

NOT FOR PUBLIC VIEW

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means

Original

Duplicate Original

UNITED STATES DISTRICT COURT

for the

SEALED

Southern District of California

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address))
428 South 46th Street, San Diego, CA, 92113)
)
)
)

Case No. '21 MJ02101

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

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

See Attachment A-2, incorporated herein by reference.

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

See Attachment B, incorporated herein by reference.

YOU ARE COMMANDED to execute this warrant on or before June 8, 2021 (not to exceed 14 days)

in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to The Honorable Michael Berg

(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person or whose property, will be searched or seized (check the appropriate box)

for days (not to exceed 30) until, the facts justifying, the later specific date of

Date and time issued: May 25, 2021 at 1750

City and state: San Diego, CA

Michael Berg

Judge's signature

The Honorable Michael Berg, U.S. Magistrate Judge

Printed name and title



AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

Return

Case No.: '21 MJ02101	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A-2

DESCRIPTION OF PROPERTY TO BE SEARCHED

428 South 46th Street, San Diego, CA, 92113

The residence (depicted below) is a single story family residence, with cream stucco exterior with white trim with gray asphalt shingle roof. 428 S. 46th St., is located on west side of 46th St., and two house north of Oceanview Boulevard. Front white metal security screen door faces east toward 46th St. The numbers 428 are black in color and located on left side of the front metal security screen door.



ATTACHMENT B

ITEMS TO BE SEIZED AND SEARCHED

1
2
3 There is probable cause that the following constitute evidence of violations of 21
4 U.S.C. Sections 841(a)(1), 843(b), 846, 952, 960, 963, and 18 U.S.C. Sections 1956-1957 (the
5 “Target Offenses”) and that they will be found in the **Target Locations** and **Target**
6 **Vehicles**:

7 1. Controlled substances.

8 2. Paraphernalia for packaging, using, weighing, cutting, testing, distributing,
9 and identifying controlled substance(s).

10 3. Records, items, and documents, reflecting drug trafficking and money
11 laundering and/or travel in furtherance of drug trafficking and or money laundering.

12 4. Money, assets, and evidence of assets derived from or used in drug trafficking
13 and money laundering; including all banking and financial institution records.

14 5. Photographs and video and audio recordings which document an association
15 with other coconspirators and/or which display narcotics, firearms, or money and proceeds
16 from narcotics transactions.

17 6. Weapons, firearms, firearms accessories, and ammunition and documents
18 relating to the purchase and/or possession of such items.

19 7. Items or personal property tending to show identity of persons in ownership,
20 dominion, and / or control of the **Target Locations** and **Target Vehicles**; and

21 8. **Seizure Only**: All electronic devices, including cellular telephones, personal
22 computers, tablets, and other electronic communication devices, which may contain
23 evidence of drug trafficking and money laundering.

24 All of the above constituting: (1) evidence of a violation of the Target Offenses; (2)
25 contraband, fruits of the Target Offenses or other items illegally possessed; or (3) property
26 designed for use, intended for use, or used in committing these Target Offenses.

27
28

UNITED STATES DISTRICT COURT

for the

SEALED

Southern District of California

In the Matter of the Search of

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

428 South 46th Street, San Diego, CA, 92113

Case No. '21 MJ02101

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

See Attachment A-2, 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;
[x] 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, Offense Description. Rows include 21 U.S.C. § 841(a)(1), §843(b) and 18 U.S.C. §§1957-1957.

The application is based on these facts:

See attached Affidavit of DEA Task Force Officer Scott Faiferlick

- [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

Signature of Scott Faiferlick
Applicant's signature

Scott Faiferlick, DEA Task Force Officer
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specify reliable electronic means).

Date: May 25, 2021

Signature of Michael Berg
Judge's signature

City and state: San Diego, CA

Hon. Michael Berg, U.S. Magistrate Judge
Printed name and title

ATTACHMENT A-2

DESCRIPTION OF PROPERTY TO BE SEARCHED

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ATTACHMENT B

ITEMS TO BE SEIZED AND SEARCHED

There is probable cause that the following constitute evidence of violations of 21 U.S.C. Sections 841(a)(1), 843(b), 846, 952, 960, 963, and 18 U.S.C. Sections 1956-1957 (the “Target Offenses”) and that they will be found in the **Target Locations** and **Target Vehicles**:

1. Controlled substances.
2. Paraphernalia for packaging, using, weighing, cutting, testing, distributing, and identifying controlled substance(s).
3. Records, items, and documents, reflecting drug trafficking and money laundering and/or travel in furtherance of drug trafficking and or money laundering.
4. Money, assets, and evidence of assets derived from or used in drug trafficking and money laundering; including all banking and financial institution records.
5. Photographs and video and audio recordings which document an association with other coconspirators and/or which display narcotics, firearms, or money and proceeds from narcotics transactions.
6. Weapons, firearms, firearms accessories, and ammunition and documents relating to the purchase and/or possession of such items.
7. Items or personal property tending to show identity of persons in ownership, dominion, and / or control of the **Target Locations** and **Target Vehicles**; and
8. **Seizure Only**: All electronic devices, including cellular telephones, personal computers, tablets, and other electronic communication devices, which may contain evidence of drug trafficking and money laundering.

All of the above constituting: (1) evidence of a violation of the Target Offenses; (2) contraband, fruits of the Target Offenses or other items illegally possessed; or (3) property designed for use, intended for use, or used in committing these Target Offenses.

1 SANDOVAL and Esteban Rueben GASTELUM-Sanchez. **Target Location 3** has been
2 identified as narcotics and money stash house for David VILLEGAS as well as the
3 residence of David SANTA MARIA. **Target Location 4** has been identified as the
4 residence of David VILLEGAS. As discussed in more detail below, I believe that probable
5 cause exists that evidence, fruits, and instrumentalities of violations of federal criminal
6 laws may be found at the **Target Locations** and **Target Vehicles** as well as a person or
7 persons to be arrested.

8 TRAINING AND EXPERTISE

9 2. I am a Deputy Sheriff employed by the San Diego County Sheriff's
10 Department (SDSD) and have been so employed for over 10 years. I was previously
11 employed as a Deputy Sheriff, by the Dallas County Sheriff's Office, State of Iowa, for
12 approximately 11 years. I am currently deputized as a federal Task Force Officer (TFO)
13 assigned to the Drug Enforcement Administration (DEA) Narcotics Task Force in North
14 San Diego County, where I have worked since May of 2014. I was previously assigned as a
15 detective to the Street Narcotics Gang Detail at the Vista Patrol Station for one year and
16 eight months. Prior to that assignment, I was assigned to the K-9 Unit as a patrol deputy
17 at the Vista Patrol Station. Prior to this assignment, I was assigned to the San Diego
18 Central Courts as a Deputy Sheriff.

19 3. During my law enforcement career, I have received formal training in
20 narcotics investigations. I have participated in multiple separate investigations involving
21 the distribution of controlled substances and firearms. As part of these investigations, I
22 have used various investigative techniques, including physical and stationary
23 surveillance, informants and cooperating sources, court authorized interceptions, pen
24 register/trap and trace devices, telephone toll analysis, undercover operations, search
25 warrants, mail covers, and electronic examinations of evidence. Through these previous
26 investigations, I have obtained knowledge regarding the ordinary meaning of controlled
27 substance slang and jargon. I have monitored and reviewed hundreds of recorded
28 telephone calls and text messages pursuant to Title III court orders in narcotics and gang

1 related investigations as well as handled confidential sources with access to drug dealers
2 and gang members.

3 4. Based on my training and experience, I am familiar with how drug traffickers
4 communicate and operate. For example, I am aware that drug traffickers frequently
5 discuss criminal activity using cellular telephones and often use coded language to obscure
6 these conversations. I am also familiar with the typical make up and operation of gangs
7 and drug trafficking organizations, including the distribution, storage, and transportation
8 of the drugs, the collection of money, which represents the proceeds of drug trafficking and
9 other criminal activity.

10 **BASES FOR CONCLUSIONS AND SOURCES OF INFORMATION**

11 5. The following is based my own investigation, oral and written reports by
12 other law enforcement officers and agents, physical surveillances, interviews, database
13 and public records checks, searches, telephone toll analysis, other investigation and court
14 authorized wire and electronic interceptions. Since this affidavit is for a limited purpose, I
15 have not included every fact I know about this investigation. I set forth only facts
16 necessary to establish foundation for the requested warrants. Conversations and
17 discussions below are set forth in substance unless noted. I have included in parentheses
18 or in brackets my explanations of coded or veiled speech, based on my training and
19 experience, as well as my familiarity with the facts of this investigation. Dates and times
20 are approximate.

21 6. I respectfully submit that the facts contained below demonstrate that there is
22 probable cause to believe that fruits, instrumentalities, and evidence of a violation of the
23 following offenses: Title 21, United States Code, Sections 841(a)(1), 843(b), 846, 952, 960,
24 963 and Title 18, United States Code, Sections 1956-1957 (collectively referred to as the
25 “Target Offenses”), as well as a person or persons to be arrested, will be found at the
26 **Target Locations** and **Target Vehicles**, which are more fully described in Attachments
27 A-1 through A-7.
28

1
2 **PROBABLE CAUSE – INTRODUCTION AND BACKGROUND**

3 7. OCDETF Operation Crystal Hydra is a long-term investigation led by the
4 Drug Enforcement Administration, Internal Revenue Service, and the Postal Inspection
5 Service targeting a sophisticated methamphetamine distribution and money laundering
6 network led by Reyes ESPINOZA, David VILLEGAS, John BOMENKA, Dennis JONES,
7 and Darren MOSIER. This San Diego based network supplied multi-kilogram quantities
8 of methamphetamine to dozens of subdistributors located throughout San Diego County as
9 well as the United States, including Hawaii, Arizona, Texas, Kansas, Iowa, Michigan,
10 Minnesota, New York, New Jersey, and Massachusetts. And in return, tens of thousands
11 of dollars in narcotics proceeds were returned to the network’s leaders via shipments of
12 bulk cash, structured cash deposits into bank accounts, and online money transfer systems
13 like PayPal, Zelle, Venmo, and Cash App. In conjunction with the wiretaps, investigators
14 ultimately seized approximately 73 kilograms of methamphetamine (actual), 1 firearm,
15 and \$47,566 in drug proceeds.

