

UNITED STATES DISTRICT COURT

for the
District of New Mexico



In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*
Subject Premises A-1 thru A-3 which are further
described in Attachments A-1 thru A-3, attached hereto
and incorporated herein

Case No. MR 26-734

Mitchell R. Elfers
Clerk of Court

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

See Attachments A-1 thru A-3, which are attached hereto and incorporated herein.

located in the _____ District of _____ New Mexico _____, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, which is attached hereto and incorporated herein.

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

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

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 846, and 841(a), and 18 U.S.C. §§ 924(c), 922 (g) and 924, and 371	Attempt and Conspiracy to Distribute Controlled Substances; Possession with Intent to Distribute Controlled Substances; Possession of a Firearm in Furtherance of a Drug Trafficking Crime; Being a Prohibited Person in Possession of Firearm or Ammunition; and Conspiracy

The application is based on these facts:

See attached affidavit.

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

Jordan Spaeth, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by _____ telephonically sworn and electronically signed _____ *(specify reliable electronic means)*.

Date: 04/10/2026

Judge's signature

City and state: Albuquerque, New Mexico

Steven C. Yarbrough, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE SEARCH OF:
**Locations A-1 thru A-3, which are fully described
below and in Attachments A-1 thru A-3, which are
attached hereto and incorporated herein**

Case No. _____

INTRODUCTION

1. I, Jordan Spaeth, Special Agent of the Federal Bureau of Investigation (“FBI”), being first duly sworn, make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the following subject premises and subjects:

	Subject Premises	Target Subject
A-1	358 58 th St NW Albuquerque, NM 87105	CRISANTOS GARCIA, aka: “VENTEX” GLORIA PADILLA
A-2	412 57 th St NW Albuquerque, NM 87105	CRISANTOS GARCIA, aka: “VENTEX”
A-3	329 64 th St NW Albuquerque, NM 87105	JONATHAN DOW, aka: “SLIM” ALAN GREEN, aka: “SHADOW” MANDEL PARKER, aka: “CHUCO” SAVANNAH SANCHEZ,

2. Hereinafter Locations A-1, A-2, and A-3, will collectively be referred to as the “Subject Premises.” A more detailed description and photographs of the Subject Premises are contained within Attachment A, which has been attached hereto and incorporated herein by reference.

3. I am requesting a warrant to search the Subject Premises for the items listed in Attachment B, which has been attached hereto and incorporated herein by reference.

PURPOSE OF THE AFFIDAVIT

4. Within the last week, the FBI Albuquerque Violent Gang Task Force (VGTF) learned about a conspiracy to help DAKOTA BRISCOE, aka: "OUTLAW," (BRISCOE) escape custody which involves the following subjects: CRISANTOS GARCIA, aka: "VENTEX" (VENTEX), GLORIA PADILLA (PADILLA), JONATHAN DOW, aka: "SLIM" (DOW), ALAN GREEN, aka: "SHADOW" (GREEN), and MANDEL PARKER, aka: "CHUCO" (PARKER), and SAVANNAH SANCHEZ (SANCHEZ), (hereinafter collectively referred to as the "Target Subjects"). During the course of the investigation, agents learned that the Target Subjects utilized the Subject Premises to traffic controlled substances, the specifics of the drug conspiracy are contained in the pages that follow.

5. This affidavit is submitted in support of three (3) warrants to search the Subject Premises, which are believed to contain evidence of conspiracies to commit drug distribution and illegal firearms possession. This affidavit is in support of search warrants seeking evidence of violations of the below violations, collectively referred to hereinafter as the "Target Offenses."

- a. 21 U.S.C. § 846 - Attempt and Conspiracy to Distribute Controlled Substances;
- b. 21 U.S.C. § 841(a) - Possession with Intent to Distribute Controlled Substances;
- c. 18 U.S.C. § 924(c) - Possession of a Firearm in Furtherance of a Drug Trafficking Crime;
- d. 18 U.S.C. § 922(g) and 924 - Being a Prohibited Person in Possession of Firearm or Ammunition; and
- e. 18 U.S.C. § 371 - Conspiracy.

6. I make this affidavit based upon my own personal knowledge, which is substantially derived from my participation in the investigation, as well as that of fellow agents and officers who have participated in the investigation. In addition, I have developed information I believe to be reliable from additional sources including:

- a. Information provided by Task Force Officers (“TFO”), Special Agents (“SA”), FBI Intelligence Analysts, and other law enforcement officials (“agents”), including oral and written reports that I have received directly or indirectly from said investigators;
- b. Results of physical surveillance conducted by agents during the investigation;
- c. A review of telephone toll records and subscriber information;
- d. A review of driver’s license and automobile registration records;
- e. Records from commercial databases; and
- f. Records from the National Crime Information Center (“NCIC”).

7. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

AFFIANT’S RELEVANT TRAINING AND EXPERIENCE

8. I am a Special Agent with the FBI and have been since 2018. I have completed all necessary training that is required annually to maintain a federal law enforcement officer certification. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest and search warrants. Furthermore, I am a law enforcement officer of the United States within the meaning of 18 U.S.C.

§ 2510(7), and I am empowered by law to conduct investigations and to make arrests for criminal offenses, to include those enumerated in 18 U.S.C. § 2516.

9. I have been a sworn law enforcement officer for 17 years. My career with the FBI began in Albuquerque in 2018, when I was assigned to the Violent Crime Task Force. During my time on the Violent Crime Task Force, I investigated violent repeat offenders, the “worst of the worst” in the Albuquerque area, those who participated in crimes such as commercial store robberies, carjackings, bank robberies, interstate threats, violations of federal firearm laws and the Controlled Substances Act. I am currently assigned to the Violent Gang Task Force (“VGTF”), which investigates criminal enterprises involving violent gang members and their associates who participate in murders, violations of the Controlled Substances Act, firearms violations, racketeering, and other violations of federal law.

10. My investigative training and experience include, but is not limited to, reviewing and analyzing phone records, interviewing subjects, targets, and witnesses, writing affidavits for, and executing search and arrest warrants, collecting evidence, conducting surveillance, and analyzing public and financial records. I have conducted hundreds of hours of surveillance on subjects, gang members, and associates suspected of, charged with, and/or convicted of violations of federal law, to include violations of the offenses in this investigation. Over the course of my career, I have arrested hundreds of persons for offenses including, but not limited to, murder, armed robbery, firearm violations, bank robbery, illegal narcotics possession and distribution, racketeering, and aggravated assault and battery. I have also been responsible for serving subpoenas and supervising cooperating sources and undercover agents; coordinating controlled

drug buys from violent gang members and murderers. I have been qualified as an expert on drug trafficking and firearms in federal court.

11. I am the government's lead case agent in the investigation of the Brew Town Locos ("BTL") Gang. Over the course of that investigation, which began in 2020, more than 35 BTL Gang members and associates have been federally charged and convicted, and dozens have been arrested on state charges. Throughout my law enforcement career, I have interviewed dozens of gang members, from biker gangs to prison gangs, including leadership and associates. I have also participated in the execution of dozens of search warrants on gang members, their associates, sources of drug supply, residences, and property for evidence of racketeering activity, VICAR murder, violations of the Controlled Substances Act, cockfighting, and federal firearms violations. During the BTL investigation, VGTF agents have seized almost \$800,000 in US Currency and property; seized more than 150 firearms, including multiple stolen firearms, machineguns; seized tens of thousands of rounds of ammunition and high-capacity magazines; seized distribution amounts of heroin, fentanyl, and methamphetamine. I have briefed the FBI Director and United States Attorney on the BTL investigation.

12. I have investigative training and experience related to analyzing telephonic data and conducting electronic and physical surveillance; which includes writing phone search warrant affidavits, monitoring wire and electronic intercepts, as well as utilizing that information for use in charging those individuals.

13. I am familiar with matters including, but not limited to, the means and methods used by persons, drug trafficking organizations ("DTOs"), and gang criminal enterprises to purchase, transport, store, and distribute illegal drugs, and to hide profits generated from those

transactions. I also have experience in analyzing and interpreting drug codes and cryptic dialogue used by drug traffickers. In addition, my knowledge in the matter of drug trafficking conspiracies, such as drug codes and cryptic dialogue used by drug traffickers, comes from information obtained from other experienced agents and witnesses as well as my own observations.

