

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

UNDER SEAL

JAIME SOLIS

CASE NUMBER:

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief. From in or about at least 1999, and continuing to the present, in the Northern District of Illinois, Eastern Division, and elsewhere, JAIME SOLIS, defendant herein,

did knowingly and intentionally conspire with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a);

all in violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent with Immigration and Customs Enforcement ("ICE") and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
DANIEL NAGY
Special Agent, Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

September, 2008 at Chicago, Illinois
Date City and State

MICHAEL T. MASON, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

STATE OF ILLINOIS }
 }
COUNTY OF COOK }

AFFIDAVIT

I, Daniel Nagy, being duly sworn on oath, depose and state as follows:

PRELIMINARY MATTERS

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been employed as a Special Agent (“SA”) with United States Immigration and Customs Enforcement (“ICE”) since approximately February 2006. I have a Bachelor’s degree in Business Management from the University of Denver, Denver, Colorado. I am a graduate of the Federal Law Enforcement Training Center, Glynco, Georgia. In connection with my official duties as a SA with ICE, I investigate criminal violations of the federal immigration laws, including but not limited to, Title 8, United States Code, Sections 1324, 1325, and 1326, and Title 18, United States Code, Sections 1028 and 1546. I have participated in criminal investigations involving the manufacture and distribution of fraudulent immigration documents, driver’s licenses, and other identification documents. I have participated in criminal investigations involving undercover transactions, the execution of search warrants, the review of consensually-recorded conversations, and various types of physical and electronic surveillance.

3. I have received specialized training in the enforcement of laws concerning the activities of the production and distribution of fraudulent identification documents in investigations involving the interception of wire and electronic communications. I am familiar with the methods in which fraudulent document vendors conduct their businesses, including but not limited to, their methods of manufacturing and distributing fraudulent documents, their use of telephones and digital display paging devices, and their use of numerical codes and code words to conduct their transactions.

4. This affidavit is submitted in support of a criminal complaint and application for warrant to arrest **JAIME SOLIS** (“SOLIS”), a/k/a “Jaime Soliz” a/k/a “Raul Salinas” a/k/a “Alejandro Martinez” a/k/a “Jarocho” a/k/a “Jarochito” a/k/a “Juliana,” for knowingly and intentionally conspiring with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a); all in violation of Title 18, United States Code, Section 371.

5. Because this affidavit is being submitted for the limited purpose of obtaining a federal arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are

necessary to obtain an arrest warrant.

6. For approximately four years, ICE, with the assistance of the Federal Bureau of Investigation (“FBI”), United States Secret Service (“USSS”), Diplomatic Security Service (“DSS”), and Chicago Police Department (“CPD”), has been investigating a criminal fraudulent document vending organization (hereinafter the “Organization”) operating in the “Little Village” area of Chicago, along 26th Street between Albany and Avers. The Organization produces and sells fraudulent identification documents, including resident alien cards (“green cards” or “micas”), social security account number cards (“social security cards”), driver’s licenses, and state identification cards.

7. This affidavit is based on my own investigation, as well as on information that I have learned through communications with other federal, state and local law enforcement personnel. The information contained in this affidavit also includes, among other things: (a) information provided by confidential informants and sources of information; (b) reports made by law enforcement officers with the CPD, and Special Agents and Task Force Officers of ICE, FBI, USSS, and DSS; (c) consensually-recorded conversations; (d) undercover purchases of fraudulent identification documents by cooperating individuals and undercover law enforcement officers; (e) telephone toll records; (f) pen register and trap and trace records; (g) conversations recorded pursuant to Title III Court authorization; and (h) seizures of currency, computers, fraudulent documents, and other fraudulent document implements.

8. On the basis of all of this information, which I have reviewed and believe to be reliable, I submit that the facts containing in this affidavit establish probable cause to believe that from in or about at least 1999, and continuing to the present, in the Northern District of Illinois, Eastern Division, and elsewhere, JAIME SOLIS ("SOLIS"), a/k/a "Jaime Soliz" a/k/a "Raul Salinas" a/k/a "Alejandro Martinez" a/k/a "Jarocho" a/k/a "Juliana," defendant herein, did knowingly and intentionally conspire with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a); all in violation of Title 18, United States Code, Section 371.

CW2

9. On about September 6, 2006, ICE registered as a confidential witness ("CW2") an individual who had sold fraudulent identification documents near 26th Street and California Avenue, in Chicago, Illinois, for the Organization beginning in 1998. CW2 provided detailed information about the members and functioning of the Organization. CW2's information has been corroborated through surveillance, public records, consensual recordings, and other information. According to CW2, JAIME

SOLIS is a member of the Organization. CW2 has had several consensually-recorded conversations with SOLIS regarding the sale of fraudulent documents, and CW2 has identified a photo of SOLIS as “Jarocho.”

10. CW2 has multiple arrests for advertisement and promotion of fraudulent identification documents and disorderly conduct, including the following: On about June 16, 1997, CW2 was arrested by CPD for disorderly conduct. On about July 29, 1997, the charge was stricken from the docket. On about July 18, 1997, CW2 was arrested by CPD for disorderly conduct. On about August 29, 1997, the charge was stricken from the docket. On about August 2, 1997, CW2 was arrested by CPD for disorderly conduct. On about September 9, 1997, the charge was stricken from the docket. On about December 2, 1997, CW2 was arrested by CPD for disorderly conduct. On about January 9, 1998, the charge was stricken from the docket. On about December 3, 1997, CW2 was arrested by CPD for criminal trespass to land. On about December 31, 1997, the charge was stricken from the docket. On about July 14, 1998, CW2 was arrested by CPD for disorderly conduct. The disposition of the charge is unknown. On May 13, 2006, CW2 was arrested by CPD for displaying/promoting fraudulent identification. On June 29, 2006, the charge was stricken from the docket. On September 24, 2006, CW2 was arrested by CPD for displaying/promoting fraudulent identification. On November 21, 2006, the charge was stricken from the docket.

11. CW2 assisted ICE in this ongoing criminal investigation in exchange for

parole status in the United States. As of today's date, CW2 has received \$1500 compensation in exchange for his/her cooperation in the investigation. The government authorized CW2 to participate in illegally soliciting and selling fraudulent identification documents in conjunction with this criminal investigation only at the direction and authorization of the government and for the sole purpose of furthering this criminal investigation. ICE advised CW2 that his/her cooperation with the government will not protect him/her from prosecution if he/she engages in criminal activity not authorized by ICE and/or the United States Attorney's Office. ICE also advised CW2 that he/she may face criminal charges for illegally soliciting and selling fraudulent identification documents before he/she began cooperating with the government. On about May 22, 2007, CW2 was processed for removal and was subsequently deported from the United States to Mexico.