16 8. The investigation began in the spring of 2020 based on information obtained
17 from a confidential source (CS-1), who identified John BOMENKA as an individual selling
18 multiple ounce quantities of methamphetamine in San Diego. In March, April, and May
19 2020, CS-2 conducted four controlled purchases of methamphetamine from BOMENKA
20 using TT1. Investigators then identified David VILLEGAS as the principal source of
21 supply for BOMENKA. VILLEGAS, in turn, operated a drug distribution and money
22 laundering network, which supplies multi-kilogram quantities of methamphetamine to
23 subdistributors throughout San Diego and the United States.

24 9. On June 9, 2020, investigators obtained authorization to intercept wire and
25 electronic communications of John BOMENKA (TT1). Interceptions began on June 9, 2020
26 and continued until July 8, 2020. During the first round of intercepts, investigators
27 intercepted hundreds of phone calls and text messages detailing BOMENKA’s drug
28 trafficking and money laundering activities. These intercepts confirmed that BOMENKA

1 is a prolific methamphetamine distributor in San Diego County. In addition, agents
2 confirmed that VILLEGAS was supplying BOMENKA. Lastly, agents identified
3 BOMENKA's close associates, Frank TUCKER and Cameron GRAFF. As investigators
4 subsequently learned, GRAFF shipped methamphetamine to other distributors across the
5 United States, including to subdistributors in Iowa and Massachusetts.

6 10. On July 16, 2020, investigators obtained authorization to intercept wire and
7 electronic communications of John BOMENKA (TT1), David VILLEGAS (TT2), Frank
8 TUCKER (TT3), and Cameron GRAFF (TT4). Interceptions began on July 16, 2020 and
9 continued until August 14, 2020. During the second round of intercepts, agents identified
10 Reyes ESPINOZA as the principal source of supply to VILLEGAS as well as two of
11 VILLEGAS's major subdistributors, Darren MOSIER, and Dennis JONES. Agents
12 coordinated multiple enforcement operations against this network, and identified multiple
13 targets, including Kristina BROWN (VILLEGAS's girlfriend and key associate), Danny
14 MILLER, Mario ESPINOZA, Shawn MORRILL, Hilleal GRANT, Lewis RICH, Terry
15 HAITH, Tansy STEINHAUER, and Jessica POMEROY.

16 11. On September 4, 2020, investigators obtained authorization to intercept wire
17 and electronic communications of David VILLEGAS (TT2), Darren MOSIER (TT5), and
18 Dennis JONES (TT6). Interceptions began on September 4, 2020 and continued until
19 October 3, 2020. During this third round of interception, agents continued to penetrate
20 VILLEGAS's network. In addition, agents learned that MOSIER was involving in shipping
21 large quantities of methamphetamine to subdistributors in Texas. Agents coordinated
22 multiple enforcement operations against this network, and identified multiple defendants,
23 including Shadow SEGURA, Jasmine LUCAS, Phillip ABBAS, Peter FULLER, Eduardo
24 OSUNA, Frank CARRILLO, and Stephen MYRICK.

25 12. On September 23, 2020, investigators obtained authorization to intercept
26 wire and electronic communications of Reyes ESPINOZA (TT7). Interceptions began on
27 September 23, 2020 and continued until October 19, 2020. During this fourth round of
28 intercepts, agents continued to identify the operations of ESPINOZA's network, including

1 his principal customers, David VILLEGAS and Charles Lee MILLER as well as his family
2 run network of associates, including his wife, Christian LOPEZ-Villegas, and relatives
3 Carlos ESPINOZA (courier), Mario ESPINOZA (courier) and Gloria SANDOVAL (stash
4 house operator). Based on a seizure on October 8, 2020, agents also identified a new
5 telephone number used by Reyes ESPINOZA (TT10).

6 13. Prior to the next round of intercepts, on October 31, 2020, agents executed a
7 state search warrant at the residence of Dennis JONES after he overdosed on fentanyl (he
8 survived) and seized a substantial quantity of methamphetamine and cash.

9 14. On November 3, 2020, investigators obtained authorization to intercept wire
10 and electronic communications of David VILLEGAS (TT2); Darren MOSIER (TT5); Reyes
11 ESPINOZA (TT7) and (TT10); Charles MILLER (TT8); and Christian LOPEZ-VILLEGAS
12 (TT9). Interceptions began on November 3, 2020 and continued until December 2, 2020.
13 During this fifth round of intercepts, agents continued to seize parcels mailed by MOSIER
14 and identified his principal Texas and New York based subdistributors, Ashley HILTON,
15 and Joseph OCCHIOGROSSO, as well as his San Diego based partners, Gary BEASLEY,
16 and Terry TYLER. Agents also conducted enforcement operations against Arnulfo
17 RODRIGUEZ, Alexandro LARIOS-Flores, Jose VARGAS, Michael NAGLE, and Raymond
18 STERLING.

19 15. Prior to the final round of intercepts, on December 23, 2020, agents stopped
20 one of Darren MOSIER's sources of supply, Victor YAMASAKI, at the Otay Mesa Port of
21 Entry with methamphetamine and heroin. And on February 1, 2021, CS-3 conducted a
22 controlled purchase of methamphetamine from David VILLEGAS, who used both TT2 and
23 a new telephone number, TT11.

24 16. On February 19, 2021, investigators obtained authorization to intercept wire
25 and electronic communications of David VILLEGAS (TT2 and TT11). Interceptions began
26 on February 19, 2021 and continued until March 20, 2021. During this sixth and final
27 round of intercepts, agents conducted additional enforcement operations against
28 VILLEGAS's network including against Chris PASCHKE and Charles GERARDI.

1 17. On May 25, 2021, a federal grand jury sitting in the Southern District of
2 California returned an indictment charging dozens of defendants in this investigation,
3 including Reyes ESPINOZA, Mario ESPINOZA, David VILLEGAS, Gloria SANDOVAL,
4 Esteban Rueben GASTELUM-Sanchez, David SANTA MARIA and others with multiple
5 offenses, including conspiracy to distribute 50+ grams of methamphetamine (actual) and
6 for Reyes ESPINOZA and VILLEGAS, conspiracy to launder monetary instruments.
7 Arrest warrants for them were also issued and to date, they remain fugitives.

8 18. Agents are currently preparing for a multi-state and multi-jurisdictional
9 takedown to begin in early June 2021. As part of that takedown, agents are seeking these
10 warrants to uncover additional evidence related to the Target Subjects' drug trafficking
11 and money laundering activities, as well as locate them for arrest.

12 19. During the course of the investigation, agents conducted extensive physical
13 surveillance in conjunction with the six rounds of wiretap intercepts (along with GPS
14 tracking devices on many of the Target Telephones). Based on this surveillance and in
15 conjunction with the extensive intercepts, investigators identified multiple locations
16 utilized by the Target Subjects to conduct their drug trafficking and money laundering
17 activities. For example, agents learned that Reyes ESPINOZA used multiple stash houses,
18 including his residence, **Target Location 1**, and the residence of Gloria SANDOVAL and
19 Esteban Rueben GASTELUM-Sanchez, **Target Location 2**. In addition, Gloria
20 SANDOVAL is the registered owner of **Target Vehicles 1-2**. Esteban Rueben
21 GASTELUM-Sanchez has been observed driving **Target Vehicle 1** and SANDOVAL has
22 been observed driving **Target Vehicle 2**. SANDOVAL drove **Target Vehicle 3** from
23 Mexico into United States on April 16, 2021. The **Target Vehicles** were also recently
24 observed at SANDOVAL and GASTELUM-Sanchez's residence (**Target Location 2**).
25 ESPINOZA's principal distributor, David VILLEGAS also used his residence, **Target**
26 **Location 4** and his stash house, **Target Location 3**, to further his drug trafficking and
27 money laundering activities.

TARGET LOCATION 1

1
2 20. During the investigation, agents identified **Target Location 1** as the San
3 Diego residence of Reyes ESPINOZA. On numerous occasions, agents have observed Reyes
4 ESPINOZA and or his co-conspirators travel to **Target Location 1** as part of their drug
5 trafficking and money laundering activities. For example, on July 17, 2020, at
6 approximately 5:26 p.m., officers observed ESPINOZA arrive at **Target Location 1** in a
7 white Ford F-150. Agents then observed ESPINOZA walk around to the northside of the
8 multi-dwelling building and enter the west door on the north side of the structure. Most
9 recently, on May 18, 2021, at approximately 10:55 a.m., agents observed a white 2013
10 Ford pickup bearing CA plate 06863Y2 arrive and park in the driveway of **Target**
11 **Location 1**. Agents observed Mario ESPINOZA exit the driver's seat and walk to
12 residence. At approximately 10:59 a.m., surveillance units observed Mario ESPINOZA exit
13 the door on the north side of residence and the far west door of the building. Mario
14 ESPINOZA was carrying a garbage bag to his vehicle and placed it in the back. Mario
15 ESPINOZA exited the driveway and left the residence. Based on this recent surveillance, I
16 believe that Reyes ESPINOZA and his co-conspirators are still using **Target Location 1**
17 to further their drug trafficking and money laundering activities.

18 21. On October 5, 2020, agents conducted surveillance at **Target Location 1**
19 and based on the intercepts discussed below, observed Charles MILLER conduct a drug
20 transaction with Christian LOPEZ-Villegas (Reyes ESPINOZA's wife). For example, on
21 October 5, 2020, at approximately 10:28 a.m., Charles MILLER using TT8, texted
22 ESPINOZA at TT7, "Brother is cool still to come by after work today?" ESPINOZA replied
23 using TT7, "il be gone all week. il be here for like 2 hours and then leave. What time yoy
24 [you] thinking." Based on this intercepted text message exchange, agents believe MILLER
25 was contacting ESPINOZA in order to set up a methamphetamine transaction at
26 ESPNOZA's residence (**Target Location 1**).

27 22. At approximately 10:32 a.m., MILLER using TT8 called ESPINOZA at TT7.
28 During the call, MILLER said he "was at the shop at South Coast" and ESPINOZA said

1 “okay.” MILLER asked if ESPINOZA could swing by there [South Coast]. ESPINOZA said
2 yeah, he “was at the border right now, so he would be over here in about 1 hour.”
3 ESPINOZA said he “would be ready in 1 hour and 30 minutes and could meet MILLER in
4 1 hour and 30 minutes.” MILLER said he “was going to leave his car unlocked in the
5 parking lot.” ESPINOZA said yeah. MILLER told ESPINOZA “to go ahead and throw it
6 [methamphetamine] in there and lock the car.” ESPINOZA asked what time MILLER got
7 off and MILLER said he got off at 2:30 p.m. ESPINOZA said he would see MILLER at 2:30
8 p.m. then. ESPINOZA told MILLER not to worry. ESPINOZA said he would be ready
9 around that time. MILLER said okay. MILLER said he “would meet ESPINOZA at his
10 [ESPINOZA’s] pad (**Target Location 1**).” ESPINOZA said that was fine.