14. I have investigated multiple DTOs and am familiar with how they use cell phones to facilitate their illegal ventures. I have been involved in the search of dozens of cell phones for evidence of drug trafficking. While searching suspect phones, I have located hundreds of text messages which discuss hiding, selling, buying, and otherwise trafficking controlled substances and firearms. I have also located dozens of text messages which discuss the presence of suspected undercover law enforcement vehicles, identities of suspected police informants, and other conversations about evading law enforcement. During residential search warrants, I have located pages worth of documents, including federal search warrant affidavits, which exist for the purpose of discovering law enforcement informants. I have also participated in several Title III wire taps which resulted in seizures of substantial amounts of controlled substances, firearms, and cash.

15. This case is being investigated by the FBI. I have personally participated in the investigation of the offenses described below and make this affidavit based on my participation in the investigation and based on reports and information made available to me by other agents, Task Force Officers, and local law enforcement officers.

**BACKGROUND ALLEGATIONS REGARDING
GANG/DRUG CRIMINAL ENTERPRISES**

16. Based upon my training, experience, and participation in the investigations of prison and street gangs, DTOs, and other criminal enterprises, I am aware of the following information:

a. The Westside Locos (“WSL”) are a street gang in Albuquerque. Gang Detectives describe the WSL gang territory as being located generally West of Coors Blvd between I40 to the North and Dennis Chavez Blvd to the South. WSL gang members identify themselves with the letters “WSL,” “W,” or “WS.” WSL gang members also utilize the “W” from the Washington Nationals Baseball Club, “DC” from the Washington Nationals because the “D” and “C” interlock to make an “O” between them, and the Chicago White Sox emblem because it looks like “SOC” for “Shooting on Chaos.”¹ WSL gang members also utilize the New Mexico Zia symbol and numbers 03, for the 3rd generation of West Side, or “WSL DOC MOB” which means Death on Chaos. First and second-generation West Side gangs consist of the West Wide Happy Homes, Stoners Only, West Gate Locos, and West Side 98th Street. Most WSL members identify as members of the Burqueños in New Mexico jails and prisons. When in the federal prison system, most WSL members fall under the Nuevo car and work out with the Sureños. I have included some WSL gang tattoos below:

¹ The “Chaos” refers to one of the WSL rival gangs, called “Thugs Causing Kaos.”



Above L to R: Photos of WSL gang tattoos, Duke City with the Washington Nationals Baseball logo inside the NM Zia, under the words “Duke City.” “DOC,” an acronym for Death on Chaos, “WS” meaning West Side. “WSL,” an acronym for West Side Locos.

- b. Gang members in New Mexico frequently work together to distribute drugs. In recent years, I have observed traditional gang rivalries set aside and associations be formed to distribute controlled substances and make money.
- c. I know that gang members frequently display symbols, numbers, letters, words, as well as their gang monikers in their tattoos, graffiti, social media photos, drawings, and on clothing as a way of displaying their affiliation, loyalty, and commitment to the gang.

- d. Members of gang/criminal enterprises and DTOs are also individuals engaged in the type of criminal conduct constituting the Target Offenses (Attempt and Conspiracy to Distribute Controlled Substances; Possession with Intent to Distribute Controlled Substances; Possession of a Firearm in Furtherance of a Drug Trafficking Crime; Being a Prohibited Person in Possession of Firearm or Ammunition; Escape; Aiding and Abetting; and Conspiracy) often conceal evidence of their activities in their residences and businesses, or the residences of friends or relatives, and in surrounding areas to which they have ready access such as garages, carports and outbuildings. They also conceal evidence in vehicles, including vehicles outside of their residences and businesses, so that they have ready access to it and so that they can hide it from law enforcement, including law enforcement officers executing search warrants at their residences or businesses. Evidence also may be found in other areas to which these individuals have ready access, such as rented storage areas and safety deposit boxes, or buried underground on their property.
- e. This documentary evidence includes: telephone numbers, address books, travel receipts, notes referencing aliases or coded names, false identification, money order receipts, money orders, money remittance receipts, pre-paid money cards such as, MoneyPak, Wal-Mart, Green Dot, or other debit cards, CashApp electronic logs or records, bulk U.S currency, money collection logs, such as "tally" sheets, drug load sheets, shipping/ mailing receipts, detention facility inmate number lists or addresses for inmates or detention facilities.

- f. Members and associates of gang/criminal enterprises and DTOs are also individuals engaged in the type of criminal conduct constituting the Target Offenses. These individuals aggressively pursue informants, suspected informants, and persons who are considered to have betrayed the gang(s). I am aware gang members relay such information to one another through covert communications, messages, emails, telephone calls, personal visits, and letters.
- g. I know that members and associates of gang/criminal enterprises and DTOs have access to numerous cellular phones, often at the same time, to avoid law enforcement monitoring. I have observed individuals who are involved in drug trafficking routinely use pre-paid phones requiring no subscriber information, or fictitious subscriber names, to advance their unlawful activities. These cellular telephones often contain names and phone numbers of other co-conspirators, text messages utilized to further their illicit activities, photographs and videos of gang members, controlled substances, drug proceeds, or firearms.
- h. In addition, I am also familiar with the use of text messaging, instant messaging, and messaging applications, used by gang/criminal enterprises and DTOs to advance their unlawful activities.
- i. In my training and experience, members and associates of gang/criminal enterprises and DTOs make money selling drugs. These individuals usually sell drugs for cash and usually pay co-conspirators in cash. Because large quantities of drugs can sell for thousands of dollars at the wholesale level, dealers may have thousands of dollars in cash on hand both as proceeds of sales and to purchase

supplies/inventory. I have been on multiple search warrants wherein upwards of \$60,000 cash was seized. In addition, these individuals often have other assets generated by their drug business, or purchased with cash earned, such as expensive jewelry, real estate, vehicles, and other valuables.

- j. Members of gang/criminal enterprises and DTOs often try to legitimize these profits from the sale of drugs. To accomplish this goal, these individuals may utilize banking institutions, real estate and businesses, both real and fictitious. They also try to secret, transfer and conceal the money by (a) placing assets in names other than their own to avoid detection while maintaining control, (b) laundering money through what appear to be a legitimate business or businesses, (c) hiding the money in their homes, safes and safety deposit boxes, and/or (d) using the money to buy assets which are difficult to trace. This evidence is useful in a criminal prosecution, and it also is useful in identifying real and personal property that can be seized and forfeited by the government under existing laws. Documentation concerning this type of activity can be stored on digital media and concealed virtually anywhere.
- k. Members of gang/criminal enterprises and DTOs often maintain records of their transactions in a manner similar to the record keeping procedures of legitimate businesses. Even after the drugs are sold, documentary records often remain for long periods of time, even years, to memorialize past transactions, especially when debts remain open. I have located notes documenting the status of accounts receivable and accounts payable, and the names and phone numbers of suppliers, customers, and co-conspirators, and other associates who have assisted drug

traffickers in other ways, such as helping with the cleansing of otherwise “dirty” money. I am aware such proceeds may be made to appear “clean” through a variety of means, including investments into legitimate enterprises and structuring deposits of large amounts of U.S. Currency into financial institutions in such a way so as to avoid the detection by law enforcement, as well as reporting requirements of banking institutions. These records can be electronic or maintained on paper, in the form of business and personal ledgers and diaries, calendars, memoranda, pay-owe sheets, drug ledgers, IOUs, miscellaneous notes, money orders, customer lists, and phone address books. These records can reflect names, addresses and/or telephone numbers of associates and co-conspirators, the sale and purchase of controlled substances, customer lists, and amounts of money owed to the trafficker by customers and by the trafficker to his/her suppliers. I have personally been involved in search warrants which resulted in the discovery of such records that were more than a year old.

1. Members of gang/criminal enterprises and DTOs often conceal evidence of their drug trafficking activities in their residences and businesses, or the residences of friends or relatives, and in surrounding areas to which they have ready access, such as garages, carports, and outbuildings. They also conceal evidence in vehicles, including vehicles outside of their residences, so that they have ready access to it and so that they can hide it from law enforcement officers executing search warrants at their residences or businesses. I have also observed individuals involved in drug trafficking bury evidence underground in containers on their property.

