

THE STATE OF TEXAS, ex rel.
EL PASO COUNTY ATTORNEY
JO ANNE BERNAL,
Plaintiff,

v.

GEORGE WASHINGTON LOUNGE
(IN REM),
ROSINA DEVEAU
Defendants.

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No.

PLAINTIFF'S ORIGINAL APPLICATION FOR TEMPORARY RESTRAINING ORDER

TO THE HONORABLE JUDGE OF THIS COURT:

NOW COMES Plaintiff, the State of Texas, by and through the El Paso County Attorney Jo Anne Bernal, pursuant to Texas Alcoholic Beverage Code Chapter 101 and Texas Rules of Civil Procedure 680, and files this Original Application for Temporary Restraining Order, and as grounds thereof would show the Court as follows:

I.
PARTIES

1. Plaintiff, the State of Texas, represented by and through the El Paso County Attorney's Office with its principal office located at 500 E. San Antonio Ave, Room 503, El Paso, Texas, is duly authorized under Tex. Civ. Prac. & Rem. Code § 125.002 and section 101 of the Alcoholic Beverage Code to bring and prosecute this cause of action to enjoin and have abated those activities declared to be a common or public nuisance and to have the premises which occupy the real estate known by the street address at 3900 Montana Ave., El Paso, El Paso County, Texas ("Premises") closed and any other such relief to abate the nuisance.

2. Defendant, ROSINA DEVEAU is the owner and operator of the George Washington Lounge (*in rem*), a business operating as a bar under Texas Alcoholic Beverage License BGBG257713. Service of citation may be had upon Defendant, *in rem*, by serving the principal place of business at 3900 Montana Ave, El Paso County, Texas, 79923.

3. ROSINA DEVEAU is the registered owner of the business and is the Texas Alcoholic Beverage Licensee of permit number BG257713. Plaintiff attempted to determine if Owner had counsel by calling the Owner at the number registered with TAB Commission. A person claiming to be Rosina Deveau informed Plaintiff that she is not yet represented by counsel and to serve her at 3900 Montana Ave, El Paso County, Texas, 79923.

II. DISCOVERY PLAN

4. The plaintiff moves the Court to issue a docket control order under Tex. R. Civ. P. 190.4, tailored to the circumstances of this specific suit, and setting the permanent injunction hearing as soon as practicable after a reasonable time for discovery under level 2.

III. VENUE & JURISDICTION

5. Venue is proper in El Paso County, Texas because all or part of the acts or omissions giving rise to Plaintiff's claims occurred in El Paso County, Texas.

6. Jurisdiction is granted to a county or district court under TAB Code, § 101.10(a).

IV. SHORT STATEMENT OF THE CASE

7. Plaintiff received an affidavit from a Texas Alcohol and Beverage (TAB) Commission enforcement agent Ernesto Prieto, a credible person. The affidavit, attached as exhibit A, informs Plaintiff that Defendant, Owner and, *in rem*, is violating and/or is about to violate a provision of the Texas Alcoholic Beverage Code.

8. Upon receipt of such an affidavit, the TAB Code, § 101.10 mandates that the County Attorney shall begin proceedings in district court to restrain the person from violating the code or operating under the permit or license. Therefore, Plaintiff brings this Original Application for Restraining Order pursuant to the TAB Code, §101.10 to temporarily restrain the business known as “George Washington Lounge” from operating as a business. Plaintiff will file an Original Petition to permanently enjoin and abate the common and public nuisances under Chapter 125 of the Texas Civil Practice and Remedies Code and Chapter 101 of the TAB Code.¹ caused by Defendants.

9. The premises located at 3900 Montana Ave, El Paso County, Texas, *in rem* is a place where persons have violated and will likely continue to violate provisions of the Texas Alcoholic Beverage Code.²

10. The premises located at 3900 Montana Ave., El Paso, El Paso County, Texas, *in rem* is a building or other place where alcoholic beverages are sold, stored, possessed or consumed in violation of the Texas Alcoholic Beverage Code or under circumstances contrary to the purposes of the Texas Alcoholic Beverage Code.³

11. The premises located at 3900 Montana Ave., El Paso County, Texas *in rem* is a place where persons habitually go for the purpose of narcotics and prostitution crimes, which are common nuisance activities. Defendants knowingly tolerate the activity and fail to make reasonable attempts to abate these activities. Parties were arrested offenses listed above.

V. FACTUAL BACKGROUND

¹ Tex. Civ. Prac. & Rem. Code §§ 125.002(a), 125.0015 & 125.064 and Tex. Alc. Bev. Code § 101.70.

² See Texas Alcoholic and Beverage Code, § 101.01

³ Tex. Alc. Bev. Code § 101.70.

³ Tex. Alc. Bev. Code

12. Under cover agents from the TAB Commission have been conducting a long-term investigation of Defendants.

13. The TAB Code recognizes the following acts as violations of the Code:

- a. Place or Manner, TAB Code §11.61(b)(7), as interpreted by TAB Code §35.31(16): a violation of any ordinance of the county or municipality in which the premises is located.
- b. Failure to Report a Breach, TAB Code §
- c. Sale and Delivery of Drugs by Employee, TAB Code §104.04(9)
- d. Solicitation of an Employee, TAB Code §104.04(4)
- e. Drug-Free Zone Violation, TAB Code §104.04(9)

14. Defendant has committed the above listed violations. These violations habitually occur at, and are likely to continue if the business is not temporarily shut down until a hearing on a temporary injunction can be heard.