11 23. At approximately 1:30 p.m., Reyes ESPINOZA using TT7 called Christian
12 LOPEZ-Villegas at TT9. LOPEZ-Villegas asked, “What happened.” ESPINOZA told
13 LOPEZ-Villegas to “ask Yoli where she [Gloria SANDOVAL] wanted to do it [deliver
14 methamphetamine] and at what time.” LOPEZ-Villegas referred to ESPINOZA as “love,”
15 and said it would be “after 2:30 [p.m.], since she [SANDOVAL] was working.” ESPINOZA
16 said he knew. LOPEZ-Villegas said “she [Yoli] had told her [LOPEZ-Villegas] to let her
17 [Yoli] know the time.” ESPINOZA asked “if at whatever time.” LOPEZ-Villegas said “the
18 time and place.” ESPINOZA said he “was going to tell him at 3:30 [p.m.] at Baskin
19 Robbins.” LOPEZ-Villegas asked “where that one [Baskin Robbins] was.” ESPINOZA said
20 “just like that.” LOPEZ-Villegas asked ESPINOZA to “send her how it [Baskin Robbins]
21 was written.” ESPINOZA said “she [Yoli] would know,” and added “he [ESPINOZA] did
22 not even know where it [Baskin Robbins] was at.” ESPINOZA said they [Yoli and David
23 VILLEGAS] were the ones who knew where it [Baskin Robbins] was.” LOPEZ-Villegas
24 said “okay.” ESPINOZA said “all right.” Based on this intercepted call, agents believe
25 LOPEZ-Villegas was assisting with arranging the delivery of methamphetamine from
26 ESPINOZA to David VILLEGAS through the courier Gloria SANDOVAL.

27 24. At approximately 1:44 p.m., Christian LOPEZ-Villegas using TT9 called
28 Reyes ESPINOZA at TT7. ESPINOZA asked “what was up.” LOPEZ-Villegas said “she

1 [LOPEZ-Villegas] told Yoli already.” ESPINOZA told LOPEZ-Villegas to tell her
2 [SANDOVAL] that it was a no after all.” LOPEZ-Villegas cursed, and asked “what now.”
3 ESPINOZA apologized, and said “that guy [VILLEGAS] did not need them
4 [methamphetamine] after all.” LOPEZ-Villegas cursed. ESPINOZA said “it would be until
5 tomorrow.” LOPEZ-Villegas said “okay.” Based on this intercepted call, agents believe that
6 ESPINOZA and LOPEZ-Villegas were discussing how the delivery of methamphetamine
7 to VILLEGAS previously planned was cancelled.

8 25. At approximately 1:48 p.m., MILLER using TT8, texted ESPINOZA at TT7,
9 “I’m headed you way now my brother.” ESPINOZA replied using TT7, “Ok im at home
10 depot. Knok [knock] on the door.” MILLER using TT8, responded, “Ok.” Based on this
11 intercepted text message exchange, agents believe that ESPINOZA directed MILLER to
12 travel to ESPINOZA’s residence (**Target Location 1**) to obtain methamphetamine.

13 26. At approximately 2:08 p.m., Reyes ESPINOZA using TT7 called Christian
14 LOPEZ-Villegas at TT9. During the call, ESPINOZA said “Chucky [MILLER] was going to
15 stop by,” and ESPINOZA thought MILLER would be there (**Target Location 1**) shortly.
16 LOPEZ-Villegas asked where ESPINOZA was and ESPINOZA said he was leaving Home
17 Depot. ESPINOZA told LOPEZ-Villegas “to give him [MILLER] the one that said number
18 7.” LOPEZ-Villegas asked “where it [one with number 7] was.” ESPINOZA said it was all
19 right if LOPEZ-Villegas gave MILLER the one with number 7. ESPINOZA said, “it [one
20 with number 7] was in the closet.” LOPEZ-Villegas said, “okay.” ESPINOZA said it was
21 just that he “put it in a lot of bags.” ESPINOZA told LOPEZ-Villegas to take some bags off.
22 LOPEZ-Villegas said okay. ESPINOZA told LOPEZ-Villegas “to just leave the last white
23 one [white bag].” LOPEZ-Villegas asked what Home Depot ESPINOZA was at. ESPINOZA
24 said the one on Palm. ESPINOZA said it was just in case he [MILLER] arrived and
25 LOPEZ-Villegas said okay. Based on this intercepted call, agents believe that ESPINOZA
26 was directing LOPEZ-Villegas to distribute 7 units of methamphetamine to MILLER.

27 27. At approximately 2:09 p.m., agents observed Charles MILLER arrive at 195
28 East Hall Avenue, San Ysidro, California (**Target Location 1**) in a grey Dodge Avenger,

1 bearing California license 7KYU914. Moments later, agents observed MILLER walk
2 towards **Target Location 1** and out of sight on the north side of the structure. At
3 approximately 2:11 p.m., agents observed MILLER return to his vehicle empty handed
4 and depart.

5 28. At approximately 2:14 p.m., Reyes ESPINOZA using TT7 called Christian
6 LOPEZ-Villegas at TT9. During the call, ESPINOZA asked if LOPEZ-Villegas had called.
7 LOPEZ-Villegas told ESPINOZA “to call him [MILLER], because he [MILLER] stopped
8 by.” LOPEZ-Villegas said “he [MILLER] was outside, but she could not see him.” LOPEZ-
9 Villegas told ESPINOZA “to tell him [MILLER] to go on in.” ESPINOZA asked if MILLER
10 had left already. LOPEZ-Villegas said she did not know, and told ESPINOZA to call him
11 [MILLER]. ESPINOZA asked if MILLER had gone over or not. LOPEZ-Villegas said yes,
12 but she thought MILLER was outside. ESPINOZA said, “okay.” Based on this intercepted
13 call, agents believe that ESPINOZA was coordinating with LOPEZ-Villegas to distribute
14 methamphetamine to MILLER.

15 29. At approximately 2:16 p.m., Reyes ESPINOZA using TT7 called Christian
16 LOPEZ-Villegas at TT9. During the call, LOPEZ-Villegas asked, “what happened.”
17 ESPINOZA said MILLER was not answering. LOPEZ-Villegas said “who knew what was
18 going on.” ESPINOZA asked if MILLER went over, knocked, and left. LOPEZ-Villegas
19 said she “told MILLER to give her 2 minutes while looked for that [bag with number 7].
20 LOPEZ-Villegas said she went outside, and she could not see MILLER outside.
21 ESPINOZA said he was going to see what was up. LOPEZ-Villegas said okay. Based on
22 this intercepted call, agents believe that ESPINOZA was coordinating with LOPEZ-
23 Villegas to distribute methamphetamine to MILLER.

24 30. At approximately 2:20 p.m., agents observed MILLER return to **Target**
25 **Location 1** in the grey Dodge. Moments later, agents observed MILLER walk back
26 around to the north side of the structure. At approximately 2:24 p.m., agents observed
27 MILLER walk back to the grey Dodge with a large grey bag in his left hand. Moments
28 later, agents observed MILLER depart the area in the grey Dodge. Based on this

1 surveillance and intercepted calls and text messages described above, agents believe that
2 ESPINOZA directed LOPEZ-Villegas to supply MILLER with 7 units of
3 methamphetamine and that the transaction occurred at **Target Location 1**.

4 31. Thus, based on the above intercepted calls and multiple surveillances
5 conducted during this long-term investigation, I believe that Reyes ESPINOZA and his co-
6 conspirators use **Target Location 1** to further their drug trafficking and money
7 laundering activities.

8 **TARGET LOCATION 2 and TARGET VEHICLES 1-3**

9 32. During the investigation, agents identified **Target Location 2** as a stash
10 house for Reyes ESPINOZA and the residence of Gloria SANDOVAL and Esteban Rueben
11 GASTELUM-Sanchez. Gloria SANDOVAL is the registered owner of **Target Vehicles 1-**
12 **2**. GASTELUM-Sanchez has been observed driving **Target Vehicle 1** and SANDOVAL
13 has been observed driving **Target Vehicle 2**. SANDOVAL drove **Target Vehicle 3** from
14 Mexico into United States on April 16, 2021. Most recently, on May 18, 2021, the **Target**
15 **Vehicles** were observed at SANDOVAL and GASTELUM-Sanchez's residence (**Target**
16 **Location 2**). On multiple occasions, agents have observed SANDOVAL, GASTELUM-
17 Sanchez and their co-conspirators at **Target Location 2** and using **Target Vehicles 1-3**.
18 In addition, SDG&E utility account records confirmed that Gloria SANDOVAL is the
19 registered account owner at **Target Location 2**. And most recently, on May 18, 2021, at
20 approximately 10:59 a.m., surveillance units observed Mario ESPINOZA exit the door on
21 the north side of **Target Location 1** and the far west door of the building. Mario
22 ESPINOZA was carrying a garbage bag to his vehicle and placed it in the back. Mario
23 ESPINOZA exited the driveway and left the residence. At approximately 11:16 a.m.,
24 agents observed Mario ESPINOZA arrive at **Target Location 2**, and park in the
25 driveway of the residence. At approximately 11:30 a.m., Mario ESPINOZA left **Target**
26 **Location 2** driving his white Ford pickup. During this surveillance, agents observed
27 **Target Vehicles 1-3** which are either registered to Gloria SANDOVAL or crossed by her
28 into the United States parked on the street in front of **Target Location 2**. Based on this

1 recent surveillance, I believe that Reyes ESPINOZA, Gloria SANDOVAL, Esteban Rueben
2 GASTELUM-Sanchez and their co-conspirators are still using **Target Location 2** and
3 **Target Vehicles 1-3** to further their drug trafficking and money laundering activities.