- m. Individuals involved in gang/criminal enterprises and DTOs possess items of identification, including but not limited to, driver's licenses, rent receipts, bills, and address books. These items may be relevant to the identity of those involved in the criminal enterprise, the possessor of the items seized, and occupants of the premises searched.
- n. Members of gang/criminal enterprises and DTOs often take, or cause to be taken, photographs and/or videos of themselves, their associates, their property and their drugs. They usually maintain these photographs and/or videos on their person or in their businesses, residences or cars, or in the residences of friends or relatives. Cellular phones often have the capability to take still photos and videos, and these individuals frequently use these devices to take their photographs and videos.
- o. Members of gang/criminal enterprises and DTOs often maintain firearms and ammunition on their person or in their homes, businesses or cars to protect themselves and their illicit profits. They also may maintain indicia of firearms such as receipts for firearms and ammunition, boxes for firearms and ammunition, firearms cleaning supplies, and instruction manuals and other documentation for firearms and ammunition.
- p. I know that weapons (including rifles, shotguns, and handguns) are tools of the trade for members of gang/criminal enterprises and DTOs who often keep firearms in close proximity to themselves, and their product and proceeds, to protect them from other criminals and law enforcement. I am aware that these individuals use, possess, and conceal bladed and/or blunt weapons, such as knives, shanks, razor

blades, metal pipes, metal fittings, edged weapons; and firearms; to include rifles, shotguns, and handguns. These weapons are used and possessed by members of the gang to commit murders, attempted murders, assaults, robberies, to protect illicit drug supplies and proceeds, to avoid arrest or escape from custody, to intimidate rivals, victims, witnesses, and persons who have betrayed the gang(s), to impose discipline within the gang, and for other violent crimes. I know that firearms are instrumentalities of the crime of drug trafficking and that firearms are critical “tools of the trade” for the gang(s). It has been my experience that gang members and associates are expected to possess and maintain weapons and firearms.

- q. I am aware that members of gang/criminal enterprises and DTOs often possess firearms to protect their drug supply and proceeds. Similarly, these individuals utilize firearms to collect drug debts and discipline persons for non-payment. Some of these individuals use firearms to rob other drug dealers of drugs and illicit proceeds.
- r. The items described above are often stored by members of gang/criminal enterprises and DTOs on their person, in their businesses, residences and surrounding garages, outbuildings, and yards, the residences of friends or relatives, and vehicles.
- s. Members of gang/criminal enterprises and DTOs often utilize digital video surveillance systems. A digital video surveillance system is a surveillance system that is capable of capturing images, videos, and audio that can be compressed, stored or sent over communication networks. I know that it is common for digital

surveillance systems to contain storage media that allow for 30 days or more of camera footage to be stored on the system. Digital video surveillance systems can be used for nearly any environment, including a commercial business or residence. I know that gang members make use of video surveillance systems to monitor who is approaching their residence and assess whether the person presents a threat. Members of gang/criminal enterprises and DTOs also utilize surveillance equipment to obtain advance notice when law enforcement arrives to hide or destroy evidence of criminal activity. However, given the constant recording that occurs with a digital surveillance system, it is also common that the digital video surveillance system will also depict evidence of the residents' crimes and conversations related to those crimes.

- t. Documents showing who owns, occupies, or controls the location being searched also show who is responsible for the items found on the premises, including contraband and other evidence seized. Documents and items showing the identity of the persons owning, residing in or controlling the area being searched include, but are not limited to, mail, utility and telephone bills, tax returns, keys, deeds and receipts. These documents may also be produced electronically, downloaded from online accounts or scanned into digital format and stored on cellular phones.
- u. The term "cellular phone" includes all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including mobile phones, smartphones, and tablets.
- v. In my training and experience, I know that subjects who have warrants often believe

that law enforcement is watching them and they often live at an address that is not publicly available. I know that records of their actual residence may be located at their residence of record, such as keys, receipts, rent, mail, utility and telephone bills, deeds, telephone bills, and vehicle registrations. Locating these items, which often have addresses on them, may assist law enforcement in locating the actual residence of the wanted subject.

17. A list of items agents seek authority to seize is in Attachment B.

BIOMETRIC ACCESS TO ELECTRONIC DEVICES

18. The warrant I am applying for would permit law enforcement to obtain from certain individuals the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to unlock devices subject to search and seizure pursuant to this warrant. 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 many electronic devices, particularly newer mobile devices and laptops, offer their users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners and facial recognition features. Some devices offer a combination of these biometric features, and the user of such devices can select which features they would like to utilize.
- b. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a

feature called “Touch ID,” which allows a user to register up to five fingerprints that can unlock a device. Once a fingerprint is registered, a user can unlock the device by pressing the relevant finger to the device’s Touch ID sensor, which is found in the round button (often referred to as the “home” button) located at the bottom center of the front of the device. The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

- c. If a device is equipped with a facial recognition feature, a user may enable the ability to unlock the device through his or her face. For example, Apple offers 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. Facial recognition features found on devices produced by other manufacturers have different names but operate similarly to Face ID.
- d. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are 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. As discussed in this affidavit, based on my training and experience I believe that one or more digital devices will be found during the search. The passcode or password that would unlock the device(s) subject to search under this warrant is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the device(s), 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 including those published by device manufacturers, that 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. For example, Apple devices cannot be unlocked using Touch ID when (1) more than 48 hours has elapsed since the device was last unlocked or (2) when the device has not been unlocked using a fingerprint for 4 hours *and* the passcode or password has not been entered in the last 156 hours. Biometric features from other brands carry similar restrictions. Thus, in the event law enforcement personnel encounter 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. In my training and experience, the person who is in possession of a device or has the device among his or her belongings at the time the device is found is likely a user of the device. However, in my training and experience, that person may not be the only user of the device whose physical characteristics are among those that will

unlock the device via biometric features, and it is also possible that the person in whose possession the device is found is not actually a user of that device at all. Furthermore, in my training and experience, I know that in some cases it may not be possible to know with certainty who is the user of a given device, such as if the device is found in a common area of a premises without any identifying information on the exterior of the device. Thus, it will likely be necessary for law enforcement to have the ability to require any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the device, to unlock the device using biometric features in the same manner as discussed above.

19. Due to the foregoing, if law enforcement personnel encounter an electronic device that is subject to seizure pursuant to this warrant and may be unlocked using one of the aforementioned biometric features, the warrant I am applying for would permit law enforcement personnel to (1) press or swipe the fingers (including thumbs) of any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the device, to the fingerprint scanner of the device; (2) hold the device in front of the face of those same individuals 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.

CONFIDENTIAL HUMAN SOURCES

20. During the course of this investigation, FBI case agents utilized multiple Confidential Human Sources² (hereinafter “CHS” for both singular and plural) to infiltrate and report on the activities of the Target Subjects. In the paragraph that follows, I have provided an overview of each CHS, to include their basis of knowledge concerning the criminal conduct; motivation to assist the FBI; criminal history; any compensation received from the government; and a statement concerning their reliability. I have tried to provide sufficient information to the Court, while balancing the anonymity and safety of the various sources.

21. CHS-1 is a close associate to veteran gang members and is an experienced drug trafficker. CHS-1 is motivated to assist the FBI, in part they hope to clean up the community, and they are motivated by monetary compensation. CHS-1 has been convicted of one felony for a crime of moral turpitude. CHS-1 has been compensated approximately \$89,000 by the FBI for their cooperation. CHS-1 has been assisting the FBI for five (5) years and has provided considerable assistance in multiple other FBI investigations. CHS-1 has participated in several controlled drug buys at the direction of the FBI and worn covert recording devices during meetings with targets of other FBI investigations. The information that CHS-1 provided has led to dozens of search warrants, over two dozen arrests, and the seizure of dozens of firearms, along with a significant amount of U.S. Currency, controlled substances, and property. I believe the information provided

² The FBI utilize the term CHS to describe an informant; however, other agencies may use Confidential Source (CS), Confidential Informant (CI), Confidential Witness (CW), or Source of Information (SOI). Herein, I have also used the term CHS to describe a Cooperating Defendant (CD). I believe the various terms are interchangeable, but for the purpose of this affidavit I have only used the term CHS.

by CHS-1 to be reliable because much of it has been corroborated by independent investigation, search warrants, controlled evidence purchases, and surveillance. I am unaware of any false or misleading information that CHS-1 has provided.

