

UNITED STATES DISTRICT COURT

SEALED

for the Southern District of California

In the Matter of the Search of s/ SuzanneA (Briefly describe the property to be searched or identify the person by name and address) 4776 El Cajon Blvd #102, San Diego, CA 92115 "Target Location 1"

Case No. '21 MJ1300

APPLICATION FOR A SEARCH WARRANT

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

See Attachment A-1, incorporated herein by reference

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

See Attachment B, incorporated herein by reference

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

- [x] evidence of a crime; [x] contraband, fruits of crime, or other items illegally possessed; [x] 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:

Table with 2 columns: Code Section (21 U.S.C. §§ 841(a)(1), 846, 843(b), 856; and 18 U.S.C. § 1955) and Offense Description (Conspiracy to Distribute Controlled Substances, Possession of Controlled Substances w/Intent to Distribute, Unlawful Use of a Communication Facility to Facilitate the Distribution of Controlled Substances, and Maintaining a Drug Involved Premises, and Illegal Gambling)

The application is based on these facts:

See attached Affidavit of FBI Special Agent Kari S. Harrison, incorporated herein by reference

- [x] 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.

[Handwritten Signature]

Applicant's signature

Kari S. Harrison, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/7/21

[Handwritten Signature]

Judge's signature

City and state: San Diego, California

Hon. Mitchell D. Dembin, U.S. Magistrate Judge

Printed name and title

1 **AFFIDAVIT IN SUPPORT OF SEARCH WARRANT APPLICATIONS**

2 I, Kari S. Harrison, being duly sworn under oath, declare and state:

3 **EXPERIENCE AND TRAINING**

4 1. I am an “investigative or law enforcement officer of the United States”
5 within the meaning of 18 U.S.C. §§ 2510(7). As such, I am empowered to conduct
6 investigations of, and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

7 2. I am a Special Agent with the Federal Bureau of Investigation and have
8 been so employed since June of 2006. I am assigned to the San Diego Field Division
9 on the Violent Crime Task Force-Gang Group (VCTF-GG). I have received basic
10 federal law enforcement training, including training at the FBI Academy, as well as
11 other specialized federal law enforcement training. I have received formal training and
12 have experience in narcotics investigations and gang investigations, including street
13 gang investigations. I have participated in multiple separate investigations involving the
14 distribution of controlled substances and firearms. As part of these investigations, I have
15 used various investigative techniques, including physical and stationary surveillance,
16 informants and cooperating sources, court authorized interceptions, pen register/trap
17 and trace devices, telephone toll analysis, undercover operations, physical searches,
18 mail covers, and electronic examinations of evidence. I have monitored numerous calls
19 and meetings with persons under investigation, including wiretap communications of
20 drug traffickers, gang members, and associates. I have worked alongside and consulted
21 with many law enforcement officials and other professionals experienced in drug and
22 gang investigations.

23 3. Based on my training and experience, I am familiar with how drug
24 traffickers and gang members communicate and operate. For example, I am aware that
25 drug traffickers and gang members discuss and text criminal matters over the telephone
26 and often use coded or vague language. I am aware of how drug traffickers and gang
27 members use their phones to organize and operate their illegal activities. I am familiar
28 with the typical make up and operation of gangs and drug trafficking organizations

1 including the distribution, storage, and transportation of drugs, the collection of money
2 which represents the proceeds of drug trafficking and other criminal activity, and money
3 laundering.

4 4. I have also investigated illegal gambling dens in San Diego. I have become
5 familiar with how illegal gambling dens are operated and utilize the sales and usage of
6 controlled substances, primarily methamphetamine, in order to draw and maintain a
7 customer base. I have also become familiar with the hierarchy of employees, how
8 employees communicate through social media and phones, security measures such as
9 surveillance, the presence of weapons including firearms, and crimes being committed
10 inside these dens such as narcotic sales, robbery, extortion, identity theft, and fencing
11 stolen property. I have participated in over five search warrants served at illegal
12 gambling dens and interviewed patrons and suspects from these locations. Further, I
13 have participated in multiple investigations involving premises maintained for the
14 purpose of distributing drugs. I have overseen numerous undercover and source
15 operations inside gambling dens and reviewed hours of consensually recorded video
16 from these operations. As part of these investigations, I have used various investigative
17 techniques including surveillance, telephone toll analysis, social media analysis and
18 electronic examinations of evidence.

19 5. The following is based my own investigation, oral and written reports by
20 other law enforcement officers, physical surveillance, interviews, database and public
21 records checks, searches, telephone toll analysis, and other investigation. Since this
22 affidavit is for a limited purpose, I have not included every fact I know about this
23 investigation. I set forth only facts necessary to establish probable cause for the
24 requested warrants. Conversations and discussions below are set forth in substance
25 unless noted otherwise.

26 REQUESTED SEARCH WARRANTS

27 6. I submit that the facts contained herein demonstrate probable cause to
28 believe that evidence of a crime; contraband, fruits of a crime, or other items illegally

1 possessed; or property designed for use, intended for use, or used in committing a crime,
2 specifically, violations of Title 21, United States Code, Sections 841(a)(1) and 846
3 (Conspiracy to Distribute Controlled Substances); Title 21, United States Code,
4 Sections 841(a)(1) (Possession of Controlled Substances with Intent to Distribute); Title
5 21, United States Code, Section 843(b) (Unlawful Use of a Communication Facility to
6 Facilitate the Distribution of a Controlled Substance); Title 21, United States Code,
7 Section 856, (Maintaining a Drug Involved Premises); and Title 18, United States Code,
8 Section 1955, (Illegal Gambling); more fully described in Attachment B; will be found
9 at the locations to be searched (including the structures, all attached and unattached
10 structures, rooms, attics, basements, garages, and parking spaces (including vehicles
11 and trailers parked therein) assigned to or part of the locations to be searched; storage
12 areas, safes, briefcases, containers, trash areas within the locations to be searched,
13 surrounding grounds and outbuildings assigned to or part of the locations to be searched,
14 at the **Target Locations:**

- 15 a. **Target Location 1:** 4776 El Cajon Blvd #102, San Diego, CA 92115
- 16 b. **Target Location 2:** 4258 ½ Euclid Avenue, San Diego, CA 92115
- 17 c. **Target Location 3:** 4079 Oakcrest Drive, San Diego, CA 92105
- 18 d. **Target Location 4:** 3772 Euclid Avenue, San Diego, CA 92105
- 19 e. **Target Location 5:** 4117 41st Street, San Diego, CA 92105
- 20 f. **Target Location 6:** 3838 41st Street, San Diego, CA 92105
- 21 g. **Target Location 7:** 4270 42nd Street, San Diego, CA 92105
- 22 h. **Target Location 8:** 3845 45th Street #2, San Diego, CA 92105
- 23 i. **Target Location 9:** 4218 35th Street, San Diego, CA 92104
- 24 j. **Target Location 10:** 2927 Chamoune Avenue, San Diego, CA 92105
- 25 k. **Target Location 11:** 2710 Highland Avenue, San Diego, CA 92105
- 26 l. **Target Location 12:** 6831 Amherst Street, San Diego, CA 92115
- 27 m. **Target Location 13:** 5517 Streamview Drive, San Diego, CA 92105
- 28 n. **Target Location 14:** 5285 El Cajon Blvd, San Diego, CA 92115

- 1 o. **Target Location 15:** 4212 Copeland, San Diego, CA 92105
- 2 p. **Target Location 16:** 4727 Federal Boulevard, San Diego, CA 92102
- 3 q. **Target Location 17:** 3555 Central Avenue, San Diego, CA 92105
- 4 r. **Target Location 18:** 4027 47th Street, San Diego, CA 92105
- 5 s. **Target Location 19:** 4834 University Avenue, San Diego, CA 92105
- 6 t. **Target Location 20:** 4461 University Avenue, San Diego, CA 92105
- 7 u. **Target Location 21:** 3690 43rd Street, San Diego, CA 92105;

8 which are more fully described in Attachments A-1 thru A-21, respectively.

9 **FACTS ESTABLISHING PROBABLE CAUSE**

10 **A. Background on the Investigation and Gambling Den Operation**

11 7. In 2013, San Diego Police Department (SDPD) Street Gang Unit
12 Detectives observed a steady increase in the prevalence of illegal gambling dens.
13 Investigators learned that Asian gang members and associates were often involved in
14 operating these illegal gambling dens and that methamphetamine was being used and
15 sold at these illegal gambling dens. These locations were known as a “trap” or “trap
16 houses.” The illegal gambling dens were often located inside houses, apartments, and
17 outbuildings in residential neighborhoods predominantly in City Heights, in the East
18 San Diego area. It is common for gambling den owners to pay rent in cash to the owners
19 of these properties and, in some cases, a percentage of the profits to cast a blind eye to
20 all the foot traffic.

21 8. In 2015, these locations began to draw more attention because of the
22 frequency of violent crimes occurring in and around them such as robberies, shootings,
23 stabbings, and assaults. Investigators learned that the patrons were often gang members,
24 career criminals, habitual drug users, and fugitives. Investigators believe that the
25 criminal activity in and around these locations is due to these patrons.

26 9. Investigators are aware of twenty-three active illegal gambling dens
27 operating in San Diego County. The illegal gambling dens are equipped with electronic
28 gambling machines which are programmed with several games of chance such as poker,

1 blackjack, keno, jacks or better, and slot games. Most locations of these establishments
2 are open 24 hours a day, seven days a week, with some shutting down in the early
3 morning hours and starting up again in the afternoons. Investigators are aware that most
4 of these locations are outfitted with exterior and interior video surveillance cameras,
5 which are often monitored remotely by the establishment owners and managers. Those
6 locations equipped with surveillance equipment often contain monitors showing live
7 feed of the video surveillance.

8 10. Investigators learned that the owners will often not enter their own
9 establishments but instead rely on trusted associates to open, operate and maintain the
10 illegal gambling dens to reduce the likelihood that they will be identified by law
11 enforcement. Investigators are also aware that the owners often rely on seemingly
12 unrelated individuals to rent and obtain utilities for these establishments to further avoid
13 detection by law enforcement. The illegal gambling establishments typically have a
14 hierarchy of employees. The employees often include: doorman, banker, and money
15 courier.

16 11. The doorman is generally an individual from the neighborhood who can
17 recognize and screen patrons. Often, the doorman is a known gang member or a career
18 criminal who has "respect" on the streets to deal with unwanted patrons, attempted
19 robberies, and law enforcement. The doorman will also act as security or as an
20 "enforcer" at the location by dealing with disputes, handling disturbances, monitoring
21 the video surveillance, and reacting to law enforcement presence.

22 12. The "banker" carries the "bank roll," meaning the money to provide
23 change and winnings to customers. There are generally one or two bankers working
24 inside at any given time. The owners rely on trusted employees to conduct an "audit,"
25 which occurs at least twice in a twenty-four hour period. The audit is conducted by
26 employees using a key to unlock and open gambling machines. The employees will
27 retrieve the money from inside of the machines. It is a common practice for employees
28 to photograph the master audit screen of each machine and share it with

1 owners/managers. The master audit screen shows the cash in, cash out (winnings), and
2 net gain/profit. Employees will clear the screen after each audit. The employees will
3 also document the cash in, cash out, net gain, loans to customers, and other information
4 in paper ledgers.

5 13. Owners may conduct several audits in a twenty-four hour period when the
6 bank roll reaches a specified amount, such as \$2,000. This is done to keep losses down
7 from robbery and law enforcement seizures. In many cases, the employees will have
8 all patrons step outside to conduct an audit to avoid being robbed. In some cases, the
9 employees will conduct an audit with patrons inside but attempt to keep them at a
10 distance. The gambling machines at these locations conservatively take in more than
11 \$3,000 a day.

12 14. Employees generally work a twelve-hour shift and make \$50 - \$250 per
13 shift. At some locations, the owners will give a bonus based upon the amount of profit
14 earned. Patrons tend to tip employees when they win jackpots, which are generally
15 maxed at \$1,000 - \$1,200. The amount of time or tenure of employees varies. The
16 current trend seems to be having one or two tenured employees and several short-term
17 employees.

18 15. Many owners utilize a money courier. The money courier brings additional
19 bank roll to employees, collects money from the audit, and brings profits to the owners.
20 The money courier also acts as a manager who directs employees actions and makes
21 decisions on behalf of the owners at these locations.

