THE STATE OF TEXAS

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COUNTY OF BEXAR

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COURT:

## AFFIDAVIT FOR SEARCH WARRANT {Article 18.02(a) (1)-(9), Texas Code of Criminal Procedure}

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED THE AFFIANT HEREIN, A PEACE OFFICER UNDER THE LAWS OF TEXAS, WHO, BEING DULY SWORN, ON OATH MADE THE FOLLOWING STATEMENTS:

My name is Jeff Denman, and I am commissioned as a peace officer by the Texas Department of Public Safety (DPS) as a Special Agent (SA). I have been employed by the Texas Department of Public Safety since November 2010. From November 2010 to June of 2017 my assignment was Texas Highway Patrol Trooper. Since June of 2017 to present my position within DPS has been with the Criminal Investigations Division (CID) at the San Antonio Texas Anti-Gang Center. In December of 2022, I was assigned as a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) Safe Streets Task Force (SSTF), now Homeland Security Task Force (HSTF) in San Antonio.

As a Special Agent with DPS and a TFO with FBI, I have participated in gang and narcotics investigations. I have participated in state and federal search/arrest warrants and narcotics-related cases and have made arrests for narcotics violations. I am familiar with the appearance, packaging, common usage, and terminology regarding controlled substances through my training, experience, and observation. I have assisted in and facilitated narcotics and weapons transactions using confidential sources. I am familiar with the manner of importation, distribution, and efforts that drug dealers use to detect and thwart law enforcement. I have been involved in the debriefing of defendants, witnesses, informants, and others who have knowledge of narcotics trafficking. I have participated in investigations that involve sophisticated electronic surveillance methods, including pen registers, trap and trace devices, and wiretaps. I am familiar with the methods in which narcotics traffickers conduct their business, including, but not limited to, their methods of importing and distributing narcotics, their use of cellular telephones, their use of businesses and houses to store narcotics and conduct meetings, and their use of codes to conduct their narcotics transactions.

There is in Bexar County, Texas, a suspected place and premises described and located as follows: The location address is 5939 San Pedro Ave San Antonio, Texas 78212, Bexar County (Suspected Place). The location is described as a mixed-use commercial property with food trailer vendors, auto repair services, and multiple metal buildings to include sheds and other metal warehouse style buildings. The

food trucks are located near the front of the property which can be seen from San Pedro Road. Behind the food trucks are multiple metal buildings described/photos attached as building 1, 2 and, 3. Building 1 is described as a one-story structure with multiple windows facing towards San Pedro Road. Building 1 has what appears to be mix of metal and tar roof. In the middle of building 1, there is a brownish wooden utility pole exiting from the roof. Building 2 is behind building 1 and is described as having cream-colored exterior walls and a metal roof. Building 2 has a standard walk thru door and car garage door opening on the front and an overhang carport area attached. Building 3 is behind building 1 and is described as having cream-colored/grey exterior walls and a metal roof. Building 3 has multiple single bay car garage doors. Part of building 3 has a wooden fence around the front area of the building. Building 3 also has a carport to the south and to the east of building 3.

Said suspected place, in addition to the foregoing description, also includes all other buildings, structures, places, and vehicles on said premises and within the curtilage, if said premises is a residence, that is found to be under the control of the suspected party named below and in, on, or around which said suspected party may reasonably reposit or secrete property that is the object of the search requested herein. Attached hereto as **Exhibit A** are photographs of the places to be searched; it is to be considered as part of this affidavit as if copied herein and included for all descriptive purposes.

Said suspected place is in charge of and controlled by each of the following named and/or described individuals (herein called "suspected parties," whether one or more), to wit:

Luis Amador Castillo-Hernandez aka "Oriente"

A#243126950 DOB: 12/19/1987 FIN# 1325847349 FBI# 1X1F59PAW

It is my belief that said suspected parties has possession of and is concealing at said suspected place the following property: firearms, controlled substances, namely, cocaine, and property and items that constitute paraphernalia commonly used in the possession and sale of controlled substances, including, but are not limited to, scales, packaging materials, cash money, customer lists, lists of suppliers, documentation showing outstanding debts of purchasers and other similar documentation. This documentation may be both written and digitally stored. Therefore, this evidence could be located on any and all computers or devices that can store digital information, which include hard drives, external hard drives, zip drives, CD's, DVD's, thumb drives, IPods, memory cards and cellular telephones.