22. **CHS-2** is an experienced informant, knowledgeable prior gang member, and drug trafficker. CHS-2 has been cooperating with the FBI for approximately nine years and has testified as a government witness in numerous federal jury trials. I view CHS-2 as a professional informant with almost a decade of FBI CHS experience, who has conducted controlled buys, introduced undercover agents to targets of FBI investigations, worn covert FBI recording devices on the street and in a maximum-security prison facility. The information that CHS-2 provided has led to a significant number of: warrant affidavits, judicial actions, distribution quantity drug seizures, firearm seizures, and money seizures. CHS-2 does not have any pending charges and has felony convictions for murder, armed robbery, aggravated battery, trafficking a controlled substance, and possession of a controlled substance. CHS-2 has received approximately \$85,000 in financial assistance from the FBI. I believe the information provided by CHS-2 to be reliable because much of it has been corroborated by independent investigation. I am unaware of any false or misleading information that CHS-2 has provided.

23. **CHS-3** is a prominent gang member of the Los Padillas gang and was a successful drug trafficker. CHS-3 has provided assistance in one other FBI investigation and also provided statements against their own self-interest. The FBI arrested CHS-3 and CHS-3 was motivated to assist the FBI in the hope of receiving consideration in a pending criminal matter. They did receive a positive recommendation in the pending criminal matter pursuant to their assistance to the FBI. CHS-3 does have felony convictions for possession of controlled substances and burglary. CHS-3

has not been paid by the FBI for their cooperation. I believe the information provided by CHS-3 to be reliable because much of it has been corroborated by independent investigation. I am unaware of any false or misleading information that CHS-3 has provided.

24. **CHS-4** is a WSL gang member and has been associated with the target subjects for some time. CHS-4 was inadvertently involved in DAKOTA BRISCOE's scheme to escape and did not want to be involved. CHS-4 is motivated to assist the FBI because they did not want to be involved in the conspiracy. CHS-4 has felony convictions for kidnapping, aggravated battery with a deadly weapon, domestic violence, receiving a stolen motor vehicle, burglary, and larceny. CHS-4 has not been paid by the FBI for their cooperation. I believe the information provided by CHS-4 to be reliable because much of it has been corroborated by independent investigation. I am unaware of any false or misleading information that CHS-4 has provided.

25. **CHS-5** is a gang member, former drug trafficker and has dealt drugs with CRISANTOS GARCIA more than a dozen times. CHS-5 was arrested by the FBI and was motivated to assist the FBI in hope to receive a positive recommendation in a pending criminal matter. CHS-5 wore a covert audio and video recording device and conducted several controlled drug buys for the FBI. CHS-5 introduced an Undercover Agent to a target of another investigation. CHS-5 provided information which led to the issuance of several search warrants. CHS-5 has felony convictions for possession of a stolen motor vehicle, shoplifting, robbery, and aggravated fleeing law enforcement. CHS-5 has not been paid by the FBI for their cooperation. I believe the information provided by CHS-5 to be reliable because it has been corroborated by independent investigation. I am unaware of any false or misleading information that CHS-5 has provided.

26. **CHS-6** is a gang associate, former drug trafficker, and has been associated with some of the target subjects in the past. CHS-6 is motivated to assist the FBI in exchange for financial compensation. CHS-6 has been paid approximately \$3,000. CHS-6 has no felony convictions. CHS-6 has participated in controlled drug buys, worn a covert audio and video recorder at the direction of agents. The information that CHS-6 provided has led to search and arrest warrants. I believe the information provided by CHS-6 to be reliable because much of it has been corroborated by independent investigation and search warrants. I am unaware of any false or misleading information that CHS-6 has provided.

27. **CHS-7** is a gang member and drug trafficker. CHS-7 is motivated to assist the FBI because they were inadvertently involved in the conspiracy. CHS-7 did not want to be involved in the conspiracy. CHS-7 has felony convictions for possession of a controlled substance, armed robbery, receiving or transferring a stolen motor vehicle, and illegal possession of a weapon. CHS-7 has not been paid by the FBI for their cooperation. I believe the information provided by CHS-7 to be reliable because much of it has been corroborated by independent investigation and search warrants. I am unaware of any false or misleading information that CHS-7 has provided.

28. **CHS-8** is a gang associate, former drug trafficker, and has been associated with some of the target subjects in the past. CHS-8 is motivated to assist the FBI in exchange for financial compensation. CHS-8 has been paid approximately \$6,500. CHS-8 has no felony convictions. CHS-8 has participated in controlled drug buys and has worn a covert audio and video recorder at the direction of agents. The information that CHS-8 provided has led to search and arrest warrants. I believe the information provided by CHS-8 to be reliable because much of it has

been corroborated by independent investigation and search warrants. I am unaware of any false or misleading information that CHS-8 has provided.

FACTS ESTABLISHING PROBABLE CAUSE

The Target Subjects

29. **CRISANTOS GARCIA** is a suspected West Side Locos (“WSL”) gang member who has 16 prior arrests in NM. Upon reviewing the New Mexico online secure court case information, I believe GARCIA has three (3) felony convictions, which prevent him from possessing a firearm, for:

- a. Receiving or Transferring of a Stolen Motor Vehicle, on September 19, 2013, in the Bernalillo County District Court, Case No. D-202-CR-2013-04480; and
- b. Possession of Marijuana with Intent to Distribute, on September 19, 2013, in the Bernalillo County District Court, Case No. D-202-CR-2013-04480.

30. **GLORIA PADILLA** is GARCIA’s mother. PADILLA has at least six (6) prior arrests in NM for possession of a controlled substance, possession of methamphetamines/child abuse, and encouraging violation of probation, parole, or bail/use of possession of drug paraphernalia. In February 2025, VGTF agents executed a search warrant at her house and seized approximately five (5) firearms, after observing her conduct a drug deal from the residence.

31. **JONATHAN DOW**, aka: “SLIM,” is a WSL gang member who has at least 18 prior arrests, and upon reviewing the New Mexico online secure court case information, I believe DOW has at least five (5) prior felony convictions, which prevent him from possessing a firearm, for:

- a. Shooting from/into a Vehicle, on March 10, 2009, in the Bernalillo County District Court, Case No. D-202-CR-2009-03880;
- b. Burglary of a Dwelling House 2x, on September 15, 2009, and February 11, 2010, in the Bernalillo County District Court, Case No.D-202-CR-2009-04733 and D-202-CR-2009-05111;
- c. Racketeering and Receiving Stolen Property, on September 15, 2009, in the Bernalillo County District Court, Case No. D-202-CR-2010-00432; and
- d. Trafficking a Controlled Substance and Aggravated Fleeing a Law Enforcement Officer, on May 23, 2024, in the Bernalillo County District Court, Case No. D-202-CR-2024-01636.

32. **ALAN GREEN**, aka: “SHADOW,” is a WSL gang member who has at least 29 prior arrests in NM. Currently, I believe GREEN is wanted for violating his conditions of release. The Albuquerque Police Department has GREEN highlighted in their proactive investigations and has released his name (because he is wanted) as a top 25 auto theft subject. Upon reviewing the NM online secure court case information, I believe GREEN has five (5) felony convictions, which prevent him from possessing a firearm or ammunition. Those convictions include:

- a. Escape from Jail, on April 13, 2004, in the Bernalillo County District Court, Case No. D-202-CR-2004-01441;

- b. Possession of a Controlled Substance 2x, on December 21, 2004 and August 24, 2005, in the Bernalillo County District Court, Case No. D-202-CR-2004-05198 and D-202-CR-2005-04013;
- c. Battery and Conspiracy Aggravated Battery on a Peace Officer, on December 31, 2005, in the Bernalillo County District Court, Case No. D-202-CR-2006-05206; and
- d. Being a Felon in Possession of a Firearm and Ammunition, on May 12, 2009, in the United States District Court for the District of New Mexico, Case No. 1:09cr1251.