22 16. Early investigative efforts revealed that one individual typically owned all
23 of the gambling machines in a given illegal gambling den. Investigators have noted,
24 however, an increase in locations where the gambling machines are owned by multiple
25 individuals. Each of these owners receive a percentage of profit.

26 17. Investigators are aware that these illegal gambling dens are also drug
27 involved premises. The main draw to illegal gambling establishments is
28 methamphetamine use and sales. Investigators are aware that other drugs are also

1 known to be used and sold inside these establishments. It is rare to have a patron who
2 does not use or sell methamphetamine inside these locations. The people selling drugs
3 inside may be employees or independent drug dealers. It is common for employees to
4 hand out small amounts of methamphetamine and “comp” customers who are playing.
5 One owner described how he would give methamphetamine to patrons because it would
6 draw them to the location and kept them playing on gambling machines.

7 18. In 2015, investigators executed numerous search warrants at illegal
8 gambling dens in an effort to eliminate violent crimes associated with these
9 establishments. These establishments are often robbed. The vast majority of these
10 robberies were initially unreported to law enforcement. During search warrant
11 executions at these locations, owners and patrons described drug use and sales inside
12 these locations. However, due to enforcement operations, gambling den owners and
13 employees have placed signs inside that say “no drug sales” or “no drugs.” More recent
14 enforcement operations have revealed that drug sales and drug use has not abated.

15 19. In the past two years, the number of violent crimes and property crimes in
16 and around gambling den/drug premises has become more prevalent. From July 2018
17 through July 2020, there were over four hundred crime cases and over three hundred
18 arrests within 150 feet of 36 known illegal gambling locations. The density of crimes
19 and arrests around these locations corresponds to the highest amount of crime in the
20 East San Diego area. Law enforcement has investigated homicides, shootings,
21 stabbings, felony assaults, robberies, arson, auto thefts, burglaries, identity theft,
22 firearm possession, drug sales/possession, and other crimes in and around these
23 locations.

24 20. Between December 2019 and June 2020, CS1¹ conducted twelve
25 controlled drug buy operations at seven different illegal gambling dens. Additionally,
26

27 ¹CS1 has been a cooperating source of information for over two years. CS1 has criminal
28 convictions for burglary and criminal threats that are more than 10 years old. CS1 was

1 during that same period, CS1 conducted twenty-three controlled gambling operations
2 at 11 different illegal gambling locations. During every controlled operation, CS1
3 observed gambling machines being used by patrons and patrons consuming controlled
4 substances including methamphetamine.

5 B. Current Investigation

6 21. The FBI Violent Crimes Task Force Gang Group is currently investigating
7 Long TRAN aka "Long Tu", Le Thi LE aka "Chi Le", and Dong NGUYEN. TRAN
8 and NGUYEN are known to affiliate with the Vietnamese Boys/V-Boys Street Gang in
9 San Diego. Based on information gathered thus far in the investigation, TRAN, LE and
10 NGUYEN are involved in the operation of several illegal gambling dens where
11 methamphetamine is being used and sold. The illegal gambling consists of electronic
12 gambling machines with games of chance such as poker, keno, blackjack, and slots.

13 22. A criminal record check of TRAN revealed that he has prior felony
14 convictions in California for conspiracy to operate a gambling den and drug premise
15 and two convictions for burglary.

16 23. A criminal record check of LE revealed that she has prior felony
17 convictions in California for possession of a controlled substance for sale and a
18 misdemeanor conviction for conspiracy to operate a gambling den.

19 24. A criminal record check of NGUYEN revealed that he has prior felony
20 convictions in California for first degree burglary and assault with a firearm on a person.

21 25. In December 2018, a CS1 met with TRAN during a supervised and
22 recorded law enforcement operation. TRAN described to CS1 how he operates illegal
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24
25 working under contract with the San Diego County District Attorney's Office since
26 November 2019 to work off a pending theft case. Investigators have corroborated
27 information provided by CS1 and have utilized CS1 to obtain search warrants, seize
28 methamphetamine and firearms, and locate fugitives. Investigators believe CS1 to be
credible and have not known CS1 to ever be untruthful or provide false information.

1 gambling dens where methamphetamine is used and sold. TRAN described how he had
2 trusted employees who operate these locations by acting as doormen, security, the
3 banker, those who audit the machines, and those who collect the money. TRAN
4 described how he is never there, and his employees take the fall when police shut down
5 a location. TRAN described at least three different locations where he was operating a
6 gambling den where drugs were being used and proposed opening a new location with
7 CS1.

8 26. Between September 2018 and March 2019, SDPD investigators executed
9 state search warrants at five locations in San Diego. While executing these search
10 warrants, investigators recovered electronic gambling machines, cash, ledgers depicting
11 audits and cash flow, methamphetamine, drug paraphernalia, and electronic devices
12 such as cellular phones. Investigators interviewed patrons and suspects detained at each
13 these search warrant locations. Through these interviews, evidence recovered, follow-
14 up search warrants on cellular devices, and other evidence such as signage and ledgers,
15 investigators identified TRAN as the owner at each location. A male named Tung
16 Nguyen, aka "Ang," was also identified as one of TRAN's employees who conducts
17 audits, provides bankroll money, and collects money from these locations. During the
18 execution of the search warrants, investigators seized gambling machines and the
19 money inside them. The sum of the money seized for each location exceeded \$2000.
20 Investigators were able to determine that TRAN's organization involved more than five
21 individuals who conducted, financed, managed, supervised, directed and/or owned all

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1 or part of the illegal gambling businesses. Images from inside three of the gambling
2 locations that have been investigated but are now closed are included below:



25 27. On February 7, 2019, SDPD officers spoke to Tung Nguyen in the alley
26 behind 3656 ½ 43rd Street. This location was being operated by TRAN, which was a
27 known gambling den where methamphetamine was being used and sold. Nguyen had
28 over \$2,800 cash in his possession and was pending authorization from San Diego

1 County Probation to be arrested for a probation violation. Nguyen agreed to be
2 transported to a police station to be interviewed. SDPD investigators read Nguyen his
3 Miranda Rights, which he waived. In the interview that followed, Nguyen admitted to
4 picking up money for TRAN from at least six different gambling dens where
5 methamphetamine was being used and sold. Nguyen described and showed how he had
6 communication with TRAN on Facebook Messenger regarding audits, collecting
7 money, and photographs of ledger pages.

8 **Target Location 1**

9 28. On June 19, 2020, CS1 met with TRAN during a supervised and recorded
10 law enforcement operation. TRAN discussed opening a gambling den with CS1. TRAN
11 described the logistics including but not limited to start-up costs, supplying employees,
12 conducting audits, collecting money, splitting the profits in half, and paying
13 “Southsiders” (members of criminal street gangs) money for protection. TRAN
14 described how he was operating three locations, one of which he referred to as the
15 “coffee shop” and stated, “It was a good den.” (Investigators believe that TRAN refers
16 to **Target Location 1** as the “coffee shop” because it is next to Café Le Le which serves
17 Vietnamese coffee.) CS1 identified the “coffee shop” as **Target Location 1**.

18 29. On September 4, 2020, investigators interviewed Phonetip INTHAVONG,
19 an Oriental Killer Boys gang member, after he was arrested by SDPD officers while in
20 possession of one-half ounce of methamphetamine, a scale, cash, and a replica handgun.
21 INTHAVONG agreed to speak with law enforcement after waiving his Miranda rights.
22 INTHAVONG stated that he worked at the gambling den next to Café Le Le (**Target**
23 **Location 1**). INTHAVONG stated he was the doorman and made \$120 or \$150 a shift
24 and worked a twelve-hour night shift. INTHAVONG stated that a lot of people smoke
25 methamphetamine in the gambling den and there were over a dozen tabletop machines
26 at the gambling den. INTHAVONG stated he did not sell drugs inside the gambling
27 den, nor did he buy the drugs that were found on his person at the gambling den, rather
28 he obtained the drugs from somewhere else. INTHAVONG noted that the gambling den

1 operators take in a couple thousand dollars a day. Other employees in the gambling den
2 include a banker and someone who cleans. The doorman is expected to do security.
3 INTHAVONG provided he had worked at the gambling den for a week. INTHAVONG
4 also provided he patronizes a gambling den across the street, **Target Location 2**.
5 INTAHVONG identified the owner of **Target Location 2** as Chi Le (Le Thi LE).
6 INTHAVONG provided he was there two weeks prior to September 4, 2020, and people
7 were “smoking dope” (using controlled substances) and gambling inside.

8 30. On August 25, 2020, the Honorable Bernard G. Skomal, United States
9 Magistrate Judge, authorized a search of TRAN’s Facebook account. Investigators
10 reviewed the material provided by Facebook and found photos of the inside of a
11 gambling den. Gambling machines were visible in the photos. These photos appear to
12 be from surveillance cameras located inside **Target Location 1**. Investigators showed
13 CS1 the photos and CS1 confirmed the photos were from the inside of **Target Location**
14 **1**.

15 31. A review of the Facebook records also revealed communications relating
16 to **Target Location 1**:

17 Na Na: “Long me and drowzy are here at euclid and we lost over a rack.”

18 TRAN: “Ok I tell nathan to give you some money back but lan might stop it ok.
19 Tell her that you lost like a thousand. Because there is no percent back at coffee shop
20 and lan is tripping.”

21 Na Na: “Ok thanks.”

22 32. Investigators believe this message exchange indicates that a gambling
23 patron, “NaNa,” communicated to TRAN that she lost over a thousand dollars at the
24 “coffee shop” (**Target Location 1**) and asked for some of the money back. TRAN
25 thereafter agreed to return some of the money. TRAN’s response also indicated that
26 “Lan” (known by investigators to be Thanh Lan NGUYEN) may disagree that TRAN
27 facilitated the return of money to “Nana” and may stop the money return. This message
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1 exchange demonstrates that TRAN has an ownership interest in **Target Location 1** in
2 partnership with Thanh Lan NGUYEN.

3 33. During the early evening hours of October 6, 2020, agents conducted
4 surveillance at **Target Location 1**. During an approximate one-hour period, twelve
5 individuals were seen entering and twelve individuals were seen leaving the business.
6 Investigators observed, however, that only approximately half of those seen leaving
7 were those previously seen entering the business. There also appeared to be an
8 individual standing at the door providing access into **Target Location 1**. Although
9 signage on **Target Location 1** indicates that it is an alteration business, investigators
10 did not observe any individuals enter or leave with any noticeable bags or items
11 indicating business activity. Rather, the activity observed by investigators was
12 consistent with an active gambling establishment at **Target Location 1**.

13 34. On October 15, 2020, investigators executed a federal search warrant
14 issued by the Honorable Linda Lopez and searched **Target Location 1**. During the
15 search of the location, sixteen video gaming machines, a baggie of narcotics, three
16 methamphetamine pipes, documentation of dominion and control, \$1707.00 in U.S.
17 Currency found concealed under a pipe inside drywall, \$50.00 in quarters in U.S.
18 Currency, documentation of illegal gambling and \$225.00 in U.S. Currency from the
19 video gaming machines, were all found and seized.

20 35. On January 19, 2021, a Confidential Source (CS2)² reported **Target**
21 **Location 1** had reopened sometime after the law enforcement search and was currently
22

23 ² CS2 was reopened as an FBI confidential human source on January 11, 2021. CS2 had
24 been administratively closed in 2011 after the completion of an investigation. CS2 has
25 a felony conviction for possession of a controlled substance in 2007, a misdemeanor
26 conviction for possession of a controlled substance in 2006, and a conviction for
27 receiving stolen property in 2001. Investigators have corroborated information provided
28 by CS2. Investigators believe CS2 to be credible and have not known CS2 to ever be
untruthful or provide false information.

1 an active gambling den.³ CS2 provided the owner of the gambling machines at **Target**
2 **Location 2** was TRAN and Lan NGUYEN. CS2 noted there were approximately fifteen
3 gambling machines at this location.