15. Listed below are recorded TAB Commission investigations which have occurred at 3900 Montana Ave., El Paso County, Texas.

Citation Number or warrant number	Date of Incident	Description
794950	08.03.2012	Delivery of Controlled Substance in Penalty Group 1, Cocaine, less than 1 gram
794962	03.20.2013	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
794961	03.20.2013	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
794964	04.03.2013	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
862843	04.03.2013	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
794966	04.25.2013	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
850342	02.21.2014	Delivery of Controlled Substance in Penalty Group 1,

		Cocaine, less than 1 gram
850345	04.04.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
850346	04.04.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
850348	04.25.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
850451	05.09.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
850452	05.25.14	Delivery of Controlled Substance in Penalty Group 1, Cocaine, less than 1 gram
850453	05.22.14	Delivery of Controlled Substance in Penalty Group 1, Cocaine, less than 1 gram
850456	06.12.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
862833	07.10.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
862832	07.10.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
862831	07.10.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams
862833	07.10.2014	Delivery of Controlled Substance in Penalty Group 1, Cocaine, over 1 gram, under 4 grams

16. Affidavits and warrants issued for the crimes observed and committed by law enforcement are attached as exhibit B.

17. In keeping with Tex. Civ. Prac. & Rem. Code § 125.002(h), Plaintiffs have considered the failure of Defendants to promptly notify the appropriate law enforcement agency of the occurrence of such criminal acts at the Premises and to cooperate with law enforcement investigations of criminal acts on the Premises.

18. The frequency of the violations described above is prima facie evidence that the defendant collectively and knowingly tolerated the criminal acts and TAB Code violations.⁴

19. “[A] person who maintains a place to which persons habitually go ... and who knowingly tolerates the activity and furthermore fails to make reasonable attempts to abate the activity

⁴ *Id* at subsection (a).

maintains a common nuisance.”⁵ This fact will be developed in Petitioners Original Petition for Original Petition for Abatement of Common and Public Nuisances, and Application for Permanent Injunction, which will be filed within seven days of the signing of a Temporary Restraining Order.

VI.
REQUEST FOR TEMPORARY RESTRAINING ORDER

20. Plaintiffs aver that pursuant to Chapter 680 of the Texas Rules of Civil Procedure, Plaintiffs are entitled to a Temporary Restraining Order, ordering defendants to cease operation of the business located at 3900 Montana Avenue, known as “George Washington Lounge.”

21. Plaintiffs aver that a restraining order and requested relief is authorized under Chapter 101 of the TAB Code. Plaintiff seek this court to order defendants to cease operation of the business located at 3900 Montana Avenue, known as “George Washington Lounge.”

22. Plaintiff is entitled to this relief because Plaintiff has clearly pled facts and attached evidence and a verified affidavit that Defendant is violating provisions of the TAB Code.

23. The facts pled in this Application and the attached evidence and verified affidavits show that immediate and irreparable injury, loss or damage will result before notice can be served and hearing had thereon.

24. Should the Defendants be allowed to stay open, there will be continued violations of the TAB Code and criminal activity. Not all arrest warrants were executed, and the actors of the crimes committed at 3900 Montana remain at large. Defendant’s conduct is habitual, as demonstrated by the length of the investigation, and the number of violations that have been observed to occur at the location.

⁵ Tex. Civ. Prac. & Rem. Code § 125.004(a).

25. The harm that will result if the temporary restraining order is not issued is irreparable because crimes will continue to be committed, and the risk of harm that the criminal element, and intoxicated persons present to the public at large, and specifically, to a Day Care is significant. The premises is located within an established “drug-free zone” as outlined in the Health and Safety Code, because the bar is located within 1000 yards of Allegro Children’s Center, 4019 Montana Ave., El Paso County, Texas, a daycare facility.

26. Plaintiff has no adequate remedy at law because damages are incalculable.

27. The State of Texas is exempt from bond and court costs under provisions of Texas Civil Practice and Remedies Code § 6.001.

28. There is not enough time to serve notice on defendant and to hold a hearing on this application. Law enforcement officers raided this business on August 28, 2014, and there is a long labor day weekend starting at the close of business the day of filing this petition.

29. Affiant Ernesto Prieto states why relief is sought best in his affidavit: “The overwhelming evidence obtained during my investigation indicates that the bar had and will continue to be a threat to the general welfare, health, peace, morals, safety and sense of decency of the people of El Paso. During the life of the license, Licensee Rosina L. Deveau has been contacted on several occasions by law enforcement agencies in regard to violations occurring at her premises. Deveau has consistently failed to take corrective action, and in my opinion, the bar will continue to threaten public safety if allowed to continue to conduct business as usual.”

