

UNITED STATES DISTRICT COURT

for the
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)*
MacBook Air Computer, Serial Number:
C1MTC3U3H3QD located at 10385 Vista Sorrento
Parkway, San Diego, California

Case No. '24 MJ3031

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

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

See attachment B

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

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

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 21 USC 952, 960, and 963	Importation of Controlled Substances and Conspiracy to do the Same

The application is based on these facts:

See attached affidavit

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

Sylvan Strohm
Applicant's signature

Sylvan Strohm, FBI Special Agent
Printed name and title

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

Date: Aug. 7, 2024

Daniel E. Butcher
Judge's signature

City and state: San Diego, CA

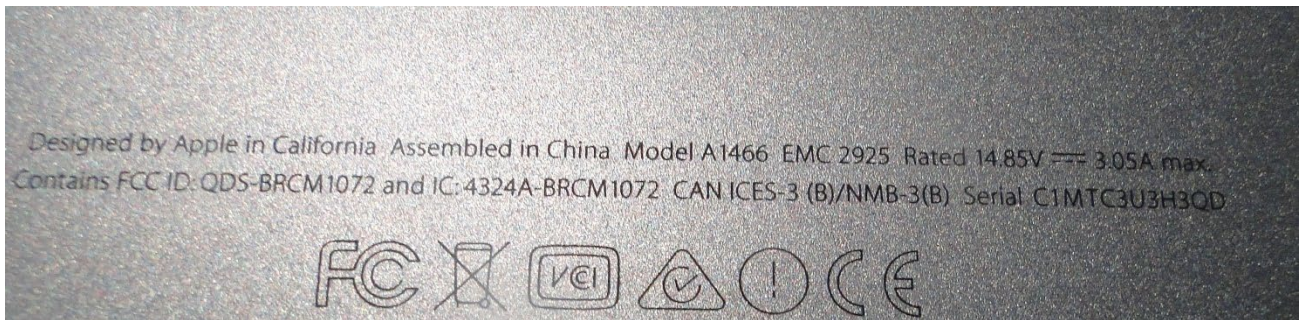
Hon. Daniel E. Butcher, US Magistrate Judge
Printed name and title

ATTACHMENT A

Property to Be Searched

The following property is to be searched:

Macbook Air Laptop bearing Serial Number C1MTC3U3H3QD (**Target Device**)



Target Device is currently in the possession of the Federal Bureau of Investigation located at 10385 Vista Sorrento Parkway, San Diego, California 92121.

ATTACHMENT B

Particular Things to be Seized

Authorization to search the computer described in Attachment A includes the search of disks, memory cards, deleted data, remnant data, slack space, and temporary or permanent files contained on or in the device for evidence described below. The seizure and search of the computer shall follow the search methodology described in the affidavit submitted in support of the warrant.

The evidence to be seized from the computer will be electronic records, communications, and data such as emails, text messages, chats and chat logs from various third-party applications, photographs, audio files, videos, and location data, for the period of September 22, 2023 to July 25, 2024:

- a) tending to indicate involvement or coordination in drug smuggling or related criminal activity, such as bribery of public officials, or efforts to share sensitive law enforcement information used in furtherance of any other illegal activities;
- b) tending to identify accounts, facilities, storage devices, and/or services—such as email addresses, IP addresses, and phone numbers—used to facilitate the coordination of drug smuggling or related criminal activity, such as bribery of public officials, or efforts to share sensitive law enforcement information used in furtherance of any other illegal activities;
- c) tending to identify co-conspirators, criminal associates, or others involved in drug smuggling or related criminal activity, such as bribery of public officials;
- d) tending to identify assets including cash, cryptocurrency, real estate, jewelry, investments, or any other item of value possibly representing proceeds of drug smuggling or related criminal activity, such as bribery of public officials, or any other illegal activities;
- e) tending to identify travel to or presence at locations involved in drug smuggling or related criminal activity, such as bribery of public officials;

- 1 f) tending to identify the user of, or persons with control over or access to, the
2 **Target Device**; and/or
3 g) tending to place in context, identify the creator or recipient of, or establish the
4 time of creation or receipt of communications, records, or data involved in the
5 activities described above, which are evidence of violations of Title 21, United
6 States Code, Sections 952, 960, and 963.