4 36. On January 21, 2021, an Undercover Employee (UCE) and CS2 went
5 inside **Target Location 1** during a supervised and recorded law enforcement operation.
6 UCE and CS2 found a closed sign on the door to **Target Location 1**, however when
7 UCE knocked an unknown Vietnamese male answered the door, spoke to CS2, and then
8 allowed UCE and CS2 to enter. UCE and CS2 walked through a narrow opening in the
9 wall and into a game room where the electronic gambling machines were located,
10 another employee of **Target Location 1** stopped UCE and instructed CS2 in
11 Vietnamese to have the UCE lower their facemask, after doing so the UCE was allowed
12 to gamble. There were approximately ten electronic gambling machines at **Target**
13 **Location 1**.

14 37. On February 2, 2021, SDPD conducted a vehicle traffic stop of Tung
15 Thanh NGUYEN and Thi NGUYEN. Tung NGUYEN provided he had picked up Thi
16 NGUYEN from the coffee shop at 4776 El Cajon Blvd (**Target Location 1**). Thi
17 NGUYEN provided she had lost \$200 from gambling at the gambling den.

18 38. On February 9, 2021, SDPD responded to **Target Location 1** after
19 receiving a radio call concerning a vehicle hitting a building. Thanh Lan NGUYEN was
20 standing outside and stated someone had just hit her business and she did not know

21 _____
22 ³ Through the course of the investigation, investigators have learned that all **Target Locations** are
23 open as gambling dens 24 hours a day and seven days a week, except:

24 **Target Location 2**, which opens around 9:00 pm and closes in the morning hours around 7 am or
25 whenever business is slow. Per CS2 the owner stated that law enforcement does not work after 9 pm,
26 since the last search warrant at her place was executed at 8 pm, which is why she does not open until
27 approximately 9 pm now.

28 **Target Location 8**, which closes in the late evening/early evening when the owner decides business
has slowed down.

Target Location 21, has intermittent hours based on who has been allowed inside to play.

1 who. With her permission one of the officers looked inside, the officer observed
2 multiple electronic gambling machines inside. The officer also noted NGUYEN had a
3 fanny pack with approximately \$10,000 in US currency in multiple dominations.
4 NGUYEN did not want to file a report.

5 **Target Location 2**

6 39. In addition to the information provided by INTHAVONG, investigators
7 had previously identified Chi LE as operating gambling locations, including **Target**
8 **Location 2**, from information provided by CS1. After learning that **Target Location 2**
9 was an active gambling den where controlled substances, including methamphetamine,
10 were being sold and consumed, investigators initiated several controlled operations at
11 **Target Location 2**.

12 40. On December 30, 2019, CS1 conducted a controlled methamphetamine
13 buy⁴ inside **Target Location 2**. CS1 reported asking the employee of the gambling den,
14 Phoung BUI aka "Phung," an Asian Crip gang member, who was acting as the doorman
15 and watching video surveillance, for two ounces of methamphetamine. BUI responded
16 all he had was a "half," opened a drawer and pulled out approximately 17 grams of
17 methamphetamine and sold it to CS1 for \$90. During this controlled buy, CS1 observed
18 electronic gambling machines being used by patrons.

19 41. On January 7, 2020, CS1 conducted a controlled operation at **Target**
20 **Location 2**. CS1 spoke to LE who CS1 identified as the owner of the gambling den. LE
21 was sitting at a table in the kitchen area playing cards, when CS1 asked about buying
22 _____

23 ⁴ The controlled buys referenced in this affidavit followed standard protocol:
24 investigators met with CS1 at an undisclosed location prior to a controlled drug buy.
25 CS1 and CS1's vehicle were searched with negative results for contraband.
26 Investigators supplied CS1 with buy money and a recording device, followed CS1 to
27 the location, conducted surveillance of the location, and followed CS1 back to a pre-
28 designated location. At the predesignated location, investigators met with CS1 to
recover drugs, recover the recording devices, and debrief CS1.

1 drugs, LE motioned to a methamphetamine pipe on the table. CS1 observed LE count a
2 large stack on cash and hand the cash to a male employee. During this controlled
3 operation, CS1 observed electronic gambling machines being used by patrons.

4 42. On February 11, 2020, CS1 conducted a controlled methamphetamine buy
5 at **Target Location 2**. CS1 observed BUI opening the door to the gambling den and
6 telling a patron they could be cashed out if they won. CS1 also observed BUI give a
7 small amount of methamphetamine to a patron. CS1 purchased approximately 7 grams
8 of methamphetamine from BUI for \$60. CS1 then purchased approximately twelve
9 grams of methamphetamine from Christian Troy CORONADO for \$60. CS1 had BUI
10 weigh the drugs and gave the 7 grams back to BUI. BUI returned CS1' money for the
11 drugs. During this controlled buy, CS1 observed electronic gambling machines being
12 used by patrons.

13 43. During each controlled drug buy operation, several individuals were
14 captured on video and observed by CS1 inside this location smoking methamphetamine
15 and in possession of apparent methamphetamine. LE was identified as the
16 owner/operator of each location by the employees working there. Each drug purchase
17 occurred inside with LE's employees participating in the drug buy or having knowledge
18 of the drug buy.

19 44. On September 25, 2020, law enforcement officers went to LE's residence
20 at 4264 Euclid Avenue #2 and spoke with LE. LE stated she lived at the location with
21 her daughter. LE admitted to having gambling machines inside the location behind 4258
22 Euclid Avenue and having four video cameras at the location.

23 45. On September 27, 2020, SDPD conducted a traffic stop near the 5000
24 block of El Cajon Boulevard. CORONADO was driving a vehicle without a valid
25 driver's license and stated he was on his way to 4258 Euclid (**Target Location 2**) to
26 pick up a friend. CORONADO also indicated that **Target Location 2** was a known
27 gambling house.

28

1 46. A review of records obtained from San Diego Gas and Electric revealed
2 that "Le Tri LE" is the name on the account for **Target Location 2** as of September 17,
3 2020. These records also indicate that LE's residential address at 4264 Euclid Avenue
4 #2 is her mailing address for billing purposes. Agents conducted an additional review
5 of SDG&E records on January 25, 2021 and verified there were no changes from the
6 prior check related to this address.

7 47. On the evening of October 6, 2020, agents conducted surveillance at
8 **Target Location 2**, surveillance was limited due to the access to the location being off
9 an alley and little to no parking with a line of sight to **Target Location 2**. Attempts
10 were made to conduct a drive-by of the location to observe activity, but numerous
11 individuals were standing in the alley watching vehicles closely. Surveillance was
12 unable to determine the volume of activity around **Target Location 2**.

13 48. On October 15, 2020, investigators executed federal search warrants issued
14 by the Honorable Bernard G. Skomal and searched **Target Location 2**. During the
15 search of the residence, eight video gaming machines, five cell phones, gaming logs,
16 keys, a DVR which was connected to the residence's security system, narcotic
17 paraphernalia, documentation of illegal gambling and \$695 in U.S. Currency from the
18 video gaming machines, were found and seized.

19 49. On October 15, 2020, Le LE, aka "Chi Le," was interviewed by law
20 enforcement and she provided she was not surprised that law enforcement were at
21 **Target Location 2** searching. LE stated she had owned gambling machines at **Target**
22 **Location 2** for two years, she makes \$300 to \$400 a day, law enforcement will find
23 \$7000 - \$8000 at the search of her residence, and she does not claim the money on her
24 taxes. LE told law enforcement officers she was no longer going to operate a gambling
25 den after this.

26 50. On October 15, 2020, investigators executed a federal search warrant
27 issued by the Honorable Bernard G. Skomal and searched 4264 Euclid Avenue #2 San
28 Diego, CA 92115. The residence was identified by LE as her residence. During the

1 search of this residence, \$13,930 in U.S. currency, video gaming machine equipment
2 parts, a laptop computer, documentation of illegal gambling, bank statements and
3 credit/debit cards, were found and seized.

4 51. An additional federal search warrant was obtained to review the video on
5 the DVR hard-drive seized on October 15, 2020 from **Target Location 2**. The review
6 found there were four camera views, two interior and two exterior, and the extracted
7 video files were from the date range of October 10, 2020 to October 15, 2020. Review
8 on interior camera views noted numerous patrons gambling at the electronic gambling
9 machines, identified individuals as employees, and observed patrons and employees
10 smoking methamphetamine. Exterior video shows employees using a key to lock and
11 unlock gate and shows an employee getting into a vehicle registered to Thanh Lan Thi
12 NGUYEN, one of the owners at **Target Location 1**. Photographs from the inside of
13 **Target Location 2** from October 2020 are included below:



21 52. On January 19, 2021, CS2 reported **Target Location 2** had reopened
22 sometime after the law enforcement search and was currently an active gambling den.
23 CS2 provided the owner of the gambling machines at **Target Location 2** was Chi LE.
24 CS2 noted there were approximately nine gambling machines at this location.

25 53. On March 10, 2021, CS2 went inside **Target Location 2** during a
26 supervised and recorded law enforcement operation. CS2 observed approximately nine
27 electronic gambling machines and approximately six patrons gambling on the
28

1 machines. CS2 gambled \$40 on one of the gambling machines and lost. CS2 was given
2 \$20 by another patron and played and won \$100. CS2 requested to be cashed out and
3 gave \$50 to the patron who supplied the \$20 per the understood rules of the room and
4 the other \$50 was given to law enforcement and placed into evidence as proceeds from
5 illegal gambling. CS2 observed methamphetamine pipes and overheard conversation
6 about packing bowls. CS2 was inside **Target Location 2** for approximately twenty
7 minutes.

8 **Target Location 3**

9 54. In December 2019, CS1 identified **Target Location 3** as an active
10 gambling drug den. On January 7, 2020, CS1 conducted a controlled buy of
11 methamphetamine inside **Target Location 3**. CS1 entered the location and spoke to an
12 employee, Dennis DIBLASI, aka "Drago," and inquired about purchasing two ounces
13 of methamphetamine. DIBLASI provided a phone number for Tam ONG, aka
14 "Fireball." CS1 called ONG on a cellular phone and negotiated a deal to purchase two
15 ounces of methamphetamine for \$250. ONG arrived several minutes later and sold
16 approximately two ounces of methamphetamine to CS1 for \$250 inside **Target**
17 **Location 3**.

18 55. On January 24, 2020, CS1 conducted a controlled buy of
19 methamphetamine inside **Target Location 3**. CS1 spoke to Karen PORTER, aka "KK,"
20 and Jessica CASTILLO, aka "Green-Eyes," inside the location while gambling on
21 electronic gambling machines. CS1 negotiated a deal to purchase approximately one
22 ounce of methamphetamine from PORTER and CASTILLO for \$120. PORTER and
23 CASTILLO left the location for approximately one hour and returned. PORTER sold
24 approximately one ounce of methamphetamine to CS1 inside **Target Location 3**. The
25 drug sale occurred in front of an employee, Wayne CLAYTON, aka "G-Wayne."

26 56. On June 19, 2020, CS1 met with TRAN during a supervised and recorded
27 law enforcement operation. TRAN discussed opening a gambling den with CS1. TRAN
28 described the logistics including but not limited to start-up costs, supplying employees,

1 conducting audits, collecting money, splitting the profits in half, and paying
2 “Southsiders” (members of criminal street gangs) money for protection. TRAN
3 described how he was operating three locations, one of which he referred to as
4 “Oakcrest” (**Target Location 3**). TRAN described how an employee named “G-
5 Wayne” operated the location for him by conducting audits and having strict rules.
6 Investigators and CS1 identified “G-Wayne” to be Wayne CLAYTON.

7 57. On August 25, 2020, the Honorable Bernard G. Skomal, United States
8 Magistrate Judge, authorized a search of TRAN’s Facebook account. A review of the
9 Facebook records revealed communications relating to **Target Location 3**. Here is an
10 example of one such message string:

11 TRAN: “Go to oakcrest game room.”

12 TRAN: “Just go there get it and leave.”

13 Justin Abdon: “Why do i have to leave.”

14 TRAN: “Because I can't have anyone with warrant there bro.”

15 Justin Abdon: “Can I go bye oak and picc up some money please.”

16 Justin Abdon: “I need a job.”

17 TRAN: “Bro I want to help you but I can't put you in the game room.”

18 58. Investigators believe this message exchange indicates that a gambling
19 patron, Justin ABDON, was asking for money and to be employed by TRAN at **Target**
20 **Location 3**. The messages indicates TRAN directed ABDON to **Target Location 3**.
21 TRAN indicated his ownership of **Target Location 3** by being in position to offer
22 ABDON money, deny him employment, and telling ABDON to leave because he had
23 a warrant.