VII.
DEMAND FOR JURY

30. Plaintiffs Demands a jury trial.

VIII.
CONDITIONS PRECEDENT

31. All conditions precedent to Plaintiff's claim for relief have been performed or have occurred.

IV.
REQUEST FOR DISCLOSURE

32. UNDER Texas Rules of Civil Procedure 194, Plaintiff requests that Defendant disclose within 50 days of the service of this request, the information or material described in Rule 194.2.


X.
PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Court grant judgment in favor of Plaintiff for a temporary injunction and other such relief; and issue an order *in rem* against the Premises located at 3900 Montana Ave., El Paso, El Paso County, Texas closing it for business until a hearing in fourteen days. Further, Plaintiff prays for a temporary injunction and other such relief; and issue an order against the owner and licensee of the premises located at 3900 Montana Ave., El Paso, El Paso County, Texas, Rosina Deveau, ordering Rosina Deveau to not operate her business until a hearing on a temporary injunction can be heard in 14 days. Plaintiff prays that no bond be required. Plaintiff specifically requests that a temporary injunction hearing be set within 14 days of the issuance of the Temporary Restraining Order.

Respectfully submitted,

JO ANNE BERNAL
El Paso County Attorney
500 East San Antonio, Room 503
El Paso, Texas 79901
Bus: (915) 546-2050
Fax: (915) 546-2133

BY:


AMY MONSIVAIS

Assistant County Attorney
Texas Bar No. 24010472
Attorney for Defendant
District Attorney Jaime Esparza

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served upon Rosina L. Deveau at 3900 Montana Ave, El Paso County, Texas, 79923.


AMY MONSIVAIS

EXHIBIT “A”

AFFIDAVIT

STATE OF TEXAS

§

COUNTY OF EL PASO

§

§

Before me the undersigned authority, on this day, personally appeared ERNESTO PRIETO, who being duly sworn and upon oath stated:

"My name is ERNESTO PRIETO. I am over 21 years of age, of sound mind, capable of making this affidavit, and I have personal knowledge of the facts stated within this document. I affirm that the facts stated herein are true and correct to the best of my knowledge and I am competent to testify to these facts.

I am employed as an Agent with the Texas Alcoholic Beverage Commission in El Paso County, Texas. I have been employed as such since August 7, 2008. I am presently assigned to the special investigations unit, and have been assigned as such since August of 2013. I have received "in-service" training in the areas of narcotics detection, undercover operations, and surveillance techniques. In addition, my previous employment was with El Paso Police Department where I served for 22 years.

Since August of 2012, I have conducted undercover operations at the George Washington Lounge located at 3900 Montana, El Paso County, Texas. On at least 18 occasions since I began my investigation, I have purchased controlled substances from at least 8 different individuals at this location.

In addition, the premises is located within an established "dreg-free zone" as outlined in the Health and Safety Code, because the bar is located within 1000 yards of a Allegro Children's Center, 4019 Montana Ave., El Paso County, Texas, a daycare facility.

The manager was present when her employees were soliciting alcoholic beverages from the patrons and customers of the bar. The employees would gather around and ask me for drinks. Every drink I purchased for an employee was \$5. I watched as they watered down the drinks, put \$2 in the register and kept the remaining \$3. The manager was present on most occasions when this occurred. I saw the employees solicit other patrons or customers as well. This is a violation of the Texas Alcoholic Beverage Code §104.01(4).

Affiant is aware that local law enforcement, specifically El Paso Police Department has responded to calls and made arrests at the George Washington Lounge for various crimes to include (but not limited to) narcotics related crimes, assault, and drunks disturbing.

The overwhelming evidence obtained during my investigation indicates that the bar had and will continue to be a threat to the general welfare, health, peace, morals, safety and sense of decency of the people of El Paso. During the life of the license, Licensee Rosina L. Deveau has been contacted on several occasions by law enforcement agencies in regard to violations occurring

at her premises. Deveau has consistently failed to take corrective action, and in my opinion, the bar will continue to threaten public safety if allowed to continue to conduct business as usual.

Ernest R. Ruto
AFFIANT

SWORN TO AND SUBSCRIBED before me on this the 29th day of August, 2014.

Rosa Maria Avalos
NOTARY PUBLIC in and for the State of Texas
Commission expires: 04/28, 2018.

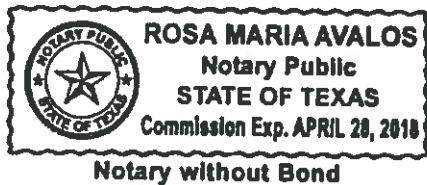


EXHIBIT “B”

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED
AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014511 409-081

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 1st Day of August, 2012 and before the filing of this complaint in the County of El Paso, The State of Texas, one Gomez, Justina Faith DOB (10/11/1970) hereinafter called DEFENDANT, did then and there Unlawfully.

Intentionally and knowingly delivered a controlled substance listed in Penalty Group 1-Cocaine - Less than 1 gram (G.A.W. 0.5 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail felony if the amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or dilutants, less than one gram.

FACTS TO SUPPORT:

P/C On 08/03/2012 at approximately 10:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$40.00. DEFENDANT then delivered two small clear plastic baggies containing a white powdery substance (G.A.W. 0.5 grams) to AFFIANT for the amount of \$40.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant

Aracely Gomez
Notary Public in and for El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the Probable Cause for issuance of Warrant found.

