

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America

v.

JUAN GABRIEL ORONA-RODRIGUEZ

Defendant(s)

Case No. 25-mj-0092-TPO

CRIMINAL COMPLAINT

I, the complainant in this case, and state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept 16, 2014 to April 9, 2025 and April 22, 2025 in the county of El Paso in the
State and District of Colorado, the defendant(s) violated:

Code Section

21 U.S.C. §§ 841(a)(1), (b)(1)(C) and 846

Offense Description

Distribution of and Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Cocaine, a Schedule II Controlled Substance; and Conspiracy to Distribute and Possess with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Cocaine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:

See Affidavit attached hereto and hereby incorporated by reference.

☒ Continued on the attached sheet.

s/Andrew Cohen

Complainant's signature

Andrew Cohen, Special Agent FBI

Printed name and title

Sworn to before me and ☐ signed in my presence ☒ submitted, attested to, and acknowledged by reliable electronic means.

4/30/25

Date:

Timothy P. OHara

Digitally signed by Timothy P.
OHara
Date: 2025.04.30 19:36:16 -06'00'

Judge's signature

Timothy P. O'Hara

United States Magistrate Judge

Printed name and title

City and state: Denver, Colorado

DEFENDANT: JUAN GABRIEL ORONA-RODRIGUEZ

YOB: 1997

OFFENSE(S): **Count 1: 21 U.S.C. § 846:** Conspiracy to Distribute and Possess with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Cocaine, a Schedule II Controlled Substance in Violation of 21 U.S.C. § 841(a)(1), (b)(1)(C)
Count 2: 21 U.S.C. § 841(a)(1), (b)(1)(C): Distribution of and Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Cocaine, a Schedule II Controlled Substance

LOCATION OF OFFENSE: El Paso County, Colorado

PENALTY: **Counts 1 & 2 (Each Count):** NMT 20 years' imprisonment; NMT \$1,000,000 fine, or both; NLT 3 years' and NMT life supervised release; \$100 Special Assessment

AGENT: Andrew Cohen
Special Agent, FBI

AUTHORIZED BY: Michael Houlihan
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days

THE GOVERNMENT
X will seek detention in this case based on 18 U.S.C. § 3142(f)(1) and (2)

The statutory presumption of detention **is** applicable to this defendant.

AFFIDAVIT

I, Andrew Cohen, a Special Agent (SA) with the Federal Bureau of Investigation (FBI) being duly sworn, depose and state under penalty of perjury that the following is true to the best of my information, knowledge, and belief.

PURPOSE OF AFFIDAVIT

1. This affidavit is submitted in support of a criminal complaint and arrest warrant against JUAN GABRIEL ORONA-RODRIGUEZ. As set forth herein, there is probable cause to believe that:

- a. From a time unknown, but not later than on or about September 16, 2024, and continuing until at least April 9, 2025, in the State and District of Colorado, ORONA-RODRIGUEZ and others both known and unknown, knowingly conspired and agreed, with interdependence, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), all in violation of 21 U.S.C. § 846; and
- b. On or about April 22, 2025, in the State and District of Colorado, ORONA-RODRIGUEZ distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all my knowledge of or investigation into

this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

INTRODUCTION AND AGENT BACKGROUND

4. I am an investigative or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7), and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Titles 21 and 18, United States Code, Section 2516.

5. I am a Special Agent with the FBI and have been since 2014. I am currently assigned to the Denver Division of the FBI, specifically to the Southern Colorado Safe Streets Violent Gang Task Force (SSVGTF). I investigate money laundering and drug trafficking in the normal course of my duties, and I am fully familiar with the facts of this investigation. During the course of my career, I have been involved in large-scale narcotics investigations that included substantial seizures of controlled substances including hundreds of pounds of methamphetamine, multi-kilogram quantities of cocaine, tens of thousands of fentanyl pills, and kilograms of heroin. I have experience analyzing financial records, deciphering coded and slang communications, analyzing pen register/trap and trace records, conducting interviews, recruiting and operating confidential informants, conducting physical surveillances, and arresting subjects of criminal investigations. I have an undergraduate degree in accounting and rely on that education during some of my investigations.