24 59. During the late morning and early afternoon hours of August 26, 2020,
25 agents conducted surveillance at **Target Location 3**. During an approximate two-hour
26 period, eleven individuals were seen entering and twelve individuals were seen leaving
27 the residence. Investigators observed that only approximately half of those seen leaving
28 were those previously seen entering the residence. The activity observed by

1 investigators was consistent with an active gambling drug premises establishment at
2 **Target Location 3.**

3 60. On September 10, 2020, investigators executed a federal search warrant
4 issued by the Honorable Barbara L. Major and searched **Target Location 3.** During the
5 search of the residence, fifteen electronic gaming machines, four cellular phones, three
6 baggies of methamphetamine, four methamphetamine pipes, documentation of
7 dominion and control, \$1,179 in U.S. currency found up inside a crawl space,
8 documentation of illegal gambling, and \$153 in U.S. currency from the video gaming
9 machines, were found and seized. During the execution of the search warrant, thirteen
10 individuals were called out of **Target Location 3.**

11 61. One of the individuals called out of **Target Location 3** was Derris Braison,
12 who indicated to law enforcement that **Target Location 3** had been open for over five
13 months and was owned by TRAN. Braison also stated, "Everyone inside does dope."

14 62. On February 18, 2021, CS2 reported he/she had heard **Target Location 3**
15 was open again and was currently an active gambling den.

16 63. On March 4, 2021, CS2 went inside **Target Location 3** during a
17 supervised and recorded law enforcement operation. CS2 observed approximately
18 fifteen electronic gambling machines. CS2 gambled \$40 on one of the machines and
19 lost. CS2 observed an unknown male smoking a methamphetamine pipe inside. CS2
20 identified Wayne CLAYTON as one of the employees working inside **Target Location**
21 **3.** CLAYTON has been identified as a gambling den employee in prior law enforcement
22 operations.

23 **Target Location 4**

24 65. On January 5, 2021, agents conducted surveillance at **Target Location 4.**
25 Surveillance was limited due to the access to the location being off an alley and little to
26 no parking with a line of sight to **Target Location 4.** During an approximate one-and a
27 half hour period during the late afternoon, seven individuals were seen entering and
28

1 leaving the location. The activity observed by agents was consistent with an active
2 gambling establishment at **Target Location 4**.

3 66. On January 19, 2021, CS2 reported **Target Location 4** was an active
4 gambling den. CS2 indicated that the owners of the gambling machines at **Target**
5 **Location 4** were FNU LNU, aka "Thuc," Dang NGUYEN, and Dong NGUYEN. CS2
6 noted there were approximately fifteen gambling machines at this location. A January
7 2021 photograph from inside **Target Location 4** is included below:



18 67. On January 23, 2021, a UCE went inside **Target Location 4** during a
19 supervised and recorded law enforcement operation. UCE observed twelve to fifteen
20 electronic gambling machines and approximately eight to ten people inside gambling at
21 **Target Location 4**. UCE observed a patron sitting next to the UCE smoking a
22 methamphetamine pipe. Review of video noted Kiara EASLY and Phoungene
23 INTCHACK, aka "Nana," were present in **Target Location 4**. EASLY had
24 previously been observed on multiple occasions working as an employee in gambling
25 dens and on January 23, 2021 had an outstanding state felony warrant. INTCHACK
26 sold methamphetamine to CS1 in a controlled by on February 19, 2020 in a gambling
27 den located at 3654 Roselawn Avenue, San Diego, CA. The Roselawn gambling den
28 has since closed.

1 68. On February 15, 2021, SDPD conducted a field interview of Cuong
2 NGUYEN after he was seen coming out of the west alley of 3800 Euclid Avenue.
3 Cuong NGUYEN admitted to officers he had thrown and spread methamphetamine
4 around his car before being stopped. Cuong NGUYEN provided he had come from a
5 gambling house and described the location, which was a match for **Target Location 4**.
6 Cuong NGUYEN stated he had picked up the methamphetamine inside the gambling
7 house. Cuong NGUYEN described the gambling house as having alley access only and
8 that there is doorman just inside the door when you enter. He said he had seen people
9 with guns inside previously and that they sell methamphetamine inside. Cuong
10 NGUYEN provided there were sixteen to seventeen gambling slot machines inside and
11 about ten to fifteen people inside when he left.

12 **Target Location 5**

13 69. On December 9, 2020, agents conducted surveillance at **Target Location**
14 **5**. Surveillance was limited due to the access to the location being off an alley with
15 limited parking. Investigators conducted a drive-by of the location and observed a
16 surveillance camera on the front of the residence, during a subsequent walk-by
17 investigators noted a second camera. During several hours of surveillance starting in
18 the early afternoon, numerous individuals were seen arriving and leaving the residence
19 through the alley. The activity observed by agents was consistent with an active
20 gambling establishment at **Target Location 5**.

21 70. On January 19, 2021, CS2 reported **Target Location 5** was an active
22 gambling den. CS2 indicated that the owners of the gambling machines at **Target**
23 **Location 5** were Tam ONG, aka "Fireball," and Son CAO. CS2 noted there were
24 approximately eight gambling machines at this location.

25 71. On January 23, 2021, an UCE went inside **Target Location 5** during a
26 supervised and recorded law enforcement operation. UCE observed at least five
27 electronic gambling machines and approximately six to seven people inside at **Target**
28 **Location 5**. UCE observed two males smoking a methamphetamine pipe. UCE

1 observed a male doorman, a female monitoring surveillance cameras, and a separate
2 male acting as the cashier and cashing out patrons. UCE noted there was a back room
3 that patrons kept coming out of but the UCE did not attempt to access as the UCE did
4 not feel comfortable to do so.

5 72. On March 24, 2021, agents conducted surveillance at **Target Location 5**
6 during the early afternoon. Agents were able to observe a surveillance camera directly
7 above the door to **Target Location 5**. During an approximately one hour and forty
8 minute period, agents observed seven individuals arrive or leave **Target Location 5**,
9 some in vehicles and some on foot. Surveillance was discontinued when individuals
10 from **Target Location 5**, who had been moving vehicles around, appeared to take notice
11 of surveillance through a fence. The activity observed by agents was consistent with an
12 active gambling den at **Target Location 5**.

13 **Target Location 6**

14 72. On November 24, 2020, agents conducted surveillance at **Target Location**
15 **6**. Agents observed multiple surveillance cameras on the front, eaves, roof, rear door,
16 and along the vehicle gate entrance to the rear of **Target Location 6**. During several
17 hours of surveillance starting in the early afternoon, numerous individuals were seen
18 arriving and leaving the residence. The activity observed by agents was consistent with
19 an active gambling establishment at **Target Location 6**.

20 73. On January 19, 2021, CS2 reported **Target Location 6** was an active
21 gambling den. CS2 indicated that the owner of the gambling machines at **Target**
22 **Location 6** was Doan Thi NGUYET and Dung TRAN. CS2 noted there were
23 approximately nine gambling machines at this location.

24 74. On January 22, 2021, an UCE went inside **Target Location 6** during a
25 supervised and recorded law enforcement operation. As the UCE approached the
26 location, the UCE was asked if the UCE had been there before. UCE stated they had
27 been and the unknown male welcomed the UCE back. UCE continued through and
28 knocked at the front door. UCE was allowed entrance by a doorman described as an

1 Asian female. UCE walked into the main room and observed approximately eleven
2 electronic gambling machines in **Target Location 6**. The room was crowded and there
3 was nowhere to play. The UCE found an empty chair, sat down, and requested change
4 from the Asian female to use on the gambling machines. UCE observed approximately
5 ten patrons playing in single room. UCE observed the same Asian female that opened
6 the door and made change and an unknown male, smoking a glass pipe beside the
7 entry/exit door. UCE played \$10 in US currency at one of the gambling machines and
8 then departed.

9 75. On February 1, 2021, agents reviewed records from SDG&E and found
10 that SDG&E listed Doan Thi Thu Nguyet as one of the customers for **Target Location**
11 **6**, corroborating information provided by CS2.

12 76. On March 24, 2021, agents conducted surveillance in the evening hours at
13 **Target Location 6** and **Target Location 15**, where the gambling den machines are
14 believed to be owned by the same owners based on information from CS2. At **Target**
15 **Location 6**, patrons are known to enter from the front of the location as well as from
16 the alley in the back. Surveillance units in the front of the location observed an
17 individual standing out front of **Target Location 6** watching the area. During a drive-
18 by of the alley, agents observed that the gate was partially open and one individual was
19 walking in the back. During the next drive-by, agents noted the gate was closed.
20 Surveillance units from **Target Location 15** followed a box truck from **Target**
21 **Location 15** to **Target Location 6**. The van went into the alley of **Target Location 6**,
22 opened the gate, backed in and then closed the gate. The box truck was registered to
23 Doan Thi Thu Nguyet at **Target Location 6**. The activity observed by agents was
24 consistent with an active gambling den.

25 **Target Location 7**

26 77. On January 19, 2021, CS2 reported **Target Location 7** was an active
27 gambling den. CS2 indicated that the owner of the gambling machines at **Target**
28 **Location 7** was Long TRAN, Dong NGUYEN, Dang NGUYEN, and Tung NGUYEN,

1 aka "Ang." CS2 noted there were approximately seventeen gambling machines at this
2 location.

3 78. On January 22, 2021, an UCE and CS2 went inside **Target Location 7**
4 during a supervised and recorded law enforcement operation. UCE and CS2 approached
5 and knocked on the door, an unknown male asked them to lower their face masks, which
6 they did. They were then allowed entrance. Upon entering **Target Location 7**, UCE
7 noted there were four to six electronic gambling machines off to the left and there was
8 a room to the right with twelve electronic gambling machines and approximately six
9 patrons. There was another room to the left and that room contained eight electronic
10 gambling machines and two patrons. UCE observed a male leaning against a wall
11 passed out from what the UCE suspected was drug use. UCE played \$20 in US currency
12 at one of the gambling machines. UCE noted the doorman on the way out mentioned
13 there had been an attempted robbery; however, the doorman said he had showed them
14 his and gestured towards his firearm and that the would-be-robbers left.

15 79. On February 23, 2021, a citizen filed a complaint with SDPD community
16 relations officer regarding foot traffic and criminal activity at a gambling den located at
17 **Target Location 7**. The citizen was contacted by a detective and indicated that **Target**
18 **Location 7** has constant foot traffic coming and going, drug use, and the citizen stated
19 he/she had observed electronic gambling machines inside. The citizen was willing to
20 provide exterior surveillance footage taken from his/her residence nearby to law
21 enforcement.

22 80. On March 23, 2021, the citizen met with a detective and provided a USB
23 drive. The citizen provided additional information, including that the activity at **Target**
24 **Location 7** began in November 2020 and continues to present. The citizen indicated
25 there had been vehicles broken into and people are hanging out smoking crack pipes. In
26 the middle of November 2020, the citizen knocked on the door of **Target Location 7**
27 and was told to go to the back door. The citizen was then invited inside through the
28 back. While inside the citizen observed surveillance cameras and a TV screen

1 monitoring the cameras, about twenty electronic gambling machines, a lot of patrons
2 gambling, patrons passing and smoking glass pipes and one person with a bag of white
3 powder. The individual that allowed the citizen inside stated that the surveillance
4 cameras do not record because then it could be used as evidence.

5 81. On March 24, 2021, agents conducted surveillance in the evening hours at
6 **Target Location 7**. Surveillance was limited parking with a line of sight to **Target**
7 **Location 7**. Agents noted a surveillance camera pointed at the front door of **Target**
8 **Location 7**. During an approximately forty-five minute period agents observed five
9 individuals go to and/or from the vicinity of **Target Location 7**.

