THE STATE OF TEXAS, ex rel. EL PASO COUNTY ATTORNEY JO ANNE BERNAL, Plaintiff,	666	
v. GEORGE WASHINGTON LOUNGE (IN REM), ROSINA DEVEAU Defendants.	<i>ග ග ග ග ග ග ග</i>	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. <u>DISCOVERY PLAN</u>

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.
- 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	
050545	04.04.2014	Group 1,
950246	04.04.0014	Cocaine, over 1 gram, under 4 grams
850346	04.04.2014	1 = to y or commonded bubblance in I charty Gloup 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,
030130	00.12.2014	
862833	07 10 2014	Cocaine, over 1 gram, under 4 grams
002033	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

ld 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.

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:

Muy Honsivais
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

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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).

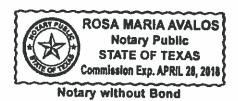
Affiant is aware that local law enforcement, specifically El Paso Police Department has responded to calls and made arrests at the George Washington Lounge for various crimes to include (but not limited to) narcotics related crimes, assault, and drunks disturbing.

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.

SWORN TO AND SUBSCRIBED before me on this the 29th day of august,

NOTARY PUBLIC in and for the State of Texas Commission expires: 04 28, 20 /8.



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EXHIBIT "B"

TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT APPROAPT EL PASO COUNTY, TEXAS

THE STATE OF TEXAS 20/4511 409-081 **ELPASO COUNTY** IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS BEFORE MF, the understand authority, on this date personally appeared Agent Ernesto Pricto #57798 Who after being by me duly swom, on outh deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about ibe Jat Dayof Anguer , 2012 and before the filing of this complaint in the County of El Prio, The State of Texas, me Comez, Jutiesa Edith DOB (EQ/IN/PUTO) hereinafter called DEFENDANT, did then and there Unlawfully. intentionally and Knowingly delivered a controlled substance listed in Penalty Group 1-Cacaine = Less than 1 gram (C.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, Utilivers, or pussesses with intent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail fesony if the amount of the enormited substance to which the offense applies is, by accremate weight, including adulterants or dilutants, less than one gram. FACTS TO SIPPORTE PAC On 08/93/2012 at approximately 10:30 pm. AFFIANT was working in plain clothes and in an undercover connecty. AFFIANT met with DEFENDANT at 3900 Montages Av. (George Washington Lounge) in the City and Country of FI Paso, TX. AFFIANT expedienced with DEFENDANT for the purchase of occaine worth \$40 (0), DEFENDANT then delivered two small clear plastic baggies concerning a white powdery schemose (GAW, 0.5 grants) to AFFIANT for the mineral of \$40.00. The white powdery substance field tested positive for ecenine. 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 pener and dignity of the State SwornAo and subscribed before the on this ARACELY GOMEZ , 2014, NOTARY PUBLIC in and for the State of Taxas My commission excures 11-25-2017 otary l'ubilg in and for Paso County, Texas Sworn to and subscribed before me, and filed in this court, this the Day of , 2014, Probable Cause for issuance of Warrant found.

District Court
County Court at Lane #
of El Paso County, Texas

JUDGE, El Paso Municipal Court El Paso Justice Ct, Pet.

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wern to and subspice Cancer to	Day of American Day of Volume Of Volume Count	, 201		m and for the State My commission 11-25-201	of Taxas Regimes 7	D Paso County, Texas	2014.	4
werrs to and subschole Cause I	Day of American Destrict Court Law #	, 201		m and for the State My commission 11-25-201	of Taxan namines 7	JUDGE, Ivo Municipal Court	2014.	<i>Y</i>
werrs to and subspirely to and subspirely Canada to 40944	Day of American Destrict Court Law #	, 201		m and for the State My commission 11-25-201	of Taxana namines 7	D Paso County, Texas	2014.	7

	WARRANT OF ARREST
	2014 54 409-061
	File No.
	THE STATE OF TEXAS
	Rita Vargas 3/30/1983
, A.D. 20	
	OFFENSE: Delivery of a controlled Substance. Penalty Group One: Cocaine 15 grams
	BOND: \$ 25,099
day of	JUDGE: FME

15.AAS ALCOROLIC BEVERAGE COMMISSION COMPLAINT AFFIDAVIT EL PASO COUNTY, TEXAS

160
AUG CEIL
CE TEN
dr.

THE STATE OF TEXAS EUPASO COUNTY

PAGE 1 OF 1

2014 < m 409-071

0011130 000	NE E			COURT NO. 2014	SM 407-011
IN THE NAME	AND BY AUTHO	DRITY OF THE STATE O	ETEVAC		10 m 10 10 10 10 10 10 10 10 10 10 10 10 10
BEFORE ME, th	e undersigned mills	ordy on this date representative	Concument	t Vinesto Prieto #57798	
With apply petting	by me duly awten,	on outh deposes and says the	the has good reason to believe	and does believe that heresoftee to	and an realism
10.00	Day of	April	. 2013 and before the fi	ing of this complaint in the County	of El Hero The State of
Texas, one	Vargas, Rita	DOR (03/30/1983)		heremalter eatted DEFENI	PANT did them and theen
Unlawibily.					NOTE TO THE BUILD BICIC
Intentionally and Code Section 48	d Konwingly delix 1.112, to wit: (a) E	ered a controlled substanc	e in Penalty Group I-Cocuing	e= 1 G>4 G (G.A.W. 1.1 G) in v n offense if the person knowingly	iulation of the Health and Safety
				n ouenst u tot person knowing) rase under Subsertion (a) is a fele cloding adulterants or dilutants,	
	ŀ			croaning againter and at Analogical	one fram or more nat 1629 than
FACISTO SUP					
\$40.00 DEFENDA AFFIANT for the :	ANT then delivered	live small clear plactic base	y of El Paso, EX. AFFIANT at	dereover capacity. AFFIANT men- agatizzed with DEFENDANT far the mann a white puwdery substance his solice funds. The DEFENDANT w	ic purchase of cocaine worth
further investigation Against the peace	AL.		TOTAL CONTRACTOR OF THE PROPERTY OF THE PROPER	unver raum: 100 (MALEININA) A	er um mienen ar nom rime benoned
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,			-	Crine	to ret
dist bits olyginal	Scribed before m	la el	ARACEI	Y GOMEZ	Alliant
7	1745 101	, 2014.	In and for the	Y PUBLIC State of Texas USSUED explines	(1110
				5-2017 Recei	/xom
				El Paso Con	ic in and for my, Texas
worn to and sub-	scribed before m	c, and filed in this court,	this the Day o	Mos	. 2014.
robuble Cause fi	reissuance of Wa	arrage found.		-	. 2017.
2,	O Mea			-	
	JUDGE, District Court			P(532.22	JUDGE,
culty Court at I	200 #	_		El Paso Municipa El Paso Justice Cl	
El Paso County	Texas			El l'aso Crim, La	
				of El Paso County	
				OF THE LIBO COMM.	4 13-34C)