4 33. On September 7, 2020, , agents intercepted telephone calls between David
5 VILLEGAS and Reyes ESPINOZA regarding the delivery of twenty-two pounds of
6 methamphetamine. Subsequently, agents conducted surveillance of the meeting between
7 VILLEGAS and Gloria SANDOVAL and Esteban Rueben GASTELUM-Sanchez at the
8 Bank of America parking lot, 5851 Balboa Avenue, San Diego, California. Later, agents
9 observed VILLEGAS selling four pounds of methamphetamine to Patrick LANE in the
10 parking lot of the San Diego County Credit Union, 5555 Mildred Street, San Diego,
11 California. At approximately 3:01 p.m., agents observed Gloria SANDOVAL and Esteban
12 Rueben GASTELUM-Sanchez in the rear parking lot of the Bank of America in a black
13 GMC Arcadia, bearing California license 8AJM738 (**Target Vehicle 2**). At approximately
14 3:11 p.m., agents observed black GMC Arcadia pull away. At that time, agents observed
15 VILLEGAS pull away from the same area in a silver Buick, bearing California license
16 5DNX616. At approximately 3:17 p.m., agents observed VILLEGAS arrive at 4850 Mt. St
17 Helens Drive, San Diego, California (**Target Location 3**). Based on this surveillance and
18 intercepted calls, I believe that SANDOVAL and GASTELUM-Sanchez used Target
19 Vehicle 2 to drop off methamphetamine to VILLEGAS.

20 34. On September 9, 2020, agents intercepted telephone calls between Reyes
21 ESPINOZA and David VILLEGAS regarding the delivery of 22 pounds of
22 methamphetamine. Subsequently, agents conducted video surveillance of Gloria
23 SANDOVAL's residence at 428 S. 46th Street, San Diego (**Target Location 2**). At
24 approximately 3:14 p.m., the video shows Gloria SANDOVAL loading big box in the back
25 of black GMC Arcadia, bearing California license 8AJM738 (**Target Vehicle 2**) that was
26 parked in the driveway of 428 South 46th Street. At approximately 3:17 p.m., the video
27 shows Mario ESPINOZA arriving back at 428 South 46th Street in his white Ford pickup.
28

1 At approximately 3:18 p.m., the video shows Mario ESPINOZA and Gloria SANDOVAL
2 depart in the Black GMC (**Target Vehicle 2**) with Mario ESPINOZA driving.

3 35. On September 10, 2020, agents intercepted telephone calls between Reyes
4 ESPINOZA and David VILLEGAS regarding the delivery of approximately 11 pounds of
5 methamphetamine. Subsequently, agents conducted video surveillance of Gloria
6 SANDOVAL's residence at 428 S. 46th Street, San Diego, California (**Target Location 2**).

7 At approximately 1:06 p.m., the video recording shows Mario ESPINOZA arrived at 428
8 South 46th Street in white Ford pickup, bearing California license 37476Z2. At

9 approximately 1:17 p.m., the video recording shows Mario ESPINOZA crawling under the
10 front of the truck. At approximately 1:34 p.m., the video shows Mario ESPINOZA

11 departing from 428 South 46th Street in white Ford pickup. At approximately 2:52 p.m.,
12 incoming text message #5429 was intercepted on Target Telephone (619)925-2490 to

13 David VILLEGAS from Reyes ESPINOZA at Target Telephone (760)592-5415. The text
14 message read, "4 [pounds of methamphetamine]? Bank [Bank of America]?" At

15 approximately 3:01 p.m., VILLEGAS replied with text message #5433 that read, "Is it
16 possible to make around sometime like 5 o'clock or 530 I'm kind in the middle of

17 something right now" ESPINOZA replied at approximately 3:04 p.m., with text message
18 #5436 that read, "5:30 then". VILLEGAS replied with text message #5438 that read, "Ok

19 thank you". At approximately 5:05 p.m., the video shows Gloria SANDOVAL depart from
20 428 South 46th Street in the Black GMC, bearing California license 8AJM738 (**Target**

21 **Vehicle 2**) At approximately 10:15 p.m., outgoing call #5508 was intercepted on Target
22 Telephone (619)925-2490 from David VILLEGAS to Reyes ESPINOZA at Target

23 Telephone (760)592-5415. During the call, VILLEGAS and ESPINOZA greeted.
24 VILLEGAS said that one [delivery of methamphetamine] was another half [half pound

25 over. ESPINOZA asked if really. VILLEGAS said yeah, and it [methamphetamine] was
26 11½ [pounds of methamphetamine]. VILLEGAS said he owed 17 [\$1700] for the one

27 [pound of methamphetamine] and another 8 or 850 [\$800 or \$850]. ESPINOZA said yeah.
28 VILLEGAS said that was what he owed, when ESPINOZA came back. ESPINOZA said

1 okay, and he would write it down. VILLEGAS said he owed ESPINOZA 25-50 [\$2550].
2 ESPINOZA said okay. VILLEGAS said it was not under and this time it was over.
3 ESPINOZA said okay. VILLEGAS said ESPINOZA needed to hurry up and get back here
4 [California]. ESPINOZA said almost. VILLEGAS said okay. VILLEGAS said he was
5 telling ESPINOZA's brother's wife [Gloria SANDOVAL] that Mario [Mario ESPINOZA]
6 was fired. ESPINOZA said yeah, and he [Mario ESPINOZA] could not count right.
7 VILLEGAS said he told her [SANDOVAL] that he [VILLEGAS] and a few years, so they
8 [VILLEGAS and ESPINOZA] were always good.

9 36. On September 16, 2020, at approximately 5:30 a.m., agents established
10 surveillance of 428 S. 46th St., San Diego, CA (**Target Location 2**). At approximately
11 6:10 a.m., agents observed two males exit the residence and get into black Dodge Nitro,
12 bearing CA plate 8KIN967 (**Target Vehicle 1**). The Dodge Nitro proceeded east on
13 Oceanview Blvd., and then turned north on 47th St. At approximately 6:12 a.m., San
14 Diego Police Officer J. Garzanti conducted a traffic enforcement stop of the black 2011
15 Dodge Nitro (**Target Vehicle 1**) at Imperial and 47th St., in San Diego, California. Officer
16 Garzanti identified the driver with a California driver's license as Esteban Ruben
17 GASTELUM-Sanchez and passenger was identified as with a United States Passport Card
18 as Jose Antonio CASTELLANOS. GASTELUM-Sanchez stated he lives at 428 S. 46th
19 Street, San Diego, California and listed phone number as 619-642-7689.

20 37. On October 8, 2020, agents conducted surveillance at a stash house belonging
21 to Reyes ESPINOZA located at 428 South 46th Street, San Diego (**Target Location 2**).
22 This stash house was run by Gloria SANDOVAL. During that surveillance, agents
23 observed Carlos ESPINOZA dropped off approximately 10 pounds of methamphetamine.
24 Agents then seized the methamphetamine, which was approximately 4.185 kilograms of
25 methamphetamine (actual). Following this seizure, agents intercepted a series of
26 telephone calls between Reyes ESPINOZA using TT7, David VILLEGAS using TT2, and
27 Charles MILLER using TT8 discussing this seizure.

28

1 38. On October 8, 2020, at approximately 9:39 a.m., agents observed Carlos
2 ESPINOZA arrive at 428 South 46th Street, San Diego (**Target Location 2**), in a white
3 Ford pickup, bearing California license plate 6C12755. Agents observed Carlos
4 ESPINOZA exit the pickup and crawl under the front of the truck. At approximately 9:50
5 a.m., agents observed Carlos ESPINOZA carry a dark-colored plastic garbage bag from the
6 front of the truck over to the gate leading into the backyard of **Target Location 2**. Agents
7 observed Carlos ESPINOZA reach over the fence and unlatch the gate and place the bag
8 behind the fence. Moments later, agents observed Carlos ESPINOZA walk from the gate
9 back to the rear of the vehicle, where he placed some paper towels into the garbage can.
10 They then observed Carlos ESPINOZA get into the white Ford and depart.

11 39. At approximately 10:35 a.m., agents approached **Target Location 2** on foot.
12 Agents approached the gate of the fence and were able to see a dark-colored plastic
13 garbage bag sitting on a small chair behind the fence. Agents unlatched the gate and
14 seized the bag. Agents returned to their vehicle where they inspected the contents of the
15 dark-colored plastic garbage bag. Inside the bag, agents discovered five plastic wrapped
16 bundles that were covered in a red-colored grease. Upon unwrapping they discovered the
17 bundles contained a white crystalline substance.

18 40. At approximately 11:03 a.m., agents observed Mario ESPINOZA arrive at
19 428 South 46th Street (**Target Location 2**) in his white Ford pickup truck, bearing
20 California license plate 37476Z2. During the next 20 to 25 minutes, agents observed Mario
21 ESPINOZA appear to crawl under the pickup truck and unload methamphetamine from
22 under the front of the truck.

23 41. At approximately 11:32 p.m., agents observed Mario ESPINOZA make a
24 telephone call on his cellular telephone. Moments later, agents observed Mario ESPINOZA
25 walk back into the rear of the residence through the gate.

26 42. At approximately 11:36 a.m., agents observed Mario ESPINOZA walk back to
27 the driveway and observed him talking on his cellular telephone again. Agents observed
28 Mario ESPINOZA walk over to a black Nissan parked in the driveway and look inside.

1 After the call, agents observed Mario ESPINOZA standing near the rear of his white Ford
2 pickup truck conversing with Aimee CASTELLANOS for several minutes, who appeared
3 to come from the residence discussed earlier. At approximately 11:44 p.m., agents
4 observed Mario ESPINOZA and CASTELLANOS return to the backyard of the residence.

5 43. At approximately 11:47 a.m., agents observed Mario ESPINOZA walk back to
6 the driveway and talk on his cellular telephone again. Agents observed Mario ESPINOZA
7 walk over to a black Nissan parked in the driveway and look inside. After the call, agents
8 observed Mario ESPINOZA enter his white Ford pickup and depart from the residence.

9 44. At approximately 1:01 p.m., Sheriff LNU at Mexican telephone number (664)
10 781-9251 called ESPINOZA at TT7. During the call, ESPINOZA said he was going to look
11 into that issue over here and it seemed they [10 pounds of methamphetamine] were stolen.
12 ESPINOZA said Yoli [Gloria SANDOVAL] mentioned nobody knew anything, and a bunch
13 of bullshit. SHERIFF LNU said that was odd and asked who could had stolen them.
14 ESPINOZA said perhaps a neighbor that found out what those dudes [Carlos and Mario
15 ESPINOZA] where doing, that those dudes [Carlos and Mario ESPINOZA] were leaving
16 something there. SHERIFF LNU said yeah, and they [unknown neighbors] took them [10
17 pounds of methamphetamine]. ESPINOZA said it was too risky though. SHERIFF LNU
18 said perhaps it was someone that was being nosy. ESPINOZA said he thought Esteban
19 [Esteban GASTELUM-SANCHEZ] could have told someone to steal it [10 pounds of
20 methamphetamine]. SHERIFF LNU said who knew, but maybe. ESPINOZA said either
21 or, because it was too much of a risk for someone to go in since there was people at the
22 house.