33. **MANDEL PARKER**, aka: “CHUCO,” is a SNM³ gang member who has 13 prior arrests in NM. Currently, I believe PARKER is wanted for violating his conditions of release, with the initial charges being Receiving or Transferring a Stolen Motor Vehicle and Possession of a Controlled Substance, Case No. T-4-FR-2026-003002. Upon reviewing the NM online secure court case information, I believe PARKER has three (3) felony convictions, which prevent him from possessing a firearm, for:

- a. Murder in the Second Degree, Tampering with Evidence, and Escape from Jail, on September 3, 1999, in the Socorro County District Court, Case No. D-725-CR-98-00173;

³ The Syndicate de Nuevo Mexico, “SNM,” is the most violent prison gang in NM’s history. Over the last 11 years, the FBI significantly dismantled the SNM by arresting more than 170 members, with more than a dozen serving life sentences on RICO and VICAR charges. Throughout the state, those in the criminal underworld readily acknowledge that if someone is an SNM gang member they are extremely violent and known for committing murder for the gang.

- b. Rico Conspiracy, on April 28, 2016, in the District Court for the District of New Mexico, Case No. 2:16cr1613; and
 - c. Aggravated Fleeing a Law Enforcement Officer, in the Bernalillo County District Court, Case No. D-202-CR-2025-02040.
34. **SAVANNAH SANCHEZ** is a WSL gang member who has at least 10 prior arrests in NM. Upon reviewing the NM online secure court case information, I believe SANCHEZ has one (1) felony conviction, which prevent her from possessing a firearm, for:
- a. Possession of a Controlled Substance, on September 27, 2021, in the Cibola County District Court, Case No. D-1320-CR-2022-00024.

Background Investigation

35. In 2015, MANDEL PARKER, aka: “CHUCO,” agreed to help another SNM gang member kill the cabinet secretary of the New Mexico Corrections Department. After the “mission,” the SNM members were supposed to then kill MANDEL PARKER because they did not trust him. The FBI infiltrated and thwarted the scheme and subsequently charged MANDEL PARKER with racketeering conspiracy, he was later sentenced to three years.

36. In a publicly available music video, I observed CRISANTOS GARCIA,⁴ the logo of the production company includes an AK rifle, wearing gold jewelry and flashing 100 dollar bills. The singer flashes a “W” hand sign and one of the main lines in the song is, “That’s why I show up with the heat.” As the singer says the word “heat,” he motions his hands like he’s shooting a gun. Another popular line in the song is about leaving the house with the gun. I understand the

⁴ <https://www.youtube.com/watch?v=MJKEwAmukIs>

song, in general, to be about drug dealing. Below are two photos of CRISANTOS GARCIA taken from the music video.



Screenshots of CRISANTOS GARCIA taken from a music video, titled "Streets"

37. In September 2020, DAKOTA BRISCOE was arrested in a federal case involving multiple counts of carjacking, drug trafficking, and firearms violations, Case No. 1:20cr1777. Those charges stemmed from incidents ranging from August to September 2022, wherein DAKOTA BRISCOE killed two subjects, torched their car, then terrorized an Albuquerque neighborhood in an attempt to steal a car and get away. The FBI led the federal investigation against DAKOTA BRISCOE. The United States District Court bifurcated the counts of the indictment, and DAKOTA BRISCOE was convicted on the first group of offenses on December 8, 2023. DAKOTA BRISCOE is also facing a double homicide charge in the Bernalillo County District Court, Case No. D-202-CR-2021-02382, regarding the same incident. Currently, he is incarcerated at the Metropolitan Detention Center in Bernalillo County, NM.

38. When BRISCOE was arrested, apparently fleeing prosecution, he was in southern New Mexico near the US-Mexico border. At the time DAKOTA BRISCOE was arrested, he had added face tattoos, in an apparent attempt to conceal his identity. He attempted to evade arrest by

providing arresting officers with his brother's name, "Austin Epps." Unbeknownst to DAKOTA BRISCOE, "Austin Epps" had an active arrest warrant, and DAKOTA BRISCOE was arrested. It was not until the FBI received a tip that BRISCOE had been arrested under an alias, that the arresting agency realized it was DAKOTA BRISCOE they actually had in custody.

39. Following DAKOTA BRISCOE's arrest, he was returned to Albuquerque and was interviewed by an FBI Gang agent. He outlined the WSL history, hierarchy, and recent activities after admitting to murdering and setting two victims on fire after shooting them. He also admitted to the carjacking. DAKOTA BRISCOE further explained to agents the criminal workings of the WSL gang to include naming those involved in criminal activities.

40. Law enforcement agents have listened to hundreds of DAKOTA BRISCOE's recorded jail calls. In several calls, agents heard DAKOTA BRISCOE discuss his unwillingness to serve a long sentence for his crimes and his intent to escape. DAKOTA BRISCOE also talked about his trial and the lead prosecutor in his case. In the calls, DAKOTA BRISCOE has also directed others to do things for him on the streets.

41. Since DAKOTA BRISCOE was arrested in 2020, he has repeatedly stated to his wife and other associates that he is not willing to do more than 10 to 15 years for his crimes, including the pending state homicide case. DAKOTA BRISCOE utilized recorded phone and video calls, as well as text messages to communicate with associates from inside the jail, including

42. In 2022, the FBI received information from the Metropolitan Detention Center (MDC) in Albuquerque, regarding a note located on one of the inmates. The note was a depiction of the federal facility where DAKOTA BRISCOE was being held and contained detailed instructions on how to smuggle contraband, including firearms into the federal facility. According

to source reporting, the Burqueños in the jail were having issues with rival gang members over control of the drug trade and territory inside the jail. The Burqueños wanted to tax the rival gang for selling drugs in the Burqueños' yard. The Burqueños heard that the rival gang had access to a firearm in the jail, so DAKOTA BRISCOE and others wanted to get a firearm for protection against the rival gang.

43. In July 2023, DAKOTA BRISCOE had a conversation, on a recorded jail call, about his intentions to escape custody. DAKOTA BRISCOE explained his motivation by discussing gang rivalries within the federal prison, and he conveyed that he believed he could walk away from prison in 10 years if he went to a low security facility and did not get in trouble. DAKOTA BRISCOE then stated, "And I'm still going to fucking run." DAKOTA BRISCOE described how every time he was outside, he was always thinking about escaping. DAKOTA BRISCOE talked about how he would move to Mexico, where he would be able to own a firearm.

44. In December 2023, the United States Marshal's service received information that suspicious subjects had knocked on an AUSA's door, the same AUSA assigned to the DAKOTA BRISCOE case and just days before the trial was set to start. The USMS subsequently opened a case, along with the FBI, and placed a security detail on the AUSA.

45. On December 4, 2023, and on the first day of the trial, USMS strip searched DAKOTA BRISCOE before transport to the Courthouse. During the strip search, USMS agents located a chain in his underwear. The strip search was due to the fact that DAKOTA BRISCOE had advised others that he was willing to kill to escape and possessed handcuff keys.

46. On February 13, 2025, VGTF agents executed three (3) residential search warrants at three different locations in Albuquerque, associated with CRISANTOS GARCIA. The warrants, 25mr245, 25mr246, 25mr247, were authorized by the Court on February 10, 2025.

47. At approximately 06:00 a.m., agents knocked and announced their presence at CRISANTOS GARCIA's residence, located at 6108 Aldea Ave NW, Albuquerque, NM. As agents knocked and announced their presence, a woman and two children exited the front door, advising agents that CRISANTOS GARCIA was inside.

48. CRISANTOS GARCIA was observed exiting a second story window at the back of the residence, he then ran across the roof and jumped into the next-door neighbor's yard. Upon landing, he broke multiple bones in both legs, his hand, and his face. He was subsequently treated by medics and transported to the ER. I believe he had multiple surgeries due to the injuries he received from attempting to escape. At the time, CRISANTOS GARCIA had a white Samsung cell phone, which I seized from him before he was transported to the hospital.

49. Upon searching CRISANTOS GARCIA's residence, agents located approximately nine (9) firearms (one of which was a Draco⁵), two of which were stolen, two ballistic vests (one of which was in CRISANTOS GARCIA's vehicle, a green Dodge hellcat), thousands of rounds of ammunition, and a bag of blue pills in CRISANTOS GARCIA's bedroom closet, stuffed in a men's jacket pocket.