10 **Target Location 8**

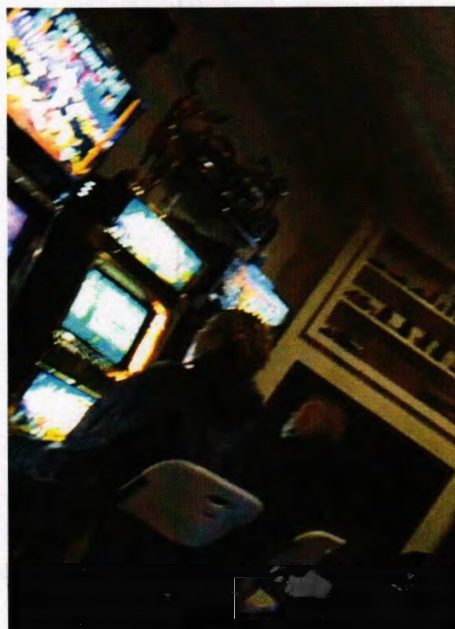
11 82. On January 19, 2021, CS2 reported **Target Location 8** was an active
12 gambling den. CS2 indicated that the owner of the gambling machines at **Target**
13 **Location 8** was Thu VU, aka "Erica," and Vien TRINH. CS2 noted there were
14 approximately eight gambling machines at this location.

15 83. On January 21, 2021, an UCE attempted entry into **Target Location 8**
16 during a supervised and recorded law enforcement operation. UCE approached the
17 metal screen door and rang the bell, an unknown female asked who the UCE was
18 looking for and what the UCE wanted. The UCE replied they wanted to make some
19 money. The unknown female stated she had never seen the UCE before and asked if the
20 UCE knew her. The UCE said they didn't know they couldn't see her through the door.
21 The unknown female opened the main door and came out to talk further. An unknown
22 male exited the location around the female. The unknown female asked the UCE how
23 he knew the place and the UCE responded by saying they knew "D." The unknown
24 female told the UCE to come back the next day with "D," The UCE observed two-three
25 electronic gambling machines through the open door.

26 84. On February 16, 2021, San Diego County Crime Stoppers received a
27 complaint regarding **Target Location 8**. The tipster indicated that "Erika VU" was
28 running an illegal gameroom with drug use at **Target Location 8**. The tipster noted VU

1 hides the profits in her bedroom safe and rents out all five garages on the property to
2 store gambling machines and stolen property. The report also included information that
3 drugs are given or sold to workers or customers playing in the gameroom. The drugs
4 are kept in the master bedroom in a desk drawer or bathroom and in the small bedroom
5 with money in a shopping bag. The tipster indicated that a couple of guns are hidden
6 on the property. The tipster indicated VU also owns the gameroom at 6831 Amherst St
7 (there is a known gambling den at 6833 Amherst St (**Target Location 12**)).

8
9 85. On March 25, 2021, CS2 went inside **Target Location 8** during a
10 supervised law enforcement operation. CS2 said a Vietnamese male named Tim was
11 leaving when CS2 arrived. CS2 indicated that Tim is a known methamphetamine dealer.
12 CS2 walked in since the door was open. CS2 observed that there is a metal enclosure
13 built around the front door area that looks like a cage. CS2 noted there were seven or
14 eight electronic gambling machines. CS2 saw one male patron inside smoking a meth
15 pipe and a second patron holding a meth pipe. CS2 gambled \$40 in US currency on a
16 machine. As CS2 was leaving, CS2 saw a Laotian male named "Racoon," who is a
17 known Oriental Killer Boy (OKB) gang member, walking into **Target Location 8**. A
18 March 2021 photograph from inside **Target Location 8** is included below:



Target Location 9

1
2 86. On January 21, 2021, CS2 reported that **Target Location 9** was an active
3 gambling den. CS2 noted there were approximately ten gambling machines at this
4 location.

5 87. On January 21, 2021, an UCE and CS2 went inside **Target Location 9**
6 during a supervised and recorded law enforcement operation. UCE and CS2 approached
7 the gate in the alley and pressed a button on the gate. An unknown female asked them
8 who they were and then opened the gate and allowed them entrance. UCE observed an
9 unknown male watching them and holding his waistband as if indicating he had a gun.
10 The unknown female led them up some stairs and into the gambling premises. UCE
11 observed two gambling rooms. One gambling room had four to five machines and the
12 second had about the same. There were four customers gambling at the machines. The
13 UCE played \$40 in US currency at one of the gambling machines and then departed.
14 CS2 indicated that there were about six people when they entered the gambling premises
15 and about twelve to thirteen when they left. CS2 noted there was an unknown female
16 walking around asking to use a torch and smoking methamphetamine. When agents
17 reviewed the video from the operation, they observed an unknown male smoking a
18 bulbous glass methamphetamine pipe.

19 88. On March 24, 2021, agents conducted surveillance at **Target Location 9**
20 in the late evening hours. During an approximately ten-minute period, six individuals
21 from three different vehicles were observed either entering or exiting **Target Location**
22 **9** through the gate in the alley behind the location. The activity observed by agents was
23 consistent with an active gambling den at **Target Location 9**.

Target Location 10

24
25 89. On November 24, 2020, agents conducted surveillance at **Target Location**
26 **10**. During approximately two hours of surveillance, starting in the early evening,
27 approximately twenty individuals were seen arriving and leaving the residence. At one
28 point during surveillance, a vehicle double-parked in front of **Target Location 10** and

1 an individual met with another individual at the door, went inside the residence, and
2 then returned to their vehicle and departed. The activity observed by agents was
3 consistent with an active gambling den operating at **Target Location 10**.

4 90. On January 23, 2021, an UCE went inside **Target Location 10** during a
5 supervised and recorded law enforcement operation. The UCE approached the door to
6 **Target Location 10** and rang the doorbell. An unknown female answered the door. The
7 UCE asked to play and was allowed entrance by the unknown female. When UCE went
8 inside, the UCE observed an older Asian male doing the books/writing in a notebook.
9 There were approximately ten electronic gambling machines and approximately three
10 to four patrons. The UCE observed an unknown male smoking a glass pipe in the
11 kitchen area. The UCE accidentally kicked a cup sitting on the floor that contained a
12 glass pipe. The UCE played \$20 in US currency at one of the gambling machines.

13 91. On February 4, 2021, San Diego Police Department Officers conducted a
14 traffic stop of Jetson DUONG and Yaritza RAMOS in the 4300 block of Thorn Street.
15 DOUNG and RAMOS had been observed leaving a known gambling house on 2900
16 Chamoune Avenue (**Target Location 10**). As RAMOS was on state parole, officers
17 conducted a search of her cell phone and observed text messages about gambling dens
18 and the mention of a gun.

19 **Target Location 11**

20 92. On November 8, 2020, San Diego Police Department Officers conducted
21 a traffic stop of a stolen vehicle across from **Target Location 11**. Two loaded firearms
22 and methamphetamine were found in the stolen vehicle. Mario VILLAREAL and
23 Kassie SANDOVAL were taken into custody. In a post-Miranda statement,
24 SANDOVAL indicated that she was driving her boyfriend, "Mario," to the trap house
25 ("trap house" is slang for gambling den) on Highland. SANDOVAL further provided
26 the trap on Highland is a game room and they have slot machines. SANDOVAL noted
27 she had been there a few times and people smoke methamphetamine there.
28 SANDOVAL said she had been in there approximately three months prior.

1 Additionally, SANDOVAL noted she had been caught leaving the Altadena (a known
2 alternative name for **Target Location 12**) game room once.

3 93. On December 3, 2020, agents conducted surveillance at **Target Location**
4 **11**. During approximately forty minutes of surveillance, starting in the late evening,
5 approximately six individuals were seen arriving and leaving the residence. One of the
6 individuals went inside, was there for approximately thirty-three minutes, and then
7 departed. The activity observed by agents was consistent with an active gambling den
8 at **Target Location 11**.

9 94. On January 22, 2021, an UCE went inside **Target Location 11** during a
10 supervised and recorded law enforcement operation. The UCE parked and walked up to
11 the area of the front door of **Target Location 11**. A person walking in front of the UCE
12 rang the doorbell. An unknown male who appeared to be the doorman asked who the
13 UCE was. The person standing in front of the UCE said that they had seen the UCE at
14 "41st" (**Target Location 6**). The doorman let the UCE inside and said he went by
15 "Youngster." Youngster cleaned the gambling den as the UCE played on the gambling
16 machines. Youngster sold methamphetamine to CS1 in a controlled buy on March 3,
17 2020 at 5061 Polk Ave (a gambling den location that is now closed). There was
18 approximately eleven electronic gambling machines inside the gambling den. There
19 was one other customer playing the gambling machines. The UCE played \$25 in US
20 currency at one of the gambling machines and then departed.

21 95. On February 23, 2021, SDPD conducted a vehicle stop of Antonia
22 GUZMAN after she was observed leaving **Target Location 11**. GUZMAN consented
23 to a search of her vehicle and officers found six different baggies of methamphetamine.
24 GUZMAN stated the methamphetamine was hers and she had it to smoke different
25 types. GUZMAN provided there were eleven to twelve gambling machines inside
26 **Target Location 11**. Guzman stated Tam LAI is the one that runs the place and collects
27 and hands out the money.

28 //

Target Location 12

1
2 96. On January 21, 2021, the UCE went inside **Target Location 12** during a
3 supervised and recorded law enforcement operation. The UCE parked and walked up to
4 the **Target Location 12**, which was the third residence east of 68th Street on the south
5 side of Amherst Street. The UCE walked down the east side of the residence, made a
6 right turn at the back of the residence, and found a door [south side of the residence
7 facing south]. A person in front of the UCE rang the doorbell, the door opened, and that
8 person went inside. The door closed and then an unknown male opened the door again.
9 The UCE said something like, "What's up?" and the unknown male let the UCE inside.
10 There were approximately fifteen electronic gambling machines in the room and about
11 four patrons gambling. The UCE sat at a gambling machine and put \$20 in US currency
12 in to play. There was a male sitting next to the UCE who went by "Fireball." (Tam
13 ONG, aka "Fireball," who sold methamphetamine to CS1 on January 7, 2020 at **Target**
14 **Location 3**). When the UCE was done playing, the UCE yelled, "Cash out!"
15 Subsequently, a different unknown male told an unknown female to cash the UCE out.
16 The unknown female gave the UCE \$35 in US currency and the UCE departed.

17 97. On February 16, 2021, as noted above, San Diego County Crime Stoppers
18 received a complaint regarding **Target Location 8**. The tipster indicated Erika VU was
19 running an illegal gameroom with drug use at **Target Location 8**. The tipster also noted
20 that VU owns the gameroom at 6831 Amherst St (**Target Location 12**).

21 98. On March 24, 2021, agents conducted surveillance at **Target Location 12**
22 in the evening hours. Agents observed two males on the east side of the residence, one
23 of the individuals is at the end of the driveway and watches one of the agents park their
24 vehicle on the street down the block, points to the vehicle and then walks back toward
25 **Target Location 12**. Shortly after this, two unknown males wearing helmets drive
26 motorcycles out of the target locations driveway at a high rate of speed and depart the
27 area. Several minutes later three unknown males walk from **Target Location 12** and
28 one of the males pointed to the agents vehicle and they walk towards and then around

1 the vehicle, stopping a few feet from the agents bumper. Surveillance was discontinued
2 due to concerns of officer safety. The activity observed by agents was consistent with
3 an active gambling den at **Target Location 12**.

4 **Target Location 13**

5 99. On January 18, 2021, SDPD officers observed Kimberly Dee SERNA
6 parked in a vehicle outside of a known gambling den at 5061 Polk Ave (now closed).
7 During a field interview, SERNA indicated that she had been at the gambling den at
8 5061 Polk Ave and that she knew of a gambling den at **Target Location 13**. SERNA
9 noted that there were about twenty gambling machines at **Target Location 13**, no
10 password required to enter, and individuals entered through the front door.

11 100. On January 19, 2021, CS2 reported **Target Location 13** was an active
12 gambling den. CS2 noted there were approximately fifteen gambling machines at the
13 location.

14 101. On January 22, 2021, an UCE went inside **Target Location 13** during a
15 supervised and recorded law enforcement operation. The UCE walked up to the area of
16 the front door and was let inside by an unknown Asian male in his 20's, who acted as a
17 doorman. The doorman asked the UCE what the UCE's name was and the UCE
18 responded. The UCE walked into the living room area and noticed a screened off door
19 to the right. Next to that door was a large monitor that displayed the video feed from
20 about sixteen different surveillance cameras. The UCE walked through the kitchen and
21 into a back room where there were around six to eight electronic gambling machines
22 and four to five patrons. There was one customer sitting next to the UCE who was
23 smoking methamphetamine. The UCE played \$40 in US currency at one of the
24 gambling machines and then left the gambling den.