14 Day of Aug, 2014.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court
El Paso Justice Ct. Pct.
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20_____, and executed the _____

day of _____, A.D. 20_____,

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SM-409-081

File No. _____

THE STATE OF TEXAS

vs.

Julissa Edith Gomez 10/8/1970

OFFENSE:

Delivery of a Controlled substance
Penalty Group One: Cocaine 0.5 grams

BOND: \$ 15,000⁰⁰

JUDGE: J. Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

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PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014SM-409-063

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 20th Day of March, 2013 and before the filing of this complaint in the County of El Paso, The State of

Texas, one Massey, Vernard Paul DOB (09/21/1959) Unlawfully,

hereinafter called DEFENDANT, did then and there

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 1.5 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more not less than four grams.

FACTS TO SUPPORT:

PC: On 03/20/2013 at approximately 04:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT and Co-DEFENDANT (Jussara Gomez) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with Co-DEFENDANT (Gomez) for the purchase of cocaine worth \$50.00. Co-DEFENDANT then placed the order with DEFENDANT. DEFENDANT then delivered one small clear plastic baggie containing a white powdery substance (G.A.W. 1.5 grams) to AFFIANT for the amount of \$50.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation.

Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

[Signature]
JUDGE,
El Paso Municipal Court
El Paso Justice Ct. Pct.
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SN- 409 063

File No. _____

THE STATE OF TEXAS

vs.

Vernard Paul Massey 9/21/1959

OFFENSE:

Delivery of a Controlled substance
Penalty Group One: Cocaine 1.5 grams

BOND: \$25,000⁰⁰

JUDGE: F. Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014SM 409-064

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 20th Day of March, 2013 and before the filing of this complaint in the County of El Paso, The State of

Texas, one Gomez, Julliana Edith DOB (10/04/1971)

hereinafter called DEFENDANT, did then and there

Unlawfully

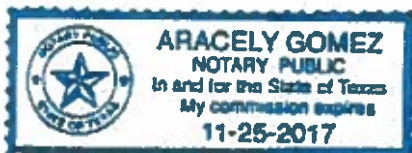
Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 G (G.A.W. 1.5 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C On 03/20/2013 at approximately 04:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT and Co-DEFENDANT (Vernard Massey) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$50.00. DEFENDANT then placed the order with Co-DEFENDANT (Massey). Co-DEFENDANT then delivered one small clear plastic baggie containing a white powdery substance (G.A.W. 1.5 grams) in AFFIANT for the amount of \$50.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation.

Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

5 met
409 JUDGE:
District Court
County Court at Law 4
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 S-4-409-064

File No. _____

THE STATE OF TEXAS

vs.

Julissa Edith Gomez 10/8/170

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One Cocaine 1.5 grams

BOND: _____

\$ 25,000

JUDGE: _____

J. Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No.

2014 SM-489-062

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 3rd Day of April, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Lopez, Rafael, Edmundo DOB (10/29/1953) hereinafter called DEFENDANT, did then and there

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 G (G.A.W. 1.5 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C On 01/03/2013 at approximately 04:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with Co-DEFENDANT (Rita Vargas) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with Co-DEFENDANT for the purchase of cocaine worth \$60.00. Co-DEFENDANT then placed the order with DEFENDANT. DEFENDANT then delivered three small clear plastic baggies to Co-DEFENDANT. Co-DEFENDANT then delivered three small clear plastic baggies containing a white powdery substance (G.A.W. 1.5 grams) to AFFIANT for the amount of \$60.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant

Aracely Gomez
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

F. J. O'Neil
JUDGE,
District Court
County Court at Law #1
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pre. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20_____, and executed the _____
day of _____, A.D. 20_____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SA 409 062

File No. _____

THE STATE OF TEXAS

vs.

Rafael Edwiges Lopez 10/29/1953

OFFENSE:

Delivery of a Controlled Substance
Penalty Group one: Cocaine 1.5 grams

BOND: \$ 25,000⁰⁰

JUDGE: [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED

AUG 14 2014

794964

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014 SM-409-061

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about

the 3rd Day of April, 2013

Texas, one Vargas, Rita DOB (03/30/1983)

Unlawfully.

and before the filing of this complaint in the County of El Paso, The State of hereinafter called DEFENDANT, did then and there

Intentionally and Knowingly delivered a controlled substance in Penalty Group I-Cocaine - 1 G > 4 G (G.A.W. 1.5 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

PC: On 04/03/2013 at approximately 04:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$60.00. DEFENDANT then placed the order with Co-DEFENDANT (Rafael Lopez). Co-DEFENDANT then delivered three small clear plastic baggies to DEFENDANT. DEFENDANT then delivered three small clear plastic baggies containing a white powdery substance (G.A.W. 1.5 grams) to AFFIANT for the amount of \$60.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14 Day of Aug, 2014.



Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.

Ernesto Prieto

409th JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

Ernesto Prieto
Affiant
Rafael Lopez
Notary Public in and for
El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer

By Officer

WARRANT OF ARREST

2014 SM-409-061

File No. _____

THE STATE OF TEXAS

vs.