6. I have also participated in Title III wiretap investigations, investigations surrounding death resulting from the distribution of fentanyl, controlled purchases of illegal drugs, and debriefing of cooperating witnesses and defendants related to large-volume narcotics

trafficking. I have also been tendered as an expert witness in federal court related to drug trafficking.

7. As part of the SSVGTF, I am also exposed to street-level and mid-level drug dealers. I work routinely with the Colorado Springs Police Department Metro Vice, Narcotics, and Intelligence Unit and benefit from those experiences.

8. As a cumulative result of my narcotics experiences ranging from enterprise level federal cases to local street dealer level cases, I am familiar with many of the methods of drug trafficking, common slang terminology for drugs, the street values and common distribution quantities of illegal drugs, the methods of drug distribution, the tradecraft drug dealers use to avoid law enforcement detection, and the laundering of drug proceeds. I am also familiar with the roles that firearms play within drug trafficking, including the use of firearms for protection and intimidation.

9. I have also investigated and charged violations of federal gun laws, and I am fully familiar with the federal definition of a firearm, and the elements surrounding the unlawful possession of firearms by prohibited persons.

10. I have participated in this investigation since approximately early January 2025. Through information obtained in this investigation, coupled with statements made to me by other law enforcement personnel, particularly from the DEA, a review of reports made by police officers/agents, statements made by confidential sources (“CS”) and sources of information (“SOI”), and information obtained through warrants, I am familiar with the facts and circumstances of this investigation.

11. In summary and as set forth below, ORONA-RODRIGUEZ, while serving as an active duty U.S. Army soldier, unlawfully distributed controlled substances. Not only did

ORONA-RODRIGUEZ sell cocaine to an undercover DEA agent, but ORONA-RODRIGUEZ's historical text message communications outline months of suspected cocaine trafficking. In addition to the conduct underlying the charges sought herein, RODRIGUEZ is also suspected of unlawfully trafficking firearms, including those with high-capacity magazines, to illegal aliens.

12. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 21 U.S.C. § 846 (conspiracy to distribute cocaine) and 21 U.S.C. § 841 (distribution and possession with intent to distribute cocaine) (collectively, the "SUBJECT OFFENSES") have been committed by ORONA-RODRIGUEZ.

STATEMENT OF PROBABLE CAUSE

Background information about ORONA-RODRIGUEZ and Immortal Security

13. Juan Gabriel ORONA-RODRIGUEZ (YOB: 1997) is an active-duty U.S. Army soldier. ORONA-RODRIGUEZ holds the rank of Staff Sergeant (E-6) and is assigned to Fort Carson in Colorado Springs, Colorado.

14. Based off of forms provided to me by the Drug Enforcement Administration (DEA) and U.S. Army, ORONA-RODRIGUEZ also appears to hold a leadership/ownership role in a business called Immortal Security LLC. This security company provides armed security at "nightclubs" – including an afterhours, unlawful nightclub called Warike -- within Colorado Springs, Colorado. Warike was the site of a federal search warrant that was executed and led by the DEA on April 27, 2025. ORONA-RODRIGUEZ was one of approximately 17 active-duty U.S. Army service members present at Warike during the execution of that search warrant.

15. On numerous prior occasions, the Colorado Springs Police Department received 9-1-1 calls related to Warike citing a wide variety of alleged crimes, including weapons violations, assault, narcotics, and other violent crime.

16. Immortal Security LLC employs some active duty and former U.S. Military service members. DEA agents with whom I have spoken believe employees of Immortal Security are involved in drug distribution and that employees of Immortal Security are carrying firearms while providing security at Warike and similar establishments.

17. Based on information received from the United States Army Criminal Investigative Division, I am aware that ORONA-RODRIGUEZ received a developmental counseling form from his commanding officer in the Spring of 2025 related to this activity, and that he was told at that time that Immortal Security Operation LLC is off limits to members of the Armed Forces. Specifically, in March 2025, ORONA-RODRIGUEZ was told that "...you are prohibited in engaging in off-duty employment without the approval of the Battalion Commander IAW 4ID..."

18. I have reviewed ORONA-RODRIGUEZ's criminal history, which does not appear to contain any prior felony convictions.

ORONA-RODRIGUEZ is Engaged in a Conspiracy to Distribute Cocaine (Count 1)

19. I have obtained evidence that supports probable cause that RODRIGUEZ, along with others both known and unknown, was engaged in a conspiracy to distribute cocaine between at least the dates of on or about September 16, 2024, to April 9, 2025.