7 This warrant authorizes a review of electronically stored information,
8 communications, other records, and information disclosed pursuant to this warrant in
9 order to locate evidence of the Target Offenses. The review of this electronic data may
10 be conducted by any government personnel assisting in the investigation, who may
11 include, in addition to law enforcement officers and agents, attorneys for the
12 government, attorney support staff, and technical experts. Pursuant to this warrant, the
13 FBI may deliver a complete copy of the disclosed electronic data to the custody and
14 control of attorneys for the government and their support staff for their independent
15 review.

16 All of the above constituting evidence of a violation of the Target Offenses.
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1 **AFFIDAVIT**

2 I, Special Agent Sylvan Strohm, being duly sworn, hereby state as follows:

3 **INTRODUCTION**

4 1. I submit this affidavit in support of an application for a warrant to search the
5 following electronic device:

6 MacBook Air Computer, Serial Number: C1MTC3U3H3QD (**Target Device**)
7 as further described in Attachment A, and to seize evidence of crimes, specifically
8 importation of federally controlled substances and conspiracy related thereto, in violation
9 of Title 21, United States Code, Sections 952, 960, and 963, as further described in
10 Attachment B. The requested warrant relates to the investigation and prosecution of
11 Department of Homeland Security (DHS), U.S. Customs and Border Protection Officer
12 (CBPO) Diego BONILLO. The **Target Device** is currently in the custody of the Federal
13 Bureau of Investigation (FBI) located at 11385 Sorrento Valley Parkway, San Diego,
14 California 92121.

15 2. The facts and conclusions set forth in this affidavit are based on my own
16 personal knowledge; knowledge obtained from other individuals during my participation
17 in this investigation; my review of documents and records related to this investigation;
18 communications with others who have personal knowledge of the events, details, and
19 circumstances described herein; and information gained through my training, experience,
20 and communications with colleagues experienced in the area of controlled substance
21 investigations. Because this affidavit is submitted for the limited purpose of establishing
22 probable cause in support of the applications for the search warrants, it does not set forth
23 each and every fact that I or others have learned during the course of this investigation.
24 Dates, times, and amounts are approximate.

25 **BACKGROUND**

26 3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and
27 have been so employed since June of 2022. I am currently assigned to the San Diego Field
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1 Office and have been assigned to investigate public corruption and border corruption cases
2 as a member of the Border Corruption Task Force (BCTF). I am charged with investigating
3 allegations of corrupt federal, state, and local public officials that engage in criminal
4 activity for profit, power, as well as those criminal associates who bribe and conspire with
5 any corrupt federal, state, or local public officials. I have received training in all criminal
6 violations investigated by the FBI and have received additional training in public
7 corruption and border corruption. Prior to my employment as a Special Agent with the FBI,
8 I was employed as an Intelligence Analyst with the FBI.

9 4. I have investigated aspects of public and border corruption, including bribery,
10 drug trafficking, and human trafficking. I have participated in investigations involving the
11 use of computers and other electronic devices to enable communication, research, and
12 record keeping amongst co-conspirators. I have experience involving a variety of
13 investigative techniques including interviewing informants, witnesses, and investigative
14 targets; executing physical and digital search warrants; conducting mobile and stationary
15 surveillance; conducting telephone toll analysis; and monitoring Title III wire-intercepts.
16 From my training and experience, I have become familiar with the techniques and methods
17 utilized by corrupt federal, state, or local public officials and their co-conspirators. In
18 addition to the above stated experience, I have also worked and consulted with numerous
19 federal agents and other law enforcement officers who have investigated public corruption,
20 border corruption, prison corruption, drug and weapon trafficking, and alien smuggling
21 throughout the United States, including Southern California.

22 5. Through the course of my training, investigations, and conversations with
23 other law enforcement personnel, I am aware that computers store data including, but not
24 limited to browsing history, passwords, communications, contact information,
25 photographs, and documentary records. These records are often retained for years or
26 longer, and sometimes despite the device owner attempting to delete such data.

FACTS SUPPORTING PROBABLE CAUSE

A. Background

6. On May 3, 2024, a grand jury returned a sealed Indictment charging eleven counts of drug trafficking activity against BONILLO, CBPO Jesse Clark Garcia (GARCIA), and one other individual. The charges included conspiracy to import controlled substances, in violation of Title 21, United States Code, Sections 952, 960, and 963; multiple counts of importation of controlled substances, in violation of Title 21, United States Code, Sections 952 and 960; aiding and abetting, in violation of Title 18, United States Code, Section 2; *Pinkerton* liability; and criminal forfeiture. BONILLO was arrested on May 4, 2024.