12. Pursuant to CW2's consent and court orders signed by the Chief Judge or an acting chief judge in the Northern District of Illinois, telephone calls occurring to and from the telephone used by CW2 ("**Subject Phone CW2**") were intercepted from about March 5, 2007, through May 22, 2007.

CW3

13. On about January 17, 2008, ICE met with CW3, who has sold fraudulent identification documents near 26th and California for the Organization since about 1998. CW3 provided detailed information about the members and functioning of the Organization. CW3's information has been corroborated through surveillance, public

records, consensual recordings, and other information. According to CW3, JAIME SOLIS is a member of the Organization. CW3 has had several consensually-recorded conversations with SOLIS regarding the sale of fraudulent documents, and CW3 has identified a photo of SOLIS as “Jarocho.”

14. CW3 has multiple arrests for advertisement and promotion of fraudulent identification documents, possession of narcotics, theft, and traffics violations, including the following convictions: On October 3, 2004, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On December 13, 2004, CW3 was convicted of the charge and sentenced to two years’ probation. On November 17, 2004, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On January 18, 2005, CW3 was convicted of the charge and sentenced to one year probation. On May 27, 2006, CW3 was arrested by CPD for attempted possession of less than fifteen grams of heroin. On June 19, 2006, CW3 was convicted of the charge and sentenced to one day imprisonment. On June 3, 2006, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On June 29, 2006, CW3 was convicted of the charge and sentenced to two days’ imprisonment. On October 28, 2007, CW3 was arrested by CPD for advertisement and promotion of a fraudulent ID card. On December 20, 2007, CW3 was convicted of the charge and sentenced to twenty days’ imprisonment.

15. CW3 is assisting ICE in this ongoing criminal investigation in the hopes of eventually obtaining lawful permanent resident status in the United States. ICE

has granted CW3 a temporary stay of deportation from a January 6, 2008, final order of removal. As of today's date, CW3 has received \$500 compensation in exchange for his/her cooperation in the investigation. The government has authorized CW3 to participate in illegally soliciting and selling fraudulent identification documents in conjunction with this criminal investigation only at the direction and authorization of the government and for the sole purpose of furthering this criminal investigation. ICE has advised CW3 that his/her cooperation with the government will not protect him/her from prosecution if he/she engages in criminal activity not authorized by ICE and/or the United States Attorney's Office. ICE also has advised CW3 that he/she may face criminal charges for illegally soliciting and selling fraudulent identification documents before he/she began cooperating with the government.

16. Pursuant to CW3's consent and court orders signed by the Chief Judge or an acting chief judge in the Northern District of Illinois, telephone calls occurring to and from the telephone used by CW3 ("**Subject Phone CW3**") have been intercepted from about January 30, 2008, through the present.

COURT-AUTHORIZED INTERCEPTION OF WIRE COMMUNICATIONS

17. On April 27, 2007, and May 25, 2007, the Chief Judge and an acting chief judge in the Northern District of Illinois authorized the interception of wire communications over Target Phone 4, used by Individual B.

18. On April 16, 2008, Acting United States District Court Chief Judge William J. Hibbler authorized the interception of wire communications over Target

Phones 5 and 11, used by JAIME SOLIS.

19. On May 21, 2008, United States District Court Chief Judge James F. Holderman authorized the continued interception and initial wire communications over Target Phones 5 (used by JAIME SOLIS), 13 (used by Individual B), and 18 (used by JAIME SOLIS).

20. On June 24, 2008, United States District Court Chief Judge James F. Holderman authorized the continued interception of wire communications over Target Phones 5, 13, and 18.

21. Pursuant to the court orders signed by the Chief Judge and acting chief judges, telephone calls occurring to and from the following telephones were intercepted for the following periods of time:

| PHONE | USER | DATES OF INTERCEPTION |
|-----------------------------------|-----------------|--|
| Target Phone 4 (773) 879-4088 | Individual B | April 27, 2007 through June 23, 2007 |
| Target Phone 5 (773) 627-2415 | Jaime Solis | April 16, 2008 through May 15, 2008 and May 21, 2008 through July 23, 2008 |
| Target Phone 11 (773) 822-6535 | Jaime Solis | April 16, 2008 through May 15, 2008 |
| Target Phone 13 (773) 964-0122 | Individual B | May 21, 2008 through June 19, 2008 and June 26, 2008 through July 23, 2008 |
| Target Phone 18 (773) 499-1198 | Jaime Solis | May 21, 2008 through June 19, 2008 and June 24, 2008 through July 23, 2008 |

OVERVIEW OF THE ORGANIZATION

22. Interceptions of communications on Subject Phone CW2, Subject Phone CW3, and Target Phones 4, 5, 11, 13, and 18 – along with surveillance, seizures, post-arrest statements of individuals in the Organization such as document vendors, consensually-recorded conversations, undercover purchases of documents and other investigative methods revealed the following information:

a. The Organization’s methods are well-established. The portion of the Organization that operates primarily on the corner of St. Louis Avenue and 26th Street in Chicago, Illinois (“the St. Louis Crew”) operates from about 10:00 a.m. to 8:00 p.m., seven days a week, and involves the following participants:

i. A “micero,” “miquero,” “solicitor,” “vendor,” or “seller” is a person standing on the street using hand gestures and verbally announcing to pedestrians and vehicles that he/she has identification documents for sale. A miquero advises customers of the cost of the identity documents and the location of a photography shop – usually Foto Studio Reyes, located at 2542 South Christiana Avenue, Chicago, Illinois, or Foto Davila, located at 3604 West 26th Street, Chicago, Illinois – to obtain photos for the documents. A miquero takes the order, photo, and payment from the customer. The St. Louis Crew typically employs about 8-10 miqueros, and CW3 reports he/she services approximately five customers per day. Miqueros charge customers between \$110 - \$150 for a set of fraudulent documents and keep any profit after paying the office approximately \$50 to make the documents. A

set consists of a social security card and a photo identification card. If the customer wants a social security card by itself, the charge is approximately \$40.

ii. A “runner” is a person who transports the money and the customer’s information to the manufacturer at the “office.” Some runners transport the order, photo, and payment from the miquero to the manufacturer. There may be multiple levels of runners between the miquero and the manufacturer. The St. Louis Crew typically employs about 2 runners.

iii. A “manufacturer” is a person who actually creates the fraudulent identification documents out of a residence that is a document production facility the Organization calls the “office,” using equipment such as typewriters, laminators, paper cutters, computers, and printers to produce false identification documents with authentic results. The St. Louis Crew typically employs at least 2 manufacturers. There may be one or two manufacturers working in an office at any one time. The Organization has the ability to manufacture a fraudulent state identification card (state ID) or a fraudulent driver’s license (DL) from most of the 50 United States. Customers most commonly request fraudulent state identification cards or driver’s licenses from Indiana, Wisconsin, Ohio, Texas, Illinois, or Michigan. The Organization also manufactures various Mexican identification cards.