	WARRANT OF ARREST
	2014 Sef 409 071
	File No.
	THE STATE OF TEXAS
	Lite Vargas 3/30/1983
, A.D. 20	OFFENSE:
	Delivery of a controlled substance Penalty Group One: Cocane 1.1 gmms
	BOND: \$ 25,000
day of .	NIDGE: D-M

TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT AFFIDAVIT EL PASO COUNTY, TEXAS

RECEIVED

PAGE 1 OF

AUG 2 8 2014

THE STATE OF TEXAS EL PASO COUNTY	Court No. 2014-54-409-108
IN THE NAME AND BY A	UTHORITY OF THE STATE OF TEXAS
BEFORE ME, the undersigned	d authority, on this date personally appeared Agent Ernesto Prieto #57798
Who after being by me duly s the 21st Day	worn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit, on or about of February 2014 and before the filing of this complaint in the County of Et Paso, The State of
Texas, one	Doe, Jane Doe, Jane hereinafter called DEFENDANT, did then and there
Unlawfully,	
Health and Safety Code Sec delivers, or possesses with it	y delivered a controlled substance listed in Penalty Group 1-Cocaine = Less than 1 gram (G.A.W. 0.8 G) in violation of the tion 481.112, to wit: (a) Except as authorized by this chapter, a person commits an offense if the person knowingly manufactures, stent to deliver a controlled substance listed in Penalty Group 1 (b) An offense under Subsection (a) is a state jail felony if the ostance to which the offense applies is, by aggregate weight, including adulterants or dilutants, less than one gram.
FACTS TO SUPPORT:	
Montana Av. (George Washing \$40.00. DEFENDANT then de \$40.00. The white powdery su was not arrested at that time po	
	*
	E to the
Sur A Ont subscribed by	fore phoon this, the
Day of	NOTARY PUBLIC
	In and for the State of Texas My commission expires
	11-25-2017 Notary Public in and for
	It Paso County, Texas
Sworn to and subscribed be	fore me, and filed in this court, this the Day of
Probable Cause for issuance	
5-1	n es
490TH JUDGE,	JUDGE,
County Court at Law #	The state of the s
of El Paso County, Texas	El Paso Justice Ct. Pet.
	of El Paso County, Texas
*.	

OFFICER'S RETURN

Came to hand th	day of		A.D. 20	, and exectued	the
lay of		, A.D. 20	·		
				7/	
	- Auto-				Offic
B	Deliver Pena	(\$10.05) ₁₁	By		Offic
BOND:	OFFENSE: Delivery of a Controlled Substance Penalty Group one: 0.8 ymms actions	"(Sona) H/I, 5'5", 130165, and Build and anylow, Olkharo, Approx. 47	- " (8")	2014	
12	contro	Jame Dec #1	THE	014-54-409-1	WARHANI OF ARREST
B	DFFEN Ned 50	8 B	THE STATE OF TEXAS	File No.	AN
8	ise: boten	1. Man	0F 7F	No.	A A
7	ch.	Vkx. B	SAXS	6	H H M
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TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT AFFIDAVIT EL PASO COUNTY, TEXAS

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PAGE	1	QF	1	1/8

THE STATE OF TEXAS EL PASO COUNTY

Count No. 2014 SM 409-071

of El Paso County, Texas

				Cour	tha 2014 2111 401-012
IN THE NAME	E AND BY AUTHOR	RITY OF THE STATE OF	mer es		W = 18
BEFORE ME, I	the undersigned author	rity, on this date personally a	nnezred	Agent Ernesto Pri	029960
the after being	by me duly sween, or	t calls characters and serve these	In his many mount t	THE CHARGE STREET	ieve that heretofore to wis, on crahout
le Jah	lay of	April	, 2014 and beti	o between task tiller liet	leve that hereignore to was on crahout
exns, one	Vera, Ramona	DOB (08/31/1957)	, 2014 Bild belt	ne me mad ur nier co	replaint in the County of El Paso, The State of
dawfully	A continuous	DOD (08/31/1957)		hereis	nuffer called DEFENDANT, did then and there
ssesses with	intent to deliver a co	ntrolled substance listed in	Penalty Cooun 1 to	ommits an offense if t	(G.A.W. 1.6 G) in violation of the Health and Saf he person knowingly manufactures, delivers, or ubsection (a) is a felony of the second degree if the terants or dilutants, one gram or more but less tha
ACTS TO SU	TROOPE.				
FIANT was known and control	noking to purchase coo	cange washington (Adinge) cange Or DEFENDANT the tied with DEFENDANT for	m me Cay and Count in introduced AFFIA	NT to DEFENDANT	r capacity. AFFIANT met with Co-DEFENDANT FIANT advised Co-DEFENDANT (Sava) that and advised DEFENDANT that AFFIANT was look EFENDANT then delivered four small clear plastic
aine. The mur	nev used in the transac	tion was taken from official			the white powdery substance field tested positive for the white powdery substance field tested positive for the mested at that time pending further investigation.
sjust the here	te and dignity of the	State		11 13	and an and some hearing small machine
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					- Crust In
		A	AD/	CELV CONET	Affinat
any to sund su	ibscribed before me	on this, the		CELY GOMEZ	10/
17	Day of	.2014.		for the State of Texas	// // //
				commission supires	
	/	′ <u>1</u>	Cont.	11-25-2017	V/114/ Short
		3-		-	
					Notary Public in and for
					El Pase County. Texas
ru to end su	ibscribed by Common	and filed in this court, the	14		///
solde (auso	for issuance of War	, will inten in this court, th	is the / /	_Day of	, 2014
mine cause	AND DOMINIOS OF WAS	TIITI IGUNA,			
	Smi	26			(T.A)
	1166	9			
COOP	JUDGE,			-	JUDGE.
CT.	District Court				IJI Paso Municipal Court #
His Court of					El Paso Justice Ct. Pct. #
I Paso Coun	ny, Texas				
					El Paso Crim, Law Magistrate

TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT APPLDAVIT EL PASO COUNTY, TEXAS

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	8508	45			02	
AGE	1	OF	1		-	