I have probable cause for said belief by reason of the following facts and circumstances:

- 1. Since December 2023, Texas DPS, FBI, and other law enforcement agency's have been investigating the Transnational Foreign Terrorist Organization, Tren de Argua (TdA), and others for drug trafficking and firearms violations. The below information has been relayed to your affiant by credible and reliable law enforcement officers. Information from the CI has also been relayed to your affiant by credible and reliable law enforcement officers. The CI has asked not to be named or otherwise identified in relation to this affidavit and the search warrant. Your affiant has agreed to withhold the CI's name and identity for the purposes of the CI's personal security and to avoid compromising investigations involving the CI's information.
- 2. In September of 2025, your affiant received credible and reliable information from other law enforcement officers (Agents) that a cooperating individual (CI) who also has been deemed credible and reliable advised that the location of 5939 San Pedro Ave San Antonio, Texas 78212, Bexar County (Suspected Place), is being utilized to host afterhours parties. The CI stated to Agents that known TdA members and associates attend these parties, sell narcotics, and are in possession of firearms. Specifically, Luis Amador Castillo-Hernandez "Oriente", a suspected TdA member, sells narcotics at the Suspected Place. The CI stated to Agents that on multiple occasions the CI attended the afterhours parties and observed "Oriente" selling narcotics (cocaine) at the Suspected Place. Your affiant learned from Agents that the CI has attended these parties at the Suspected Place on or about September 13, September 20, September 27, November 1, and November 9 of 2025. Agents have conducted surveillance on three of these occasions and validated the information that the CI has provided law enforcement.
- 3. On September 20, 2025, Agents conducted covert surveillance at the Suspected Place beginning at around 9:40pm and ending around 12:30am. During this time frame Agents observed individuals setting up an outdoor seating area in between building 1 and building 3 on the Suspected Place. At around 12:30am, Agents observed a medium size crowd arriving at the Suspected Place indicating the Suspected Place was used for afterhours parties. All observations corroborated the Cl's accounts for activities occurring at the Suspected Place.
- 4. On September 27, 2025, Agents conducted covert surveillance at the Suspected Place. During the surveillance, Agents observed an individual acting as security, searching individuals who entered building 3 on the Suspected Place. For this reason, Agents believe unauthorized individuals leave their firearms and narcotics in their vehicles and only directed individuals are permitted to bring in firearms and narcotics to sell. Also, during the surveillance, Agents observed suspects entering

and exiting Buildings 1, 2, and 3 on the **Suspected Place**. Once again, all observations corroborated the Cl's accounts for activities occurring at the **Suspected Place**.

- 5. Also on September 27, 2025, FBI Agents, Texas DPS Agents, and other law enforcement officers arranged a controlled narcotics purchase for a small amount of cocaine from "Oriente" at the Suspected Place. Agents informed your affiant that the CI contacted "Oriente" while on the suspected place to arrange the purchase. Agents stated to your affiant that the CI met with "Oriente" and provided "Oriente" \$150.00 of DPS funds and in return "Oriente" provided the CI with three small plastic bags containing a white powdery substance (cocaine). As a result of the cocaine purchase, FBI Agents seized the cocaine from the CI. The cocaine was then weighed, field tested and secured at the FBI San Antonio Evidence Locker. FBI Agents informed your affiant that the white powdery substance tested positive for cocaine and weighed approximately 1.7 grams. After the controlled purchase of cocaine from "Oriente", the CI relayed to Agents that "Oriente" continued to stay at the Suspected Place to distribute cocaine to other unknown individuals at the Suspected Place.
- 6. In the early morning hours of November 9, 2025, FBI Agents, Texas DPS Agents, and other law enforcement officers arranged another controlled narcotic purchase for cocaine from "Oriente" at the Suspected Place. Your affiant and other Agents conducted surveillance during this controlled purchase. While the CI was at the Suspected Place the CI arranged the purchase of cocaine from "Oriente". The CI met with "Oriente" and provided \$130.00 of DPS funds to "Oriente" and in return "Oriente" provided the CI with four small plastic bags containing a white powdery substance (cocaine). After the controlled purchase, Agents met with the CI at predetermined location and seized the cocaine from the CI. The cocaine was then weighed, field tested and secured at the FBI San Antonio Evidence Locker. FBI Agents informed your affiant that the white powdery substance field tested positive for cocaine and weighed approximately 1.6 grams. After the controlled purchase of cocaine from "Oriente", the CI relayed to Agents that "Oriente" continued to stay at the Suspected Place to distribute cocaine to other unknown individuals at the Suspected Place.
- 7. On November 15, 2025, your affiant was made aware by other Agents that the CI was at the Suspected Place on Friday November 14, 2025. The Agents informed your affiant that the CI stated "Oriente" was in possession of a firearm and was selling cocaine while at the Suspected Place.
- 8. Based on my training, experience, and knowledge of the investigation, the **Suspected Place** has been in the past and continues to be used to facilitate