b. In just one location in the area of St. Louis Avenue and 26th Street alone, there are as many as five to ten illegal aliens at any one time selling fraudulent documents. When these sellers locate a customer, they obtain the photograph and

personal information such as name and address that the customer wants on a particular card. Once these sellers have accumulated such information from enough customers, one of the sellers will send that information to a document production facility where the false documents are made.

c. Miqueros in the St. Louis Crew send their customers to either Foto Studio Reyes, located at 2542 South Christiana Avenue, Chicago, Illinois, or Foto Davila located at 3604 West 26th Street, Chicago, Illinois, to have their photo taken for the fraudulent documents. After the photo is taken, the miquero usually will meet the runner at a predetermined location in Chicago, Illinois, away from 26th Street, to exchange orders, money, and documents. Currently, the Organization uses either the intersection of South Keeler Avenue and 25th Street in Chicago or South Avers Avenue and 32nd Street in Chicago as locations to meet.

d. Members of the Organization are primarily of Mexican descent, but the nationality of the Organization's customers vary. Customers have requested green cards for the following countries: Mexico, Columbia, Guatamala, Ecuador, El Salvador, Jamaica, Poland, Czech Republic, Albania, Russia, and China. Customers also include Caucasian and African-American individuals believed to be United States citizens. Law enforcement is unaware of any occasion in which this Organization declined selling fraudulent identification documents to a customer who had sufficient money to purchase the documents.

e. During the investigation, agents have identified some principal

members of the Organization and their roles. Law enforcement has identified some individuals who produce or manufacture the fraudulent identification documents, some street level vendors who market or distribute the fraudulent identification documents, and some leaders of the Organization. Law enforcement also has identified some locations of manufacturing, marketing, and distribution of the fraudulent identification documents.

23. JAIME SOLIS has been a member of the Organization for several years. SOLIS previously worked as a runner and manufacturer for the Organization. In early 2006, SOLIS became a mid-level supervisor for the Organization, reporting directly to Individual B. According to CW3, Individual B “controls” the street corner located at St. Louis Avenue and 26th Street in Chicago, Illinois. However, Individual B is worried about being arrested for soliciting fraudulent documents on 26th Street; therefore he prefers to limit his risk and exposure by “renting” the corner of St. Louis Avenue and 26th Street to SOLIS for \$700 per week. SOLIS keeps any organizational profits above and beyond the weekly \$700 payment to Individual B. SOLIS supervises the fraudulent document activity in the vicinity of 26th Street and St. Louis Avenue and also supervises the fraudulent document office located at 2456 South Homan Avenue.

REPRESENTATIVE SAMPLE OF PERTINENT CALLS

24. The following are partial summaries of wire communications to and from Subject Phone CW2, Subject Phone CW3, and Target Phones 4, 5, 11, 13, and 18. In many of the intercepted calls, coded language was used to conceal the true nature of

the telephone calls. For some of the calls summarized below, I have placed in brackets my understanding of what is being said during intercepted calls, based on the content and context of the conversations, surveillance, the results of pen register devices, debriefing of CWs, my experience as a law enforcement officer and the experience of other law enforcement officers in this investigation, including the experience of the agents and officers assigned to this case listening to the intercepted conversations as a whole. The times listed for these calls are approximate. In most cases, voice identifications are based on names used during the intercepted conversations, voice recognition that has been accomplished to date by the CWs and by other law enforcement, information obtained from CWs, historical information developed during this investigation, and/or telephone subscriber information. The summaries below do not include all potentially criminal calls intercepted during the period of interception, or all statements or topics covered during the course of the intercepted conversations. They do not represent finalized transcripts and may not represent the entire conversation that occurred between the identified individuals.

25. The language used during most of the intercepted conversations summarized below was Spanish. In such cases, Spanish speaking agents and/or linguists have listened to the calls and translated the conversations into English.

SAMPLE OF RECORDED CALLS IN 2007

26. On March 5, 2007, at approximately 7:25 p.m., CW2 received a consensually-recorded call on the Subject Phone CW2 from Target Phone 5. During the

conversation, JAIME SOLIS¹ said, "Give me the name." CW2 said, "It's M-I-N-J-A-R-E-S." SOLIS said, "What's the date of birth?" CW2 said, "The date of birth is zero nine, zero three, eighty-three. Social security number . . . it's six, thirty-nine. Forty. Eighty-six, sixteen." SOLIS said, "How is the girl?" CW2 said, "The girl is dark complected, you see it . . . Look she's a dark girl with a black blouse . . . and she has, she has her hair to one side." [I believe that CW2 and JAIME SOLIS were clarifying an order for fraudulent documents. Further, I believe that the female customer placed the order with CW2, who then gave the order to SOLIS.]

27. On March 6, 2007, at approximately 12:54 p.m., CW2 placed an outgoing telephone call on the Subject Phone CW2 to Target Phone 5. During the conversation, CW2 said, "My boy, they don't want to take it, dude." JAIME SOLIS said, "Why don't they want to take it?" CW2 said, "The birth certificate came out wrong again, my boy." SOLIS said, "Which one? The one for Arturo?" CW2 said, "Uh . . . Arturo? Yes dude, I believe so . . . he's from eighty-eight." SOLIS said, "But tell him that he has ninety-one there . . . should I make it?" CW2 said, "Yes, make it, dude. The only thing that was wrong with that one was the date of birth." SOLIS said, "Let's see, name and date of birth?" CW2 said, "He's from the tenth . . . zero, five, of eight-four. It's an ID from the State of Illinois, okay." SOLIS said, "All right, I'll put it in right now." [I

¹As set forth in paragraphs 9 and 13 above, both CW2 and CW3 have identified an arrest photo of JAIME SOLIS as "Jarocho," a runner and later supervisor for the St. Louis Crew. Also, SOLIS has responded when addressed as "Jarocho," "Jarochito," and "Juliana," such as the calls summarized in paragraphs 33, 46, 60, 62, and 63.

believe that CW2 and SOLIS were clarifying two orders for fraudulent documents. The first order was for a fraudulent social security card, and the second order was for an Illinois state ID card.]

28. On April 8, 2007, at approximately 10:53 a.m., CW2 received a consensually-recorded call on the Subject Phone CW2 from telephone number (773) 412-5769. During the conversation, SOLIS said, “Where are you going?” CW2 said, “To pick up a job. Why? Are you a cop, man? Are you watching me? Don’t be watching me, man, okay?” [I know that “jobs” is a coded reference used by the Organization to describe fraudulent documents.] SOLIS said, “Who are you going with?” CW2 said, “With Pajarraca.” SOLIS said, “Where are you going to pick up.” CW2 said, “Here, on Trumbull and 28th.” [I believe that CW2 and SOLIS were discussing a location to pick up fraudulent documents. Further, I believe that CW2 was referring to the intersection of South Trumbull Avenue and West 28th Street in Chicago, Illinois.]