THE STATE OF TEXAS FL PASO COUNTY

COURT No. 2014 SM 409-870

of El Paso County, Texas

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS DEFORE ME, the endersigned authority, on this date personally appeared Muto offer being by me duly sweet, or each deposes and says that he has good reason to believe and does the like 4° 13y/of April 2014 and before the filling of this Texas, one Silva. Blanca, Lidia DOB (06/06/1968) Intentionally and Knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 Code Section 481.112, to wit: (a) Except as authorized by this chapter, a person cummits an offense in processes with intent to deliver a controlled substance bated in Penalty Group 1 (c) An offense under amounts of the controlled substance to which the offense applies is, by agar crate weight, including additional articles and substance to which the offense applies is, by agar crate weight, including additional articles and a substance in Penalty Group Very and advised Co-DEFENDANT then antroduced AFFIANT to Co-DEFENDANT flavors of Very and advised Co-DEFENDANT then antroduced AFFIANT to Co-DEFENDANT flavors of Very and advised Co-DEFENDAN intaining a white powdery substance (G.A.W. 1.6 grams) to AFFIANT for the uniques of \$80.00. The who was used in the transaction was taken from official police funds. The DEFENDANTS were not arrested a galaxy the peace and dignity of the State	helieve that hereinfine to wit, on or about a complaint in the County of El Paso. The State of creinsafter called DEFENDANT, did then and there are safety if the person knowingly manufactures, delivers, or a Subsection (a) is a felour of the second degree if the dulterants or dilutants, one gram or more but less than over capacity. AFFIANT met with DEFENDANT at 1900 FENDANT that AFFIANT was looking to purchase comine. ANT that AFFIANT was looking to buy cocaine. AFFIANT ANT then delivered four small clear pisstic baggies.
DEFORE ME, the undersigned multority, on this date personally appeared. Multo after being by me duly shorm, on this date personally appeared. Agent Erwesto I Who after being by me duly shorm, on this date personally that he has good reason to believe and does I the 4th 12xy of April 2014 and before the filling of this Texas, one Silva. Blanca. Lidia DOB (06/06/1968) Unlawfully. Intentionally and Knowlingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 Code Section 481.112, to wit: (n) Except us authorized by this chapter, a person commits an offense in processes with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under amount of the controlled substance to which the offense applies is, by aggregate weight, including all four grams. FACTS TO SUPPORT: C. On 04/04/2014 at approximately 07:00 pm, AFFIANT was wrighing in plant clothes and in un undercoductant Av. (George Washington Lounge) in the City and Cecenty of El Paso, TX. AFFIANT advised DEF EFFINDANT then introduced AFFIANT to Co-DEFENDANT (Ramonn Vern) and advised Co-DEFENDANT intentioned with Co-DEFENDANT (Vern) for the parchase of \$30.00 worth of cocaine Co-DEFENDANT intining a white powdery substance (G.A.W. 1.6 grams) to AFFIANT for the annexes of \$30.00. The wiscocy used in the transaction was taken from official notice funds. The DEFENDANT was accounted to the control of \$30.00.	helieve that hereinfure to wit, on or about a complaint in the County of El Paso, The State of creinsifier called DEFENDANT, did then and there are said the person knowingly manufactures, delivers, or a Subsection (a) is a felony of the second degree if the dulterants or dilutants, one gram or more but less than over capacity. AFFIANT met with DEFENDANT at 1900 FENDANT that AFFIANT was looking to purchase openine. ANT that AFFIANT was looking to buy cocaine. AFFIANT was looking to buy cocaine. AFFIANT was looking to buy cocaine.
Who offer being by me duly swern, on each depuses and says that he has good reasen to believe and does the 4th Day of April 2014 and before the filing of this ferent, one Silva. Hanca. Lidia DOB (06/06/1968) Intentionally and Knowingly delivered a controlled substance in Penalty Group 1-Cocaine = 1 G > 4 Code Section 481.112, to with (n) Except as authorized by this chapter, a person commits an offense intentionally and knowingly delivered a controlled substance listed in Penalty Group 1 (c) An offense under imposes with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under imposes with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under imposes with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under imposes with intent to deliver a controlled substance low high the offense applies is, by aggregate weight, including adour grants. FACTS TO SUPPORT: C. On 04/04/2014 as approximately 07/00 pm, AFFIANT was working in plain clothes and in an undercontain Av. (Occape Washington Lounge) in the City and County of El Paso, TX. AFFIANT advised DEFEFENDANT then introduced AFFIANT to Cy-DEFENDANT (Ramonn Vern) and advised Co-DEFENDANT introlling a white powdery substance (G.A.W. 1.6 grants) to AFFIANT for the unaverse of \$80.00. The wisexy used in the transaction was taken from official police funds. The DEFENDANT was severed in the transaction was taken from official police funds.	helieve that hereinfure to wit, on or about a complaint in the County of El Paso. The State of creinsifier called DEFENDANT, did then and there are said the person knowingly manufactures, delivers, or a Subsection (a) is a februar of the second degree if the dulterants or dilutants, one gram or more but less than over capacity. AFFIANT met with DEFENDANT at 1900 FENDANT that AFFIANT was looking to purchase openine. ANT that AFFIANT was looking to buy cocaine. AFFIANT was looking to buy cocaine. AFFIANT was looking to buy cocaine.
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FENDANT then introduced AFFIANT to Co-DEFENDANT (Ramonn Vera) and advised Co-DEFENDA is measurabled with Co-DEFENDANT (Vera) for the purchase of \$80.00 with Go-DEFENDANT (Vera) for the purchase of \$80.00 for the annexes of \$80.00. The white powdery substance (G.A.W. 1.6 grams) to AFFIANT for the annexes of \$80.00. The white pay used in the transaction was taken from official reduce funds. The DEFENDANTS USES AND ASSESSED TO THE WARRENCE OF \$80.00.	FENDANT that AFFIANT was looking to purchase comine, ANT that AFFIANT was looking to huy cocaine, AFFIANT ANT then delivered four small clear plastic baggies
ARACELY GO NOTARY PUBL to and subscribed hefure for on this, the Day of July 2014. ARACELY GO NOTARY PUBL to and for the State of My commission of	of Touas
nus to and subscribed before use, and filed in this court, this the	Notary Public in and for Finest County, Texas , 2014. JUDGE. El Paso Memicipal Court.

	WARRANT OF ARREST
and executed the	2014-54-469-070
pue '	File No.
02	
A.D. 20	THE STATE OF TEXAS
A.D. 20	Blanca Lidia 5.1va 6/6/1968
day of	Delivery of a controlled Substance Penalty Grop one: 1.6 grans
Came to hand the	BOND: # 25,200
Came t	JUDGE: 5 MOS

TEXAS AT COHOLIC REVERAGE COMMISSION COMPLAINT AFFIDAVIT ELPASO COUNTY, TEXAS

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PAGE	1	ÓF	1		4

THE STATE OF TEXAS EL PASO COUNTY

Court No.