⁵ A "Draco" is a compact AK style pistols, chambered for 7.62x39mm, accept standard 30-round AK magazines, and are commonly manufactured by Century Arms.

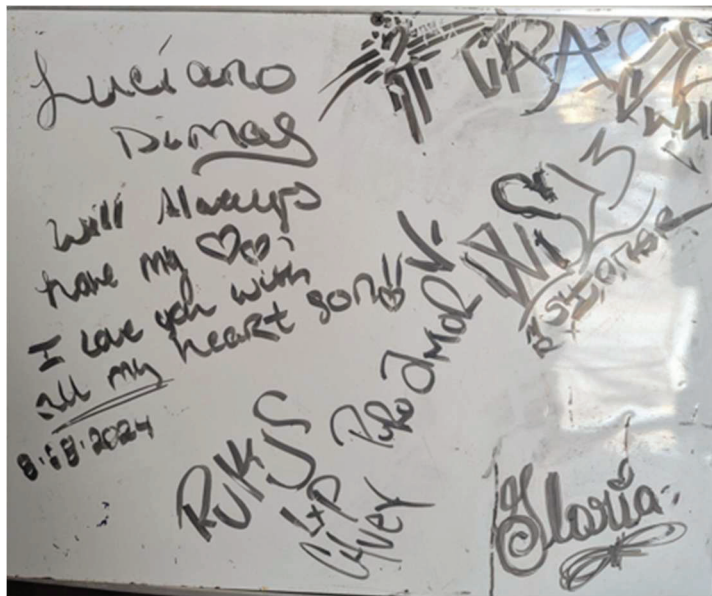
50. The following vehicles were also seized from the property, and towed to the Albuquerque FBI Office, 1963 Chevrolet Impala, a 2018 Dodge “Hellcat” Challenger, and a 2021 Range Rover.

51. Based on prior reporting, from CHS-3, agents were aware that CRISANTOS GARCIA was known to drive around in the green Dodge Hellcat, armed with a Draco, and ready to shoot it out with rivals.

52. At approximately 7:30 a.m., agents executed a search warrant at 358 58th St NW, Albuquerque, NM, which agents believed to be a stash house for CRISANTOS GARCIA. Prior to agents arriving, surveillance units observed two subjects leave in a silver vehicle, only to return a short time later. The silver vehicle again left, parked nearby, then left again as agents arrived to execute the search warrant. Agents subsequently stopped the silver vehicle shortly after it left the suspected stash house. The driver of the vehicle was identified, and omitted herein in an attempt to protect their identity, and found to be in possession of a small amount of heroin. The driver of the vehicle advised agents that they had obtained the heroin from CRISANTOS GARCIA and that there were firearms that belonged to CRISANTOS GARCIA inside the suspected stash house, A-1.

53. Below is a photograph taken from GLORIA PADILLA’s residence, it includes the words WSL13 and RUKUS LXP. From my training and experience I know that WSL stands for West Side Locos and 13 is also associated with the south side gang. I know that LXP is commonly

used to refer to the Los Padillas gang, and I know that LUCAS MALDONADO, aka: “RUKUS,” is a LP gang member.⁶ The photograph is below:



Above: A dry erase board from GLORIA PADILLA’s house. RUKUS LxP is on the bottom, and WSL13 is on the right.

54. Pursuant to the search at the suspected stash house, agents seized approximately five (5) firearms, one (1) ballistic vest, thousands of rounds of ammunition, and a high-capacity magazine.

55. On March 17, 2025, I attempted to execute a search warrant, MR-25-479, on the white Samsung cell phone seized on February 13, 2025, from CRISANTOS GARCIA’s person, however I was unsuccessful unlocking the cell phone.

⁶ On March 26, 2026, LUCAS MALDONADO, aka: “RUKUS,” was arrested for selling several pounds of methamphetamine to an Undercover Officer, T-4-FR-2026-002858.

56. On November 19, 2025, I obtained a search warrant, authorized by the Court, to collect a sample of DNA from the body of CRISANTOS GARCIA, by way of two (2) buccal (cheek) swabs, Case No. 25mr1966.

57. On November 20, 2026, I executed the search warrant by collecting a sample of DNA from CRISANTOS GARCIA, who was incarcerated at the Metropolitan Detention Center (MDC) on a pending arrest involving approximately 10,000 fentanyl pills.

58. The firearms seized on February 13, 2025, from CRISANTOS GARCIA's residence and suspected stash house were sent to the FBI laboratory alongside the DNA collected from CRISANTOS GARCIA for a side-by-side comparison.

59. On December 15, 2025, I was able to execute a renewal search warrant, MR-25-250, on the aforementioned cell phone and viewed the contents. Pursuant to the cell phone search warrant, I observed photographs of firearms and conversations about drug trafficking, including but not limited to:

- a. Facebook user asked Ventex for blues,
- b. Facebook user purchased a tactical rifle from Ventex,
- c. A Snapchat user asked for "smerfs"⁷,

⁷ I am aware that "Smurfs" are blue cartoon characters who live in a mushroom. In this context, and based on my training and experience, I believe that "Smerfs" is code word for blue M30 stamps pills, commonly found to contain fentanyl.

d. A text message conversation in which a person asked CRISANTOS GARCIA if he was interested in purchasing ammunition and asked CRISANTOS GARCIA for blue pills, which I believe to refer to fentanyl.

60. On February 13, 2026, the FBI laboratory returned a report revealing that CRISANTOS GARCIA's DNA was located on two firearms seized from his residence, the laboratory did not test the rest of the firearms seized from his residence. Specifically, for the two firearms seized and tested from CRISANTOS GARCIA's residence, one was a CMMG pistol, and the other was an Anderson Manufacturing pistol.

61. On April 8, 2026, I obtained an arrest warrant and criminal complaint charging CRISANTOS GARCIA with PWID heroin, being a felon in possession of a firearm and ammunition, and possession of a firearm in furtherance of a drug trafficking crime, Case No. 26mj1640.

The Current Investigation

62. On March 31, 2026, CHS-7 reported that DAKOTA BRISCOE trusted them and considered them a reliable associate. CHS-7 reported to officers that DAKOTA BRISCOE had confided in them his escape plan, and that DAKOTA BRISCOE was supposed to give them a letter upon their release. The letter was expected to outline DAKOTA BRISCOE's escape plan and include phone numbers and names of individuals who may assist in the plan. CHS-7 further reported that DAKOTA BRISCOE had been discussing how he was going to obtain a stolen vehicle and guns as part of his plan, and that he intended to flee to Mexico. CHS-7 later turned a letter over to officers, see below.

63. At the time, MDC STIU Officers believed that DAKOTA BRISCOE was in possession of a handcuff key. However, multiple strip searches and body scans were conducted, but no contraband was located.

64. On April 1, 2026, DAKOTA BRISCOE allegedly injured himself and was transported to the hospital.

65. CHS-4 stated that DAKOTA BRISCOE faked the injury so that he would be transported to the hospital, as a "dry run" for the escape plan. CHS-4 explained to agents that DAKOTA BRISCOE went to the hospital so that he could see the layout of the new emergency room area and see how he would be transported.

66. According to CHS-4, within the last two weeks, DAKOTA BRISCOE sent a letter out with MANDEL PARKER. MANDEL PARKER then gave the letter to CRISANTOS GARCIA. CHS-4 knew that CRISANTOS GARCIA had been collecting firearms and money with ALAN GREEN. They were saving the money and stockpiling the firearms to be used during DAKOTA BRISCOE's escape. CHS-4 also knew that JONATHAN DOW, aka; "SLIM," was assisting CRISANTOS GARCIA and ALAN GREEN with the mission to obtain firearms, cash, and a stolen vehicle for BRISCOE's escape.

67. CHS-4 knew that CRISANTOS GARCIA was supposed to be stashing the guns and money at his mom's house, CHS-4 provided the address of A-2. Based on my experience I am aware that GLORIA PADILLA is CRISANTOS GARCIA's mother, and she lives at A-1. A-2 is CRISANTOS GARCIA's residence.