20. On April 10, 2025, United States Magistrate Judge Cyrus Y. Chung of the District of Colorado authorized a search warrant permitting law enforcement to extract and search the data of a cell phone belonging to ORONA-RODRIGUEZ with the associated phone number XXX-XXX-1379¹ ("x1379"). This search warrant was lawfully executed, and the content of ORONA-RODRIGUEZ's cell phone is discussed below. Immediately prior to the execution of that search warrant, ORONA-RODRIGUEZ was in possession of the cell phone, and I have no reason to

¹ I am aware of but have omitted the full phone number for RODRIGUEZ in an effort to protect his contact information.

believe anyone other than ORONA-RODRIGUEZ was the user of the phone during the time periods discussed.

21. I have not included all the messages about drugs or suspected unlawful firearm activity from ORONA-RODRIGUEZ's cell phone; rather, I have chosen communications that are examples demonstrating probable cause for the Subject Offenses. There are additional messages, including a photograph of substances that are consistent with cocaine, within those messages. I have also omitted the names of suspected co-conspirators in an effort to protect the integrity of a continuing investigation. I have also omitted text messages that are irrelevant to the present complaint, but have not purposefully omitted any portions of the text message content that would undercut probable cause or present exculpatory information.

22. There are text messages between at least September 16, 2024, and mid-April 2025 that appear to concern the distribution of drugs on ORONA-RODRIGUEZ's cell phone. Many of these communications clearly establish a continuing illicit relationship between ORONA-RODRIGUEZ and at least one other user.

Messages Related to Drug Trafficking with CONSP1

23. Between September 16, 2024 and April 9, 2025, ORONA-RODRIGUEZ and another individual, identified herein as CONSP1, exchanged numerous text messages that were recovered from ORONA-RODRIGUEZ's phone following execution of the April 10, 2025, search warrant. I have not reviewed every one of those text messages; however, among the messages that I have reviewed, the messages appear to primarily concern distribution of controlled substances. I have included some content of text messages communication between ORONA-RODRIGUEZ and the CONSP1 phone over a timespan of the last several months. The messages are listed below in reverse chronological order, with the most recent messages first.

24. Investigators are aware of CONSP1's identity, and I am aware that CONSP1 is unlawfully present in the United States without admission and is a Mexican citizen. Based in part on the communications detailed herein, CONSP1 appears to be a source of supply for illegal drugs to ORONA-RODRIGUEZ.

25. The following text message exchange took place on or about April 9, 2025, between a phone previously identified as belonging to CONSP1 and ORONA-RODRIGUEZ (x1379):

DIRECTION	USER	MESSAGE
Incoming	CONSP1	You wats good
Outgoing	X1379	Need two half and the 7
Outgoing	X1379	Ima pick them up later today if you have them
Incoming	CONSP1	So you need a whole full and the 7 g right?
Outgoing	X1379	Yeah I do just split in half lol
Incoming	CONSP1	Yea I got you no worry's and Simon I should have it by like one,two the latest
Outgoing	X1379	Thanks make sure is good the last batch people complain about it b
Incoming	CONSP1	Watt really bro whenever it's like that I can always give it back bro hell nah that's like a big NO your like the first person to tell me this
Incoming	CONSP1	That's why i always try to give you like in rock but my bad bro ima have a talk with them see wat they say

26. Based on my training and experience, I am aware that individuals involved in drug distribution often refer to controlled substances using shorthand references to their weights. In this light, I understand that, when ORONA-RODRIGUEZ refers to "two half" he is referring to two half ounces, which I know to be a common measurement of cocaine. Similarly, I understand

that, when the user of the CONSP1 phone refers to 7 g, the user is referring to seven grams of cocaine. Further, when ORONA-RODRIGUEZ says “. . .the last batch people complain . . .,” I understand from my training and experience that ORONA-RODRIGUEZ is likely saying that his customers complained about the poor quality of drugs. The CONSP1 phone responds that “...I can always give it back...”. Based on my training and experience, this is a common practice in the drug trade, as dealers often replace drugs of poor quality to keep customers satisfied.