25 102. On March 24, 2021, agents conducted surveillance at **Target Location 13**
26 in the evening hours. Agents observed approximately four to five individuals approach
27 or leave **Target Location 13** in a twenty-minute period. It appeared there was an
28 individual working the front door as a doorman, opening the door and allowing

1 individuals inside. The activity observed by agents was consistent with an active
2 gambling den at **Target Location 13**.

3 **Target Location 14**

4 103. On January 22, 2021, CS2 reported that **Target Location 14** was an active
5 gambling den. CS2 indicated that the owner of the gambling machines at **Target**
6 **Location 14** was TRAN, Dong NGUYEN, Dang NGUYEN, Tung NGUYEN, aka
7 “Ang,” and one other unidentified individual known as “Thuc.” CS2 stated this location
8 was known as “53rd.” CS2 noted there were approximately twenty gambling machines
9 at this location.

10 104. On January 22, 2021, an UCE and a CS2 went inside **Target Location 14**
11 during a supervised and recorded law enforcement operation. The UCE and CS2
12 approached the back of the location and were greeted and allowed entrance by an
13 unknown black male called “Boogey.” The UCE observed a desk to the right of the
14 entrance with security monitors and a short unknown Asian male sitting at the desk.
15 There were over twenty electronic gambling machines in a big open space. The UCE
16 played \$40 in US currency at one of the gambling machines. The UCE cashed out and
17 left with \$30 in US currency. The UCE observed one unknown male holding a
18 methamphetamine pipe. There were approximately a dozen people inside the gambling
19 den. Review of the video from the operation revealed that an unknown male was in the
20 gambling den smoking a bulbous glass pipe with a small torch. The pipe was consistent
21 with the type used for smoking methamphetamine.

22 105. On March 2, 2021, CS2 reported⁵ going inside **Target Location 14** on
23 February 28, 2021 and March 1, 2021 and noted it was still an active gambling den. On
24 March 1, 2021, CS2 observed Dong NGUYEN enter **Target Location 14** and provide
25 bank roll money to the banker. NGUYEN informed CS2 he owned machines at **Target**

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27 ⁵ CS2 contacted handling agents prior to going to gambling dens to collect intelligence,
28 but this activity was not recorded.

1 **Location 14** and there had been a robbery there. NGUYEN stated the doorman had
2 been involved and the bankroll along with some machines had been stolen.

3 106. On March 16, 2021, an agent conducted surveillance at **Target Location**
4 **14** in the late morning hours. Agents observed approximately five surveillance cameras
5 around **Target Location 14**. The building appears to be a vacant commercial building
6 with no identifiable business name on the building structure. The back entrance is a
7 white metal security gate with a cardboard sign. The back door is only accessible after
8 you pass through a chain link security fence. The fence separated the property from the
9 public sidewalk and was partially covered with black fabric. During an approximate
10 one-hour period, several individuals were seen hanging outside and going into to **Target**
11 **Location 14**. The activity observed was consistent with an active gambling den at
12 **Target Location 14**.

13 **Target Location 15**

14 107. On February 11, 2021, CS2 went inside **Target Location 15** during a
15 supervised law enforcement operation. Agents observed CS2 approach and enter
16 **Target Location 15**. CS2 walked up to the gate and an unknown male that goes by
17 "Whiteboy" opened the gate. CS2 walked under the carport and to the side door, which
18 was open. CS2 went inside and observed four patrons and approximately twenty
19 electronic gambling machines. A Vietnamese female named "Nhung" stated she was
20 staying there with her husband "Tung." "Nhung" had the bankroll and stated the one
21 large Go-Fish [large table-top electronic gambling machine for four – six players]
22 machine cost \$14,000, did not pay out, and made them good money, while the Pot of
23 Gold machines were losing money that day. CS2 indicated that "Whiteboy" was inside
24 smoking methamphetamine and offered CS2 a hit of meth, which CS2 declined. CS2
25 observed a TV monitor with video surveillance just inside the door. CS2 played \$40 in
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1 US currency at one of the gambling machines. Agents observed CS2 departing the
2 location and followed CS2 to conduct a debrief.⁶

3 108. On March 4, 2021, CS2 went inside **Target Location 15** during a
4 supervised and recorded law enforcement operation. CS2 indicated that a Chaldean
5 male named "Louise" was working as the doorman and had opened the gate for CS2.
6 CS2 observed approximately seven patrons inside playing on the electronic gambling
7 machines. CS2 played \$40 in US currency at one of the machines and then cashed out
8 \$30. CS2 then played the \$30 in US currency at one of the penny machines. CS2
9 observed a glass meth pipe and a meth bong sitting on one of the machines.

10 109. On March 16, 2021, a neighbor of **Target Location 15** contacted SDPD
11 to file a complaint related to **Target Location 15**. The neighbor was contacted and
12 interviewed by agents over the phone. The neighbor said he lived in view of **Target**
13 **Location 15**, had started observing suspicious behavior at the location approximately a
14 month and a half ago. The neighbor observed 50 to 100 people a day going in and out
15 of **Target Location 15**. The neighbor described the people going into the residence as
16 males and females that were Black, White, Asian, and Mexicans between 20 years old
17 and 60 years old. Some would park in the driveway, but most of them parked on the
18 street, double parked, or tried to park in other neighbor's driveways. The neighbor never
19 saw anyone go in through the front door of the location. The neighbor indicated that
20 everyone would go through the side of the location and through a back door. The
21 neighbor said there were always two or three males that seemed to be security that
22 would let people in the gate. The people would go into the residence for a few minutes
23 and then leave. The neighbor believed **Target Location 15** had become some kind of
24 drug dispensary operation.

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27 ⁶ The recording equipment used in the operation on February 11, 2021 malfunctioned
28 and no recording was obtained.

1 110. On March 24, 2021, as discussed above, agents conducted surveillance in
2 the evening hours at **Target Location 6** and **Target Location 15**, where the gambling
3 den machines are believed to be owned by the same owners. Surveillance units from
4 **Target Location 15** followed a box truck from **Target Location 15** to **Target Location**
5 **6**. The van went into the alley of **Target Location 6**, opened the gate, backed in and
6 then closed the gate. The box truck was registered to Doan Thi Thu Nguyet at **Target**
7 **Location 6**. Surveillance units observed approximately five individuals enter and six
8 individuals leave **Target Location 15** in a twenty-four minute period. The activity
9 observed by agents was consistent with an active gambling den.

10 **Target Location 16**

11 110. On March 4, 2021, CS2 went inside **Target Location 16** during a
12 supervised and recorded law enforcement operation. CS2 provided they went into a
13 black door behind the Rainbow Market and an unknown male opened the door and let
14 CS2 inside. Once through the door, CS2 noted that there was a courtyard and then
15 another door. CS2 went through the second door and into the gambling den. CS2
16 observed two patrons inside playing and there was a known male sitting inside an office
17 watching the security cameras on a monitor. There were two rooms with at least twenty
18 electronic gambling machines. CS2 played \$40 in US currency at one of the machines.
19 A female asked if anyone had anything, CS2 believed the female was asking to obtain
20 drugs.

21 111. On March 19, 2021, agents conducted physical surveillance at 5952
22 Dwight Street, the known residence of TRAN. A female was observed leaving the
23 residence and was followed to **Target Location 16**.

24 112. On March 22, 2021, a citizen filed a complaint with a SDPD regarding
25 **Target Location 16**. The citizen and their spouse stated there is a gambling den located
26 at **Target Location 16**. The citizens stated for the past seven months people had been
27 driving into the alley and entering the business. There had been multiple fights in the
28 alley and other disturbances. The citizens noted they had not seen any gambling

1 machines; however, they had a good idea illegal activity like narcotics or gambling was
2 going on. They had observed an individual acting as a doorman to the location and that
3 the location appeared to be open to 24 hours a day.

4 113. On March 23, 2021, an officer conducted surveillance at **Target Location**
5 **16** in the early evening. During an approximate one-hour period, twelve individuals
6 were observed leaving, and at least eleven individuals were observed going inside
7 **Target Location 16**. The activity observed by law enforcement was consistent with an
8 active gambling den at **Target Location 16**.

9 **Target Location 17**

10 114. On March 10, 2021, CS2 went inside **Target Location 17** during a
11 supervised and recorded law enforcement operation. CS2 said they were told to enter
12 **Target Location 17** from the alley and that it was a long driveway with a white door.
13 CS2 indicted that the doorman was a Vietnamese male known to working in gambling
14 dens. CS2 observed approximately thirteen electronic gambling machines and then
15 noticed one additional penny machine in a closet. CS2 played \$40 in US currency at
16 one of the gambling machines. CS2 observed three patrons inside. CS2 was told by one
17 of the employees that the owner of the machines at **Target Location 17** was "Son BM."

18 115. On March 24, 2021, agents conducted surveillance at **Target Location 17**
19 in the evening hours. Patrons at this location enter from the alley and go into the back
20 door. During an approximate two-hour period agents observed four vehicles depart from
21 nearby the location, one person exit the location on foot, four vehicles arrive, and at
22 least four individuals from those vehicles approach the location. The also observed one
23 person arrive to the location by foot. Also, during this period agents conducted drive-
24 by surveillance and observed an unknown male standing outside the backdoor or the
25 target location. The activity observed by law enforcement was consistent with an active
26 gambling den at **Target Location 17**.

27 116. Additionally, on March 24, 2021, at the direction of surveillance agents,
28 CS2 entered **Target Location 17**, stayed approximately seventeen minutes, and then

1 departed. CS2 was debriefed and indicated that there were about seven patrons inside,
2 most of whom were playing on electronic gambling machines. CS2 observed one
3 unknown Hispanic male smoking methamphetamine.

4 **Target Location 18**

5 117. On February 4, 2021, agents conducted drive-by surveillance at **Target**
6 **Location 18**. Agents observed surveillance cameras mounted under the eaves of **Target**
7 **Location 18** on the north and south corners.

8 118. On February 15, 2021, CS2 reported going to **Target Location 18** and
9 confirmed it was a gambling den. While at **Target Location 18**, CS2 observed TRAN
10 and Tung NGUYEN, aka "Ang," arrive at the location and go inside. CS2 was told by
11 another individual that TRAN had taken over **Target Location 18** from Le LE, aka
12 "Chi LE."

13 119. On March 10, 2021, CS2 went inside **Target Location 18** during a
14 supervised and recorded law enforcement operation. CS2 indicated that "Derek" was
15 working as the doorman and let CS2 inside. CS2 observed thirteen electronic gambling
16 machines, including one large penny machine, and approximately eight patrons inside.
17 CS2 played \$40 in US currency at one of the machines. CS2 observed a least three
18 people smoking methamphetamine. CS2 observed that a female named "Michelle" had
19 just started her shift as the banker and she was in the kitchen area of **Target Location**
20 **18** with the bankroll. Michelle discussed the previous shift and the bankroll, and she
21 had what appeared to be an eight-ball of methamphetamine in a baggie laying out next
22 to her.

23 120. On March 24, 2021, agents conducted surveillance at **Target Location 18**
24 in the evening hours. In coordination with agents, CS2 arrived and parked outside
25 **Target Location 18**. Agents observed an individual working as a doorman at the
26 location letting patrons inside and out. During a thirty-minute period, agents observed
27 seven individuals including CS2 either go into or exit from **Target Location 18**. The
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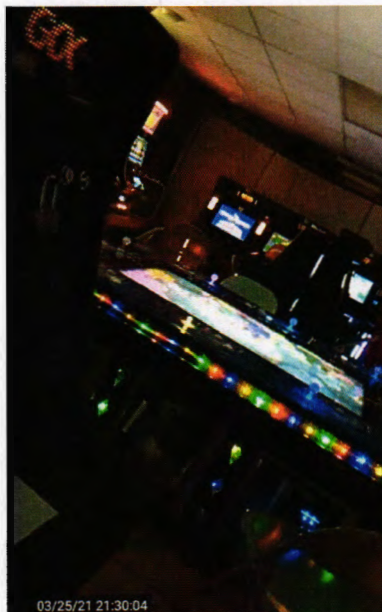
1 activity observed by law enforcement was consistent with an active gambling den at
2 **Target Location 18.**

3 121. On March 24, 2021, CS2 was debriefed regarding **Target Location 18** and
4 indicated that “Derek” opened the door. CS2 had sat at an electronic gambling machine
5 to gamble. CS2 observed two individuals counting bankroll money and a Black male
6 named “Capone” acting as security watching the cameras. CS2 observed two
7 individuals smoking methamphetamine inside **Target Location 18.**

8 **Target Location 19**

9 122. In January 2021, CS2 reported that **Target Location 19** was an active
10 gambling den. CS2 indicated that the owner of the gambling machines at **Target**
11 **Location 19** were Sean TRAN, En TO, and Tri VO. CS2 stated this location was known
12 as “48th.” CS2 noted this was a very busy location and they had a large number of
13 machines.