9014 Sm 409-074

mu 1150 CO	WALI		Court	No JU14 371 40	19-017
IN THE NAM	E AND BY AUTHORITY	OF THE STATE OF TEXAS			
BEFORE ME	the undersigned nathurity, o	in this date nersonally appeared	Agent Ernesto Prio	ALCO METTER	
Who after bein	ig by me duly speem, on cart	deposes and says that he lins good in	Agent Ernesto Fra State to believe and sevel	ene flut lesstellisie te mit	\$.
	way we will	nl 2014 a	nd before the filling of this con	mplaint in the County of El Pido.	The State of
Texas, one	Silva, Blanca, I idia	DOB (06/06/1968)	berein	rather called DEFENDANT, did	the said there
Dalawfully.					mich and and
puscess with	intent to deliver a control	controlled substance in Penalty Gr as notherized by this chapter, a per led substance listed in Penalty Gru bleb the offruse applies is, by agency	sou commis an oliense il th	te person lunowingly manufacto	res, delivers, or
FACTS TO SE	LPPORT:				
who had sold AI DEFENDANT is narcotics. AFFI/ bugges common cucaine. The one	FIANT coculing an prior on then introduced AFFIANT to ANT then regardated with Co and a white pundless substant	ppm, AFFIANT was working in plain in the City and County of El Peo. Transfer JEFENDANT advised AFF of Co-DUTENDANT (Barbara Munuz o-DEFENDANT for the purchase of fee (G.A.W. L8 grams) to AFFIANT and taken from official police funds.	IANT that she would find AF o and advised Co-DEFENDAT 160.00 worth of cocaine. Co-I	ni/ANT that he was looking for n FIANT sumeone at the bar that e NT (Munor) that AFFIANT cont DEFENDANT then delivered thr	wo subjects at the bar ould provide aurootics, d he trusped to buy as small clear plastic
					120
					Ω
		*****		Sent Ste	V 11
. /		105-7	ARACELY GO	MEZ AIB	Millo
Sworn a mid st	ibscribed before me on if	his the	NOTARY PLIN		
//	Day of HUG		in and for the State of		1111
	' /	O.	My commission a 11-25-2011		
		3	11.50-501	11.11/1/	Am
				Notary Publish and fo	
			4 -	13 Paso County, Texas	0
Sworn to and su	bacribed before me, and	filed in this court, this the	Day of	11110	
Probable Cause	for issuance of Warrant	found.	, 1/2y 01	MAS	2014.
5	maple				
-	1 led				
490	-JUDGE.		_	JUDGE,	
707	District Court			El Paso Municipal Court	#
County Court at	Law #			13 Paso Justice Ct. Pet.	<i>y</i>
of El Paso Cour	ity, Texus			H Paso Crim, Law Magistra	
				of El Paso County, Texas	repo

	WARRANT OF ARREST
and exectued the	201454-409-074
h h	File No.
OFFICER'S RELURN (A.D. 20	THE STATE OF TEXAS
A HEIU	E VS.
S 8	Blanca Lidia Silva 6/6/1968
OF 16	
day of	OFFENSE: Delivery of a Continued Substance Newalty Group One; Cocaine 1.8 gm
Came to hand the	BOND: # 25,800
Came to	JUDGE: 5-Mach

TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT AFFIDAVIT EL PASO COINTY, TEXAS



PAGE 1 OF 1

THE STATE OF TEXAS EL PASO COUNTY

Court No. 2014511489-973

Who alter bem	the undersigned authority by me duly awars, on	math depreses and says that he has	s good reason to believe and do	in Prieto #57798 es helime that beretofore to wit, on or about
4.7	4/Hy III	/vbs.n	2014 and before the filing of e	his complaint in the Coursey of III Pasts, The State of
exas one dawfully	Munoz, Barbara	DOB (04/08/1979)	_	hereinafter called DEFT.NDANT, did then and there
ssesses with	intent to deliver a con	trolled substance listed in Pena	ts: Committee and orien	> 4 G (G.A.W. 1.8 G) in violation of the Health and Safety se if the person knowingly manufactures, delivers, or the Subsection (a) is a felony of the second degree if the adulterants or dilutants, one gram or more but less than
ACTS TO ST	IPPORT:			
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erijiy jehel su	ubscribed before me	n this, the	ARACELY	SOMEZ AMERICA
19	Day of HU	. 2014.	A Y NOTARY P	JULIC // // //
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		3-	-	Notary Pulate in and for
			Lee	EtPaso County, Texas
ला रंग कार्व इर	abscribed before me,	and filed in this court, this the	E 14 Day of	2014
ahld Cause	for issurance of Warr	iound.	977	,
2	- mas			
10/	- UIDCE			
-ou	JUDGE, District Court			JUDGE,
1/-1				Lil Dave Manisimal Court 2
nly Court w				Fil Paso Mimicipal Court #
mly Court no I Pasa Cour	1124			El Paso Justice Ct. Pet. #

TEXAS ALCOHOLIC BEVERAGE COMMISSION COMPLAINT AFFIDAVIT EL PASO COUNTY, TEXAS

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	850451			Di
PAGE	1	ØF:	1	-

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THE STATE OF TEXAS EL PASO COUNTY