27. On or about March 30, 2025, the following conversation occurred between ORONA-RODRIGUEZ’s phone and the CONSP1 phone.

DIRECTION	USER	MESSAGE
Outgoing	X1379	Can I grab it?
Incoming	CONSP1	Yea come tu
Incoming	CONSP1	Thru
Outgoing	X1379	Where at?
Incoming	CONSP1	[[REDACTED]] and [[REDACTED]]
Outgoing	X1379	Send me the address
Incoming	CONSP1	[[REDACTED]]
Outgoing	X1379	13 min away

28. Based on my training and experience, I understand that, in this exchange, ORONA-RODRIGUEZ asks to come to the user of CONSP1 phone’s location to pick up drugs, referenced here as “it.” From my training and experience, I am aware that it is common for individuals engaged in narcotics transactions to use vague or coded language to refer to controlled substances in order to avoid directly referring to those substances. I also reviewed the location identified in

these text messages and found that it is consistent with the vicinity of CONSP1's suspected residence.

29. On March 20, 2025, the following conversation occurred between the user of CONSP1 phone and the user of ORONA-RODRIGUEZ's phone.

DIRECTION	USER	MESSAGE
Outgoing	X1379	You got that.
Incoming	CONSP1	Hey I have 10g in me right now idk if u want that or u wanna wait half an hour for the whole half lmk
Outgoing	X1379	Yeah I will wait

30. Based on my training, experience, and context of this conversation, I understand that the excerpted discussion represents a request from ORONA-RODRIGUEZ for CONSP1 to supply him with an unspecified but understood controlled substance, referenced as "that." From my training and experience, I am aware that it is common for individuals engaged in narcotics transactions to use vague or coded language to refer to controlled substances in order to avoid directly referring to those substances. I further understand that, in response, CONSP1 offers to provide 10 grams of cocaine to ORONA-RODRIGUEZ now or waiting for the "whole half," which I understand to be a reference to .5 ounces (approximately 14.1748 grams) at a later time. ORONA-RODRIGUEZ's response indicates that he will "wait" for the larger quantity. From my training and experience, I am aware that a purchase of a half ounce of cocaine is more consistent with someone who is purchasing cocaine to distribute it for others than for personal use.

31. On or about February 9, 2025, the following conversation occurred between the user of the CONSP1 phone and ORONA-RODRIGUEZ's phone. I have also included the original Spanish text below, as well as a translation provided to me by an FBI linguist:

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Incoming	CONSP1	Dónde estás aki acabo de llegar	Where are you I just arrived
Outgoing	X1379	Estoy adentro	I'm in
Outgoing	X1379	En dónde estás?	Where are you?
Incoming	CONSP1	Y miro en la puerta pa darte mi pistola ahí voy para aya	I look at the door to give you my pistol. I'm on my way over there
Outgoing	X1379	Dale	Ok

32. Based on the context of this conversation and ORONA-RODRIGUEZ's suspected role as a security guard for Immortal Security, I believe that ORONA-RODRIGUEZ was working security at a nightclub where individuals are searched at the front door. It appears from the context of this conversation that firearms are not allowed within the location, and the user of the CONSP1 phone suggests that he/she brought a pistol to the club with him.

33. On or about January 11, 2025, the following conversation occurred between the user of ORONA-RODRIGUEZ's cell phone and CONSP1's phone. I have also included the original Spanish text below, as well as a translation provided to me by an FBI linguist:

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Outgoing	X1379	Puedo darte el dinero el martes completo?	Can I give you the money on the whole Tuesday?
Incoming	CONSP1	Ya te la sabes que sii	You already know, of course!
Outgoing	X1379	Dale gracias	Give thanks to him.
Outgoing	X1379	Cuando la puedo recoger	When can I pick it up

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Incoming	CONSP1	Yo te la puedo llevar ay al Warike si kieres o la quieres antes	I can take it to you to the Warike if you want, or do you want it earlier?

34. Based on my training and experience, I understand that ORONA-RODRIGUEZ was informing the user of the CONSP1 phone that he had enough money to purchase a full ounce of cocaine (“on the whole”) and was offering to pay for it on the upcoming Tuesday. I further understand that the user of the CONSP1 phone agreed to supply that amount of cocaine to ORONA-RODRIGUEZ and planned to deliver the cocaine to ORONA-RODRIGUEZ at Warike. From my training and experience, I am aware that an ounce of cocaine is consistent with someone who is acquiring cocaine with the intent to distribute it to others and not just possess it for personal use.