14 123. On March 24, 2021, agents conducted surveillance at **Target Location 19**
15 in the early evening hours. Agents observed approximately eight different individuals
16 in a one-hour period go into or exit **Target Location 19**. The activity observed by law
17 enforcement was consistent with an active gambling den at **Target Location 19**. A
18 photograph from inside **Target Location 19** is included below:



1 124. On March 25, 2021, CS2 went inside **Target Location 19** during a
2 supervised and recorded law enforcement operation. CS2 provided they walked to the
3 rear door and “Steve” was working as the doorman. CS2 observed approximately thirty
4 electronic gambling machines and one large Go Fish electronic gambling machine. CS2
5 noted there were approximately fifteen patrons inside. CS2 observed the audit was being
6 conducted by a Vietnamese male named “Sam” and En TO, aka “Mama.” CS2 asked if
7 CS2 could still play, was directed to a machine by “Sam,” and the audit continued. CS2
8 observed a methamphetamine pipe on one of the gambling machines.

9 **Target Location 20**

10 125. On March 24, 2021, agents conducted surveillance at **Target Location 20**
11 in the early evening hours. Agents observed seven different individuals in a twenty-
12 minute period go into or exit **Target Location 20**. The activity observed by law
13 enforcement was consistent with an active gambling den at **Target Location 20**.

14 126. On March 25, 2021, CS2 went inside **Target Location 20** during a
15 supervised and recorded law enforcement operation. CS2 provided an unknown female
16 opened the door after a short delay. An individual named Roy Hayes told CS2 that
17 **Target Location 20** was owned by “Vinny,” who also owns **Target Location 13**. CS2
18 observed Billy HO with the bankroll money inside the location. CS2 played \$40 in US
19 currency at one of the gambling machines and cashed out \$70 in US currency which
20 was given to law enforcement and impounded as evidence. CS2 observed there were
21 thirteen electronic gambling machines in the backroom of the business. CS2 observed
22 an unknown male smoking methamphetamine inside **Target Location 20**.

23 **Target Location 21**

24 127. On January 19, 2021, CS2 reported that **Target Location 21** was an active
25 gambling den. CS2 indicated that the owner of **Target Location 21** was Nam LU and
26 there were seven electronic gambling machines in one room and a four-person Go Fish
27 machine in a second room. CS2 noted this was an exclusive gambling den and LU was
28 very selective in who he allowed inside.

1 128. On January 23, 2021, agents conducted an undercover operation at **Target**
2 **Location 21**. Surveillance agents observed two unknown male departing **Target**
3 **Location 21**, followed by one unknown male three minutes later, followed by another
4 unknown male eleven minutes later. A UCE walked up to **Target Location 21** and there
5 was a locked gate. The UCE attempted to open the gate and was unable to unlock the
6 gate or gain the attention of anyone inside. The UCE ended the operation.

7 129. On March 16, 2021, agents conducted surveillance at **Target Location 21**
8 in the evening hours. Surveillance agents observed three unknown males exit a mini-
9 van parked in front of **Target Location 21** and enter the location. Approximately five
10 minutes later, the three unknown males exited **Target Location 21** return to the mini-
11 van and departed the area. Surveillance agents followed the mini-van until it was pulled
12 over for expired registration. During the traffic stop, the three individuals were found
13 to be in possession of methamphetamine and a loaded firearm.

14 130. On March 29, 2021, law enforcement officers conducted a traffic stop of
15 Thanh NGUYEN in the vicinity of **Target Location 21**. NGUYEN said he was coming
16 from **Target Location 21** where there were seven gambling machines and an active
17 gambling den. NGUYEN indicated that there was one fish game and six other slot
18 machines. NGUYEN stated Nam THAO is the one that runs the gambling den at **Target**
19 **Location 21**.

20 BASIS FOR EVIDENCE SOUGHT IN SEARCH WARRANT

21 131. Based upon my experience and training, consultation with other law
22 enforcement officers experienced in drug and financial investigations, and all facts and
23 opinions set forth in this affidavit, I know that:

24 a. Individuals involved in drug trafficking often maintain the following
25 items in furtherance of their drug trafficking activities: controlled substances,
26 paraphernalia for packaging, weighing, cutting, testing, distributing and manufacturing
27 controlled substances. Individuals who maintain a drug involved premises will often
28 maintain these items at the drug involved premises.

1 b. Individuals involved in drug trafficking and illegal gambling
2 operations often maintain records of their narcotics and gambling transactions and other
3 records of evidentiary value for months or years at a time. It is common, for example,
4 for drug traffickers and illegal gambling operators to keep pay/owe sheets or other
5 papers of drug sold and monies owed. Such pay/owe sheets or papers are used as a
6 basis for accounting and for settling existing debts. Such records are often maintained
7 for a substantial period of time even after the debts are collected. I have found in my
8 training and experience that such records are invaluable to drug traffickers and illegal
9 gambling operators and that such records are rarely discarded. Finally, it has also been
10 my experience that such records and pay/owe sheets also frequently include the names,
11 identities and telephone numbers of suppliers, customers and co-conspirators.

12 c. Individuals involved in drug trafficking must often rely on others to
13 obtain their drugs and to help them market the drugs. Frequently, traffickers maintain
14 evidence of the identities of these co-conspirators.

15 d. Individuals involved in drug trafficking and illegal gambling
16 operations commonly earn income in the form of cash and try to legitimize these profits.
17 In order to do this, traffickers frequently attempt to secrete, transfer and conceal the
18 money by means, including, but not limited to: placing assets in names other than their
19 own to avoid detection while maintaining control; laundering the money through what
20 appears to be legitimate business or businesses; hiding money in their homes, safes and
21 safety deposit boxes; or using the money to buy assets which are difficult to trace.
22 Records of these and other types of transactions are often found at the residences of
23 individuals involved in drug trafficking and illegal gambling, and inside the location
24 where illegal gambling takes place and inside the premises where drug trafficking takes
25 place.

26 e. Individuals involved in drug trafficking and illegal gambling
27 operations often keep and maintain large amounts of United States currency at their
28 residences, inside the location where illegal gambling takes place, and inside the

1 premises where drug trafficking takes place. Such funds are often used for everyday
2 expenditures and to maintain and finance their ongoing business operations.
3 Additionally, individuals involved in drug trafficking and illegal gambling operations
4 often amass and maintain assets at their residence, inside the location where illegal
5 gambling takes place, and inside the premises where drug trafficking takes place, which
6 were generated by their illegal activities, or purchased with the cash earned from such
7 illegal activities.

8 f. Individuals involved in drug trafficking and illegal gambling
9 establishments often maintain weapons, firearms and ammunition on their person or in
10 their residence and/or vehicles. Such weapons and firearms are used, and can be used,
11 as an instrumentality of the crime of possession and distribution of drugs and firearms.
12 Furthermore, I am aware of instances in which these individuals have maintained such
13 items in their residences, in the illegal gambling establishments, and in vehicles in order
14 to protect themselves and guard their drugs, firearms and profits, as well as for
15 enforcement purposes during their drug and firearms dealings.

16 g. Premises used by individuals involved in drug trafficking and illegal
17 gambling usually contain articles of personal property evidencing the identity of
18 person(s) occupying, possessing, residing in, owning, frequenting or controlling the
19 premises.

20 h. Individuals involved in maintaining a drug involved premises, illicit
21 drug trafficking, and illegal gambling maintain records, including electronic files and
22 messages related to their illicit business on smart phones, computers, and computer
23 servers hosting internet applications such as electronic mail (email) and personal social
24 networking web pages. These individuals commonly use cellphones, blackberries,
25 PDAs, other personal handheld electronic devices, and laptop and desktop computers
26 to communicate with, among others, their customers, their suppliers, and other criminal
27 associates and to store phone numbers, text messages, emails, photographs, physical
28 and email addresses, and other information that constitutes evidence of their drug

1 trafficking activities and illegal gambling activities. Drug traffickers also commonly
2 store records of the business of distributing and selling drugs, on computers and
3 computer discs, diskettes, cassettes, tapes, and other forms of digital media. Drug
4 traffickers commonly maintain these items on their person and/or in their residences
5 and vehicles.

6 i. Individuals involved in drug trafficking often utilize radio scanners,
7 police radios and other electronic equipment in order to conduct counter surveillance
8 upon law enforcement authorities, and usually maintain these items on their person
9 and/or in their residences and vehicles.

10 j. Individuals involved in maintaining a drug involved premises, illicit
11 drug trafficking, and illegal gambling maintain documents and files containing names
12 of associates and/or conspirators. These individuals also often maintain photographs,
13 and/or audio and video recordings of their associates or real and personal property
14 which were acquired with drug and/or gambling proceeds or property utilized to
15 facilitate drug trafficking and/or gambling activities. Such items are typically
16 maintained at the premises where drug trafficking and illegal gambling take place.

17 k. Illegal gambling establishments will often contain electronic
18 gambling machines. The data stored in electronic gambling machines includes daily
19 audit screens, which show the amount of money the machine has taken in and paid out
20 in winnings. This also includes master audit screens to show the amount of money the
21 machines have taken in and paid out for the life of the machine, including breakdowns
22 based on weekly, monthly, and yearly earnings/losses. This data includes identification
23 information on the manufacturer and model of the machines, dates and times the
24 machine has been operated, and other electronic spreadsheets.

25 ELECTRONIC GAMBLING MACHINE SEARCH METHODOLOGY

26 132. Based on my training and experience I know that electronic gambling
27 machines are basically small computers with electronic hard drives, monitors and
28 computer boards that store the information. At a minimum each machine contains data

1 on how much money had been played and how much money has been payed out during
2 the lifetime of the machine as well as the amounts since the last audit/reset. Often times,
3 these machines are put together with various parts from other machines. I know the
4 aforementioned data can be accessed and observed on the main screen of the gambling
5 machine.

6 133. Following the issuance of this warrant, agents will forensically examine
7 the subject devices, download, view and photograph the data stored on each gambling
8 machine.

9 **PRIOR ATTEMPTS TO OBTAIN DATA**

10 134. The United States has not attempted to obtain this data by other means.

11 **REQUEST FOR NIGHT SERVICE**

12 135. Pursuant to Federal Rule of Criminal Procedure 41(e)(2)(A)(ii) and Title
13 21, United States Code, Section 879, I request authority to execute the search warrants
14 at any time of the day or night. Good cause exists for night service. As detailed above,
15 there is probable cause to believe that the individuals present at the search warrant
16 locations will be involved in the use of controlled substances, the distribution of
17 controlled substances, and maintenance of these locations as drug involved premises.
18 This affidavit supports a determination that evidence of violations of Title 21, United
19 States Code, Section 856, maintaining a drug involved premises will be obtained by
20 service during the late evening, early morning hours. Investigators know that patrons
21 use methamphetamine and other controlled substances while present at these locations
22 and that individuals distribute methamphetamine at these locations during these hours.
23 Evidence that these search locations are maintained as drug involved premises,
24 therefore, will be best obtained while the search locations are operated for the purpose
25 of being a drug involved premises.