30,148 va 1100 - 070

ENTHE NAME AND BY ARTHORITY OF THE STATE OF TENAS HEFORE Not, the undersigned audicity, on this date personally appeared Who after being by me duly shown, on each deposes and asys that he has good reason to believe and does believe that heretofare to wit, on or about the 9th Duylof 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) 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 offence if the person knowingly meanfacture, delivers, or possesses with intent to deliver a controlled substance listed in Penalty Group I (c) An offence under Subscetting (a) is a felony of the second degree if the amount of the controlled substance to which the offense applies ic, 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 organity. AFFIANT met with DEFENDANT at 3900 Muniman Av. (George Washington Lourge) in the City and County of El Paso, TX. AFFIANT negotiated with DEFENDANT for the purchase of cocaine worth S120.00. DEFENDANT then delivered six small clear plastic haggies (G.A.W. 2.4 grams) containing a white powdery substance field ustang positive for cocaine to AFFIANT for the amount of \$220.00. The money used in the transaction was taken from official police funds. The DEFENDANT was not accepted at that time penals affirmed invasionalism.	221.00 (00	INT B			Court No.	LUY MEYUL	9-0/5
Who after being by me duly swarn, on each deponent and anywithin he has good reason to believe and does believe that furctofiere to wit, on or about the 9th Duy of May 2014 and before the filting of this complaint in the County of El Paso. The State of Texas, one Vera, Ramona DOB (6R/31/1957) Intentionally and Knowingly delivered a controlled substance in Penalty Group I Cocnine = 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 continits an offense if the person knowingly manufactures, delivers, or possesses with intent to defiver a controlled substance listed in Penalty Group I (c) An offense under Subsection (a) is a relong 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. FACIS TO SUPPORT: PC On 05/09/2014 at approximately 7.53 pm, AFFIANT was working in plain clothes in an undercover capacity. AFFIANT and with DEFENDANT at 3900 Munition Av. (George Washington Lourge) in the City and County of El Paso, TX. AFFIANT regorized with DEFENDANT for the purchase of cocnine worth AFFIANT for the amount of \$120.00. The morey used in the transaction was taken from official colding to the Tay DEFENDANT for the purchase of cocnine to AFFIANT for the amount of \$120.00. The morey used in the transaction was taken from official colding to the Tay DEFENDANT. The delivered six small clear plastic hargies (G.A.W. 2.4 grams) containing a white powdery substance field using positive for occaine to	IN THE NAME	AND BY AUTHOR	RITY OF THE STATE OF	TEVAC			
Who after being by me duly sworn, on each depotes and anywithin he has good reason to believe and does believe that heretofure to wit, on or about the 9th Day of May 2014 and hence the filing of this complaint in the County of El Paso. The State of Texas, one Vera, Ramona DOB (00/31/1957) Intentionally and Knowingly delivered a controlled substance in Penalty Group I-Cocnine = 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 committed at offense under Subsection (a) is a febory of the second degree if the amount of the controlled substance in Penalty Group I (c) An offense under Subsection (a) is a febory 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: On 05/09/2014 at approximately 7.53 pm, AFFIANT was working in plain clothes in an undercover expectly. AFFIANT met with DEFENDANT at 3900 dumma Av. (George Washington Lounge) in the City and County of El Paso, TX AFFIANT regotimed with DEFENDANT for the purchase of cocnine 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 occaine to 15 ferial policy for the recount of \$120.00. The money used in the transactions over official policy for the Table Testing Testing to the containing a white powdery substance field testing positive for occaine to 15 ferial policy for the recount of \$120.00. The money used in the transactions of the form official policy for the process of the continuous and the controlled testing positive for occaine to 15 ferial policy for the process of the controlled testing positive for occaine to the controlled testing positive for occaine to 15 ferial policy for the process of the controlled testing positive for occaine to 15 ferial policy for the controlled testing positive for oc	HEFORE ME, I	te undersnead author	ity, on this date reasonally a	mercani saa	Ernems Prieza #57704	k	
Trues, our Vera, Ramona DOB (08/31/1987) Intentionally and Knowingly delivered a controlled substance in Penalty Group I-Cocaine — I 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 continits an offcase if the person knowingly manufactures, delivers, or possesses with linent to deliver a controlled substance listed in Penalty Group I (c) An offense under Subsection (a) is a relong 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: **COn 05/09/2014 at approximately 7.53 pm, AFFIANT was working in plain clothes in no undercover enoseity. AFFIANT met with DEFENDANT at 3900 luminum Av. (George Washington Lounge) in the City and County of El Pate, TX. AFFIANT regorizated with DEFENDANT for the purchase of cocaine worth 120.00 DEFENDANT then delivered six small clear plastic haggiest (G.A.W. 2.4 grams) containing in white powdery substance field testing positive for occaine to FFIANT for the account of \$420.00. The morey used in the tensection was taken form official police fined. The DEFENDANT delease field better the filling of the second of the controlled substance field testing positive for occaine to FFIANT for the account of \$420.00. The morey used in the tensection was taken form official police fined. The DEFENDANT delease field testing positive for occaine to	Who after print	by meduly quien, or	nearh deponen and says that	he has good reason to believe	and does believe that he	chafire to wit the coulon	
Intentionally and Knowingly delivered a controlled substance in Penalty Group I-Cocaine — I 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 continib an offense if the person knowingly manufactures, delivers, or possesses with larent to deliver a controlled substance listed in Penalty Group I (c) An offense under Subsection (a) is a relong of the second degree if the name and on the controlled substance to which the offense applies is, by aggregate weight, including adulterants or dilutants, one gram or more but fees than lower grams. FACTS TO SUPPORT: **C On 05/09/2014 at approximately 7.53 pm, AFFIANT was working in plain clothes in an undercover engaging. AFFIANT met with DEFENDANT at 3900 luminum Av. (George Washington Lounge) in the City and County of El Pase, T. AFFIANT regoriated with DEFENDANT for the purchase of cocaine worth 120,00 DEFENDANT then delivered six small clear plastic haggies (G.A. W. 2.4 grams) containing in a white powdery substance field testing positive for occaine to FFIANT for the measure of \$220.00. The money used in the transaction was taken form official police fined. The DEFENDANT the special containing in the account of \$220.00. The money used in the transaction was taken form official police fined. The DEFENDANT the special containing in the account of \$220.00. The money used in the transaction was taken form official police fined. The DEFENDANT the special containing in the account of \$220.00. The money used in the transaction was taken form official police fined. The DEFENDANT and the account of \$220.00. The money used in the transaction was taken form official police fined.	HIP /	Duyjor	May	, 2014 and before the fi	line of this complaint in the	he t county of 14 there 'Th	en Steen of
Intentionally and Knowingly delivered a controlled substance in Penalty Group I-Cocnine — I G > 4 G (G.A.W. 2.4 G) in violation of the Health and Sufery Code Section 484.112, to wit: (a) Except as authorized by this chapter, a person commits an offcase if the person knowingly manufactures, delivers, or possesses with insent to deliver a controlled substance listed in Penalty Group I (c) An offense under Subsection (a) is a relong of the second degree if the amount of the controlled substance to which the offense applies ic, by aggregate weight, including adulterants or dilutants, one gram or more but less than four grams. FACTS TO SUPPORT: **C. On 05/09/2014 at approximately 7.53 pm, AFFIANT was working in plain clothes in an undercover expectity. AFFIANT met with DEFENDANT at 3900 luminant Av. (George Washington Lounge) in the City and County of El Pase, TX. AFFIANT negotiated with DEFENDANT for the purchase of occaine worth 120.00. DEFENDANT then delivered six small clear plastic haggiest (G.A.W. 2.4 grams) containing in white powdery substance field using positive for occains in FFIANT for the amount of \$420.00. The money used in the transaction was taken form official rollers found. The DEFENDANT for the portions positive for occains in FFIANT for the amount of \$420.00. The money used in the transaction was taken form official rollers funds. The DEFENDANT for the positive for occains to		Vera, Ramona	DOB (08/31/1957)		hereastic offer	ing County of Earning, 11 I Therefore Ante Market	ic Susc or
ossesses with intent to deliver a controlled substance listed in Penalty Group 1 (c) An offense under Subscript (a) is a relong of the second degree if the intent to deliver a controlled substance to which the offense applies it, by aggregate weight, including adulterants or dilutants, one group or more but less than our grams. ACTS TO SUPPORT: C. On 05/09/2014 at approximately 7:53 pm, AFFIANT was working in plain clothes in an undercover especity. AFFIANT met with DEFENDANT at 3900 unitant Av. (George Washington Lounge) in the City and County of El Pase, TX. AFFIANT regordated with DEFENDANT for the purchase of cocaine worth FFIANT then delivered six small clear plastic baggies (G. W. 2.4 grams) containing a white powdery substance field testing positive for occaine to	inlawfully.				INTERNETIAL PROPERTY	DETENDANT, USTER	an and white
calinst the peace and dignity of the State	Missesses with introduct of the conference. ACTS TO SUI C. On 05/03/20 uniting Av. (Gen. 20.00. DEFENI FFIANT for the other investigation.	nate to deliver a controlled substance PPORT: Il 4 at approximately orge Washington 1 or DANT then delivered amount of \$420.00.7	atruffed substance listed in to which the offense applie 7.53 pm, AFFIANT was we age) in the City and County six small clear plantic hagg the money used in the trans	empirer, a person commits a Penalty Genup I (c) An off as it, by aggregate weight, in thing in plain clothes in an interference of El Paso, TX. AFFIANT as it of El Paso, TX. AFFIANT as	nt offene if the person hence under Subsection (a cluding adulternate or d decover espacity. AFFI/regolated with DEFINDA	allowingly manufacture a) is a felony of the second literants, one grain or a ANT inct with DEFEND, NT for the purchase of	and degree of the nore but less than ANT at 3900 cocnine worth
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Emel Rich	vorstagi nesi sut	Day of	on this, the	In and fo	TARY PURILIC or this State of Texas or	10	lan S
My commission expires 11-25-2017	were to ment and			. 14	No.	augminy, Texas	0
Day of Day of Notary Public in and for III have County Texas	bable Cause 1	or issuance of Wa	and filed in this court, the our found.	his the Day o	1 _ [[6]	, 201	14.
Day of Da	, 2:	- med			•		
Day of Day of Warrant found. NOTARY PUBLIC In and for the State of Tenas My commission expires 11-25-2017 Notary Public in and for 11-25-2017	Ignie	JUDGE.			<u> </u>		.
Day of Day of Judge. Day of Judge.	ingre						
Day of Day of Judge. Day of Judge. District Chairs District Chairs Day of Judge. District Chairs Day of Judge. El Paso Municipal Court	1994	District Court				Auncipal Court	A
Day of District Chart on Law # Day of District Chart on Law # Day of District Chart of Day of D	109th	District Court Law#			Lii Paso Ja	Auncipal Court ustice Ct. Pet	
Day of Day of June Day of June Deliver on this court, this the Juny of Jung Deliver Charts Jung C. District Charts Et Paso Municipal Court	109th	District Court Law#			El Paso C	dencipal Court ustice Ct. Pet itim, Law Magistrate	