7. BONILLO's arrest stemmed from a long-term investigation by the FBI BCTF, with assistance from the Drug Enforcement Administration (DEA). BONILLO and GARCIA worked with a Mexico-based poly-drug distribution Drug Trafficking Organization (DTO) to ensure that the DTO's drug vehicle loads were admitted into the United States without inspection at the Otay Mesa and Tecate, California Ports of Entry (POE).

8. As CBPOs, BONILLO and GARCIA were randomly assigned to various locations throughout their respective POEs in one-hour shifts. Their schedules were posted daily. The randomness of the shifts, the limited duration of the assignments, and the timing of the scheduling were all efforts by CBP to mitigate threats posed by unidentified corrupt CBPOs. Nevertheless, the investigation reflected that BONILLO and GARCIA shared their duty assignments with the DTO, including the times they were assigned to the primary vehicle lanes and the specific lanes under their respective control, so the drivers of load vehicles could enter into the United States with their assistance free from inspection.

9. To date, investigators have identified at least five drug seizures associated with BONILLO and GARCIA; some of which are discussed below.

B. Arquimides Jesus De Los Santos Rabiela and Nayeli Viridriana Servin Vega

10. On February 6, 2024, at 12:54 p.m., Nayeli Viridriana Servin Vega (SERVIN) entered the United States from Mexico at the Tecate POE in a Honda Odyssey bearing California license plates. Records from the POE reflect that GARCIA was assigned to work the primary vehicle lanes from 12:00 p.m. to 1:00 p.m. They also reflect that SERVIN was admitted by GARCIA despite there being an Automatic Referral for “High Risk Narcotics/Currency Smuggling” on the Odyssey. GARCIA subsequently told POE staff that he had received the alert late, which resulted in him admitting the Odyssey. However, an audit of GARCIA’s computer revealed that the Automatic Referral was received approximately 55 seconds before he admitted the Odyssey.

11. SERVIN was admitted into the United States and undercover officers surveilled her until a traffic stop was conducted on her in Chula Vista, California. A K-9 alerted to the Odyssey, and a total of approximately 130 packages of methamphetamine, weighing approximately 58.87 kilograms, were found concealed inside a non-factory compartment located in the Odyssey’s floorboard. A sample of the substance tested positive for methamphetamine. SERVIN was arrested as a result.

12. In addition to coordinated crossings through lanes manned by GARCIA, crossing records of SERVIN reflect that she also coordinated her crossings to be admitted at times by BONILLO. For example, before crossing through the Tecate POE (where GARCIA worked), Servin crossed 32¹ times through the Otay Mesa POE vehicle lanes. Five of those crossings were through BONILLO’s lane, which strongly indicates a coordinated effort. Indeed, the remaining 27 crossings were through lanes operated by 25 *separate* CBPOs. Moreover, telephone evidence suggests that she was transporting drugs and in contact with known co-conspirators on dates she crossed through BONILLO’s lanes,

¹ TECs records are searchable via name. Investigators recently discovered a variation of Servin’s name under which additional vehicle crossings through the Otay Mesa POE were uncovered.

1 and not at other times she crossed through the Otay Mesa POE. For example, on November
2 25, 2023, SERVIN entered the United States from Mexico at the Otay Mesa POE through
3 a vehicle lane manned by BONILLO. Hours later, she took a picture of the Fusion Ultra
4 Lounge located in Anaheim, California, where it appears she had been directed to deliver
5 the drug load. Indeed, on February 10, 2024, DEA investigators in Los Angeles executed
6 a search warrant at the Fusion Ultra Lounge and seized approximately 225 pounds of
7 methamphetamine, one kilogram of cocaine, and 10,000 fentanyl pills.

8 13. Similarly, on December 14, 2023, after SERVIN entered the United States
9 from Mexico at the Otay Mesa POE through BONILLO's lane, telephone evidence reflects
10 that she had the following WhatsApp exchange with a co-conspirator:

11 SERVIN: I'm about to get to San Clemente (audio message)

12 SERVIN: I just passed secondary checkpoint

13 Co-Conspirator: Were they there

14 SERVIN: No, closed. Do you have an address yet?

15 14. Investigators are aware that there is a checkpoint located near San Clemente,
16 California. Investigators are further aware that the operational status of checkpoints is often
17 of concern to drug traffickers because vehicles carrying drugs may be identified by law
18 enforcement officers or K-9s working at the checkpoints. As such, investigators believe,
19 based on training and experience, that SERVIN had imported federally controlled
20 substances on this date. Further bolstering the belief that a coordinated drug smuggling
21 event took place on December 13, 2023, is the fact that two minutes before SERVIN was
22 admitted into the United States by BONILLO, BONILLO also admitted Luis Francisco
23 Gonzalez-Montenegro (GONZALEZ), who is discussed below, and, less than 20 minutes
24 after SERVIN was admitted, BONILLO also admitted Arquimides Jesus De Los Santos
25 Rabiela² (RABIELA). RABIELA, like SERVIN, was also arrested on February 6, 2024,
26

