic storage media and their components, or remove most or all electronic storage media items (*e.g.* computer hardware, computer software, computer-related documentation, and cellular telephones) to be processed later by a qualified computer expert in a laboratory or other controlled environment. This is almost always true because of the following:

a. Electronic storage media can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take days or weeks, depending on the volume of data stored, and it would be generally impossible to accomplish this kind of data search on site.

b. Searching electronic storage media for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of an electronic storage media system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since electronic storage media evidence is extremely vulnerable to tampering or destruction (which may be caused

by malicious code or normal activities of an operating system), the controlled environment of a laboratory is essential to its complete and accurate analysis.

60. In order to fully retrieve data from a computer system, the analyst needs all storage media as well as the computer. The analyst needs all the system software (operating systems or interfaces, and hardware drivers) and any applications software which may have been used to create the data (whether stored on hard disk drives or on external media).

61. In addition, electronic storage media such as a computer, its storage devices, peripherals, and Internet connection interface may be instrumentalities of the crime(s) and are subject to seizure as such if they contain contraband or were used to carry out criminal activity.

62. The warrant I am applying for would permit law enforcement to obtain from JACOBO the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to unlock the **Subject Phone**. I seek this authority based on the following:

a. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that the **Subject Phone** offers users the ability to unlock the device through biometric features, namely, facial recognition features, in lieu of a numeric or alphanumeric passcode or password.

b. The **Subject Phone** is an Apple product with a facial recognition feature called "Face ID." During the Face ID registration process, the user holds the

device in front of his or her face. The device's camera then analyzes and records data based on the user's facial characteristics. The device can then be unlocked if the camera detects a face with characteristics that match those of the registered face.

c. In my training and experience, users of electronic devices often enable the aforementioned biometric feature(s) because it is considered to be a more convenient way to unlock a device than by entering a numeric or alphanumeric passcode or password. Moreover, in some instances, biometric features are considered to be a more secure way to protect a device's contents. This is particularly true when the users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

e. The passcode or password that would unlock the **Subject Phone** is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the devices, making the use of biometric features necessary to the execution of the search authorized by this warrant.

f. I also know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that the **Subject Phone's** biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, inactive, or has not been unlocked for a certain period of time. Thus, because the **Subject Phone** is a locked device equipped with biometric features, the opportunity to unlock the device through a biometric feature may exist for only a short time.

g. As detailed above, JACOBO is the user of the **Subject Phone** and has been using the **Subject Phone** to set up narcotics and firearms transactions with the UCs. Based on these facts and my training and experience, it is likely that JACOBO is one user of the **Subject Phone** and thus that his biometric characteristics are among those that are able to unlock the **Subject Phone**.

h. Due to the foregoing, the warrant I am applying for would permit law enforcement personnel to hold the device in front of the face of JACOBO and activate the facial recognition feature for the purpose of attempting to unlock the device in order to search its contents as authorized by this warrant.

### **III. PROCEDURES TO BE FOLLOWED IN SEARCHING ELECTRONIC STORAGE MEDIA**

63. Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant will authorize the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A-2 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol.

64. The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the below techniques. These techniques are a non-exclusive list, and the government may use other procedures if those procedures are designed to minimize the review of information not within the list of items to be seized as set forth in Attachment B-2:

a. examination of categories of data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B-2;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B-2;

c. surveying various file directories and folders to determine whether they include data falling within the list of items to be seized as set forth in Attachment B-2;

d. opening or reading portions of files, and performing key word or concept searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B-2; and

e. using forensic tools to locate data falling within the list of items to be seized as set forth in Attachment B-2.

65. The government will return any electronic storage media removed from the premises described in Attachment A-2 within 60 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

## **VI. CONCLUSION**

66. Based on the foregoing, I submit that there is probable cause to believe that between on or about October 24, 2024 and November 14, 2024, in Joliet, Will

County, the Northern District of Illinois, Eastern Division, EFRAIN JACOBO distributed approximately 452.9 grams of methamphetamine, approximately 29 grams of cocaine, in violation of Title 21, United States Code, Section 841(a)(1); and engaged in the business of selling firearms, specifically seven firearms, without a license in violation of Title 18, United States Code, Section 922(a)(1).

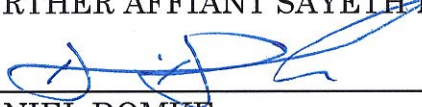
67. Based on the above information, I further submit that there is probable cause to believe the Subject Offenses have been committed, and that evidence relating to this criminal conduct, as further described in Attachment B-2, will be found in the **Subject Phone**, as further described in Attachment A-2. I therefore respectfully request that this Court issue a search warrant for the **Subject Phone** more particularly described in Attachment A-2, authorizing the seizure of the items described in Attachment B-2, pursuant to the protocol described in the addendum to Attachment B-2.

68. I also submit that there is probable cause to believe that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct, as further described in Attachment B-3, will be found in the storage unit located at 1004 South Milwaukee Avenue, Unit #126, Wheeling, Illinois, as further described in Attachment A-3. I therefore respectfully request that this Court issue a search warrant for the storage unit more particularly described in Attachment A-3, authorizing the seizure of the items described in Attachment B-3.

69. I also submit that there is probable cause to believe that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct, as further

described in Attachment B-4, will be found in the **Subject Vehicle**, as further described in Attachment A-4. I therefore respectfully request that this Court issue a search warrant for the **Subject Vehicle**, authorizing the seizure of the items described in Attachment B-4.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
DANIEL DOMKE  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

SWORN TO AND AFFIRMED by telephone December 19, 2024.

  
\_\_\_\_\_  
Honorable BETH W. JANTZ  
United States Magistrate Judge