	Officer Officer	WARRANT OF ARREST
and exectued the		201454-409075
and c		Ifile No.
A.D. 20		THE STATE OF TEXAS
A.D. 20	By	Ramona Vera 8/31/1957
day of		OFFENSE: Delivery of a Controlled Substance Peralty Group one; Cocaine 1.4 grams
Came to hand the		BOND: # 25/082
Came to		JUDGE: 5 Med

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THE STATE OF TEXAS EL PASO COUNTY PAGE 1 OF 1

COURTNO. 20145m 409-077

			Cou	IIINO. OLUITATIONI	9-011
IN THE NAME	AND BY AUTHO	RITY OF THE STATE OF TEXAS		F 33	
REFURE ME II	ac undersigned author	tily, on this date renamelly unnessed	B = 1 . A 25 . T A 25 .		
Who after being	by me duly swom, o	n cash deposes and says that he has go	Agent David Gar	rein #336462	
the 22**	Day of	May 2014	and before the films of the	illeve that heretofire to wit, or or ahe	
Texas, enc	Vera, Ramona	DOB (08/31/1957)	and desorte the fitting of this of	omplaint in the County of El Paso, T	he State of
Unkawfully.			3615	inalier called DEFENDANT, did the	in and there
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Intentionally an	in Knowlingly delive	red a controlled substance listed in P	enalty Group 1-Cocaine = Le	ss than I gram (G.A.W. 0.2 G) in 18	iniation of the
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williams the Plie C	AUGUSTICIT SUIDSENICE	to which the offense applies it, by 42	prevale weight, including adu	lterunts or difutants, less than one	gram.
FACTS TO SU					
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DEFENDANT /R	Janes Cilentes 2000	05:56 pm, AFFIANT was working at p	lain clothes and in an underony	er consciny: AFFIANT met with (343	ENDANT and Co-
small clear obstic	harrie to Co-DCEE	of \$20.00 worth of cocare, Co-DEFE	NUANT then placed the order	WITH DEFENDANT DEFENDANT	then delivered one
grams) to AFFIAN	I for the agreement of	TO ON The white wood and then delive	cive our repail ejent bjærge pari	sic containing a white powdery subs	tance (G.A.W. 0.2
		\$20.00. The white pewdery substance ITS were not arrested at that time pendi		e. The money used in the transaction	was taken lions
Against the peace	and dignity of the	State	ne minet averriganor		
1200	0.000				
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Sworn so and sub	escribed before hy	on this the		and the same of th	
19	Day of 1	. 2014.	ARACELY GOME	Z	11
-		1 1/-6	NOTARY PUBLIC	// //	11 /
			In and for the State of Te.		16- (/
			My commission expin		San S
			11-25-2017	Notary Public in and for	
		100000		Elliso Cuenty, Texas	0
Cryster to unit out	and the second	127.79 (61)	/4	len.	
SWORTH OF BEST ME	actined betote we	, and filed in this court, this the	Day of	120	14.
Probable Cause I	ur esseance of Wa	pent found.			
5 =	Xnad	<u></u>			
-	Or get				
Maste	JUDGE,		_	****	
TOU	District Court			JUDGE,	114
County Court at-				El Paso Municipal Court	#
of El Paso Count				El Paso Justice Ct. Pet.	p
or my and coult.	7 - 1			El Paso Crim, Law Magistrate	
				of El Paso County, Texas	
				The second secon	

		WARRANT OF ARREST
	and exectned the	2014-54 409-077
	, and	File No.
OFFICER'S RETURN	A.D. 20	THE STATE OF TEXAS VS. Reimona Vera 8/31/1957
	Jo kep	Deturn of a controlled substance Penalty Group one: Cocaine O.2 grams
	Came to hand the	BOND: \$ 15,000
	Came	JUDGE: 5-Mel

THE STATE OF TEXAS

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PAGE I OF

EL PASO CO	UNIY			Court No.	20/45m 4	09-016
Who after bein	the undertign a by mc dely	UTHORITY OF THE STATI ed suchorny, on this date person warn, on buth deposes and says	nally appeared Ages that he has good reason to believ	nt David Garcin #336 e and does believe that	herelofice to wit, on or she	
Texas, enc	Littly	of May mez, Lidiu DOB (86/86/1	. 2014 and beline the f	iling of this complaint	in the County of FI Paso, TI End DEFENDANT, did the	he State of
Unlawfully.						
delivers, or po	controlled su	fixed to deliver a controlled su	ance listed in Fenalty Group t-6 ot as uniburized by this chapter. Ostance listed in Penalty Group opilies is, by aggregute weight, is	a betwou commers an	offense if the person know	ingly manufactures,
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for the perchase plastic barrie to for the amount n	of \$20.00 were DEFENDAN F\$20.00. The	th of cocaine, DEFENDANT the T. DEFENDANT then delivered white powdery substance field and at that time newline further	as working in plain clothes and in Washington Leurge) in the City a ten placed the order with Co-DEF if one small their plastic huggie or tested positive for cocaine. The minutestigation.	ENDANT (Vers) Co-	TX. AFFIANT negotiated DEFENDANT then deliver	with DEFENDANT ad one small clear
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Sworn to find st	abscribed be	fore fac on this the	-		ΛITian	
17	Day of	MUG .2014	ARACE	LY GOMEZ) //
			In and for th	o State of Texas	/ /	11 0
			11-2	5-2017	Juliary Publish and Tor	an /
					lotary Public in and for I Pase County, Texas	1
Sworn to and su	ibscribed bet	fore me, and filed in this cou	IIT, this the 14 Day			
Probable Cause	for issuance	of Warrant found.	in this the 77 Day	of Can	. 20	EG.
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1000	KILIDADE	The same of the sa				
400	District Co	ourt :		410 -	JUDGE,	
County Court M	Law #				o Municipal Coart o Justice Ct. Pct.	N
of El Paso Coun	ity, Texas				o Jusace Ct. Pci. o Crim, Liny Magistrate	4
					aso County, Texas	