29. On April 8, 2007, at approximately 11:36 a.m., CW2 received a consensually-recorded call on the Subject Phone CW2 from (773) 412-5769. During the conversation, CW2 said, “Make me a social right away.” SOLIS said, “Did you already get the other one or not?” CW2 said, “No, it hasn’t arrived yet . . . Let’s see, here goes the number . . . It’s three, fifty-four, zero, eight . . .” SOLIS said, “What else.” CW2 said, “Zero, eight, zero, nine, seven, six. Angel J. Gonzalez.” [I believe that CW2 and SOLIS were clarifying a social security number and a date of birth to be printed on a

fraudulent social security card and an identification document.]

30. On about April 28, 2007, at approximately 10:08 a.m., JAIME SOLIS called CW2 from Target Phone 5, and the call was consensually-recorded. During the conversation, CW2 asked, “Hey, can we, can we work now?” JAIME SOLIS responded, “Yeah dude. Well, right now the situation is calmer. Yeah, well, if you guys see, well then you get out of there.” CW2 stated, “Oh, all right. Yeah, well I was waiting for you to give me the green light.” SOLIS stated, “Yeah, yeah, it’s now, dude.”² [I believe that SOLIS told CW2 that the miqueros could start working again.]

31. On about April 29, 2007, at approximately 10:28 a.m., Individual B placed a call from Target Phone 4 to Target Phone 5. During the conversation, Individual B asked, “Did you already talk to those guys?” JAIME SOLIS answered, “I already told them . . . they said no, that’s fucked up.” Later in the conversation, SOLIS stated, “No, well because . . . if they want, they’re going to . . . it’s going to happen, happen one way or another.” Individual B responded, “I’ve already told these guys, man. Everyone, man.” Individual B asked, “Did any work come in yesterday or not?” SOLIS answered, “Nah, only about eight, man.” Individual B asked, “See, with those eight at

² On about April 24, 2007, ICE executed twelve federal arrest warrants of members of the Organization active in the parking lot of and inside “The Little Village Discount Mall” on 26th Street and Albany in Chicago, Illinois (“the Albany Crew”), in conjunction with *United States v. Leija-Sanchez, et al*, No. 07 CR 224 (J. Pallmeyer). On April 28, 2007, only four days after ICE dismantled the Albany Crew, ICE agents observed that miqueros for the St. Louis Crew resumed selling fraudulent identification documents and had actually increased their prices because their main competition -- the Albany Crew -- had been eliminated.

seventy each, how much would that had been already, man?" SOLIS answered, "Yeah, that's a good chunk of change." Individual B stated, "Yeah, take them up there already because they . . . they have to take them up, man, for sure, man." SOLIS answered, "No, well that's what I told them. . . . well, that the shit is big." Individual B stated, "Well, that you're not going to be risking yourself just for a little bit of money." [I believe that SOLIS and Individual B decided to raise the price that the "office" charges the miqueros for fraudulent documents.] Later in the conversation, Individual B stated, "Well, everyone has to understand the deal, man." SOLIS responded, "Uh-huh. No, and that as you say because they also get more money." Individual B stated, "And they want to pay the same. No man, fuck that. People are going to pay anything right now, man. Nothing is going to be done at the mall, man . . . a shitload of work is going to be coming in soon, man." [I believe that SOLIS and Individual B agreed that the miqueros could charge their customers more on the street, given the fact that no one would be able to get documents made at the Discount Mall because of the arrests on April 24, 2007.]

32. On May 11, 2007, at approximately 12:17 p.m., an incoming call was received at Target Phone 4 from Target Phone 5. JAIME SOLIS stated, "I need some sheets." [I believe that SOLIS asked Individual B to order him blank sheets of fraudulent documents.] Individual B replied, "I don't have anymore, man." SOLIS asked, "I have a client that wants twenty, man. And I also wanted some for myself. When are you getting more?" Individual B replied, "Get the money so I can order them

for you, man.” SOLIS stated, “My cousin’s husband just got here and that guy is a street miquero over there in Los Angeles. He says that they don’t use a pattern over there anymore, man. I think they make the seals with rollers. I also asked him to hook me up, man.” [I believe seals are holographic security features placed by Government agencies on legitimate identification cards and that SOLIS told Individual B about a process that produces a more authentic looking fraudulent document.] SOLIS stated, “His buddy is that Perico guy, maybe you’ve heard of him. I think he’s one of the main guys over there. A guy they call Perico.” [I believe that SOLIS was referring to Pedro Castorena-Ibarra, the head of a fraudulent document organization referred to as the Castorena Organization, who is currently awaiting trial in federal court in Colorado.] SOLIS stated, “He says that they’ve already modernized, that they use rollers now, man. That they don’t use the net anymore.” [I believe that when SOLIS told Individual B that the fraudulent document organization in Los Angeles no longer uses the “net,”he meant that the organization has replaced the process of silk-screen printing with a printing process that uses “rollers” to replicate the holographic security features found on identification documents.] SOLIS stated, “And he’s going to be here for a month. I’m going to talk to him later to see if he could hook us up with the seals to get them at a cheaper price.” [I believe SOLIS is referring to the fact that his cousin’s husband will be in Chicago for a month and may be able to get SOLIS some cheaper document-making supplies from Los Angeles.] Individual B said, “Ask him to hook you up with the rollers instead.”

SAMPLE OF RECORDED CALLS IN 2008

33. On January 31, 2008, at approximately 1:53 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 5. During the conversation, CW3 asked, “Jarochito, are you almost coming down or what, son?” JAIME SOLIS replied, “I’m, I’m on my way, hold on. I’ll get close and give you a call so you can come for them.” [I believe that SOLIS was traveling from the “office” to the area of 26th Street and St. Louis Avenue to deliver the fraudulent documents to CW3.]

34. On February 19, 2008, at approximately 1:45 p.m., CW3 received an incoming telephone call from Target Phone 5 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 said, “What’s up?” JAIME SOLIS responded, “Which one is yours?” CW3 replied, “The one of Maria, I believe.” SOLIS said, “What does the man want, a green card or social?” CW3 responded, “Uh . . . no, he wants an ID, he wants an ID to collect unemployment, something like that, to collect unemployment.” SOLIS asked, “So then why did he put a green card number?” CW3 replied, “I don’t know, dude. That’s why I asked him if it was a green card or ID. He said, no ID to collect unemployment. That’s why I put eye color and all that shit.” SOLIS said, “Okay, and yours is only one?” CW3 said, “Yes.” [I believe this conversation involved the sale of a fraudulent state identification card to an individual wanting to unlawfully obtain unemployment benefits. Further, I believe that SOLIS was confused as to which type of fraudulent document CW3 wanted SOLIS to create.