27 ² On the date of RABIELA's arrest, Gonzalez also crossed immediately behind
28 RABIELA through GARCIA's lane and then traveled in tandem with RABIELA until

1 shortly after crossing through GARCIA’s lane at the Tecate POE. His vehicle was found
2 to contain approximately 32.35 kilograms of fentanyl, 37.1 kilograms of
3 methamphetamine, and 54.6 kilograms of cocaine.

4 **C. Luis Francisco Gonzalez-Montenegro and Others**

5 15. On February 15, 2024, a CBPO working pre-primary at the Otay Mesa POE
6 inspected a Buick LaCrosse being driven by GONZALEZ. During the pre-primary
7 inspection, the CBPO observed packages in one of the quarter panels and called-out over
8 the radio “SDNET,” which is an enforcement group that surreptitiously follows loaded
9 vehicles from the POE in order to gain intelligence about associates and stash locations.
10 The CBPO also notified the primary officer – BONILLO – and requested that the LaCrosse
11 be sent to the secondary inspection area. GONZALEZ was only one car away from
12 BONILLO’s booth at the time the discovery was made. Notably, border records reflect that
13 GONZALEZ was admitted *four* other times by BONILLO at the Otay Mesa POE – a
14 statistically improbable number of crossings unless coordinated.

15 16. In the secondary inspection area, a Z-Portal scan showed anomalies within the
16 doors and rear quarter panels of the LaCrosse. A K-9 also alerted to the LaCrosse’s trunk.
17 GONZALEZ and the LaCrosse were then admitted into the United States after placement
18 of a GPS tracker so that SDNET could follow it to its destination. Despite not being told
19 that anything was amiss, GONZALEZ engaged in highly surveillance-cautious maneuvers
20 after leaving the POE, including making sudden U-turns. GONZALEZ eventually parked
21 the LaCrosse in a public parking area and then fled out of the back of a store after
22 convincing a store manager he was in danger, leaving behind the LaCrosse. Investigators
23 believe that BONILLO notified the DTO that SDNET would be following GONZALEZ.

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26 _____
27 RABIELA was pulled over by San Diego Sheriff’s Deputies. Investigators then
28 observed Gonzalez circle the location of the traffic stop several times before leaving the
area.

1 17. Indeed, the counter-surveillance continued. As investigators watched, a
2 different individual arrived after several hours to the LaCrosse. She then drove it to a few
3 locations, including trying to stay the evening at a hotel, before parking it on the street
4 overnight. She returned the next day and drove it to a residence where it was taken into a
5 garage. A search warrant was then obtained for the residence. Three males, later identified
6 as Michael Morales, Cesar Meza (MEZA), and Armando Gallo ran from the garage
7 towards the rear of the residence and were apprehended at an outside patio. Inside the
8 residence, Jamie Rose Perez, who had driven the LaCrosse to the residence, and Sheila
9 Torres (TORRES) also were apprehended. Notably, MEZA has three vehicle crossings
10 through lanes manned by GARCIA, and one through a lane manned by BONILLO.
11 Similarly, crossing records reflect that TORRES crossed through BONILLO's lane
12 approximately 18 minutes after GONZALEZ entered the United States in the LaCrosse.

13 18. A search of the LaCrosse resulted in the seizure of 41 packages of fentanyl
14 powder weighing approximately 43.42 kilograms; 3 packages of fentanyl pills, weighing
15 approximately 2.18 kilograms; and 1 package of heroin, weighing approximately 1.01
16 kilograms. The packages were found concealed inside, among others, the vehicle's quarter
17 panels, left door panels, and right passenger door panel. An additional 24 packages of
18 fentanyl powder and 11 packages of fentanyl pills also were found in two duffle bags inside
19 the residence.

20 19. Notably, after her arrest, TORRES was given the chance to make a call and
21 stated that she wanted to call her cousin, who she identified as "Melissa." When the call
22 was placed to the Mexican number of her supposed cousin, a male answered. Torres asked
23 for Melissa, but the male seemed confused. This prompted Torres to exclaim, "Diego!"
24 and state that she was in jail. The male then hung up. BONILLO's first name is "Diego."