afterhours parties for known TdA members and associates who sell narcotics namely cocaine. The Cl has knowledge that the subjects are TdA members and/or associates and has observed the selling of narcotics and are possessing firearms at the **Suspected Place**. This information was corroborated through a credible and reliable Cl, surveillance of the **Suspected Place**, and two controlled purchases of cocaine at the **Suspected Place**.

9. Based on my training, experience, and knowledge of the investigation, narcotics will be present at the premises during the course of these after hour parties.

I request authority from the Court to transport, remove, or take any property or evidence seized pursuant to the warrant requested herein to any location deemed necessary for purposes of safekeeping and completion of any investigation or proceedings related to the activities described in this Affidavit.

Wherefore, I ask for issuance of a warrant that will authorize me, other Peace Officers, Federal Officers, and Federal employees to search said suspected place, premises, curtilage, and vehicles on the **Suspected Place** described above and to seize the items or property described in this affidavit. Your affiant also requests this search warrant to authorize the forced entry into locked vehicles that are on the **Suspected Place**.

Affiant

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT ON THIS THE 16

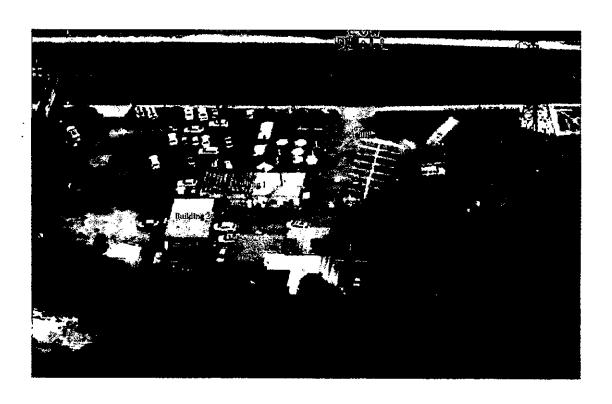
DAY OF Mederher, 2025.

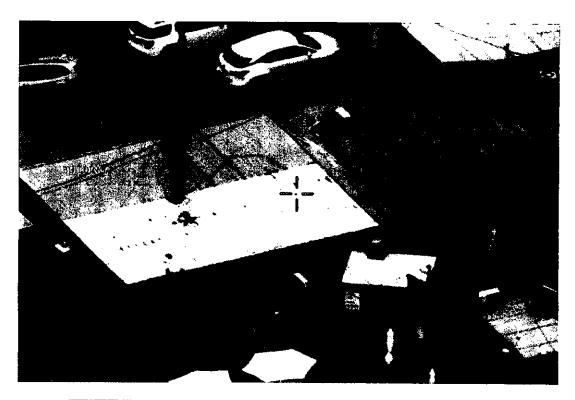
District Judge

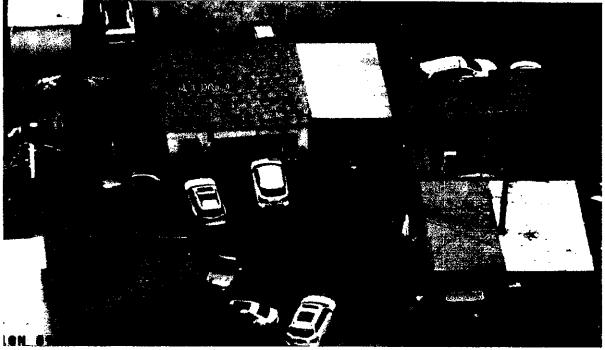
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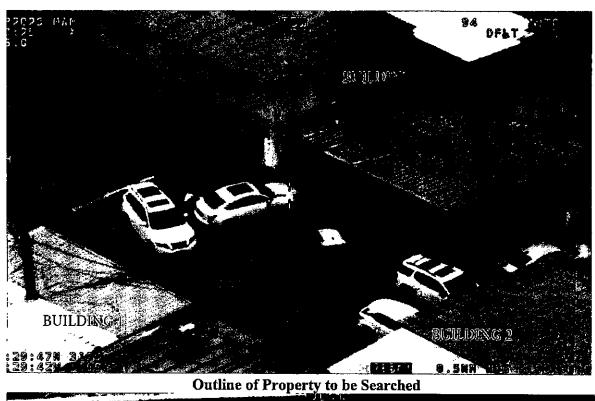
Exhibit A