	WARRANT OF ARREST
and exectined the	2014 SU-409-076
and c	File No.
A.D. 20	THE STATE OF TEXAS
	Blanca Ldia 5. lua 6/6/1968
, A D. 20	
o de la	Detury of a Controlled substance Peralty Group One: Cocane 0.29 mms
200	BOND: \$ 15,000
day of	BUND:
हु हु	JUDGE: 5 Med

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	85845	h		320	
PAGE	1 4	_ OF	1	38	•

THE STATE OF TEXAS

of El Paso County, Texas

EE PASO CO	BENTY		Ci	ourt No.	2014 511 40	14-018
IN THE NAM	E AND BY AUTHOR	CITY OF THE STATE OF TH	Fras		C Goard B	0.0
BILFORE ME	the undersigned nather	dity, on this date personally and	aread to a second	Prints #57	798	
With affer bein	in pa me quit encen co	of the deputies and says that he	im good reason to believe and does!	believe that	beretofree to put, on neal-	rest
		ra sirect	Teacher and ecities the libral of this	complaint i	in the County of El Pase. T	he State of
Texas, one Unlawfally.	Vera, Ramona	DOB (08/31/1957)	ha	rcinafter cal	lied DEFENDANT, did th	en and there
Intentionally	and Kanadamle delice	rrel n muntmillad vulatuman i	Bancies Carries & M. Carries			
possesses with	intent to deliver a cur	tituled substance listed in De	Penalty Group 1-Cocaine = 1 G>+ opter, a person commits an offense i maity Group 1 (c) An offense under 1, by aggregate weight, including ad	if the perso	a knowingly monufactur	es, delivers, or
FACTS TO SE	L'PPORT:					
P/C On 06/12/2	201-1 at appensimately (k:39 pm. AFFIANT was workin	ig in plain clothes in an undercover of		Pr. 1	W 900.
AFFIANT for the further investigation	VDANT then delivered to amount of \$300,00. T	six small clear plastic betales. The money used in the transacti	ig in point clothes in an intercover en El Paso, TX. AFF(ANT negotiated w (G.A.W. 2.1 grums) containing a whit on was taken from official police fun-	NO DEFEN	DANT for the purchase of	cocaine worth
refluings inc hes	or nan different of rule 3	Hate				
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					E. ASA	2
Swork southed sa	ibscribed before me	on this the	*****		Alling	-> /
14	Day of HC	2014. A	ARACELY GON		11	111
	1 /	/	In and for the State of My commission exp	Texas pires		llan /
	/		11-25-2017	UK	lutary the line in and for	
		5.000	105	1	l Pass County, Texas	0
Sworn to and sa	ibscribed before me.	and filed in this court, this	da: // Day of	da	, 21	14.
Probable Cause	for issuance of War	at found,				
HOOFE	JUDGE.		_			
409	District Court			III Pass	JUDGE, Municipal Court	ň
County Court no	Law#				Justice Ct, Pct,	ф
of El Pasa Cour	Hy Texas				Crim, Liew Magistrate	

	WARRANT OF ARREST
and exectued the	2014-54-409-078
. and e	Fale No.
20	THE STATE OF TEXAS Vs. Ramona Vera 8/31/1957
A D, 20	OFFENSE: Delivery of a Controlled Substance Penalty Group one: Cocaine 2.1 grams
day of	BOND: # 25, 000
day of	JUDGE 5 ONEL

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			AUG THEO
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PAGE	1	OF	1

THE STATE OF TEXAS EL PASO COUNTY

Court No

2014 Sm 409-080

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IN THE NAM	IE AND BY AUTHO	DRITY OF THE STATE OF				
ampunce Mis-	me undersigned aud	ionly, on this date personally	appeared	Agent Ernestn Prieto #57	799	
e 10 ⁴	ig by the cally swifth, Day of	on both deposes and says the July	t be has good reason to b	clieve and does believe that	beresolore to wit, on or abo	ul .
COM, UNC	Vera, Ramona	DOB (08/31/1957)	, 2014 and before	the filing of this complaint i	n the County of El Paso, Th	E State of
niawfally.	vera, scalitoria	0408 [8603111331]		hereinatter cal	lied DEFENDANT, did the	it and there
Miches Will	Intent to deliver a	rered a controlled substance Except as authorized by this controlled substance fisted is se su which the offense appli	r Propier, a person com:	mile an offense if the perso	n koowingly manufacture	a. delivers, or
CISTO S	UPPORT:					
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DOO. DEFEN FIANT for the contraction of the contrac	DANT then delivered to the second of the sec	y 9:30 pm, AFFEANT was we ounge) in the Cay and Coung d four small clear plastic bags The money used in the trans- te State	y of El Prso, TX, AFFIA	NT regulated with DEFEN	DANT for the purchase of	ocaine worth
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j		<i>a i</i>		pose	Emet Ri	*
in for shit	athscribed before y	he on this the	ARA	CELY GOMEZ	Affiain	511
<i>17</i> _	Day of	<i>TU[]</i> , 2014.	/ No	OTARY PUBLIC	// //	11
	-	/ 1	My My	for the State of Toxas	///	12. (/
		1		1 05 0047	wis >	SOLX
				The state of the s	lotary Public in and for	1
					hi as County, Texas	0
Fine of us	والمنظمة المنظمة	es, and filed in this court,	this the 14		10	1 .0. 70
onble Cours	Lor spinne of W	action of the second	inistrie / C	Day of	.20	14_
MORE CHIE	CILI ISMINISCOL W	apant round.		- 0		
2	- man					
	JUDGE,					
400	District Court			20.	JUDGE,	
nty-Cent	Out .				o Municipal Court	#
	mly, Texas	-			o Justice C.L.Pet.	#
A F GMP CADE	ony, rexas				o Crim, Law Magistrate	
				of [] 1	aso County, Texas	

	WARRANT OF ARREST
AIN CACHICO INC	2014-54-409-080
2	File No.
	THE STATE OF TEXAS
	75.
8	Ramonsi Vena 8/31/1957
. A.D. 20	
	OFFENSE: Deliving of a controlled substance
	Penalty Group one: Focasine 1.4 grams
day of	BOND: # 25, 229
केप्र ल	JUDGE: 5 Maf