Rita Vargas 3/30/1983

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: Cocaine 1.5 grams

BOND: \$25,000.00

JUDGE: J. Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED
AUG 14 2014

794966
PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 3014 SM 409-071

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernest Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 25th Day of April, 2013 and before the filing of this complaint in the County of El Paso, The State of Texas, one Vargas, Rita DOB (03/30/1983) hereinafter called DEFENDANT, did then and there Unlawfully.

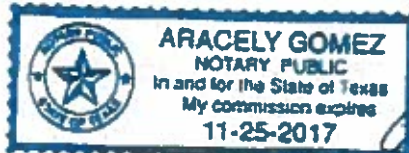
Intentionally and Knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 1.1 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C: On (04/25/2013) at approximately 4:45 pm, AFFIANT was working in plain clothes in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$40.00. DEFENDANT then delivered two small clear plastic baggies (G.A.W. 1.1 grams) containing a white powdery substance field testing positive for cocaine to AFFIANT for the amount of \$40.00. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending further investigation.

Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant

Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14th Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

JUDGE,
400th District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SLF 409 071

File No. _____

THE STATE OF TEXAS

VS.

Rita Vargas 3/30/1983

OFFENSE:

Delivery of a controlled substance
Penalty Group One: Cocaine 1.1 grams

BOND: \$ 25,000⁰⁰

JUDGE: [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 28 2014

850342

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No.

2014-54-409-108

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about

the 21st Day of February #1, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Doc. Jane #1 hereinafter called DEFENDANT, did then and there Unlawfully,

Intentionally and Knowingly delivered a controlled substance listed in Penalty Group 1-Cocaine = Less than 1 gram (G.A.W. 0.8 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail felony if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, less than one gram.

FACTS TO SUPPORT:

P/C On 02/21/2014 at approximately 06:30 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$40.00. DEFENDANT then delivered two small clear plastic baggies containing a white powdery substance (G.A.W. 0.8 grams) to AFFIANT for the amount of \$40.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending further investigation. Positive identification on DEFENDANT is pending. AFFIANT can recognize and identify DEFENDANT by sight. DEFENDANT is described as a Hispanic female, 5'5", 130 lbs, with a medium build, medium complexion, black hair, brown eyes, approximately 42 years of age, and going by the first name of "Sonia".
Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 28th Day of August, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 28 Day of August, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
409th JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pet. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20 _____, and executed the _____ day of _____, A.D. 20 _____.

Officer

By _____ Officer

WARRANT OF ARREST

2014-54-409-108

File No. _____

THE STATE OF TEXAS

vs.
Sane Doe #1
"Sane" H/F, 5'5", 130lbs, med build, med complexion, Black hair, approx. 42,

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One. 0.8 grams Cocaine

BOND: \$15,000

JUDGE: _____

[Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED
AUG 14 2014

850346
PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014 SM 409-072

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about

the 14 day of April, 2014

and before the filing of this complaint in the County of El Paso, The State of

Texas, one Vera, Ramona DOB (08/31/1957)

hereinafter called DEFENDANT, did then and there

Unlawfully

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 1.6 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c). An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

PIC: On 04/04/2014 at approximately 07:00 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with Co-DEFENDANT (Blanca Silva) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT advised Co- DEFENDANT (Silva) that AFFIANT was looking to purchase cocaine. Co- DEFENDANT then introduced AFFIANT to DEFENDANT and advised DEFENDANT that AFFIANT was looking to buy cocaine. AFFIANT then negotiated with DEFENDANT for the purchase of \$80.00 worth of cocaine. DEFENDANT then delivered four small clear plastic baggies containing a white powdery substance (G.A.W. 1.6 grams) to AFFIANT for the amount of \$80.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14 Day of April, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of April, 2014.

5-mer
JUDGE,
District Court
County Court at Law II
of El Paso County, Texas

JUDGE,
[] Paso Municipal Court #
El Paso Justice Ct. Pet. #
[] Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____
day of _____, A.D. 20____

Officer _____
By _____ Officer _____

WARRANT OF ARREST

2014SH-409-072

File No. _____

THE STATE OF TEXAS

vs.

Ramona Vera 8/31/1957

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: Cocaine 1.6 grams

BOND: \$25,000⁰⁰

JUDGE: J Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014 SM 409-070

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that hereinbefore in wit, on or about

the 14 Day of April, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Silva, Blanca, Lidia DOB (06/06/1968) hereinafter called DEFENDANT, did then and there unlawfully

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 G (G.A.W. 1.6 G) in violation of the Health and Safety Code Section 481.112, to wit: (n) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams.

FACTS TO SUPPORT:

PIC: On 04/04/2014 at approximately 07:00 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Mustang Av. (Orange Washington Lounge) in the City and County of El Paso, TX. AFFIANT advised DEFENDANT that AFFIANT was looking to purchase cocaine. DEFENDANT then introduced AFFIANT to Co-DEFENDANT (Ramon Vera) and advised Co-DEFENDANT that AFFIANT was looking to buy cocaine. AFFIANT then negotiated with Co-DEFENDANT (Vera) for the purchase of \$80.00 worth of cocaine. Co-DEFENDANT then delivered four small clear plastic baggies containing a white powdery substance (G.A.W. 1.6 grams) to AFFIANT for the amount of \$80.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14 Day of Aug, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE.
El Paso Municipal Court #
El Paso Justice Ct. Pet. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014-S4409070

File No. _____

THE STATE OF TEXAS

vs.