23 45. At approximately 1:58 p.m., ESPINOZA using TT7 texted MILLER at
24 telephone number (619) 905-9202 "I have problems someone stole my stuff [10 pounds of
25 methamphetamine] today." MILLER texted back "I'm in Idaho right now if you need
26 anything let me know and I'll call my wife." ESPINOZA texted "No that's fine brother
27 spread the word someone stole 10 Ls [10 pounds of methamphetamine] from me on
28 imperial ave [428 S. 46th Street]. ESPINOZA then texted "2 long pakages and 2 fat ones

1 all whit grease". ESPINOZA continued with text "Today around 11 am" and then "After
2 unloading the car".

3 46. At approximately 2:04 p.m., ESPINOZA using TT7 called VILLEGAS at
4 telephone number (619) 634-5089. During the call, VILLEGAS asked what happened.
5 ESPINOZA said someone stole it [10 pounds of methamphetamine] this morning, after
6 they [Carlos ESPINOZA] unloaded the things [bundles of methamphetamine]. VILLEGAS
7 asked if all of them [methamphetamine] ESPINOZA said it was only 10 [pounds of
8 methamphetamine]. ESPINOZA said the first car would get there [**Target Location 2**],
9 they [Carlos ESPINOZA] would unload it and leave it [methamphetamine] there.
10 ESPINOZA added then the second car would get there, they [Mario ESPINOZA] would
11 unload it [methamphetamine] and ESPINOZA would go and get it [pounds of
12 methamphetamine] from there [**Target Location 2**]. ESPINOZA said whenever the chick
13 [Gloria SANDOVAL] went to deliver she [Gloria SANDOVAL] would just grab it from
14 there [**Target Location 2**] and would deliver to VILLEGAS. ESPINOZA said this time
15 after the second car [Mario ESPINOZA] got there [**Target Location 2**], he [Mario
16 ESPINOZA] called and asked where the other one [10 pounds of methamphetamine] was
17 and ESPINOZA mentioned it [10 pounds of methamphetamine] was on the chair.
18 ESPINOZA said he [Mario ESPINOZA] mentioned it was not there, he [Mario ESPINOZA]
19 sent a picture and it [pounds of methamphetamine] was gone. ESPINOZA said he did not
20 know what was going on, so he called the guy [Carlos ESPINOZA] back, asked where it
21 [methamphetamine] was and he [Carlos ESPINOZA] said it [methamphetamine] was on
22 the chair. ESPINOZA said there was like a little gate, so the dogs were out, and the gate
23 was open. ESPINOZA said after they [Carlos ESPINOZA] unloaded the first car somebody
24 went in there and stole the stuff [10 pounds of methamphetamine]. VILLEGAS said
25 somebody talked. ESPINOZA said exactly, and ESPINOZA thought it had to be someone
26 from the inside. VILLEGAS said it had to be, otherwise how they [unknown persons]
27 would had not known. ESPINOZA said exactly. ESPINOZA said he was in TJ [Tijuana,
28 Mexico] and just came right now to check that. ESPINOZA added he had about 13 [pounds

1 of methamphetamine] at his house, because he was saving those [pounds of
2 methamphetamine]. VILLEGAS asked what ESPINOZA was going to do with them
3 [pounds of methamphetamine]. ESPINOZA said he was just going to have those ones until
4 Thursday, the next ones. VILLEGAS said that was not going to work for him. ESPINOZA
5 said he knew and asked if VILLEGAS needed the 13 [pounds of methamphetamine] right
6 now and if VILLEGAS could wait until Tuesday. VILLEGAS said no, there was no way,
7 and VILLEGAS was halfway through the ones [pounds of methamphetamine] he got last
8 time. ESPINOZA said okay. VILLEGAS said he had the 12 [\$12,000] that he owed
9 ESPINOZA. ESPINOZA said okay. VILLEGAS asked if ESPINOZA had 13 [pounds of
10 methamphetamine] more. ESPINOZA said yeah. VILLEGAS said that [13 pounds of
11 methamphetamine] would not even last VILLEGAS until Tuesday. ESPINOZA said he
12 could do 11 [pounds of methamphetamine] on Saturday. VILLEGAS asked if ESPINOZA
13 could not do anything today. ESPINOZA said just the 13 [pounds of methamphetamine].
14 VILLEGAS asked if nothing tomorrow. ESPINOZA said nothing tomorrow, until
15 Saturday, the 11 [pounds of methamphetamine]. VILLEGAS said he would take what he
16 could get. ESPINOZA asked if that would work. VILLEGAS said he guessed so, it had to.
17 VILLEGAS asked what ESPINOZA wanted VILLEGAS to do about the guys, the inside
18 job. ESPINOZA said for VILLEGAS to have his ear up since they [unknown persons]
19 might try to sell them [10 pounds of methamphetamine] for cheap. ESPINOZA added he
20 was sure they [unknown persons] would sell it [10 pounds of methamphetamine] for
21 cheap, possibly 1,000 bucks or something since it was stolen stuff [methamphetamine].
22 ESPINOZA said he was spreading the word right now and everybody was looking around
23 for it [pounds of methamphetamine]. VILLEGAS asked how many people knew.
24 ESPINOZA said just the chick [Gloria SANDOVAL], the drivers [Mario and Carlos
25 ESPINOZA] and him [Reyes ESPINOZA]. VILLEGAS said it was one of them. ESPINOZA
26 said he was checking right now, because he was told at the apartments that somebody
27 that smoke [methamphetamine] lived across the street. ESPINOZA said they [ESPINOZA
28 and others] had someone right now checking. ESPINOZA said maybe they [unknown

1 persons] noticed the sketchy stuff they [ESPINOZA and others] were doing and went
2 inside real quick and grabbed them [pounds of methamphetamine] once the car [Carlos
3 ESPINOZA] left. ESPINOZA said yeah, all the time, it was a shitty neighborhood.
4 ESPINOZA added he was trying to find out right now. VILLEGAS said all together with
5 ESPINOZA had and what he [VILLEGAS] owed ESPINOZA already then it would be 31-5
6 [\$31,500]. ESPINOZA said okay, and ESPINOZA had 13 [pounds of methamphetamine]
7 right now. VILLEGAS said he definitely wanted them [13 pounds of methamphetamine].
8 VILLEGAS said he would have the 12,000 that he owed ESPINOZA plus the rest.
9 ESPINOZA said okay. ESPINOZA said he would try to find out right now, and if
10 VILLEGAS heard anything to let him know, so they [ESPINOZA and others] could go
11 knock on some few doors. VILLEGAS asked if they [pounds of methamphetamine] were
12 already unwrapped, or if he had to unwrap them. ESPINOZA said they were already
13 unwrapped and those were the ones [pounds of methamphetamine] ESPINOZA had them
14 at the house. VILLEGAS asked if they [pounds of methamphetamine] were new.
15 ESPINOZA said yeah, everything was new.

16 47. At approximately 2:20 p.m., MILLER using telephone number (619) 905-9202
17 texted ESPINOZA at TT7 “Ok my friends who lives around that area said he would keep
18 his ears open.” ESPINOZA texted back “Ok I will give 1000 dlls [\$1000] reward just for
19 knowing ho [who] it was so I can go use MYRICK 12g [12 guage] haha.”

20 48. At approximately 2:48 p.m., VILLEGAS using telephone number (619) 634-
21 5089 called ESPINOZA at TT7. During the call, VILLEGAS asked if 14 [pounds of
22 methamphetamine] of the new. ESPINOZA said yeah. VILLEGAS said he (VILLEGAS)
23 had that, plus the 12 [\$12,000] he owed ESPINOZA. ESPINOZA said he found another
24 one [pound of methamphetamine] all the way at the bottom of the bag. VILLEGAS said he
25 had a guy coming down from Ramona and would be there in about 40 minutes. VILLEGAS
26 asked when ESPINOZA wanted to meet. ESPINOZA asked if when or where. VILLEGAS
27 said both. ESPINOZA said at the bank in like 30 minutes. VILLEGAS said alright.
28 ESPINOZA said he was going to send his nephew [Mario ESPINOZA]. VILLEGAS asked if

1 it was the guy [Mario ESPINOZA] who could not count. ESPINOZA laughed, and said yes,
2 that one [Mario ESPINOZA]. VILLEGAS said okay. VILLEGAS said he had 33 [\$33,000]
3 for ESPINOZA all together. ESPINOZA said okay, he [Mario ESPINOZA] was on his way.
4 VILLEGAS asked if half an hour at the bank. ESPINOZA said yeah. VILLEGAS asked
5 what he [Mario ESPINOZA] was driving. ESPINOZA said a brown Prius. VILLEGAS
6 asked if the little brown one he had seen ESPINOZA in, and ESPINOZA said yes.

7 49. At approximately 3:31 p.m., Abraham LNU using Mexican telephone number
8 (664) 477-5904 called ESPINOZA at TT7. During the call, ESPINOZA said he had been
9 staying in Tijuana, but he was currently in San Diego. ABRAHAM asked if ESPINOZA
10 could talk. ESPINOZA said yes. ABRAHAM asked if everything was okay. ESPINOZA
11 said 10 [pounds of methamphetamine] were stolen today from him. ABRAHAM asked
12 what ESPINOZA meant. ESPINOZA said his guy [Carlos ESPINOZA] would arrive,
13 unload them [pounds of methamphetamine] and leave them somewhere. ESPINOZA said
14 whenever the second one [Mario ESPINOZA] came, the first stuff [methamphetamine] was
15 no longer there, someone took them [10 pounds of methamphetamine]. ABRAHAM asked
16 if out on the street. ESPINOZA said no, at a house. ABRAHAM said it was weird.
17 ESPINOZA said it was in the backyard, and it was weird. ESPINOZA said it was the back
18 porch, there was a wooden door and one would go to the back. ABRAHAM said right.
19 ESPINOZA said he was looking into it. ABRAHAM said someone must have been keeping
20 an eye. ESPINOZA said right. ABRAHAM said it might not be cops but thieves.
21 ESPINOZA said right. ABRAHAM said ESPINOZA should change it up. ESPINOZA said
22 yes, and he was looking into it right now. ABRAHAM asked how everything else was
23 going. ESPINOZA said everything was fine and everything had been really slow.
24 ABRAHAM said it [methamphetamine] was cheap right now. ESPINOZA said yes, and
25 that was the problem. ABRAHAM said there was a lot of work [methamphetamine] inside
26 [the United States]. ESPINOZA said that was the problem. ABRAHAM said they [pounds
27 of methamphetamine] were even going down [in price] in Los Angeles. ESPINOZA asked if
28 that was so. ABRAHAM said he was selling them for 2 [\$2000] and now they [possibly

1 customers] wanted to pay 18 [\$1800]. ESPINOZA said he (ESPINOZA) was doing 1,600
2 [\$1600]. ABRAHAM said it was really cheap. ABRAHAM said he had some on stand still
3 in "Los Vientos" [winds], Chica [Chicago]. ESPINOZA said things were tough. ABRAHAM
4 said half was paid to him but kept the other half there. ESPINOZA said all right.