35. The below conversation occurred on or about November 11, 2024, between the user of ORONA-RODRIGUEZ’s phone and the user of CONSP1’s phone. I have also included the original Spanish text below, as well as a translation provided to me by an FBI linguist:

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Outgoing	X1379	Si quieres llega hasta mi casa [[REDACTED]]	If you want, come to my house. [[REDACTED]]
Incoming	CONSP1	Daleeee ahí te aviso cuando esté afuera	Alrighty! I'll let you know when I'm outside.
Outgoing	X1379	Dale	Alrighty
Outgoing	X1379	Tira me una llamada cuando llegues	Give me a call when you arrive.

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Incoming	CONSP1	Estás en tu casa?	Are you at home?
Outgoing	X1379	Si estoy en casa	Yes, I'm home
Incoming	CONSP1	Aki estoy afuera	I'm here outside.

36. Based on my training and experience, I understand that ORONA-RODRIGUEZ was requesting that the user of the CONSP1 phone travel to a specified address, which I have redacted for privacy reasons, to meet him for an unspecified purpose. The redacted address is consistent with ORONA-RODRIGUEZ's home address, and ORONA-RODRIGUEZ identifies that location as his home in response to questions from the user of the CONSP1 phone.

37. On or about October 7, 2024, the following conversation took place between the user of ORONA-RODRIGUEZ's phone and the user of CONSP1's phone. I have also included the original Spanish text below, as well as a translation provided to me by an FBI linguist

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Outgoing	X1379	Cuánto por una oz?	How much for an oz?
Incoming	CONSP1	850	850

38. Based on my training and experience, as well as the other conversations discussed in this affidavit, I believe I believe ORONA-RODRIGUEZ contacted the user of the CONSP1 phone to obtain a quote for one ounce of cocaine. In response, the user of the CONSP1 phone stated the price was \$850, which I know, from my training and experience, is consistent with the local market pricing for an ounce of cocaine at the approximate time of this exchange.

Messages about drug trafficking with CUST1

39. ORONA-RODRIGUEZ and another individual, identified herein as CUST1, exchanged numerous text messages that were recovered from ORONA-RODRIGUEZ's phone following execution of the April 10, 2025, search warrant. I have not reviewed every one of those text messages; however, among the messages that I have reviewed, the messages appear to primarily concern distribution of controlled substances. Based on my training, experience, and the context of these communications, I submit that there is probable cause to believe that ORONA-RODRIGUEZ's role within these messages is a drug dealer, and CUST1 is a customer purchasing drugs from ORONA-RODRIGUEZ.

40. The following text message exchange took place on or about November 1, 2024 between CUST1's phone and ORONA-RODRIGUEZ (x1379 number). I have omitted certain messages from this exchange to streamline the conversation, and there are multiple messages related to drug trafficking between the two users.

DIRECTION	USER	MESSAGE
Outgoing	X1379	[[REDACTED]] is my buddies address
Incoming	CUST1	I got it, thanks bro
Outgoing	X1379	Hey he gave you an 8 can you send me atleast 50 more
Incoming	CUST1	Really? Seemed less than you give me lol but I got you.
Outgoing	X1379	Yeah because he gave to you in a bigger bag
Outgoing	X1379	It was miscommunication
Incoming	CUST1	I sent it, I won't screw you over

41. Based on my training, experience, and the context of this message, I understand that ORONA-RODRIGUEZ gave the user of the CUST1 phone an address for purposes of traveling to meet a third party (“my budd[y]”) to pick up the drugs from that address. I have reviewed the address, which is redacted here for privacy, and know that it is associated with a second suspected member of Immortal Security. Further, I understand ORONA-RODRIGUEZ’s later message to indicate that the user of the CUST1 phone received a higher quantity of drugs than he/she paid for, and so ORONA-RODRIGUEZ asks the user of the CUST1 phone for additional money. I further understand the specific reference to an “8” as an eighth of an ounce, a common user amount of cocaine.

42. Taken together, I understand this message demonstrates that ORONA-RODRIGUEZ uses other individuals to distribute drugs at his direction.