Blanca Lidia Silva

6/6/1968

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: 1.6 grams

BOND: \$25,000

JUDGE: J. M. [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 9014 Sm 409-074

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 25th Day of April, 2014

Texas, one Silva, Blanca, Iulia DOB (06/06/1968)

hereinafter called DEFENDANT, did then and there

Unlawfully.

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 G (G.A.W. 1.8 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C On 04/25/2014 at approximately 07:00 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT in 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT advised DEFENDANT that he was looking for two subjects at the bar who had sold AFFIANT cocaine on prior occasions. DEFENDANT advised AFFIANT that she would find AFFIANT someone at the bar that could provide narcotics. DEFENDANT then introduced AFFIANT to Co-DEFENDANT (Barbara Munoz) and advised Co-DEFENDANT (Munoz) that AFFIANT could be trusted to buy narcotics. AFFIANT then negotiated with Co-DEFENDANT for the purchase of \$60.00 worth of cocaine. Co-DEFENDANT then delivered three small clear plastic baggies containing a white powdery substance (G.A.W. 1.8 grams) to AFFIANT for the amount of \$60.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant
Notary Public in and for El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14th Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice CL Per. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the

day of _____, A.D. 20____.

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SM-409-074

File No. _____

THE STATE OF TEXAS

vs.

Blanca Lidia Silva 6/6/1968

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One; Cocaine 1.8 grams

BOND:

\$ 25,000⁰⁰

JUDGE:

S. Med

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED
AUG 11 2014

850348
PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014511489-073

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about
the 25th day of April, 2014 and before the filing of this complaint in the County of El Paso, The State of
Texas, one Munoz, Barbara DOB (04/08/1979)
Unlawfully

hereinafter called DEFENDANT, did then and there

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 1.8 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

PC. On 04/25/2014 at approximately 07:00 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with Co-DEFENDANT (Blanca Silva) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT advised Co-DEFENDANT (Silva) that he was looking for run subjects at the bar who had sold AFFIANT cocaine on prior occasions. Co-DEFENDANT advised AFFIANT that she would find AFFIANT someone at the bar that could provide narcotics. Co-DEFENDANT then introduced AFFIANT to DEFENDANT and advised DEFENDANT that AFFIANT could be trusted to buy narcotics. AFFIANT then negotiated with DEFENDANT for the purchase of \$60.00 worth of cocaine. DEFENDANT then delivered three small clear plastic baggies containing a white powdery substance (G.A.W. 1.8 grams) to AFFIANT for the amount of \$60.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14 Day of Aug, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.

[Signature]
JUDGE,
District Court
County Court at Law #1
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer

By _____ Officer

WARRANT OF ARREST

2014-SH-409-073

File No. _____

THE STATE OF TEXAS

VS.

Barbara Munoz 4/8/1979

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: Cocaine 1.8 grams

BOND: \$25,000

JUDGE: J. Med

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 15 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 20143M409-075

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

HITHERTO, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57796

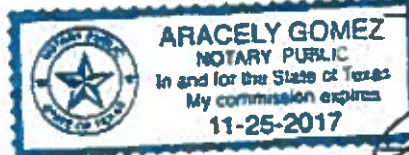
Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 9th Day of May, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Vera, Ramona DOB (08/31/1957) hereinafter called DEFENDANT, did then and there Unlawfully.

Intentionally and knowingly delivered a controlled substance in Penalty Group I Cocaine - 1 G > 4 G (G.A.W. 2.4 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group I (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams.

FACTS TO SUPPORT:

PC On 05/09/2014 at approximately 7:53 pm, AFFIANT was working in plain clothes in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington I range) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$120.00. DEFENDANT then delivered six small clear plastic baggies (G.A.W. 2.4 grams) containing a white powdery substance field testing positive for cocaine to AFFIANT for the amount of \$420.00. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending further investigation.
Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14 Day of Aug, 2014.



Ernesto Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for Issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SM-409 OTS

File No. _____

THE STATE OF TEXAS

vs.

Ramona Vera 8/31/1957

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One; Cocaine 2.4 grams

BOND: \$25,000

JUDGE: J. Med

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

RECEIVED
AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Count No. 2014 SM 409-077

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent David Garcia #336462

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about
the 22nd Day of May, 2014 and before the filing of this complaint in the County of El Paso, The State of
Texas, was: Vera, Ramona DOB: (08/31/1957)
Unknown fully. hereinafter called DEFENDANT, did then and there

Intentionally and Knowingly delivered a controlled substance listed in Penalty Group 1-Cocaine = Less than 1 gram (G.A.W. 0.2 G) in violation of the
Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures,
delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail felony if the
amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or diluents, less than one gram.