5 50. At approximately 5:15 p.m., MILLER using telephone number (619) 905-9202
6 called ESPINOZA at TT7. During the call, MILLER said if ESPINOZA needed something
7 then he could go by his [MILLER's] house. MILLER said if ESPINOZA needed some
8 money there was some money there [MILLER's house] too. ESPINOZA told MILLER not
9 to worry. MILLER asked if it happened there behind on Imperial. ESPINOZA said yeah,
10 Imperial. ESPINOZA said one would get off on the 805 [I-805], go right and it was the first
11 street. MILLER said okay and asked if it [10 pounds of methamphetamine] was in a car.
12 ESPINOZA said no, it was in a house. ESPINOZA said he thought that somebody was
13 already checking them [ESPINOZA and others], because as soon as that fool [Carlos
14 ESPINOZA] left it [pounds of methamphetamine] the other [Mario ESPINOZA] came and
15 30 minutes had not passed, when somebody got it [methamphetamine]. MILLER asked
16 what they [unknown persons] got. ESPINOZA said it was [10 pounds of
17 methamphetamine] and ESPINOZA thought it was a black dude [unidentified neighbor],
18 because the neighbor thought it was a black dude [unidentified neighbor]. ESPINOZA told
19 MILLER to let ESPINOZA if MILLER heard anything.

20 51. Subsequent DEA laboratory testing confirmed that ESPINOZA supplied
21 approximately 4.185 kilograms of methamphetamine (actual) which was intended for
22 VILLEGAS and MILLER but intercepted.

23 52. Thus, based on the above intercepted calls, multiple surveillances, and
24 seizure, I believe that Reyes ESPINOZA, Gloria SANDOVAL, Esteban Rueben
25 GASTELUM-Sanchez and their co-conspirators use **Target Location 2** as a stash house
26 for their drug trafficking and money laundering activities as well as **Target Vehicles 1-3**
27 to further their criminal activities.

28

TARGET LOCATION 3

1
2 53. During the investigation, agents identified **Target Location 3** as stash
3 house used by David VILLEGAS and the residence of David SANTA MARIA. On
4 numerous occasions, agents have observed VILLEGAS and or SANTA MARIA at Target
5 Location 3 in order to conduct drug trafficking transactions. Most recently, on May 12,
6 2021 at approximately 8:00 p.m., agents established surveillance in the vicinity of **Target**
7 **Location 3**. Agents observed VILLEGAS walk to **Target Location 3**. Based on this
8 recent surveillance, I believe that David VILLEGAS and his co-conspirators are still using
9 **Target Location 3** to further their drug trafficking and money laundering activities.

10 54. On February 1, 2021, CS-3¹ purchased approximately 341 grams of
11 methamphetamine (actual) from David VILLEGAS for \$1,500. This purchase occurred at
12 Circle K located at 4360 Genesee Avenue, San Diego and is discussed in more detail below.
13 On February 1, 2021, at approximately 1:30 p.m., agents provided CS-3 with \$1,500 to
14 purchase one pound of methamphetamine from VILLEGAS. Prior to this, agents searched
15 CS-3 and CS-3's vehicle for contraband with negative results. At approximately 1:43 p.m.
16 CS-3 placed a telephone call to VILLEGAS at TT2 in the presence of the agents, who
17 verified that CS-3 called TT2. During the conversation, VILLEGAS told CS-3 that he
18 would call CS-3 back.

19 55. At approximately 1:55 p.m., CS-3 received a telephone call from VILLEGAS
20 at telephone number (858) 717-7746 (TT11). During the conversation, CS-3 asked
21 VILLEGAS if this was his number [858-717-7746 (TT11)] and VILLEGAS said it was his
22

23 ¹ In July 2020, CS-3 was arrested in Kansas for distribution of approximately 3 pounds of
24 methamphetamine. CS-3 agreed to cooperate with investigators in order to reduce CS-3's criminal liability
25 from this arrest. Prior to this arrest, CS-3 did not have any criminal history. CS-3 returned to San Diego at
26 the direction of investigators and met with agents in this investigation. In August 2020, agents met with CS-
27 3 and CS-3 admitted that he had provided false information to agents in Kansas regarding the source of the
28 3 pounds of methamphetamine. CS-3 told San Diego agents that he had in fact obtained the
methamphetamine from VILLEGAS and not from a third party as CS-3 had told the Kansas agents. In light
of the false information that CS-3 had provided to Kansas agents, CS-3 was subsequently deactivated as a
confidential source in Kansas. In January 2021, CS-3 was signed up a confidential source by investigators in
San Diego in order to identify VILLEGAS's new telephone number. Much of the information provided by CS-
3 has been corroborated by further investigation. I believe that the information provided by CS-3 is credible
and reliable.

1 “burner phone” [temporary telephone number]. VILLEGAS said that he now has “people
2 [customers] call me on my regular number [TT2]” and then VILLEGAS calls them back
3 “from my burner number [TT11].” VILLEGAS said he “changes it [burner telephone] once
4 a week just to be safe.” VILLEGAS told CS-3 that he has a female customer that comes in
5 from Hawaii to purchase methamphetamine from him. VILLEGAS told CS-3 “the price of
6 methamphetamine in Hawaii is \$800 per ounce.” VILLEGAS said the unidentified female
7 customer flies “from Hawaii to San Diego and then mails the methamphetamine back to
8 herself in Hawaii.” CS-3 asked VILLEGAS the price for a pound of methamphetamine and
9 VILLEGAS said, “15 [\$1,500] a piece.” CS-3 asked if VILLEGAS could meet up with CS-3
10 and VILLEGAS said yes. VILLEGAS said he “needed to see another customer” also so
11 VILLEGAS could take care of both of them. CS-3 asked VILLEGAS if they could meet
12 after 3:30 p.m., and VILLEGAS said, “Yes.” VILLEGAS told CS-3 he had to meet a
13 maintenance guy regarding VILLEGAS’s motorhome (**Target Location 4**) first.
14 VILLEGAS asked CS-3 how many CS-3 wanted, “one or two [pounds of
15 methamphetamine]” and CS-3 said just one.

16 56. At approximately 3:19 p.m., CS-3 placed a telephone call to VILLEGAS at
17 telephone number TT2. During the conversation, VILLEGAS told CS-3 that he “would call
18 CS-3 back.” At approximately 3:35 p.m., CS-3 received a telephone call from VILLEGAS at
19 TT11. During the conversation, VILLEGAS told CS-3 that he was “still waiting on the
20 maintenance guy.” CS-3 asked VILLEGAS if he wanted to meet CS-3 in their normal spot.
21 VILLEGAS told CS-3 no, “not the jack [Jack in the Box]” and that he had to meet a couple
22 of people. CS-3 told VILLEGAS to let him know where they could meet and VILLEGAS
23 said he, “would call back.” At approximately 4:12 p.m., CS-3 received a telephone call from
24 VILLEGAS at TT2. During the conversation, VILLEGAS told CS-3 to get to the
25 “Clairemont area” and VILLEGAS would let CS-3 “know where to go.”

26 57. At approximately 4:29 p.m., agents observed VILLEGAS arrive at **Target**
27 **Location 3** in a maroon Buick Rainer, bearing California license plate 5LFF336. Agents
28 observed VILLEGAS exit the vehicle and walk up the driveway of **Target Location 3**. At

1 approximately 4:33 p.m., agents observed VILLEGAS talking with an unidentified male in
2 the driveway of **Target Location 3**. At approximately 4:36 p.m., agents observed
3 VILLEGAS depart in the maroon Buick. At approximately 4:37 p.m., agents observed
4 VILLEGAS park across the street from 4850 Mt. St. Helens Drive. Moments later, agents
5 observed VILLEGAS exit the vehicle and walk towards the residence carrying a black bag.

6 58. At approximately 4:41 p.m., CS-3 received a telephone call from VILLEGAS
7 at TT2. During the conversation, VILLEGAS told CS-3 to meet him at the Circle K on
8 Genesee Avenue. At approximately 4:45 p.m., agents followed CS-3 as he traveled to the
9 predetermined location. At approximately 4:51 p.m., agents observed VILLEGAS walk
10 back to the maroon Buick carrying the same black bag. Moments later, agents observed
11 VILLEGAS depart in the maroon Buick. At approximately 4:53 p.m., agents observed CS-3
12 arrive at the Circle K, located at 4360 Genesee Avenue, San Diego, California.

13 59. At approximately 4:55 p.m., agents observed VILLEGAS arrive at the Circle
14 K in the maroon Buick and park next to CS-3's vehicle. Moments later, agents observed
15 VILLEGAS exit his vehicle and open the passenger door of CS-3's vehicle. At that time,
16 CS-3 purchased approximately one pound of methamphetamine from VILLEGAS for
17 \$1,500.

18 60. During the meeting, VILLEGAS told CS-3 that the car he was using was just
19 for drop-offs [deliveries of methamphetamine] and that he uses low profile cars that don't
20 stand out and blend in. VILLEGAS told CS-3 that he has other vehicles that he drives
21 when he's not delivering drugs that he parks at mechanic's houses who works on them.
22 VILLEGAS showed CS-3 a picture of a 2015 Thor Outlaw motorhome (**Target Location**
23 **4**) that VILLEGAS just purchased for \$91,000. VILLEGAS told CS-3 he would give CS-3
24 10 or 20 pounds to take to his customers in Missouri but would probably charge CS-3 a
25 little more. VILLEGAS told CS-3 that he slowed down for a little while but still picks up
26 20 to 40 pounds a week. VILLEGAS told CS-3 that he used to do 30 or 40 pounds a day
27 before. VILLEGAS told CS-3 that he had some customers before that would do 20 pounds
28 of methamphetamine per week. VILLEGAS told CS-3 that he doesn't want to meet anyone

1 new. VILLEGAS said he buys “burner” phones at Walmart for \$30 and calls his customers
2 back on the burner. VILLEGAS said he gets a new phone every week so if they [law
3 enforcement] want to record his calls that VILLEGAS doesn’t have the number long
4 enough for them [law enforcement] to get on to him. VILLEGAS told CS-3 if he/she calls
5 VILLEGAS’ regular number he [VILLEGAS] will call back from the burner phone.