1 136. Investigators know that at the gambling dens occupying commercial
2 business spaces are near other legitimate business that are not open during night service
3 hours. Night service at these locations will best reduce the likelihood of danger to
4 legitimate patrons at these legitimate businesses, will reduce the impact to the lawful
5 operation of the legitimate businesses and decrease traffic congestion associated with
6 service during the day. Night service at these locations is the best method to avoid undue
7 economic burden on the nearby legitimate businesses. Further, these locations are most
8 active during the hours requested and serving arrest warrants at these locations while
9 they are most active will facilitate the execution of arrest warrants in conjunction with
10 the search warrant and thereby avoid the execution of follow-on arrest warrants at
11 individual residences, the destruction of evidence, and individuals fleeing. Investigators
12 are aware that many of the individuals who frequent illegal gambling dens have prior
13 convictions for violent crimes. Based on my training and experience and in consultation
14 with others in planning for the execution of these warrants, I believe executing these
15 arrest warrants at these locations at night will reduce the risks associated with making
16 the arrests.

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1 137. Investigators also know that the gambling establishments located inside
2 residences are in residences that are fully consumed by the gambling establishment.
3 That is, any residents living within the establishment are fully aware it is operated as a
4 gambling establishment and almost always participates in the operation and
5 maintenance of the gambling establishment. During the execution of numerous previous
6 warrants at illegal gambling establishments nearly every room, save for the kitchen area,
7 bathrooms, and one bedroom, were filled with gambling machines. Further, evidence
8 of drug trafficking was often found inside the bathrooms, kitchen and the bedroom
9 occupied by a resident. The bedroom occupied by a resident also nearly always
10 contained evidence related to gambling, to include a safe where gambling and drug
11 proceeds were kept, firearms, gambling ledgers, and keys to open the gambling
12 machines. In short, the occupants were fully involved in the operation of the illegal
13 gambling machines and drug distribution. The effect of night service, therefore, will not
14 likely wake any resident present in the gambling establishment. Given the amount of
15 activity, including numerous individuals who are gambling, using drugs, providing
16 access to the gambling establishment as a doorman, and monitoring video surveillance,
17 there is little likelihood that investigators will encounter a legitimate resident woken
18 from sleep who may believe an intruder is breaking into their residence. In fact, quite
19 the opposite is true. It is more likely that a resident within an illegal gambling
20 establishment would be woken during a daytime service. Officer safety and public
21 safety concerns weigh in favor of night service.

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1 138. As discussed above, surveillance, undercover operations, source
2 information, and observations from uniformed officers working around the Target
3 Locations has found that gambling dens are most active in the late evening hours. Search
4 warrants will be executed in conjunction with arrest warrants and the subjects are known
5 to frequent these locations in the late evening hours, otherwise many subjects are
6 transient and will be difficult to locate. Additionally, as a large number of warrants will
7 be executed simultaneously in a small geographical area, there will be less pedestrian
8 and vehicle traffic in the late evening. Also, the majority of these locations are near
9 schools, churches, and/or recreation centers which have minimal use in the late evening
10 compared to the morning hours and night service will allow for greater

11 CONCLUSION

12 139. Based upon my experience and training, consultation with other law
13 enforcement officers experienced in drug and financial investigations, and all the facts
14 and opinions set forth in this affidavit, I believe that the items set forth in Attachment
15 B (incorporated herein by reference), which evidence violations of Title 21, United
16 States Code, Sections 841(a)(1) and 846 (Conspiracy to Distribute Controlled
17 Substances); Title 21, United States Code, Sections 841(a)(1) (Possession of Controlled
18 Substances with Intent to Distribute); Title 21, United States Code, Section 843(b)
19 (Unlawful Use of a Communication Facility to Facilitate the Distribution of a
20 Controlled Substance); Title 21, United States Code, Section 856, (Maintaining a Drug
21 Involved Premises); and Title 18, United States Code, Section 1955, (Illegal Gambling);
22 as set forth above, will be found at the **Target Locations**.

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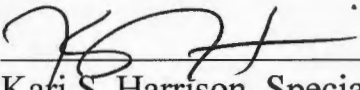
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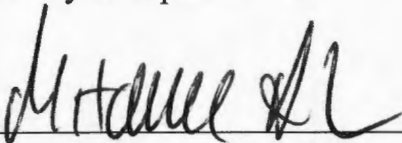
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1 140. Because this is an ongoing investigation and premature disclosure of the
2 investigation could endanger agents and officers, cause the target subjects and others to
3 flee, and cause destruction of evidence, I request that this affidavit, the application for
4 the search warrant, the search warrant, and all other associated court records be sealed
5 until further court order.

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8 
9 Kari S. Harrison, Special Agent
10 Federal Bureau of Investigation

11 Sworn to and subscribed before me
12 this 7th day of April 2021.

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14
15 HON. MITCHELL D. DEMBIN
16 United States Magistrate Judge

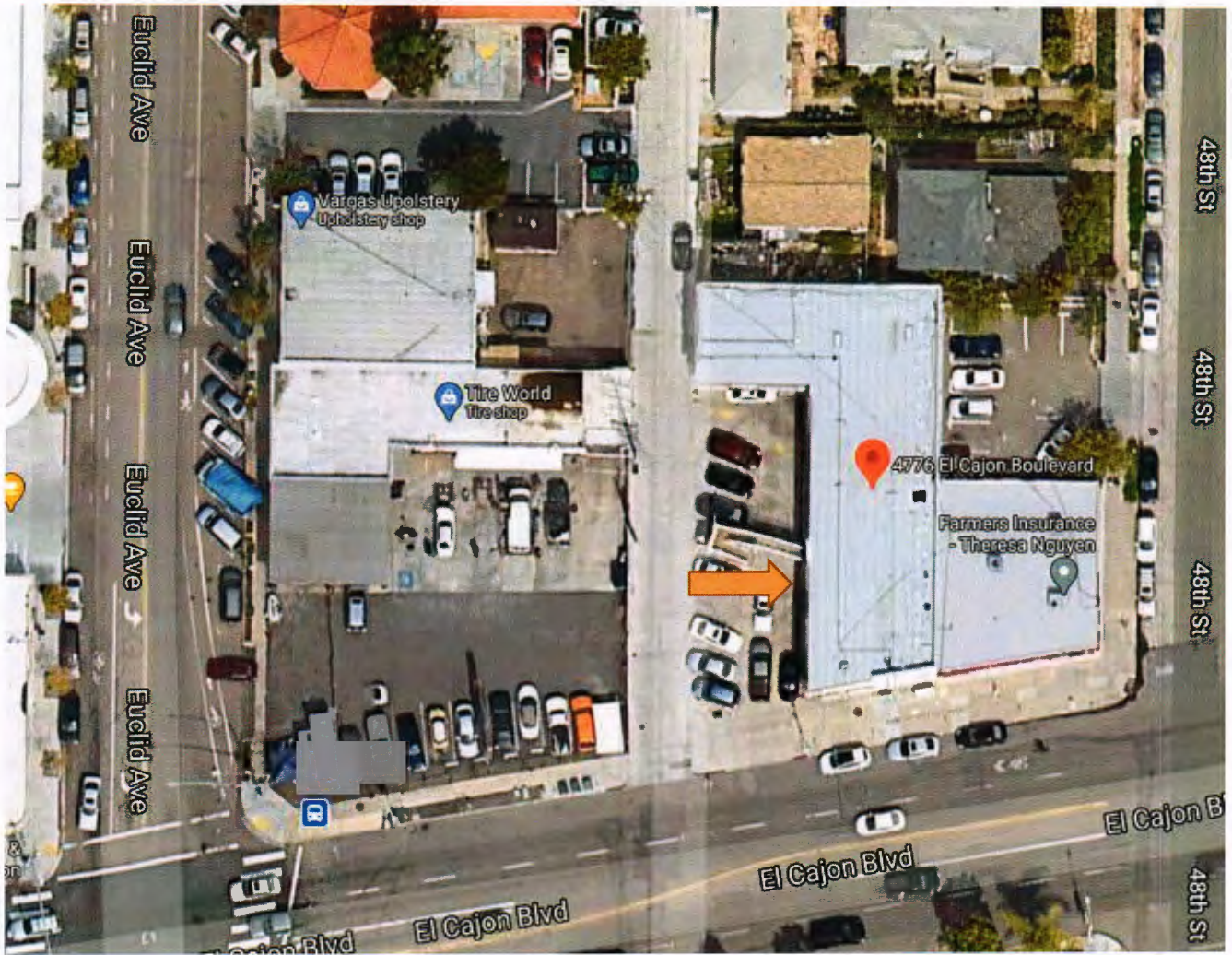
ATTACHMENT A-1
DESCRIPTION OF PROPERTY TO BE SEARCHED

4776 El Cajon Boulevard, Suite #102, San Diego, California, zip code 92105, is described as a ground story business space inside of a business complex. The building has off-white siding and stucco with predominantly tan colored trim. The numbers "4776" appear in red on the center of the south side of the building facing El Cajon Boulevard. Suite #102 is accessed by walking north from El Cajon Boulevard and is the second door on the west side of the building facing the alley. There are no numbers affixed to the door. The door is situated between suite #101 and suite #103. There is a large white sign with blue and red lettering that reads, "KT Alterations and Gifts" above the doorway. The doorway has a silver metal frame comprised of a large sheet of black tinted glass.

Enclosed are three (3) photographs:







ATTACHMENT B

ITEMS TO BE SEIZED

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3 1. Documents showing or memorializing, or related to, the operations of an illegal
4 gambling business, including payroll sheets/journals, payroll stubs, personnel files, pay
5 owe sheets, gambling machine audits, records of income and expenses, records showing
6 ownership of machines or gambling premises, cash in and cash out, records of loans, log
7 books, gambling ledgers, receipts for purchases of gambling machines, names of
8 employees and owners, personal telephone/address books, electronic organizers, telephone
9 and utility bills, telephone answering pads, bank and financial records, storage records such
10 as storage locker receipts, safety deposit box rental records, mailboxes, and keys.
- 11 2. Money, assets, and evidence of assets derived from conducting an illegal gambling
12 business and records thereof, including but not limited to United States currency.
- 13 3. Documents and articles of personal property reflecting the identity of persons
14 occupying, possessing, residing in, owning, frequenting or controlling the premises to be
15 searched or property therein, including keys, rental agreements and records, property
16 acquisition records, utility bills and receipts, photographs, telephone records, vehicle
17 and/or vessel records, canceled mail envelopes, correspondence, financial documents such
18 as tax returns, bank records, safety deposit box records, canceled checks, and other records
19 of income and expenditure, credit card records, travel documents, personal identification
20 documents.
- 21 4. Devices used to monitor gambling operations and counter surveillance against law
22 enforcement, such as surveillance cameras and monitors, surveillance footage and
23 recordings, radio scanners, police radios, and recording devices and cameras.
- 24 5. Photographs and video and audio recordings which document an association with
25 other coconspirators and/or which display narcotics, firearms, or money and proceeds from
26 drug and/or gambling transactions.
- 27 6. All gaming machines, whether mechanical or video operated, any device that is
28 adapted for use in such a way that, as a result of the insertion of any piece of money, coin,

1 token, game card, credit card, debit card, or other object, or by any other means, is caused
2 to operate, and by reason of any element of hazard or chance or other outcome of such
3 operation unpredictable by him, the user may receive anything of value or credit.

4 7. The contents of gaming machines or devices to include currency and coins, paper
5 for producing receipts or credits, and all data and media within the gambling machines.

6 8. Controlled substances, paraphernalia for packaging, weighing, cutting, testing,
7 distributing and manufacturing controlled substances.

8 9. Documents containing data reflecting or memorializing the ordering, possession,
9 purchase, storage, distribution, transportation and sale of controlled substances, including
10 buyer lists, seller lists, pay owe sheets, records of sales, log books, drug ledgers, personal
11 telephone/address books containing the names of purchasers and suppliers of controlled
12 substances.

13 10. Money, assets, and evidence of assets derived from or used in the purchase or sale
14 of controlled substances and records thereof.

15 11. To seize and preserve all computers, computer hardware, computer hard drives,
16 discs, "thumb" drives, digital cameras, CD's, DVD's, hand held computers commonly
17 referred to as "tablets" or "iPads", cellular phones, smart phones (commonly referred to as
18 iPhones or Android phones, or similar devices), or any other device or media capable of
19 digitally or magnetically storing data. A separate warrant will be applied for any such
20 search within 14 days of a device's seizure (not counting the day of the seizure) or a device
21 will be returned.

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