	TECK
	NECEIVED
	1 20%
_	-4

THE STATE OF TEXAS

TELYSO CO	UNTY		Court No. 20/4 5 11 409-679
IN THE NAM	TE AND BY AUTHOR	UIV OF THE STATE OF TEXAS	
BEFORE ME,	the undersiseed author	ity, an this date personally appeared	Agent Ernesta Prieto, 257798
Who after bein	ig by me duly twom, or	ofth deposits and says that he has good re	ason to believe and does believe that hazelusine to wit, un or about
W-76	1843(19)	July . 2014 as	ad before the filling of this complaint in the County of El Paso, The State of
Texas, one	Blanco, Mignel	DOB (10/16/1976)	hereinafter called DEFENDANT, did then and there
Unlawfulfy			The state of the s
possesses with	intent to deliver a co	tirniled substance listed in Penairy Com-	oup 1-Cucaine $\sim 1~{\rm G} > 4~{\rm G}$ (G.A.W. 2.2 C) in violation of the Health and Safe son commits an offcase if the person knowingly manufactures, delivers, or up 1 (c). An offense under Subsection (a) is a felony of the second degree if the pate weight, including adulterants or dilutants, one gram or more but less than
FACTS TO SE	UPPORT:		
DIC () 0217A		1287 MARTIN - 27 W 50	
the purchase of a Co-DEFENTIAN amount of \$100. In the transaction	Excaine worth \$100,00, VF. Co- DEFENDANT 00.Co- DEFENDANT	Co-DEFENDANT then placed the order then delivered six small clear place to be then delivered six small clear place to be then delivered six State to be DEFENDANT at pulse finds. The LIFE-SMANTS was	clothes and in an undercover capacity. AFFIANT met with Co-DEFENDANT and County of EI Pasa, TX. AFFIANT negationed with Co-DEFENDANT (Adame) with DEFENDANT. DEFENDANT then delivered six small clear plastic bindles to containing a white powdery substance (G A W 2.2 grans) to AFFIANT for the JT. The white powdery substance (Ickl tested positive for cocaine. The maney use not arrested at that time pending further investigation.
	1/1		
1.0			Exerto Vato
d . ls .	ubscribed before pla	7	Alliand
worm desines a	Day of	A Lawrence Control of the Control of	ARACELY GOMEZ
-//	Day of 1/1	,2014.	NOTARY PUBLIC
			in and for the State of Texas
	/	We was	44 95 9017
		-	Purple III and for
			Paradicionity, Texas
e has at man	therribed before in	and filed in this court, this the	Day of ARC 2014.
obable Cause	for issuance of War	and then it this court, this the	Day of
	100-1	панн	
	0160		
· · · ·	Munce		
424	7.IUDGE, District Court		JUDGE,
a r			El Paso Municipal Court
TI Page Court			III Paso Justice Ct. Pet g
El Paso Cour	ny, Texas		El Paso Crim, Law Magistrate
			of El Paso County, Texas

	WARRANT OF ARREST
and exectued the	2014-54-409-079
and	l'ile Nn.
2 12 2	
A.D. 20	THE STATE OF TEXAS
S. Y	vs.
OFFICER'S RETURN A.D. 20	Miguel Blanco 10/16/1976
day of	OFFENSE: Detvery of a controlled substance
	Penalty Group one: Cocaine 2.2gians
Came to hand the	BOND: # 25, 850
Came to	JUDGE: 5- mel

				Allo, CEIVA			
	862833			82			
'AGE	1	OF	ı	21/0			

THE STATE OF TEXAS EL PASO COUNTY

Court No 2014- SM- 409-121

IN THE NAME AND	BY AUTHORITY OF THE STATE OF TEXAS	
	rsigned 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 _10 th	Day of July , 2014 and bo	fore the filing of this complaint in the County of El Paso, The State of
Texas, one	Doc, Jane ***	hereinafter called DEFENDANT, did then and there
Unlawfully,		
Code Section 481.112, possesses with intent to	to wit (a) Except as authorized by this chapter, a person o deliver a controlled substance listed in Penalty Group 1	1-Cocaine = 1 G > 4 G (G.A.W. 2.2 G) in violation of the Health and Safety commits an offense if the person knowingly manufactures, delivers, or (c) An offense under Subsection (a) is a felony of the second degree if the weight, including adulterants or dilutants, one gram or more but less than
FACTS TO SUPPORT	r:	
Montana Av. (George W. \$100.00. DEFENDANT: DEFENDANT: DEFENDANT: S100.00. DEFENDANT: transaction was taken fro DEFENDANT is pending	nshington Lounge) in the City and County of El Paso, TX. A then placed the order with Co-DEFENDANT (Miguel Blane DANT) then delivered six small clear plastic baggies contains then delivered the \$100.00 to Co-DEFENDANT. The white m official police funds. The DEFENDANTS were not arreste g. AFFIANT can recognize and identify DEFENDANT by six applexion, blonde hair, brown eyes, approximately 45 years of	thes and in an undercover capacity. AFFIANT met with DEFENDANT at 3900 FFIANT negotiated with DEFENDANT for the purchase of cocaine worth o).Co- DEFENDANT (Blanco) then delivered six small clear plastic bindles to ng a white powdery substance (G.A.W. 2.2 grams) to AFFIANT for the amount of powdery substance field tested positive for cocaine. The money used in the ed at that time pending further investigation. Positive identification of ght. DEFENDANT is described as a Hispanic female, 5'03", 180 lbs, with a fage, and going by the full name of "Norma Adame".
		200
		E L
		great lut
Swam 12 God subscribe	ed before me on this, the	ARACELY GOMEZ Affiant
Day		NOTARY PUBLIC In and for the State of Texas
Day	1 7 12014	My Commission expires
		11-25-2017
		Notary Public in and for
	<u> </u>	TP aso County, Texas
		1311 aso-county, resas
Sworn to and subscribe	ed before me, and filed in this court, this the	Day of
	uance of Warrant found.	
	mall	
0	War	
JUD JUD	GE.	JUDGE,
477 Distri	ict Court	El Paso Municipal Court #
County Court at Law #		El Paso Justice Ct. Pct.
of El Paso County, Tex	cns	El Paso Crim, Law Magistrate
		of H Paso County, Texas

OFFICER'S RETURN

Came to	hand the	day of		, A.D. 20			, and exectued the		
day of			_, A.D. 20		·				
								×	
		Pi De	*(Nor	Ву				Officer	
	BOND: 4	huesy of a halfy Sourp	mu Adame) 4/5,5				2014	e 180	
	# 25,B	Defuery of a Controlled Substance finally Gove one 2.2 gams where	Jave Doc. 1 (Nurmu Adame) 4/5,565, 180 155, 144 bild, Oct 1860, Approx. 45 year) VS	THE STATE	File No.	1-54-40	WARRANT O	
	B	NSE:	bild, 94/64c, App	#4	OF TEXAS	No.	19-12	OF ARREST	
		410.22	7. 45 yea						