CW3 was explaining to SOLIS that the individual wanted the document for unemployment benefits and therefore a state identification card would be required.]

35. On February 25, 2008, at approximately 7:20 p.m., CW3 received an incoming telephone call from Target Phone 5 on Subject Phone CW3, and the call was consensually recorded. During the conversation, JAIME SOLIS asked, “What is it going to be?” CW3 replied, “White.” [I believe that a “white” is a coded reference for a white colored resident alien card (green card).] SOLIS said, “Just give it to me over the phone, man.” CW3 said, “Oh, this, this one? Hold on, hold on, I’ll give that to you right now.”

36. On February 25, 2008, at approximately 7:24 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 5. During the conversation, SOLIS said, “Let’s see.” CW3 responded, “Jose Lopez.” SOLIS asked, “Hold, on. Jose Lopez Jose Lopez. Number?” CW3 replied, “Zero, Five, . . . with a Z, Lopez.” SOLIS asked, “What do you want for the social?” CW3 said, “uh . . . any number for the social. Zero, five, thirteen, seventy-two.” [I believe that SOLIS and CW3 were discussing the sale of a fraudulent document to a customer that used the name of Jose Lopez and the date of birth May 13, 1972.]

37. On February 26, 2008, at approximately 5:51 p.m., CW3 received an incoming telephone call from Target Phone 5 on Subject Phone CW3, and the call was consensually recorded. During the conversation, JAIME SOLIS asked, “Is Chaparro’s ready?” CW3 said, “No, I’m on my way. Where is it? . . . Trumbull and what?” SOLIS

said, "Trumbull and Twenty-Five, half a block down, where the fire hydrant is." Later in the conversation, SOLIS said, "Guero owes me one from yesterday, so get the money from him." [I believe that "one" is a coded reference for a set of fraudulent documents.] CW3 responded, "Oh, well tell him to come out, have him be out there already." [I believe that this conversation involved the placement of a fraudulent document order which was placed "Chaparro." I believe that CW3 was en route to pick up an order which "Chaparro" had left in a hidden location near a fire hydrant at 25th Street and Trumbull Avenue in Chicago, Illinois, in the event that law enforcement was watching the area. I also believe that SOLIS instructed CW3 to collect money "GUERO" owed to SOLIS for production of fraudulent documents.]

38. On February 26, 2008, at approximately 5:59 p.m., CW3 received an incoming telephone call from Target Phone 5 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 said, "I'm here on Trumbull, between Twenty-Four and Twenty-Five. Oh, that dude lives between Twenty-Five and Twenty-Six." JAIME SOLIS responded, "Yes." CW3 then responded, "Chaparro, oh, okay, so tell Guero to come out, dude." SOLIS responded, "He's already, already, already going out. He's going out. Yours is done already." [I believe that CW3 was advising SOLIS to tell "Guero" to come to CW3's location so CW3 could collect the money "Guero" owed to SOLIS for fraudulent documents.]

39. On February 26, 2008, at approximately 6:01 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 5.

During the conversation, CW3 said, "I'm already here at the fire hydrant, dude. Tell that dude to come out." JAIME SOLIS asked, "Okay, listen, did you already get the one from Payaso?" CW3 answered, "Uh, Payaso is waiting for me at the laundromat." SOLIS said, "Move that immediately, because that dude is the one that's on the look out. Tell him to go down Twenty-Five, dude. We also have to watch out for ourselves." CW3 said, "Okay, but tell that dude to, to go outside dude." SOLIS responded, "Be careful on your way back, old man." [I believe that CW3 was advising SOLIS that CW3 was at the agreed location at a fire hydrant. I also believe that SOLIS instructed CW3 to quickly retrieve the money because Payaso was acting as a "lookout" for law enforcement.]

40. On February 26, 2008, at approximately 6:05 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 5. During the conversation, CW3 said, "Hey, it's done. I'm on my way over there." JAIME SOLIS responded, "All right. Listen . . . park up in front and act as if you're delivering something to me." CW3 affirmed. [I believe that this conversation involved the delivery of fraudulent documents from CW3 to SOLIS and that SOLIS instructed CW3 to pose as a delivery person in the event that law enforcement was following CW3.]

41. On March 1, 2008, at approximately 12:38 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 5. During the conversation CW3 asked JAIME SOLIS, "What's the name of the ink?" SOLIS responded, "It's ninety-two, ninety-three." CW3 asked, "ninety-three ink,

ninety-three, that's it. Color?" SOLIS said, "Uh-huh." CW3 asked again, "Color ink. Ninety-three, okay? The polarized one right? The one that's twelve dollars?" SOLIS said, "Yes." [I believe that this conversation involved the purchase of color ink for the printers that manufacture fraudulent documents for the St. Louis Crew. I believe SOLIS sent CW3 to purchase the ink for the printers, and that CW3 called SOLIS to confirm the type of ink that was used by the printers.]

42. On April 8, 2008, at approximately 4:08 p.m., CW3 received an incoming telephone call from Target Phone 11 on Subject Phone CW3, and the call was consensually recorded. During the conversation, JAIME SOLIS stated, "I need your assistance." CW3 asked, "What's going on?" SOLIS stated, "I ran out of the spray, the glue, dude. . . . the one in the red can." CW3 asked, "And where do I buy that?" SOLIS answered, "At Home Depot." CW3 asked, "But how do I ask for it?" SOLIS stated, "It's in the glue containers. It's M3 super seven hundred . . . seventy-seven." CW3 stated, "M3 seventy-seven, all right." [I believe that SOLIS uses an adhesive spray during his process of manufacturing fraudulent documents. Further, I believe that SOLIS asked CW3 to purchase another can of the adhesive spray at Home Depot.]

43. On April 8, 2008, at approximately 5:33 p.m., CW3 received an incoming telephone call from Target Phone 11 on Subject Phone CW3, and the call was consensually recorded. During the conversation, JAIME SOLIS asked, "Where are you?" CW3 answered, "I'm here. I'm on my way to go pick up the, the license that came out wrong, man." SOLIS stated, "Bring me the two that Pantufla has, okay . . . but

hurry up, man, because I have a client right there, man, who already wants to leave, man.” CW3 asked, “What? What?” SOLIS stated, “Go pick that up from Pantufla and bring me that job.” [I believe that CW3 told SOLIS that the fraudulent driver’s license which SOLIS had created for CW3's customer contained an error. Further, I believe SOLIS asked CW3 to first pick up an order for fraudulent documents from Individual H a/k/a “Pantufla,” and then deliver both Pantufla’s order and the erroneous driver’s license.]