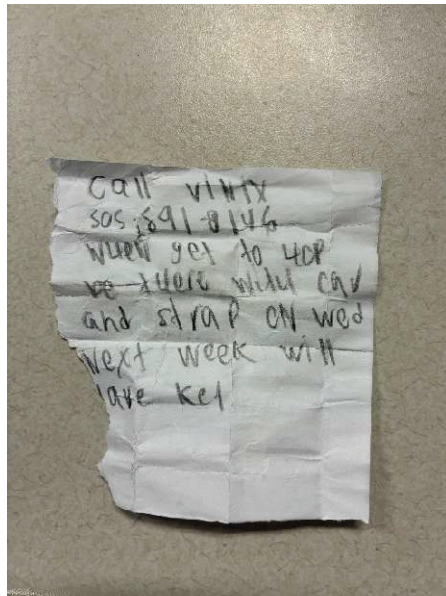
68. Investigators understand DAKOTA BRISCOE's escape plan to consist of CRISANTOS GARCIA and ALAN GREEN hiding a firearm behind an ATM on the second floor

of the University of New Mexico Hospital (“UNMH”), directly in front of the elevator. When DAKOTA BRISCOE is transported, they think that he will be taken onto the elevator, and when the doors open, BRISCOE would be able to obtain the firearm hidden behind the ATM. CRISANTOS GARCIA and ALAN GREEN will also provide additional guns, cash, and a stolen car nearby to further assist in DAKOTA BRISCOE’s escape.

69. On April 8, 2026, officers received a letter from CHS-7. CHS-7 described the letter as being written by DAKOTA BRISCOE and it reads: “Call Vintx 505-891-8146 when get to 4cp be there with car and strap on wed next week [illegible].” Agents looked into the phone number but were unable to determine who it belongs to.

70. According to CHS-7, DAKOTA BRISCOE gave this letter to CHS-7, who then turned it over to officers. I understand the letter to mean for CHS-7 to call CRISANTOS GARCIA, to make sure he was there at the meet location with a car and a firearm. This letter is DAKOTA BRISCOE directing others to assist him in his obtaining a firearm and vehicle for his escape.

71. A photograph of the letter is depicted below:



Above: The letter provided to officers, from BRISCOE via CHS-7. The letter directs CHS-7 to call GARCIA to make sure he is at the designated location with a firearm and vehicle to aid in BRISCOE's escape.

72. Based on prior and current reporting, agents believe that DAKOTA BRISCOE intends to attempt to flee to Mexico. According to CHS-4 and CHS-7, DAKOTA BRISCOE is planning to fake a medical emergency while at the courthouse in order to be transported to UNMH for medical care.

73. I know that DAKOTA BRISCOE has court on Wednesday, April 15, 2026, and this may be the day that he is planning to fake an injury and escape.

Drug Trafficking

74. In July 2023, I spoke with CHS-3 who advised that they had purchased fentanyl and methamphetamine from CRISANTOS GARCIA on multiple occasions. CHS-3 described CRISANTOS GARCIA as a WSL gang member who went by the nickname VENTEX.

75. In July 2024, CHS-6 conducted a controlled drug buy of approximately 1,000 fentanyl pills from SAVANNAH SANCHEZ. CHS-6 was searched before and after, surveillance was maintained on the target and CHS during the operation, and official bureau funds were utilized for the controlled drug buy, which was recorded.

76. In the summer and fall of 2023, CHS-2 advised agents that CRISANTOS GARCIA was a big-time fentanyl and heroin trafficker, WSL gang member, and his nickname was VENTEX. CHS-2 knew that CRISANTOS GARCIA supplied a lot of WSL and other gang members in Albuquerque. CHS-2 was unable to infiltrate the drug trafficking activities of the WSL, as the WSL gang members conducted their own investigation and surmised that CHS-2 was cooperating with law enforcement. CHS-2 was no longer able to assist in the investigation as the WSL gang members would not deal with CHS-2 any longer.

77. In December 2024, CHS-1 advised agents that CRISANTOS GARCIA was a WSL gang member who went by "VENTEX."

78. CHS-5 stated that they knew CRISANTOS GARCIA, and that he had a reputation for selling a considerable amount of fentanyl and heroin. CHS-5 stated that they had purchased fentanyl and heroin from CRISANTOS GARCIA at least a dozen times in the past. CHS-5 advised agents that they knew CRISANTOS GARCIA to be the largest WSL drug trafficker, who supplied the entire WSL gang and other gangs in Albuquerque.

79. In December 2025, CHS-1 advised agents that CRISANTOS GARCIA was working with JONATHAN DOW, aka: "SLIM," and they were moving a lot of blues from JONATHAN DOW's house, A-3.

80. In April 2026, CHS-6 advised agents that SAVANNAH SANCHEZ and a male known as SLIM sold fentanyl out of their house, A-3. CHS-6 also advised agents that CRISANTOS GARCIA and his mom, GLORIA PADILLA were still selling a lot of fentanyl from her house, located at A-1.

81. In April 2026, CHS-8 advised agents that they had regularly given MANDEL PARKER, aka: "CHUCO," a ride to A-3 to pick up fentanyl. CHS-8 had not given MANDEL PARKER a ride in a few weeks, as he was in and out of jail a lot, but they knew that SLIM still sold fentanyl out of A-3

The Subject Premises

82. **Subject Premises A-1** is located at 358 58th St. NW, Albuquerque, NM 87105, and may be described as a two-story single-family residence, blue stucco siding, a blue roof, white trim, with barred windows and front door. A white fence surrounds the front yard and a mailbox with the numbers 358 posted in front of A-1. Color photographs of A-1 are contained within Attachment A-1.

83. **Indicia of residence:**

- a. On April 8, 2026, an agent conducted surveillance at A-1 and observed a large truck parked in the driveway and several vehicles parked out front. It appeared that the truck was stolen, as it had no license plate, which I know to be a common feature of stolen vehicles in my training and experience. There were two subjects who appeared to be lethargic and partially in two separate vehicles, they appeared intoxicated.

- b. According to tax records, A-1 is owned by ISABEL PADILLA, a sister to CRISANTOS GARCIA.
 - c. According to police records, GLORIA PADILLA lives at A-1.
 - d. According to vehicle registration records, a white GMC SUV is registered to GLORIA PADILLA, which agents have observed CRISANTOS GARCIA operate.
 - e. In February 2025, I executed a search warrant at A-1 and located GLORIA PADILLA, along with approximately five (5) firearms. She represented that she lived at A-1.
 - f. ALAN GREEN has an outstanding warrant, the address listed on the warrant is A-1.
 - g. CHS-1 knew that CRISANTOS GARCIA sold drugs from A-1.
 - h. CHS-6 knew that CRISANTOS GARCIA and his mother, GLORIA PADILLA, sold a lot of drugs from A-1.
84. **Subject Premises A-2** is located at 412 57th St NW, Albuquerque, NM 87105, and may be described as a single-family residence, tan stucco siding, barred windows, and a black fence by the street. A color photograph of A-2 is contained in Attachment A-2.
85. Indicia of residence:
- a. In February 2026, CRISANTOS GARCIA renewed his driver's license with the address being A-2.
 - b. According to Bernalillo County Tax Records, A-2 is owned by ISABEL PADILLA.
 - c. On April 9, 2026, surveillance units observed a vehicle parked out front of A-2, which was registered to ISABEL PADILLA and FERNANDO PADILLA; both of

which I believe are family members of CRISANTOS GARCIA. Furthermore, the vehicle is associated with a separate fugitive investigation.

- d. Within the last two weeks, CHS-4 advised agents that CRISANTOS GARCIA was currently storing firearms, stolen cars, and money at A-2.

86. **Subject Premises A-3** is located at 329 64th St NW, Albuquerque, NM 87105, and may be described as a single-story residence with tan stucco siding, and brown trim. The numbers 329 are posted on the curb in front of A-3 and the porch post. Color photographs of A- 3 are contained within Attachment A-3.