6 61. At approximately 5:06 p.m., agents observed VILLEGAS standing near the
7 CS-3’s vehicle and talking on a cellular telephone. Moments later, agents observed
8 VILLEGAS get back into the maroon Buick and depart the area. At approximately 5:11
9 p.m., agents observed VILLEGAS return to **Target Location 3** and walk towards the
10 residence. Subsequent DEA laboratory testing confirmed that VILLEGAS sold CS-3
11 approximately 341 grams of methamphetamine (actual).

12 62. Between February 22, 2021 and March 3, 2021, agents intercepted telephone
13 calls between David VILLEGAS and Chris PASCHKE regarding the delivery of ten
14 pounds of methamphetamine. On March 3, 2021, investigators observed VILLEGAS
15 deliver the methamphetamine to PASCHKE. Agents then coordinated with SDPD officers
16 to stop PASCHKE and Charles GERARDI in the parking lot of the La Quinta Inn & Suites
17 at 4610 De Soto Street, San Diego. There officers seized approximately 4.080 kilograms of
18 methamphetamine (actual) and approximately \$27,896 in U.S. currency.

19 63. On February 22, 2021, at approximately 5:09 p.m., Chris PASCHKE using
20 telephone number (858) 285-9018 called David VILLEGAS at TT2. During the call,
21 PASCHKE said he was just giving VILLEGAS a heads up and they [PASCHKE and
22 GERARDI) were probably going to do that like in week or 5 days. VILLEGAS said his guy
23 [Reyes ESPINOZA] was out of town until like Wednesday. PASCHKE said okay.
24 VILLEGAS said he would try to get a hold of him [ESPINOZA] on the phone right now.
25 VILLEGAS asked if the same [amount of methamphetamine]. PASCHKE said no, double
26 at least. VILLEGAS said okay. PASCHKE said what they talked about or shooting for 50
27 [pounds of methamphetamine] or something. VILLEGAS said he needed to know a for
28 sure the number [pounds of methamphetamine]. PASCHKE said it would be at least 40

1 [pounds of methamphetamine], but he was just giving VILLEGAS a heads up that it
2 would be going down in about a week, that he [GERARDI] would be back. VILLEGAS told
3 PASCHKE to let him know the exact day, when PASCHKE found out. VILLEGAS said he
4 would tell him [ESPINOZA] tonight. PASCHKE said okay. PASCHKE said he would keep
5 VILLEGAS informed. VILLEGAS said okay.

6 64. On February 28, 2021, at approximately 4:26 p.m., Chris PASCHKE using
7 telephone number (858) 285-9018 called David VILLEGAS at TT2. During the call,
8 PASCHKE asked if there was any chance that he would see VILLEGAS tomorrow.
9 VILLEGAS asked if on that large thing [methamphetamine]. PASCHKE said yeah.
10 VILLEGAS said he was not sure about that [methamphetamine], but VILLEGAS would do
11 his best. PASCHKE said okay. VILLEGAS said he had mentioned about the problems
12 with the flow of things [amount of methamphetamine] right now. PASCHKE said okay.
13 VILLEGAS said he was going to give him [ESPINOZA] a call as soon as VILLEGAS was
14 done with that job and would call PASCHKE back when he knew the results. PASCHKE
15 said okay. PASCHKE said he was looking like at 60 or 80 thousand. VILLEGAS asked if
16 PASCHKE had it there in front of him. PASCHKE said he would tomorrow. VILLEGAS
17 said okay. PASCHKE said he was just giving VILLEGAS the heads up and they would do
18 what they could. VILLEGAS said it might take a little longer than a week to get that
19 [methamphetamine], but they [VILLEGAS and PASCHKE] would do what they could per
20 day. PASCHKE said yeah, whatever. VILLEGAS said okay. PASCHKE said they would
21 talk tomorrow around 12:00 or 1:00 p.m. VILLEGAS said okay.

22 65. On March 1, 2021, at approximately 10:36 a.m., Chris PASCHKE using
23 telephone number (858) 285-9018 texted David VILLEGAS at TT2, "Hey this is Chris
24 [PASCHKE] if u can stop by anytime after 12:00 or call me please thanks". At
25 approximately 12:14 p.m., VILLEGAS replied, "I have to run a couple errands and then
26 after I'm done I will come by the house and talk to you."

27 66. On March 3, 2021, at approximately 12:42 p.m., VILLEGAS texted
28 PASCHKE, "Good morning Chris [PASCHKE] I will pick all it [methamphetamine] up

1 somewhere around four 430 [between 4:00 and 4:30 p.m.] then I got it and wrap it
2 [methamphetamine] put a gather and bring it [methamphetamine] over so send me a text
3 back and let me know what time you think you'll be ready."

4 67. At approximately 3:55 p.m., agents observed VILLEGAS' maroon Buick
5 Rainer, bearing California license 5LFF336 parked in front of the Sufi Mediterranean
6 Cuisine, 5915 Balboa Avenue, San Diego. Agents then observed VILLEGAS standing at
7 the passenger door of a black GMC Acadia, bearing California license 8AJM738 (**Target**
8 **Vehicle 2**). At that time, agents observed VILLEGAS talking to Gloria SANDOVAL
9 through the passenger side of the black GMC. At approximately 3:58 p.m., agents
10 observed SANDOVAL depart the parking lot in the black GMC (**Target Vehicle 2**). At
11 approximately 4:08 p.m., agents observed VILLEGAS depart the area.

12 68. At approximately 4:12 p.m., agents observed VILLEGAS arrive at the Rite
13 Aid, 5270 Balboa Avenue, San Diego. Moments later, agents observed Jasmine LUCAS
14 approach the maroon Buick and meet with VILLEGAS. At approximately 4:15 p.m.,
15 agents observed LUCAS walk away from VILLEGAS' vehicle and get into a white Acura,
16 bearing California license 7CZJ209. Agents observed LUCAS depart the Rite Aid shortly
17 thereafter. At approximately 4:27 p.m., agents observed VILLEGAS depart the Rite Aid.
18 Shortly thereafter, agents lost sight of VILLEGAS but at approximately 4:45 p.m., agents
19 located the maroon Buick parked across the street from **Target Location 3**.

20 69. At approximately 5:46 p.m., Chris PASCHKE using telephone number (858)
21 285-9018 called David VILLEGAS at TT2. During the call, PASCHKE asked if VILLEGAS
22 would be coming by later or not. VILLEGAS said yeah, he was putting it [ten pounds of
23 methamphetamine] together right now. PASCHKE said right on, and that he would see
24 VILLEGAS when VILLEGAS got there.

25 70. At approximately 6:19 p.m., agents observed VILLEGAS walk across the
26 street from **Target Location 3** carrying what appeared to be a white bag. At
27 approximately 6:24 p.m., agents observed VILLEGAS depart in the maroon Buick. At
28 approximately 6:31 p.m., agents observed the maroon Buick arrive at 5402 Cole Street,

1 San Diego. Moments later, agents observed VILLEGAS exit the vehicle and meet with
2 PASCHKE in the street. Agents observed VILLEGAS and PASCHKE walk towards the
3 south side of the residence. At that time, agents observed VILLEGAS carrying two white
4 or light-colored plastic bags in his hand. At approximately 6:50 p.m., agents observed
5 VILLEGAS and PASCHKE return to the maroon Buick. At that time, VILLEGAS was not
6 carrying anything in his hands. agents observed VILLEGAS depart shortly thereafter.

7 71. At approximately 7:10 p.m., agents observed a black Toyota, bearing
8 California license 8NEX710 depart from the area of 5402 Cole Street. Agents followed the
9 vehicle, which arrived at the La Quinta Inn & Suites at 4610 De Soto Street, San Diego,
10 California at approximately 7:22 p.m. At approximately 7:24 p.m., agents observed
11 Charles GERARDI exit the driver's seat of the black Toyota and walk towards the hotel
12 office. At that time, agents observed PASCHKE sitting in the front passenger seat of the
13 black Toyota.

14 72. At approximately 7:30 p.m., agents directed officers from the San Diego
15 Police Department to make contact with PASCHKE and GERARDI in the parking lot of
16 the La Quinta Inn & Suites. During a search of GERARDI and his possessions, officers
17 found two light grey Walmart bags containing a total of ten clear Ziploc bags that
18 contained a white crystalline substance and \$27,896 in U.S. Currency. During the search,
19 PASCHKE was found in possession of a small amount of personal use methamphetamine.
20 PASCHKE was subsequently cited and released from the scene by San Diego Police.
21 Officers placed GERARDI under arrest and transported him to the San Diego County
22 Central Jail. Subsequent DEA laboratory testing confirmed that VILLEGAS supplied
23 PASCHKE and GERARDI with approximately 4.080 kilograms of methamphetamine
24 (actual).

25 73. Thus, based on the above intercepted calls, multiple surveillances, and
26 seizures, I believe that David VILLEGAS and his co-conspirators use **Target Location 3**
27 as a stash house for their drug trafficking and money laundering activities.
28

TARGET LOCATION 4

1
2 74. During the investigation, agents identified **Target Location 4** as the
3 residence of David VILLEGAS. On numerous occasions, agents have observed David
4 VILLEGAS enter or exit **Target Location 4** before traveling to or from narcotics
5 transactions. In addition, agents have intercepted calls in which VILLEGAS discusses
6 counting drug proceeds at **Target Location 4**. On January 30, 2021, at about 1000 a.m.,
7 agents conducted surveillance at Mission Bay RV Resort located at 2727 De Anza Road,
8 San Diego, CA 92109. While driving through the campground, agents observed David
9 VILLEGAS walking with his dog through the campground. Agents then observed
10 VILLEGAS walk to **Target Location 4**. Agents observed a red 2004 Buick Rainer bearing
11 CA license plate 5LFF336, parked in front of the **Target Location 4** which is currently
12 being driven by VILLEGAS. Most recently on May 18, 2021, agents observed **Target**
13 **Location 4** parked in space 93, at the Mission Bay RV Resort.