44. On April 8, 2008, at approximately 6:20 p.m., CW3 received an incoming telephone call from Target Phone 11 on Subject Phone CW3, and the call was consensually recorded. During the conversation, JAIME SOLIS asked, “Are you working?” CW3 replied, “Yes, as soon as I get something, I’ll bring it to you, okay?” SOLIS responded, “The thing is that, the thing is that I have a, a social, dude, there on Pulaski.” [I believe that “social” is a coded reference for social security card.] CW3 asked, “Oh, you want me to pick it up?” SOLIS replied, “No, it’s for you to deliver.” CW3 replied “Oh, deliver it? Okay, I’ll take this one to you and deliver that.” SOLIS replied, “Yes.” CW3 responded, “And I’ll give you the one hundred that they gave me.” [I believe that “one hundred” is in reference to \$100 that CW3 was given by the client for the fraudulent documents.]

45. On April 8, 2008, at approximately 7:18 p.m., CW3 received an incoming telephone call from Target Phone 11 on Subject Phone CW3, and the call was consensually recorded. During the conversation, SOLIS stated, “The social is, is the

customer there already?" CW3 answered, "Yes, he's right here." SOLIS stated, "Okay, Chaparro has to give you forty." CW3 asked, "Okay. How much does the customer have to give, thirty?" SOLIS replied, "Thirty." [I believe that SOLIS and CW3 were discussing the amount a miquero for the Organization owed SOLIS for creating his customer's fraudulent documents.]

46. On April 9, 2008, at approximately 3:17 p.m., CW3 placed a consensually-recorded telephone call from Subject Phone CW3 to Target Phone 11. During the conversation, CW3 asked, "Juliana?" SOLIS answered, "What?" CW3 asked, "Who, who is the other job from?" [I believe CW3 was acting as a runner that day and was asking SOLIS what other miquero had a fraudulent document order for CW3 to pick up and deliver to the office.]

47. On April 16, 2008, at approximately 6:58 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 216-5251. During the conversation, Individual E stated, "Ah, dude, where is it? It's . . . it's Carmen. Can you hear me?" JAIME SOLIS replied, "Carmen." Individual E stated, "Carmen Diaz." SOLIS replied, "Uh-huh." Individual E stated, "Vega. V as in Victor, E, G, A." SOLIS replied, "Vega?" Individual E stated, "Vega, Ve . . . ga. Like the Vega shoe store." SOLIS asked, "Number?" Individual E replied, "five, eight, three, four, seven, three, six, two, eight. . . The other one." SOLIS asked, "The other one?" Individual E stated, "Rosa." SOLIS replied, "Rosa." Individual E stated, "Imelda." SOLIS replied, "Imelda." Individual E stated, "Cardenas with an S at the end." SOLIS asked, "S as in Samuel?" Individual

E replied, "S as in Samuel." SOLIS asked, "Imelda with an H?" Individual E replied, "Rosa Imelda without the H, I as in India." SOLIS asked, "Number?" Individual E stated, "Three, forty-five." SOLIS replied, "Hold on." Individual E stated, "Three, four five, ninety, zero, nine, four, nine . . . Okie-dokie. There?" SOLIS replied, "There." [I believe that Individual E placed an order for two fraudulent social security cards.]

48. On April 17, 2008, at approximately 7:11 p.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, JAIME SOLIS said, "I'm going to eat with my old lady, dude. If you want, once I'm done eating I'll do it. It's probably Brody's, right? Because that fucker never called me again, dude." Individual B replied, "No, they are for Hielo, dude." SOLIS stated, "Well, let me see, it won't be that long." Individual B replied, "It's four of them." SOLIS stated, "Tell your dad to wait an hour, dude. Until I finish eating." [I believe that Individual B asked SOLIS to manufacture four sets of fraudulent documents for a miquero named "Hielo." I believe that SOLIS told Individual B that he would manufacture the documents and return them to Individual B's father (Individual F) after SOLIS finished eating dinner.]

49. On April 17, 2008, at approximately 8:07 p.m., an outgoing telephone call was placed to Target Phone 5 from Target Phone 4. During the conversation, JAIME SOLIS asked, "I'm here in the parking lot." Individual F stated, "I'm also here. They gave them to me about two hours ago and they're already bothering the shit out of me." SOLIS replied, "Oh, but I just told [Individual B] I was going to go eat. It's just that

also . . . no, in other words, I'll make them. The thing is that when he told me I said, there isn't anything anymore . . . , there's nothing. I'm going to go see my wife. He said they were Hielo's, right?" [I believe that SOLIS called Individual F to confirm that SOLIS would manufacture the fraudulent documents for Hielo, as soon as he finished eating dinner with his wife.]

50. On April 17, 2008, at approximately 8:19 p.m., an incoming telephone call was received at Target Phone 5 from Target Phone 4. During the conversation, JAIME SOLIS asked, "Hello?" Individual F replied, "Yes, well he said one is a license and the other two are ID. And he said, It's stated there. How the hell . . . ?" SOLIS replied, "They don't even state Don't fool yourself." Individual F stated, "It's stated there on the paper. One states license and" SOLIS replied, ". . . two are fuckin' IDs and the woman's is a white one." Individual F replied, "Two fuckin' IDs." SOLIS replied, "Okay. It's set. Tell that son of a bitch. I've . . . told him a shitload of times, State it's a license, a white license! He doesn't remove anything! It's another fuckin' thing that . . . !" Individual F stated, "Right now . . . I'm going to show you the papers right now." SOLIS replied, ". . . don't even know how to write! Son of a bitch . . . All right." [I believe that Individual F is a "runner," and on this occasion, he submitted multiple fraudulent document orders to SOLIS. I believe that SOLIS was frustrated because the miquero did not specify which type of fraudulent document he/she wanted.] Later in the conversation, SOLIS stated, "That's why I'm telling you. Because there have been plenty of times when they send in, send in jobs . . . and put in the address

and all . . . and they end up being white ones.” Individual F replied, “I have pens with me so I told him, Did you already state what they are? Because I’m not the one doing them. I’m going to send them off.” SOLIS replied, “Son of a bitch . . . Yes, I’ll take them over right now. I’m about to finish. I’ll send them over right now.” [I believe that SOLIS told Individual F that SOLIS would deliver the completed fraudulent documents.]