87. Indicia of residence:

- a. On April 9, 2026, surveillance units observed a truck with a temporary tag, which did not come back on file, pull up to A-3. Two Hispanic tattooed males exit the truck and walk around A-3 then leave, like they were casing the property.
- b. On April 10, 2026, surveillance units observed two vehicles in the driveway of A-3. One was registered to SAVANNAH SANCHEZ's father and the other was registered to JONATHAN DOW.
- c. CHS-1 and CHS-6 knew that JONATHAN DOW lived at A-3.
- d. CHS-1 knew that JONATHAN DOW and CRISANTOS GARCIA sold controlled substances together, from A-1.
- e. CHS-8 believed that JONATHAN DOW sold controlled substances from A-1.
- f. On many different occasions, CHS-8 had taken MANDEL PARKER to A-1 to pick up drugs

CONCLUSION

88. Based on the information contained herein, I submit there is probable cause for a search warrant authorizing the examination of the Subject Premises described in Attachment A to seek the items described in Attachment B for evidence pertaining to violations of the Target Offenses.

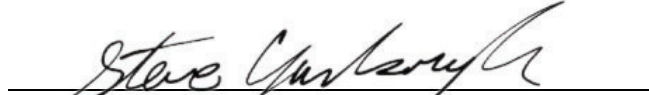
89. This affidavit was reviewed by Assistant United States Attorney Jesse Pecoraro.

Respectfully submitted,



Jordan Spaeth
FBI Special Agent

Electronically signed and telephonically sworn to me on April 10, 2026.



HONORABLE STEVEN C. YARBROUGH
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF NEW MEXICO

ATTACHMENT A-1
Premises to be Searched

Premises to be Searched: Subject Premises A-1 is located at 358 58th St. NW, Albuquerque, NM 87105, and may be described as a two-story single-family residence, blue stucco siding, a blue roof, white trim, with barred windows and front door. A white fence surrounds the front yard and a mailbox with the numbers 358 posted in front of A-1. Color photographs of A-1 are contained below.



Surveillance photo



Google Streetview photo

The search of Subject Premises A-1 shall include the entire residence and all outbuildings, trash cans, and storage containers designated for use by the Subject Premises. The search shall also include vehicles parked at, or in front of, the Subject Premises provided such vehicle has an apparent connection to the Subject Premises. Connection to the Subject Premises may be established by way of prior law enforcement observation, vehicle registration, subject admission or possession of an ignition key. All safes or lock boxes, where evidence of the Target Offenses may be stored for safekeeping against seizure.

Biometric Access to Electronic Devices: During the execution of the search of the premises described herein, law enforcement officers are also specifically authorized to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the device, to provide biometric features, including pressing fingers (including thumbs) against and/or putting a face before the sensor, or any other security feature requiring biometric recognition, of:

1. Any electronic devices found at the premises, and

ATTACHMENT A-1
Premises to be Searched

2. Where the electronic devices are limited to those which are capable of containing and reasonably could contain fruits, evidence, information, contraband, or instrumentalities of the offense(s) as described in the search warrant affidavit and warrant attachments for the purpose of attempting to unlock the devices' security features in order to search the contents as authorized by this warrant.

3. This warrant authorizes law enforcement personnel to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the electronic device, to provide biometric features, as described in the preceding paragraph, to access or otherwise unlock any electronic device. Further, this warrant does not authorize law enforcement personnel to request that the individual state or otherwise provide the password or any other means that may be used to unlock or access another person's electronic device(s), including by identifying the specific biometric characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the electronic devices.

ATTACHMENT A-2
Premises to be Searched

Premises to be Searched: Subject Premises A-2 is located at 412 57th St NW, Albuquerque, NM 87105, and may be described as a single-family residence, tan stucco siding, barred windows, and a black fence by the street. Color photographs of A-2 are contained below.



Surveillance photo



Google Streetview photo

The search of Subject Premises A-2 shall include the entire residence and all outbuildings, trash cans, and storage containers designated for use by the Subject Premises. The search shall also include vehicles parked at, or in front of, the Subject Premises provided such vehicle has an apparent connection to the Subject Premises. Connection to the Subject Premises may be established by way of prior law enforcement observation, vehicle registration, subject admission or possession of an ignition key. All safes or lock boxes, where evidence of the Target Offenses may be stored for safekeeping against seizure.

Biometric Access to Electronic Devices: During the execution of the search of the premises described herein, law enforcement officers are also specifically authorized to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the electronic device, to provide biometric features, including pressing fingers (including thumbs) against and/or putting a face before the sensor, or any other security feature requiring biometric recognition, of:

1. Any electronic devices found at the premises, and

ATTACHMENT A-2
Premises to be Searched

2. Where the electronic devices are limited to those which are capable of containing and reasonably could contain fruits, evidence, information, contraband, or instrumentalities of the offense(s) as described in the search warrant affidavit and warrant attachments for the purpose of attempting to unlock the devices' security features in order to search the contents as authorized by this warrant.

3. This warrant authorizes law enforcement personnel to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the electronic device, to provide biometric features, as described in the preceding paragraph, to access or otherwise unlock any electronic device. Further, this warrant does not authorize law enforcement personnel to request that the individual state or otherwise provide the password or any other means that may be used to unlock or access another person's electronic device(s), including by identifying the specific biometric characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the electronic devices.

ATTACHMENT A-3
Premises to be Searched

Premises to be Searched: Subject Premises A-3 is located at 329 64th St NW, Albuquerque, NM 87105, and may be described as a single-story residence with tan stucco siding, and brown trim. The numbers 329 are posted on the curb in front of A-3 and the porch post. Color photographs of A- 3 are contained below.



Surveillance photo



Google Streetview photo

The search of Subject Premises A-3 shall include the entire residence and all outbuildings, trash cans, and storage containers designated for use by the Subject Premises. The search shall also include vehicles parked at, or in front of, the Subject Premises provided such vehicle has an apparent connection to the Subject Premises. Connection to the Subject Premises may be established by way of prior law enforcement observation, vehicle registration, subject admission or possession of an ignition key. All safes or lock boxes, where evidence of the Target Offenses may be stored for safekeeping against seizure.

Biometric Access to Electronic Devices: During the execution of the search of the premises described herein, law enforcement officers are also specifically authorized to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the electronic device, to provide biometric features, including pressing fingers (including thumbs) against and/or putting a face before the sensor, or any other security feature requiring biometric recognition, of:

1. Any electronic devices found at the premises, and

ATTACHMENT A-3
Premises to be Searched

2. Where the electronic devices are limited to those which are capable of containing and reasonably could contain fruits, evidence, information, contraband, or instrumentalities of the offense(s) as described in the search warrant affidavit and warrant attachments for the purpose of attempting to unlock the devices' security features in order to search the contents as authorized by this warrant.

3. This warrant authorizes law enforcement personnel to compel any individual, who is found at the Subject Premises and reasonably believed by law enforcement to be a user of the electronic device, to provide biometric features, as described in the preceding paragraph, to access or otherwise unlock any electronic device. Further, this warrant does not authorize law enforcement personnel to request that the individual state or otherwise provide the password or any other means that may be used to unlock or access another person's electronic device(s), including by identifying the specific biometric characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the electronic devices.

ATTACHMENT B
Items to be Seized

Items to be Seized: All evidence, fruits, and instrumentalities of violations of: a. 21 U.S.C. § 846 - Attempt and Conspiracy to Distribute Controlled Substances; 21 U.S.C. § 841(a) - Possession with Intent to Distribute Controlled Substances; 18 U.S.C. § 924(c) - Possession of a Firearm in Furtherance of a Drug Trafficking Crime; 18 U.S.C. § 922(g) and 924 - Being a Prohibited Person in Possession of Firearm or Ammunition; and 18 U.S.C. § 371 - Conspiracy to include the following:

1. Firearms, firearm parts, magazines, and ammunition;
2. Controlled substances, drug packaging materials, and paraphernalia;
3. Large amounts of United States Currency and expensive jewelry;
4. Articles of property tending to establish the identity of persons in control of premises, vehicles, storage areas, and containers being searched, including utility company receipts, rent receipts, addressed envelopes, and keys.
5. All documents and communications relating to the Target Offenses or the whereabouts of the person CRISANTOS GARCIA (whether on paper or stored magnetic, digital, or optical media).
6. All evidence related to all off-site storage units, other residences, safety deposit boxes, etc. where evidence of the Target Offenses may be stored for safekeeping against seizure;
7. Cellular telephones and all cellular telephone records to establish ownership of the device or the residence; and
8. The person of CRISANTOS GARCIA, whose photograph is contained below.