25 **D. Financial Records Reflect BONILLO's Involvement in the Drug Conspiracy**

26 20. Records from CBP reflect that BONILLO, who had been employed by CBP
27 since approximately April 2023, made approximately \$64,722 per year in base salary plus
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1 an additional average of \$17,923 per year in overtime salary prior to his arrest. Bank
2 records also reflect that he receives a nominal amount of money (between \$500 to \$700)
3 from Veterans Affairs (VA) every month. Both his salary and his VA benefits are directly
4 deposited into his bank account. Notably, at the time he was hired, BONILLO reported
5 approximately \$45,000 in debt.

6 21. Investigators have conducted interviews separately with BONILLO's long-
7 term girlfriend, and roommate and brother-in-law, Erick Monsalvo (MONSALVO). Both
8 denied that BONILLO receives income from any sources other than outlined above,
9 including through the buying and selling of vehicles. Evidence, including that outlined
10 below, reflects that BONILLO has unexplained wealth which, based on training and
11 experience, investigators are aware is indicative of involvement in drug trafficking.

12 **Unexplained Cash**

13 22. A review of BONILLO's J.P. Morgan Chase credit card statements reflect
14 that, between October 2023 and May 2024 (the timeframe of the conspiracy, as outlined
15 above), BONILLO utilized cash to make eight payments toward his credit card balance
16 and two deposits to his bank account (which occurred on the same date so are combined
17 into one entry below). The average cash deposit was \$2,067, although the amounts ranged
18 from \$1,000 to \$4,000. Bank records reflect that this cash, which totaled \$18,600 during
19 that timeframe, had not been withdrawn from his bank account that received the direct
20 deposits from CBP and the VA. Moreover, the deposits were all made on dates that
21 BONILLO returned from Mexico, or the day(s) shortly thereafter, as reflected in the chart
22 below. Based on training and experience, investigators are aware that it is common practice
23 for narcotics traffickers to be paid in cash and for the cash to often be paid to them in
24 Mexico.

Travels from Mexico	US Bank & Credit Card Cash Payment Amount	US Bank & Credit Card Cash Payment Amount
10/25/2023	10/27/2023	\$ 1,000
11/8/2023	11/8/2023	\$ 1,200
11/25/2023	11/27/2023	\$ 1,400
12/5/2023	12/5/2023	\$ 2,000
12/20/2023	12/22/2023	\$ 3,000
1/17/2024	1/17/2024	\$ 2,000
2/27/2024	2/27/2024	\$ 4,000
3/9/2024	3/9/2024	\$ 1,000
3/25/2024	3/25/2024	\$ 3,000
Total US Bank & Credit Card Cash Amount		\$ 18,600

High-Priced Expenditures

23. BONILLO's financial records also reflect spending above his means. For example, in March 2024, BONILLO flew to Paris, France, where he stayed approximately one week abroad before returning to the United States. Similarly, in November 2023, it appeared he spent time abroad after traveling to/from Dublin, Ireland. Indeed, his credit card expenditures reflect that, between November 2023, and March 18, 2024, he utilized his credit card to make expenditures associated with: (1) Dublin, Ireland, (2) Amsterdam, Netherlands, (3) Luxembourg, (4) Cancun, Mexico, (5) Big Bear Lake, California, and (6) Paris, France. Travel expenses posted to BONILLO's account during this timeframe were approximately \$13,091, as outlined in the chart below.³ A Gucci purchase for \$1,498 during the same timeframe also was recorded.

³ Interestingly, not all expected travel expenses were observed in BONILLO's travel records. For example, airfare and a "vacation getaway" expense for \$99 to Cancun, Mexico was posted to his account in January 2024; however, lodging expenses were absent. Based on training and experience, investigators believe that it is likely that BONILLO was utilizing cash for these expenses, which is why they do not appear in his credit card statements.

24. Notably, during this same timeframe, BONILLO made cash payments to his credit card in the amount of \$13,400 and deposited \$1,200 in cash into a bank account, totaling \$14,600. Given that BONILLO, as well as MONSALVO and his girlfriend, have denied any outside employment, investigators believe that the cash likely represents the proceeds of BONILLO's drug-trafficking activity. As stated above, based on training and experience, investigators are aware that drug trafficking is largely a cash business.