51. On April 18, 2008, at approximately 4:48 p.m., an outgoing telephone call was placed from Target Phone 5 to Target Phone 13. During the conversation, JAIME SOLIS stated, “Hey, [Individual A] keeps calling me, dude, because I told him I wanted some white ones.” Individual B replied, “Ask him for ten, okay . . . five of the snow whites?” SOLIS asked, “But is it going to be worth it to you?” Individual B asked, “What do you mean?” SOLIS replied, “Is it going to be worth you getting five? The dude is not going to sell us five, dude . . . I’m going to see what’s the least he’ll sell me.” [I believe that both SOLIS and Individual B purchase certain supplies to manufacture fraudulent documents from Individual A. I believe that “snow whites” is a coded reference for blank sheets of white permanent resident cards.] Individual B asked, “Are you going to buy any?” SOLIS replied, “I don’t even, you know that I don’t invest in that, dude. If I, if I were to buy any I would buy from Indiana, of . . . consulate, I have a lot of the consulate ones, dude.” Individual B stated, “Let’s get some. I want five of the white ones and about three consulate and two from Indiana. If you want to ask . . . how many do you want? The same, more or less, right?” SOLIS replied, “I am

going to ask him for about twenty . . . look, let's ask for twenty of the white ones because I honestly have a lot of consulate ones and from Indiana." Individual B asked, "You have those?" SOLIS replied, "Yes, I have the ones for the consulate and Indiana. But I didn't tell you that the client, Pelon's buddy, gave me some one time and I still have seals from [Individual A]." Individual B asked, "The ones you gave me, who were they from? Were they from Pelon's buddy, or from him . . . or [Individual A]'s?" SOLIS replied, "From Pelon." [I believe the two men were discussing exactly what was left in their inventory and which supplies they will need to order from Individual A. I also believe that "consulate" is a reference to a Mexican consulate ID card, often referred to as a Matricula. I believe that the "two from Indiana" is a reference to either a State of Indiana driver's license or ID card.] Individual B stated, "I believe my customer is going to come down tomorrow, dude." SOLIS asked, "How much do you sell them to him for?" Individual B replied, "Twenty." SOLIS replied, "Well, then it's worth it . . . it will be worth it if you buy twenty from him, dude." Individual B stated, "Just ask him for ten white ones and five, and five of the other ones, dude." SOLIS replied, "All right, dude, cool." [I believe that Individual B was planning to resell part of his order to an unknown customer in order to make a quick profit.]

52. On April 18, 2008, at approximately 7:11 p.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, Individual B asked, "What's up?" JAIME SOLIS replied, "Tomorrow around midday." Individual B asked, "Tomorrow around midday, what?" SOLIS replied, "The papers,

dude.” Individual B asked, “Oh, he does have them?” SOLIS replied, “Yes, tomorrow at noon.” [I believe that SOLIS was informing Individual B that they would be meeting with Individual A to purchase supplies needed to manufacture fraudulent documents.] Individual B asked, “Did Payaso send anything?” SOLIS replied, “Yes.”

Individual B stated, “The dude is in the gas station like he’s waiting for someone.” SOLIS said, “Yeah, he did send it.” [I believe that Individual B was inquiring about the work performance of Payaso, a miquero.]

53. On April 19, 2008, at approximately 4:53 p.m., an incoming telephone call was received on Target Phone 5 from (773) 540-6207. During the conversation, Individual H stated, “Talk to me.” JAIME SOLIS asked, “What’s up?” Individual H stated, “A white one, dude.” SOLIS replied, “Okay, bye.” [I believe that Individual H told SOLIS that he just sold a fraudulent green card and needed to meet SOLIS to deliver the order.]

54. On April 19, 2008, at approximately 7:32 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 540-6207. During the conversation, Individual H asked, “What’s up?” JAIME SOLIS replied, “Hey, where are you?” Individual H stated, “I’m here in the laundromat. Here in the parking lot.” SOLIS replied, “I’ll be there.” Individual H asked, “Are you on your way? So I can give it to the customer.” SOLIS replied, “Okay.” [I believe that Individual H told SOLIS that he was waiting with his customer at the laundromat located at the corner of St. Louis Avenue and 26th Street. I believe that SOLIS was calling Individual H to deliver his

completed fraudulent document.]

55. On April 21, 2008, at approximately 10:39 a.m., an incoming telephone call was received on Target Phone 5 from Target Phone 13. During the conversation, Individual B asked, "What's up, dude?" JAIME SOLIS replied, "I'll call you back in forty minutes." Individual B stated, "Before twelve because this dude is giving me a hard time." SOLIS stated, "Call me in like forty minutes, dude." Individual B replied, "All right." [I believe that the meeting with Individual A did not occur at its originally scheduled time on April 19, 2008. Further, I believe Individual B told SOLIS that Individual A was pressuring Individual B to meet later that afternoon.]

56. On April 24, 2008, at approximately 11:10 a.m., an outgoing telephone call was placed from Target Phone 5 to (312) 513-9964. During the conversation, JAIME SOLIS stated, "You owe me big time, dude." Individual G asked, "Why, dude?" SOLIS replied, "You left the fucking laminating machine on, dude." Individual G replied, "Get the fuck out of here!" SOLIS stated, "Well, yeah. Weren't you the last one that took it out? It's all fried up, man. Oh, man! . . . Huh?" Individual G asked, "Yeah? Yeah, it did stay on, man?" SOLIS stated, "Yes. No, I'm just kidding, it didn't burn up but it did stay on all night. It looks like the fucking rollers in it are all stuck together because it didn't want to take the . . . either way though, I have another one." Individual G replied, "All right, cool." [I believe that Individual G accidentally left the laminator turned on all night long at the "office." I believe that Individual G occasionally works in the "office" and manufactures fraudulent documents for the

miqueros.]

57. On May 2, 2008, at approximately 5:05 p.m., an outgoing telephone call was placed from Target Phone 5 to (773) 641-2497. During the conversation, JAIME LNU asked, "What's up, cousin?" JAIME SOLIS replied, "Are you going to want them for today?" JAIME LNU replied, "Yeah, cousin. I need them for today. Yeah." SOLIS stated, "Okay. Then call me later." JAIME LNU stated, "Later on, cousin, I'll call you when I have everything ready, all right?" SOLIS replied, "All right. Remember that it's the address, weight, hair color, eye color and height, all right?" JAIME LNU replied, "Okay. Address, eye color, hair color." SOLIS stated, "Mm-hmm and height." JAIME LNU asked, "And weight, right?" SOLIS replied, "Height and weight . . . it's best that if they want the signature, have them write it on . . . white paper not on a yellow envelope. Have them put their signature on a white paper, if they want their signature put on there . . . so that we can, we can scan it." JAIME LNU stated, "We want the signature exactly the same, cousin, all right?" SOLIS replied, "Yeah. . . . but have them write it on a white paper, on white paper with ink . . . not red or blue, black ink." JAIME LNU replied, "Okay. With black ink. Okay. Yeah of course. That's how we'll do it, all right? I'll call you." [I believe that SOLIS gave his cousin JAIME LNU specific instructions to gather his customers' signatures and relevant information, so SOLIS could properly manufacture fraudulent documents.]