FACTS TO SUPPORT:

PC On 05/22/2014 at approximately 06:56 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT and Co-
DEFENDANT (Blanca Silva) at 3900 Miercana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with Co-
DEFENDANT (Silva) for the purchase of \$20.00 worth of cocaine. Co-DEFENDANT then placed the order with DEFENDANT. DEFENDANT then delivered one
small clear plastic baggie to Co-DEFENDANT. Co-DEFENDANT then delivered one small clear plastic baggie containing a white powdery substance (G.A.W. 0.2
grams) to AFFIANT for the amount of \$20.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from
official police funds. The DEFENDANTS were not arrested at that time pending further investigation.
Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14
Day of April, 2014.



[Signature]
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14
Probable Cause for issuance of Warrant found.

14 Day of April, 2014.

[Signature]
JUDGE,
District Court
County Court at Law #1
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20 _____, and executed the _____

day of _____, A.D. 20 _____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014-54 409-077

File No. _____

THE STATE OF TEXAS

vs.

Reimona Vera 8/31/1957

OFFENSE:

Delivery of a controlled substance
Penalty Group One: Cocaine 0.2 grams

BOND: \$15,000⁰⁰

JUDGE: J. Mel

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

FILED
AUG 14 2014

858453

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No.

20145m 409-076

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

HONORABLE ME, the undersigned authority, on this date personally appeared

Agent David Garcia #336462

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 22nd Day of May, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Silva, Blanca, Lidia DOB (06/06/1968) hereinafter called DEFENDANT, did then and there Unlawfully.

Intentionally and knowingly delivered a controlled substance listed in Penalty Group 1-Cocaine - Less than 1 gram (G.A.W. 0.2 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail felony if the amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or dilutants, less than one gram.

FACTS TO SUPPORT:

P/C On 05/22/2014 at approximately 06:56 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT and Co-DEFENDANT (Ramon Vera) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of \$20.00 worth of cocaine. DEFENDANT then placed the order with Co-DEFENDANT (Vera). Co-DEFENDANT then delivered one small clear plastic baggie to DEFENDANT. DEFENDANT then delivered one small clear plastic baggie containing a white powdery substance (G.A.W. 0.2 grams) to AFFIANT for the amount of \$20.00. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14 Day of Aug, 2014.



[Signature]
Affiant
[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court ☐
El Paso Justice Ct. Per. ☐
El Paso Crim. Law Magistrate ☐
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014 SH-409-076

File No. _____

THE STATE OF TEXAS

vs.

Blanca Lidia Silva 6/6/1968

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: cocaine 0.2 grams

BOND: \$15,000

JUDGE: [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

850456

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No.

2014 511 409-078

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about
the 12th Day of June, 2014 and before the filing of this complaint in the County of El Paso, The State of
Texas, one Vera, Ramona DOB (08/31/1957) hereinafter called DEFENDANT, did then and there
Unlawfully,

intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 2.1 G) in violation of the Health and Safety
Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or
possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the
amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than
four grams.

FACTS TO SUPPORT:

P/C On 06/12/2014 at approximately 8:30 pm, AFFIANT was working in plain clothes in an undercover capacity. AFFIANT met with DEFENDANT at 3900
Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth
\$100.00. DEFENDANT then delivered six small clear plastic bags (G.A.W. 2.1 grams) containing a white powdery substance field testing positive for cocaine to
AFFIANT for the amount of \$300.00. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending
further investigation.

Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14th Day of Aug, 2014.



Ernesto Prieto
Affiant
[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14th Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court
El Paso Justice Ct. Pct.
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014-54-409-078

File No. _____

THE STATE OF TEXAS

vs.

Ramona Vera 8/31/1957

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: cocaine 2.1 grams

BOND:

\$ 25,000⁰⁰

JUDGE:

J. M. [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

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PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No 2014 SM 409-080

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agnat Ernesto Prieto #57798

Who after being by me duly sworn, an oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about
the 10th Day of July, 2014 and before the filing of this complaint in the County of El Paso, The State of
Texas, one Vera, Ramona DOB (08/31/1957)
Unlawfully, hereinafter called DEFENDANT, did then and there

Intentionally and Knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 1.4 G) in violation of the Health and Safety
Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or
possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the
amount of the controlled substance in which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than
four grams.

FACTS TO SUPPORT:

INC On 07/10/2014 at approximately 9:30 pm, AFFIANT was working in plain clothes in an undercover capacity. AFFIANT met with DEFENDANT at 3900
Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth
\$60.00. DEFENDANT then delivered four small clear plastic baggies (G.A.W. 1.4 grams) containing a white powdery substance field testing positive for cocaine to
AFFIANT for the amount of \$60.00. The money used in the transaction was taken from official police funds. The DEFENDANT was not arrested at that time pending
further investigation.

Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 14
Day of July, 2014.



Emil Prieto
Affiant

[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of July, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court
El Paso Justice C.L. Pct.
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer

By _____
Officer

WARRANT OF ARREST

2014-54-409-080

File No. _____

THE STATE OF TEXAS

vs.