	11/12/2023 to 11/18/2023	1/8/2024	02/13/2024	03/10/2024 to 03/18/2024
	Dublin, Ireland; Amsterdam, Netherlands	Cancun, Mexico	Big Bear Lake, CA	Paris, France & Luxembourg
Airfare	\$ 864	\$ 950	\$ -	\$ 1,594
Lodging	\$ 1,074	\$ -	\$ 440	\$ 700
Food/Other/Retail	\$ 1,235		\$ -	\$ 768
Booking.com/Vacation Getaway	\$ 297	\$ 99	\$ -	
Entertainment	\$ -	\$ -	\$ 474	\$ 4,596
	\$ 3,470	\$ 1,049	\$ 914	\$ 7,658

25. Data obtained from BONILLO's telephone also reflects high-dollar real estate interests. In December 2023 alone, BONILLO had contact with approximately 13 different Mexican realtors about purchasing property in Mexico. For example, on or about December 15, 2023, BONILLO exchanged several text messages with "Ambar Navarro" from "Amber Luxury Realty" about the purchase of property in the La Colonia Del Rio, a neighborhood located in Tijuana, Mexico. During the text conversation, BONILLO stated that he was looking to purchase an apartment through a combination of cash and financing. BONILLO also told Navarro that the two would discuss the possibility of cash when they met in person to view the property. Then, on January 5, 2024, BONILLO relayed that Navarro would receive a message from his "lawyer" and that they could then begin. It is unclear whether BONILLO went forward with the purchase, although the messages stopped in February 2024. Similarly, on or about December 20, 2023, BONILLO exchanged messages with "Gabriela Arteaga" about purchasing an investment property. During one text exchange, BONILLO asked if she could assist him with the purchase of "five beach apartments and 3 plots of land" that he had apparently located himself.

1 BONILLO also stated that his investment budget was “6 Million Pesos” (approximately
2 equivalent to \$349,000). The messages do not reflect whether the deal went through.

3 26. BONILLO also appears to have ownership or interest in vehicles that are not
4 registered to him, despite his girlfriend and MONSALVO specifically denying that
5 BONILLO was involved in the buying and selling of vehicles. As stated above,
6 investigators are aware, based on training and experience, that drug traffickers often seek
7 to conceal their unexplained wealth by putting assets in the names of others. For example,
8 on or about May 4, 2024, during a recorded jail call occurring shortly after his arrest,
9 BONILLO instructed MONSALVO to contact “Albert” and have him get ahold of
10 “Marco.” BONILLO said to tell Albert that BONILLO has three cars with Marco and that,
11 if MONSALVO needed money, Albert could help.

12 **E. Seizing the Target Device**

13 27. On or about the date BONILLO was arrested, BONILLO made a recorded jail
14 call to MONSALVO. In the call, BONILLO instructed MONSALVO:

15 *“If they want to search, only what’s mine, like my room, not your room, or the garage.*
16 *So, if they have a warrant, tell them which room is mine and that I am renting it out.*
17 *It’s not right they search the other rooms and the garage.”*

18 28. Based on my training and experience, I am aware that individuals in custody
19 often attempt to relay covert messages because they are aware that their communications
20 are monitored by law enforcement. Here, investigators believe that BONILLO was covertly
21 instructing MONSALVO to conceal and/or impede investigators’ ability to obtain
22 additional evidence of his wrongdoing by encouraging MONSALVO to conceal such
23 evidence in his own room and/or by stopping law enforcement from accessing common
24 areas of the Target Residence, including MONSALVO’s room or the garage.

25 29. On July 23, 2024, a federal search warrant issued in the Southern District of
26 California by U.S. Magistrate Judge Michael S. Berg authorized the search of the entire
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1 residential rental home of BONILLO located at 842 Caminito Estrella, Chula Vista,
2 California (see 24-mj-02811-MSB).

3 30. Two days later, on July 25, 2024, the FBI executed the search warrant.
4 Pursuant to the search warrant, the FBI located and seized a box for a MacBook Air
5 computer bearing serial number C1MTC3U3H3QD from BONILLO's bedroom. The FBI
6 also located and seized a MacBook Air computer with the same serial number (**Target**
7 **Device**) in MONSALVO's bedroom on the floor between a nightstand and the bed. When
8 interviewed by FBI BCTF investigators, MONSALVO denied moving items including the
9 **Target Device**, but admitted the **Target Device** belonged to "Diego".