58. On May 3, 2008, at approximately 4:00 p.m., an incoming telephone call was received at Target Phone 5 from (773) 641-2497. During the conversation, JAIME

LNU asked, "Oh, cuz, you know what?" JAIME SOLIS replied, "What?" JAIME LNU stated, "One, one of the . . . clients, is not too . . . too happy with the job, cuz. It looks like that shit is peeling off. So I wanted you to take a look, because I don't want . . . So you can see that I'm not lying." SOLIS asked, "No, no, that's not a problem. If it came apart . . . did it come apart or what happened?" JAIME LNU replied, "Yeah, exactly, cuz. The corner kind of came apart." SOLIS stated, "Okay, no problem. If you want I'll send it to you. I will glue it back or I'll make it again." JAIME LNU replied, "Okay, cuz." SOLIS stated, "No, don't worry. Tell the client, no problem. But also they need to be careful, because it's a photocopy. No, no it's not a photocopy, it's . . . Hold on a second. Because those shits cannot be bent or anything, because in time they'll get unglued. Do you know what I mean? I mean . . . Yeah . . . It's only to show it and to have it for when . . . If you carry it inside a wallet or in a paper that bends; then it will peel. Because, it's, it's like cardboard and if you fold it, it will get unglued. It's not plastic." JAIME LNU replied, "Yeah, yeah, yeah, I understand, cuz." [I believe that JAIME LNU's client complained that the corner of his/her fraudulent document came unglued. I believe that SOLIS agreed to fix the fraudulent document free of charge.]

59. On May 24, 2008, at approximately 11:40 a.m., an incoming telephone call was received on Target Phone 5 from (312) 282-7066. During the conversation, Individual I stated, "It's Rojo. Yesterday, the, the last one from yesterday . . . from yesterday the Mexico . . . It opened up, dude. They brought it to me right now and it opened up right in the middle . . . It detached from the back." JAIME SOLIS asked,

“Tell them to put some saliva.” Individual I stated, “And you know what? And where it says, it was Francisca Jile Sanchez . . .” SOLIS replied, “Uh-huh.” Individual I stated, “We, we put a J and instead of a J it was a B, B for Bravo. It’s Biles. Biles.” [I believe that Individual I told SOLIS that a customer had returned her fraudulent document because it contained an error. Further, I believe that the fraudulent document was not laminated properly and the document was peeling apart.] SOLIS replied, “Right now when something comes through we’ll make it.” Individual I stated, “Ok, because uh, I’m just telling you. The guy just brought it to me right now.” SOLIS replied, “Yeah, yeah just tell him, just as soon as something comes through, dude . . . I’m not gonna do it until something comes through.” [I believe that SOLIS agreed to fix the fraudulent document but wanted to wait for a few more orders first.]

60. On May 27, 2008, at approximately 6:19 p.m., an outgoing telephone call was placed from Target Phone 5 to telephone number (773) 294-0069. During the conversation, Individual C said, “What’s up, Jarocho?” JAIME SOLIS responded, “The jobs are already down there.” Individual C said, “Yeah, they already gave them to me.” SOLIS said, “All right.” [I believe that this conversation involved SOLIS manufacturing fraudulent documents and informing Individual C that they have been delivered to the miqueros.]

61. On July 18, 2008, at approximately 2:00 p.m., an outgoing telephone call was placed from Target Phone 18 to telephone number (773) 603-5092. During the conversation, Individual J said, “Hey.” SOLIS asked, “Where are you at?” Individual

J responded, "On St. Louis and Twenty-fifth." SOLIS said, "All right. I'll be right there." Individual J said, "Uhm, what I was going to tell you? Hey do you remember the one I told you about? Pelon's? The one that came out wrong." SOLIS said, "Uh-huh." Individual J said, "It came out wrong again. They said that it doesn't have a seal on it." SOLIS asked, "That it doesn't have what?" Individual J said, "A seal." SOLIS asked, "What kind of seal?" Individual J said, "Well I don't know. That's what he told me that they told him that it doesn't have a seal on it." SOLIS said, "No, you check because you know that it was an ID right?" Individual J said, "Yeah. I'll tell him that it's an ID, I'll tell him." SOLIS said, "You, you check it. Well you tell him that the seal that goes on it is the one that you see . . . the one that it has, in other words have him give it to you." Individual J said, "Yeah." SOLIS said, "And you tell him, that's how we make them, where . . . ? Tell him where the fuck are those guys going to put the seal on?" [I believe that Individual J told SOLIS that Individual D a/k/a PELON'S customer was unhappy with a fraudulent document that SOLIS had manufactured. I believe PELON's customer felt that his/her fraudulent document lacked the appropriate "seal," or hologram, which the Organization places on certain fraudulent documents to make them appear authentic.]

62. On August 12, 2008, at approximately 7:57 p.m., an outgoing call was placed from Target Phone 18 to Subject Phone CW3. During the conversation, SOLIS said, "Hello." CW3 said, "Juliana, pick up a job for me?" SOLIS said, "Call my cousin." [I believe CW3 asked SOLIS to pick up an order of fraudulent documents. I also believe

that SOLIS instructed CW3 to call SOLIS's cousin, who law enforcement believes is Individual G a/k/a, PRIMO to retrieve the order.]

63. On September 8, 2008, at approximately 11:21 a.m., CW3 received an incoming telephone call from Target Phone 18 on Subject Phone CW3, and the call was consensually recorded. During the conversation, CW3 stated, "Juliana, Juliana, Juliana. Look . . . He didn't come until eight, dude. No bullshit. The green card has a name and the social has another name, dude." [I believe that SOLIS manufactured a fraudulent green card and social security card for CW3 on September 7, 2008. I believe CW3 called SOLIS to inform him that the names on the customer's fraudulent green card and social security card did not match.] SOLIS replied, "Don't bullshit . . . How could that be . . . let's see, give me the job right now." CW3 asked, "Juliana, I have the job right here. Where are you?" SOLIS replied, "Where are you?" CW3 stated, "Here on Central Park." SOLIS stated, "I'm on my way to see if it's true. I'm coming." CW3 replied, "For real, I have it here, buddy." SOLIS stated, "I'll pass by." [I believe SOLIS agreed to meet CW3 to inspect the accuracy of the fraudulent documents.]

Conclusion

64. I believe that based on the above information there is probable cause to believe that the defendant knowingly and intentionally conspiring with others known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely

make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a); all in violation of Title 18, United States Code, Section 371.

FURTHER AFFIANT SAYETH NOT.

Daniel Nagy, Special Agent
Immigration and Customs Enforcement
Department of Homeland Security

SUBSCRIBED AND SWORN TO BEFORE ME
this ____ day of September, 2008

MICHAEL T. MASON
United States Magistrate Judge