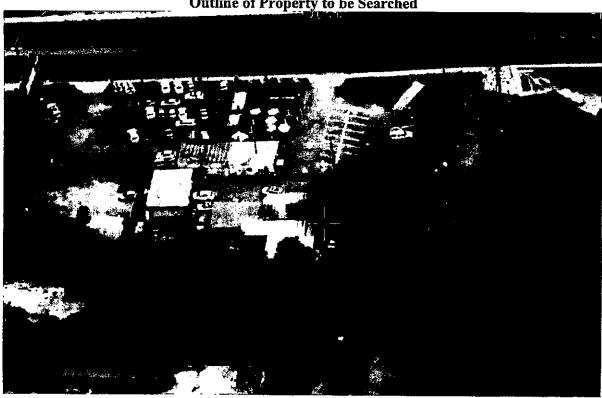
Overhead View of Structures











THE STATE OF TEXAS

§ DOCKET#

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COUNTY OF BEXAR

COURT:

## SEARCH WARRANT {Article 18.02(a)(1)-(9), Texas Code of Criminal Procedure}

The State of Texas: To the Sheriff or any Peace officer of Bexar County, Texas, any Peace Officer of the State of Texas, or Federal Officer:

Whereas I have been presented an affidavit requesting issuance of a search warrant and whereas I find that the verified facts stated by affiant in said affidavit show that affiant has probable cause for the belief he/she expresses therein, and whereas I believe said affidavit properly establishes grounds for issuance of this Warrant;

Now, therefore, you are commanded to enter the suspected place, premises, described in said affidavit, to-wit. The location address is 5939 San Pedro Ave San Antonio, Texas 78212, Bexar County (Suspected Place). The location is described as a mixed-use commercial property with food trailer vendors, auto repair services, and multiple metal buildings to include sheds and other metal warehouse style buildings. The food trucks are located near the front of the property which can be seen from San Pedro Road. Behind the food trucks are multiple metal buildings described/photos attached as building 1, 2 and, 3. Building 1 is described as a one-story structure with multiple windows facing towards San Pedro Road. Building 1 has what appears to be mix of metal and tar roof. In the middle of building 1, there is a brownish wooden utility pole exiting from the roof. Building 2 is behind building 1 and is described as having cream-colored exterior walls and a metal roof. Building 2 has a standard walk thru door and car garage door opening on the front and an overhang carport area attached. Building 3 is behind building 1 and is described as having cream-colored/grey exterior walls and a metal roof. Building 3 has multiple single bay car garage doors. Part of building 3 has a wooden fence around the front area of the building. Building 3 also has a carport to the south and to the east of building 3. Attached hereto as Exhibit A is a photograph of the places to be searched; it is to be considered as part of this affidavit as if copied herein and included for all descriptive purposes.

At said places you shall search for and, if same be found, seize and bring before me the property described in the affidavit, to-wit: firearms, controlled substances, namely, cocaine, and property and items that constitute paraphernalia commonly used in the possession and sale of controlled substances, including, but are not limited to, scales, packaging materials, cash money, customer lists, lists of suppliers, documentation showing outstanding debts of purchasers and other similar documentation. This

documentation may be both written and digitally stored. Therefore, this evidence could be located on any and all computers or devices that can store digital information, which include hard drives, external hard drives, zip drives, CD's, DVD's, thumb drives, IPods, memory cards and cellular telephones.

It is further ordered that any and all property seized by authority of this Warrant or during the execution thereof shall be and remain under the care, custody, and control of any peace officer or Federal Officer to whom this Warrant is delivered for execution. Further, said property may be removed and taken to any location as deemed necessary by such peace officer, Federal Officer, or Federal employee for purposes of safekeeping and completion of any investigation or proceedings related to the activities described in the Affidavit upon which the foregoing Warrant was issued.

Herein fail not, but have you then and there this Warrant to be executed without delay; and upon compliance with the orders herein, make return forthwith showing how you have executed same within three days of the date shown below, exclusive of said date and the day of its execution.

Issued this the Loday of Mil, 25, at 26 clock A.M., to certify which witness my hand this day.

District Judge

Bexar County, Texas

12:32 ar

Exhibit A

Overhead View of Structures