10 31. Based upon my training, experience, and consultations with law enforcement
11 officers experienced in criminal investigations, I am aware that criminal actors, their co-
12 conspirators, and others who aid them will often attempt to hide or destroy evidence which
13 they believe can be used to show culpability in criminal activity. I am further aware that
14 personal items, such as personal laptop computers are commonly stored in either personal
15 spaces (such as the owner's bedroom) or in a home office environment. Of relevance, during
16 the search of BONILLO's residence, a different personal laptop belonging to
17 MONSALVO's wife (who is also BONILLO's sister) was observed by the FBI. That
18 separate laptop was located in her personal space (specifically, her shared bedroom with
19 MONSALVO) and not in the bedroom of a different occupant of the home (such as
20 BONILLO's bedroom).

21 32. Based on the totality of the circumstances described above, I believe that
22 despite proffering to the contrary, MONSALVO did in-fact act on BONILLO's covert jail
23 call instructions to move the **Target Device** from BONILLO's room to a portion of the
24 residence BONILLO previously indicated that law enforcement officers would not be able
25 to search. Based on my training and experience, I believe MONSALVO took this action in
26 an attempt to interfere with the federal investigation into his brother-in-law.

1 33. Furthermore, based upon my experience and training, consultation with other
2 law enforcement officers experienced in criminal investigations, and all the facts and
3 opinions set forth in this affidavit, I believe that information including but not limited to;
4 browsing history, account records, photographs, financial records, passwords, evidence of
5 connections to co-conspirators, and other content tending to show culpability for the charges
6 for which BONILLO has been indicted will be found within the **Target Device**.

7 34. Accordingly, I request permission to search the **Target Device** for data
8 beginning on September 22, 2023 (one month prior to SERVIN's first crossing through
9 BONILLO's lane), up to and including July 25, 2024 (the date the **Target Device** was seized
10 by the FBI) because evidence exists showing MONSALVO or other individuals with access
11 to the **Target Device** have already attempted to interfere with the investigation of
12 BONILLO by moving it and may have further attempted to interfere by tampering with or
13 attempting to destroy data stored on the **Target Device** after BONILLO's arrest. If
14 authorized to search through July 25, 2024, investigators may be able to recover evidence
15 of attempts to destroy evidence after BONILLO's arrest.

16 **METHODOLOGY**

17 30. With the approval of the Court in signing this warrant, agents executing this
18 search warrant will employ the following procedures regarding computers and other
19 electronic storage devices, including electronic storage media, which may contain data
20 subject to seizure pursuant to this warrant.

21 **Identification And Extraction of Relevant Data**

22 31. A forensic image is an exact physical copy of the hard drive or other media.
23 After obtaining a forensic image, the data will be analyzed to identify and extract data
24 subject to seizure pursuant to this warrant. Analysis of the data following the creation
25 of the forensic image can be a highly technical process requiring specific expertise,
26 equipment, and software. There are literally thousands of different hardware items and
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1 software programs, and different versions of the same program, that can be
2 commercially purchased, installed, and custom-configured on a user's computer
3 system. Computers are easily customized by their users. Even apparently identical
4 computers in an office environment can be significantly different with respect to
5 configuration, including permissions and access rights, passwords, data storage, and
6 security. It is not unusual for a computer forensic examiner to have to obtain
7 specialized hardware or software, and train with it, in order to view and analyze
8 imaged data.

9 32. Analyzing the contents of a computer or other electronic storage device,
10 even without significant technical issues, can be very challenging. Searching by
11 keywords, for example, often yields many thousands of hits, each of which must be
12 reviewed in its context by the examiner to determine whether the data is within the
13 scope of the warrant. Merely finding a relevant hit does not end the review process.
14 The computer may have stored information about the data at issue: who created it,
15 when and how it was created, downloaded, or copied, when it was last accessed, when
16 it was last modified, when it was last printed, and when it was deleted. Sometimes it
17 is possible to recover an entire document that was never saved to the hard drive if
18 the document was printed. Moreover, certain file formats do not lend themselves to
19 keyword searches. Keywords search text. Many common electronic mail, database,
20 and spreadsheet applications do not store data searchable text. The data is saved in a
21 proprietary non-text format. Documents printed by the computer, even if the document
22 was never saved to the hard drive, are recoverable by forensic programs but not
23 discoverable by keyword searches because the printed document is stored by the
24 computer as a graphic image and not as text. Similarly, faxes sent to the computer are
25 stored as graphic images and not as text. In addition, a particular relevant piece of data
26 does not exist in a vacuum. To determine who created, modified, copied, downloaded,
27 transferred, communicated about, deleted, or printed the data requires a search of other
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1 events that occurred on the computer in the time periods surrounding activity
2 regarding the relevant data. Information about which user had logged in, whether users
3 share passwords, whether the computer was connected to other computer or networks,
4 and whether the user accessed or used other programs or services in the time period
5 surrounding events with the relevant data can help determine who was sitting at the
6 keyboard.