Messages about drug trafficking with CUST2

43. ORONA-RODRIGUEZ and another individual, identified herein as CUST2, exchanged numerous text messages that were recovered from ORONA-RODRIGUEZ’s phone following execution of the April 10, 2025, search warrant. I have not reviewed every one of those text messages; however, among the messages that I have reviewed, the messages appear to primarily concern distribution of controlled substances. I have included some content of text messages communication between ORONA-RODRIGUEZ and the CUST2 phone. Based on my training, experience, and the context of these communications, I submit that there is probable cause to believe that ORONA-RODRIGUEZ’s role within these messages is a drug dealer, and CUST2 is a customer purchasing drugs from ORONA-RODRIGUEZ.

44. The following text message exchange took place on or about January 1, 2025 between CUST2’s phone and ORONA-RODRIGUEZ (x1379 number). I have left some messages

out to streamline the conversation, and there are multiple messages related to drug trafficking between the two users.

DIRECTION	USER	MESSAGE
Incoming	CUST2	Yo can i link u tomorrow for half a O
Incoming	CUST2	Yo u out and about brotha
Outgoing	X1379	Ima be at the after at 12:30
Incoming	CUST2	Yo is the spot open ??
Outgoing	X1379	296 S academy is the new location

45. Based on my training and experience, I understand that when the user of the CUST2 phone asks for “. . . half a O . . .” he/she is referring to half an ounce of cocaine. I further understand ORONA-RODRIGUEZ’s response as implicitly agreeing to supply that amount of cocaine. ORONA-RODRIGUEZ provided a location for the completion of the transaction, “296 S academy”, I know to be the address of Warike.

46. The following text message exchange took place on or about October 3, 2024, between CUST2’s phone and ORONA-RODRIGUEZ:

DIRECTION	USER	MESSAGE
Incoming	CUST2	Yo i’m back ... need two on Monday
Outgoing	X1379	Two what?
Incoming	CUST2	Os
Incoming	CUST2	17? Same as last time ?
Incoming	CUST2	Or somehow did the price get even better lol
Outgoing	X1379	Prices are going up

Incoming	CUST2	Por qué
Outgoing	X1379	Because shit is getting expensive lol
Incoming	CUST2	Can we do this price one more time ?
Outgoing	X1379	They are giving me two for 1800, all Shit is gone
Incoming	CUST2	lol I feel that
Incoming	CUST2	Tomorrow i'm ready for that one
Outgoing	X1379	Just one

47. Based on my training, experience and the context of these communications, I understand that the user of the CUST2 phone contacted ORONA-RODRIGUEZ and requested to purchase two ounces (“Os”) of an unspecified controlled substance, and asks whether the price would be \$1,700 per ounce (“17”). I know that \$1,700 is consistent with the price of two ounces of cocaine in this area at the time of this exchange. I further understand from the context of this communication that ORONA-RODRIGUEZ had sold two ounces of cocaine for \$1,700 to the user of the CUST2 phone on a previous occasion (“Same as last time?”). I understand ORONA-RODRIGUEZ’s response to indicate that the price of cocaine had increased and that he would charge the user of the CUST2 phone \$1,800 for two ounces of cocaine. In response, CUST2 indicates that he/she will only purchase one ounce of cocaine (“Just one”).

Messages about drug trafficking with CUST3

48. ORONA-RODRIGUEZ and another individual, identified herein as CUST3, exchanged numerous text messages that were recovered from ORONA-RODRIGUEZ’s phone following execution of the April 10, 2025, search warrant. I have not reviewed every one of those text messages; however, among the messages that I have reviewed, the messages appear to

primarily concern distribution of controlled substances. Based on my training, experience, and the context of these communications, I submit that there is probable cause to believe that ORONA-RODRIGUEZ's role within these messages is a drug dealer, and CUST3 is a customer purchasing drugs from ORONA-RODRIGUEZ.

49. The following text message exchange took place on or about January 4, 2025 between CUST3's phone and ORONA-RODRIGUEZ (x1379 number). I have left some messages out to streamline the conversation, and there are multiple messages related to drug trafficking between the two users.