14 75. As discussed above, during a recorded conversation with CS-3, VILLEGAS
15 admitted to purchasing **Target Location 4** in cash. The current registered owner of the
16 motorhome is Virginia Bondi in Lake Havasu City, Arizona. A currency transaction report
17 from US Bank on Virginia Bondi was filed on December 18, 2020, because she deposited
18 \$88,600 in U.S. currency into her bank account on December 11, 2020. Based on this
19 recorded conversation with CS-3 and the suspicious transaction involving Virginia Bondi,
20 I believe that VILLEGAS purchased **Target Location 4** but to conceal his ownership of
21 **Target Location 4**, arranged for Bondi to be the registered owner.

22 76. Thus, based on the above recorded conversation, financial records, and
23 surveillance, I believe that David VILLEGAS and his co-conspirators use **Target**
24 **Location 4** to further their drug trafficking and money laundering activities. In addition,
25 I believe that VILLEGAS can be located and arrested at **Target Location 4**.

BASIS FOR EVIDENCE SOUGHT IN SEARCH WARRANTS

26
27 77. Based upon my training and experience, consultation with other law
28 enforcement officers experienced in drug investigations, and all the facts and opinions set

1 forth in this affidavit, I believe that probable cause exists that the **Target Locations** and
2 are being used to further the drug trafficking and money laundering activities by Reyes
3 ESPINOZA, Gloria SANDOVAL, Mario ESPINOZA, David VILLEGAS, and David SANTA
4 MARIA and their coconspirators discussed above.

5 78. In addition, I know that:

6 a. Individuals involved in drug trafficking and money laundering often
7 maintain the following items in their residences and vehicles: controlled substances and
8 paraphernalia for packaging, weighing, cutting, testing, distributing and manufacturing
9 controlled substances. They will commonly have this contraband on hand, secreted at their
10 premises or on their person or in their vehicle, in order to maintain the confidence of their
11 customers as well as to satisfy their own habits. The selling of such contraband is an
12 ongoing type of business, because it takes time to develop clientele, the nature of drug
13 abuse requires a steady supply, and the business tends to be too lucrative to abandon.
14 They also have fruits of their illegal sales on hand, including United States currency and
15 other valuables.

16 b. Individuals involved in drug trafficking and money laundering often
17 maintain records of their drug and money transactions and other records of evidentiary
18 value for months or years at a time. It is common, for example, for drug traffickers and
19 money launderers to keep pay/owe sheets or other records of drugs sold and proceeds of
20 unlawful activity owed. Such pay/owe sheets or papers are used as a basis for accounting
21 and for settling existing debts. Such records are often maintained for a substantial period
22 of time even after the debts are collected. I have found in my training and experience that
23 such records are invaluable to drug traffickers and money launderers and that such
24 records are rarely discarded. Finally, it has also been my experience that such records and
25 pay/owe sheets also frequently include the names, identities and telephone numbers of
26 suppliers, customers, and other coconspirators. It is also my opinion and belief that the
27 above-described documents are currently possessed by drug traffickers and money
28 launderers much the same way a legitimate business will maintain records and tools of its

1 trade whether or not the business has a particular item in inventory on a given date.
2 These documents are kept by drug traffickers and money launderers whether or not the
3 individual is in possession of any drugs or drug proceeds at any given moment. I believe
4 that the seizure of such documents will provide evidence of the events set forth in this
5 affidavit and that such documents can be found at this location despite any lapse of the
6 time between the events described and the anticipated search pursuant to these warrants.

7 c. Individuals involved in drug trafficking and money laundering must
8 often rely on others to obtain their controlled substances and unlawful proceeds and to
9 help them market the drugs and launder their illicit proceeds. Frequently, drug traffickers
10 and money launderers maintain evidence of the identities of these co-conspirators at their
11 residence and their vehicles.

12 d. Individuals involved in drug trafficking and money laundering often
13 utilize stash houses to store controlled substances; weigh, cut and package the illegal
14 narcotics; store narcotics proceeds, and/or store information relating to their drug
15 trafficking business.

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

25 f. Individuals involved in drug trafficking and money laundering often
26 keep and maintain large amounts of United States currency at their residences and in
27 their vehicles. Such funds are often used for every-day expenditures and to maintain and
28 finance their ongoing drug trafficking and money laundering businesses.

1 g. Additionally, individuals involved in drug trafficking and money
2 laundering often amass and maintain assets at their residence, which were generated by
3 their trafficking activities, or purchased with the cash earned from their illegal activity.

4 h. Individuals involved in drug trafficking and money laundering often
5 maintain weapons, firearms and ammunition on their person or in their residence and/or
6 vehicles. Such weapons and firearms are used, and can be used, as an instrumentality of
7 drug trafficking and money laundering. Furthermore, I am aware of instances in which
8 drug traffickers and money launderers have maintained such items in their residences
9 and vehicles in order to protect themselves and guard their drugs, firearms and profits, as
10 well as for enforcement purposes during their narcotics and firearms dealings.

11 i. Residences and premises used by individuals involved in drug
12 trafficking and money laundering usually contain articles of personal property evidencing
13 the identity of person(s) occupying, possessing, residing in, owning, frequenting or
14 controlling the residence, premises, and vehicles.

15 j. Individuals involved in drug trafficking and money laundering
16 frequently communicate with coconspirators by means of cellular telephones and other
17 electronic devices, such as computers, and tablets, and usually maintain these items on
18 their person and/or in their residences and vehicles. I have participated in investigations
19 where computers, internet-enabled cellular “smartphones,” and conventional cellular
20 telephones were seized and searched pursuant to court authorized search warrants that
21 contained digital photographs of bulk cash and pictures of the target with smuggling and
22 drug associates, as well as text messages referencing smuggling and drug transactions.
23 Drug traffickers and money launderers, often use e-mail, social networking websites, and
24 the internet to further their criminal activity, by, among other things, communicating
25 with their coconspirators, meaning others who are involved with and/or or provide
26 assistance with the illegal purchase, possession or manufacture or distribution of
27 controlled substances, and posting information about their exploits.

28

REQUEST FOR NIGHT SERVICE

1
2 79. Agents anticipate arresting approximately sixty Target Subjects (including
3 Reyes ESPINOZA, Gloria SANDOVAL, Esteban Rueben GASTELUM-Sanchez, Mario
4 ESPINOZA, David VILLEGAS, and David SANTA MARIA and their coconspirators) of
5 this investigation during a coordinated multi-state and multi-agency takedown on or
6 about early June 2021 and executing these search warrants contemporaneously with the
7 planned takedown. To that end, I am seeking authorization to execute these search
8 warrants at any time in the day or night for the following reasons: (1) in an effort to
9 minimize the risk of discovery of the coordinated multi-state takedown which will involve
10 arrests in multiple judicial districts located throughout the United States; (2) in an effort
11 to minimize the risk of any violent confrontations with the Target Subjects and or their
12 conspirators in light of the agents having seized a firearm from members of the network
13 and intercepted multiple communications in which the Target Subjects discussed
14 employing firearms and violence to protect their drug trafficking and money laundering
15 activities; and (3) during the investigation, agents have intercepted communications in
16 which the Target Subjects have discussed fleeing to Mexico or other remote locations in
17 the United States if they learned about any planned law enforcement action against the
18 network. Based on these reasons, I believe that there is good cause to authorize executing
19 these search warrants at any time in the day or night. In addition, from my training and
20 experience, I know that it is often safer for law enforcement agents and members of the
21 general public for law enforcement to execute search warrants in the late evening or early
22 morning hours. Thus, based on the unique circumstances of this investigation described
23 throughout the affidavit, including the sophistication, potential violence, and risk of flight
24 for the Target Subjects and in light of the planned takedown in June 2021, I believe that
25 executing the search warrants at any time in the day or night would be safer for agents
26 and would diminish the real risks described above.

REQUEST FOR SEALING

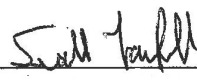
80. This is an ongoing investigation of which the Targets Subjects are unaware. It is very likely, based upon the above, that evidence of the crimes under investigation exists in the direct and indirect control of the Target Subjects. There is reason to believe, based on the above, that premature disclosure of the existence of the warrants will result in destruction or tampering with that evidence and seriously jeopardize the success of the investigation. Accordingly, it is requested that these warrants and their related materials be sealed until further order of the Court.

CONCLUSIONS

81. Based on all of the above, my experience and training, a review of documents and other relevant information I believe to be reliable, and discussions with other law enforcement officers, it is my opinion that the items listed in Attachment B are fruits, instrumentalities or evidence of the Target Offenses. It is also my opinion that there is probable cause to believe that the items set forth in Attachment B are present at the **Target Locations** and **Target Vehicles** as more fully described in Attachments A-1 through A-7.


82. With the above information, I formally request the issuance of a search warrant authorizing a search of the **Target Locations** and **Target Vehicles**, and the seizure of items described with particularity in Attachment B to the Application and Affidavit for Search Warrant.

83. I declare under penalty and perjury the foregoing is true and correct to the best of my knowledge and belief.



Scott Faiferlick
DEA Task Force Officer

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 25th day of May 2021.



The Honorable Michael S. Berg
United States Magistrate Judge

SEALED

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6 Attorneys for United States of America

7
8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 IN THE MATTER OF SEARCH OF:

No. '21 MJ02101

11 428 South 46th Street, San Diego, CA,
12 92113

MOTION TO SEAL 1) SEARCH WARRANT;
2) APPLICATION AND AFFIDAVIT FOR
SEARCH WARRANT; AND 4) THIS
MOTION AND ORDER THEREON

13
14 **[FILED UNDER SEAL]**

15 The United States of America, by its counsel, moves to seal the 1) Search Warrant, 2)
16 Application and Affidavit for Search Warrant, and 3) this Motion and Order in the above-
17 captioned matter. These documents disclose an ongoing covert investigation. Disclosure in
18 the public record at this time likely would cause the targets to destroy or discard evidence
19 and otherwise seriously jeopardize the investigation.

20
21 DATED: May 25, 2021

Respectfully submitted,

22 RANDY S. GROSSMAN.
Acting United States Attorney

23 *Matthew Sutton*
24 MATTHEW SUTTON
Assistant U.S. Attorney

25 **SO ORDERED.**

26
27 DATED: May 25, 2021

28 *Michael Berg*
The Honorable Michael Berg
United States Magistrate Judge