7 33. It is often difficult or impossible to determine the identity of the person
8 using the computer when incriminating data has been created, modified, accessed,
9 deleted, printed, copied, uploaded, or downloaded solely by reviewing the
10 incriminating data. Computers generate substantial information about data and about
11 users which generally is not visible to users. Computer-generated data, including
12 registry information, computer logs, user profiles and passwords, web-browsing
13 history, cookies, and application and operating system metadata, often provides
14 evidence of who was using the computer at a relevant time. In addition, evidence such
15 as electronic mail, chat sessions, photographs and videos, calendars, and address
16 books stored on the computer may identify the user at a particular, relevant time. The
17 manner in which the user has structured and named files, run or accessed particular
18 applications, and created or accessed other, non-incriminating files or documents, may
19 serve to identify a particular user. For example, if an incriminating document is found
20 on the computer but attribution is an issue, other documents or files created around
21 that same time may provide circumstantial evidence of the identity of the user that
22 created the incriminating document.

23 34. Analyzing data has become increasingly time-consuming as the volume of
24 data stored on a typical computer system and available storage devices has been mind-
25 boggling. For example, a single megabyte of storage space is roughly equivalent of
26 500 double-spaced pages of text. A single gigabyte of storage space, or 1,000
27 megabytes, is roughly equivalent of 500,000 double-spaced pages of text. Computer
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1 hard drives are now being sold for personal computers capable of storing up to 2
2 terabytes (2,000 gigabytes) of data. And this data may be stored in a variety of formats
3 or encrypted (several new commercially available operating systems provide for
4 automatic encryption of data upon shutdown of the computer). The sheer volume of
5 data also has extended the time that it takes to analyze data. Running keyword searches
6 takes longer and results in more hits that must be individually examined for relevance.
7 And, once reviewed, relevant data leads to new keywords and new avenues for
8 identifying data subject to seizure pursuant to the warrant.

9 35. Based on the foregoing, identifying and extracting data subject to seizure
10 pursuant to this warrant may require a range of data analysis techniques, including the
11 use of hashing tools to identify evidence subject to seizure pursuant to this warrant,
12 and to exclude certain data from analysis, such as known operating system and
13 application files. The identification and extraction process may take weeks or months.
14 The personnel conducting the identification and extraction of data will complete the
15 analysis within one-hundred and twenty (120) days from the date the warrant is signed,
16 absent further application to this court.

17 36. Following the issuance of the warrant, I will collect the **Target Device** and
18 subject them to analysis. All analysis, including forensic and manual review, of the data
19 contained within the computer and its memory card will employ search protocols directed
20 exclusively to the identification and extraction of data within the scope of this warrant.

21 **PRIOR ATTEMPTS TO OBTAIN THIS EVIDENCE**

22 37. There have been no prior attempts to obtain this evidence other than as stated
23 above, except that on or about July 2, 2024, investigators obtained a search warrant for
24 Apple iCloud data related to BONILLO's telephone number 619-942-0940 and email
25 address manefire@hotmail.com, for data from September 22, 2023 to May 5, 2024.
26 Investigators have not yet been able to review the materials provided by Apple in response
27 to the search warrant.

1 38. Investigators are unaware at this time whether the **Target Device** is associated
2 with the same iCloud account. To the extent it is, investigators may obtain some duplicate
3 data from a search of the **Target Device** if it is synced with the same iCloud account.

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1 **CONCLUSION**

2 39. Based on the facts and information set forth above, I submit there is probable
3 cause to believe that a search of the **Target Device** will yield evidence of BONILLO and
4 others' violations of Title 21, United States Code, Sections 952, 960, and 963. Accordingly,
5 I request that the Court issue warrants authorizing law enforcement to search the items
6 described in Attachments A, and seize the items listed in Attachment B as applicable, using
7 the above-described methodology.

8
9 I swear the foregoing is true and correct to the best of my knowledge and belief.

10
11 *Sylvan Strohm*
12 _____
13 Special Agent Sylvan Strohm
14 Federal Bureau of Investigation

15 Sworn and attested to under oath by telephone, in accordance with Federal Rule of Criminal
16 Procedure 4.1, this 7th day of August, 2024

17 *Daniel E. Butcher*

18 Honorable Daniel E. Butcher
19 United States Magistrate Judge
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