Ramona Vera 8/31/1957

OFFENSE:

Delivery of a controlled substance
Penalty Group One: Cocaine 1.4 grams

BOND: \$ 25,000⁰⁰

JUDGE: J. M. [Signature]

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 14 2014

PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No. 2014 SM 409-079

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this day personally appeared

Agent Ernesto Prieto 257798

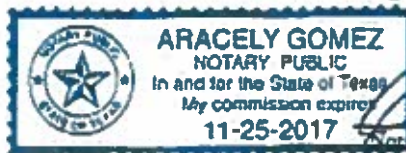
Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that hereinafter to wit, on or about
the 10th Day of July, 2014 and before the filing of this complaint in the County of El Paso, The State of
Texas, one Blanco, Miguel DOB (10/16/1976) hereinafter called DEFENDANT, did then and there
Unlawfully

Intentionally and knowingly delivered a controlled substance in Penalty Group 1-Cocaine - 1 G > 4 G (G.A.W. 2.2 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c). An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or diluents, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C On 07/10/2014 at approximately 08:15 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with Co-DEFENDANT (Norma Adame) at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with Co-DEFENDANT (Adame) for the purchase of cocaine worth \$100.00. Co-DEFENDANT then placed the order with DEFENDANT. DEFENDANT then delivered six small clear plastic bindles to Co-DEFENDANT. Co-DEFENDANT then delivered six small clear plastic baggies containing a white powdery substance (G A W 2.2 grams) to AFFIANT for the amount of \$100.00. Co-DEFENDANT then delivered the \$100.00 to DEFENDANT. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Against the peace and dignity of the State

Sworn to and subscribed before me on this the 14 Day of Aug, 2014.



Ernesto Prieto
Affiant
[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 14 Day of Aug, 2014.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court
El Paso Justice Ct. Pct.
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20____, and executed the _____

day of _____, A.D. 20____

Officer _____

Officer _____

By _____

WARRANT OF ARREST

2014-54-409-079

File No. _____

THE STATE OF TEXAS

vs.

Miguel Blanco 10/16/1976

OFFENSE:

Delivery of a controlled substance
Penalty Group One: Cocaine 2.2 grams

BOND: \$ 25,000⁰⁰

JUDGE: Jones

TEXAS ALCOHOLIC BEVERAGE COMMISSION
COMPLAINT AFFIDAVIT
EL PASO COUNTY, TEXAS

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AUG 28 2014

862833
PAGE 1 OF 1

THE STATE OF TEXAS
EL PASO COUNTY

Court No 2014-Sm-409-121

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

BEFORE ME, the undersigned authority, on this date personally appeared

Agent Ernesto Prieto #57798

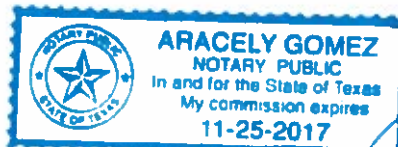
Who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about the 10th Day of July, 2014 and before the filing of this complaint in the County of El Paso, The State of Texas, one Doe, Jane #4 hereinafter called DEFENDANT, did then and there Unlawfully,

Intentionally and Knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 G (G.A.W. 2.2 G) in violation of the Health and Safety Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subsection (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams.

FACTS TO SUPPORT:

P/C On 07/10/2014 at approximately 08:15 pm, AFFIANT was working in plain clothes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 Montana Av. (George Washington Lounge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth \$100.00. DEFENDANT then placed the order with Co-DEFENDANT (Miguel Blanco). Co- DEFENDANT (Blanco) then delivered six small clear plastic bindles to DEFENDANT. DEFENDANT then delivered six small clear plastic baggies containing a white powdery substance (G.A.W. 2.2 grams) to AFFIANT for the amount of \$100.00. DEFENDANT then delivered the \$100.00 to Co-DEFENDANT. The white powdery substance field tested positive for cocaine. The money used in the transaction was taken from official police funds. The DEFENDANTS were not arrested at that time pending further investigation. Positive identification of DEFENDANT is pending. AFFIANT can recognize and identify DEFENDANT by sight. DEFENDANT is described as a Hispanic female, 5'03", 180 lbs. with a heavy build, medium complexion, blonde hair, brown eyes, approximately 45 years of age, and going by the full name of "Norma Adams".
Against the peace and dignity of the State

Sworn to and subscribed before me on this, the 28 Day of Aug, 2014.



Ernesto Prieto
Affiant
[Signature]
Notary Public in and for
El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the 28 Day of Aug, 2014.
Probable Cause for issuance of Warrant found.

[Signature]
JUDGE,
District Court
County Court at Law #
of El Paso County, Texas

JUDGE,
El Paso Municipal Court #
El Paso Justice Ct. Pct. #
El Paso Crim. Law Magistrate
of El Paso County, Texas

OFFICER'S RETURN

Came to hand the _____ day of _____, A.D. 20 _____, and executed the _____
day of _____, A.D. 20 _____.

Officer

Officer

WARRANT OF ARREST

2014-SM-409-121

File No. _____

THE STATE OF TEXAS

vs.

Jane Doe #4

(Norma Moore) W/5'565, 180 lbs, Mex build, Gr/Brn, Approx. 45 yoa *

OFFENSE:

Delivery of a Controlled Substance
Penalty Group One: 2.8 grams cocaine

BOND:

\$ 25,000

JUDGE:

[Signature]