DIRECTION	USER	MESSAGE
Incoming	CUST3	I'm at the club rn
Outgoing	X1379	How much for half of zip
Incoming	CUST3	For you
Outgoing	X1379	Yeah
Incoming	CUST3	500
Outgoing	X1379	450?
Outgoing	X1379	Lol
Incoming	CUST3	Your killing me smalls

50. Based on my training, experience, and the context of these communications, I believe that the user of the CUST3 phone contacted ORONA-RODRIGUEZ to inform him that he/she was at the "club" (likely at Warike) and wished to purchase .5 ounces of cocaine from ORONA-RODRIGUEZ. From my training and experience, I know that "zip" is a common slang term for an ounce. I understand ORONA-RODRIGUEZ's response, 500, to indicate that he would be willing to sell the user of the CUST3 phone a half-ounce of cocaine for \$500, and the user of

the CUST3 phone then attempted to negotiate the price. I am aware that \$500 was consistent with the market price of a half-ounce of cocaine at the time of this communication and in this area.

Summary of Count 1

51. Based on the foregoing, I respectfully assert that there is probable cause to believe that the elements of 21 U.S.C. § 846 are satisfied as to RODRIGUEZ:

- a. On or about between September 16, 2024 and April 9, 2025, ORONA-RODRIGUEZ and CONSP1, agreed to violate the federal drug laws;
- b. ORONA-RODRIGUEZ knew that the essential objective of the conspiracy, *i.e.* to distribute cocaine, a Schedule II controlled substance;
- c. ORONA-RODRIGUEZ knowingly and voluntarily involved himself in the conspiracy, including by voluntarily reaching out to his suppliers to obtain distribution quantities of cocaine and then redistributing that cocaine to others; and
- d. There was interdependence among members of the conspiracy in that CONSP1 and ORONA-RODRIGUEZ acted for their shared mutual benefit in distributing cocaine for profit.

***April 22, 2025 Sale of Cocaine to an Undercover DEA Agent
(Count 2)***

52. On or about the week of April 21, 2025, the FBI and Drug Enforcement Administration (DEA) conducted a controlled purchase of cocaine from ORONA-RODRIGUEZ. That transaction occurred in the immediate vicinity of ORONA-RODRIGUEZ's residence in Colorado Springs, Colorado. That location is within the District of Colorado.

53. Among others, a DEA undercover ("UC") was witness to the purchase. In summary, investigators pre-arranged for the purchase of .5 ounces of cocaine from ORONA-RODRIGUEZ after contacting him using the x1379 phone number.

54. On April 22, 2025, an individual whose identity is known to me (CS-1) contacted ORONA-RODRIGUEZ using phone number x1379 and requested to purchase .5 ounces of cocaine. This is not the first time CS-1 has purchased cocaine from ORONA-RODRIGUEZ, and CS-1 used language consistent with his/her previous purchases.

55. Based on those messages, CS-1 and the UC traveled to ORONA-RODRIGUEZ's residence by car. I have withheld the address of that residence for privacy. In advance of the transaction, I checked both the vehicle and CS-1 to ensure that neither had any controlled substances or other contraband in advance of the transaction.

56. Once in front of the house, ORONA-RODRIGUEZ exited the residence and entered the vehicle with the UC and CS-1. CS-1 provided ORONA-RODRIGUEZ with US Currency supplied in advance by the FBI. In response, ORONA-RODRIGUEZ handed CS-1 (in the presence of the UC) a plastic baggie containing a white powdery substance.

57. ORONA-RODRIGUEZ then exited the vehicle, and the UC and CS-1 drove away.

58. The UC and CS-1 drove to a pre-arranged location and met with investigators. Once there, investigators recovered the plastic baggie with a white powdery substance from CS-1.

59. The substance within the plastic baggie tested presumptively positive for the presence of cocaine, and had a net weight of approximately 43.6 gross grams (including packaging). A DEA Agent submitted that substance to the DEA's Western Laboratory for final testing, but I have not yet received the results of that testing.

60. Based on my training and experience, I know that cocaine is a Schedule II controlled substance within the meaning of the law.

61. Based on the facts in this section, I respectfully submit that there is probable cause to believe that the elements of 21 U.S.C. § 841(a)(1) and (b)(1)(C) are satisfied as to ORONA-RODRIGUEZ:

- a. On or about April 22, 2025, ORONA-RODRIGUEZ knowingly or intentionally distributed cocaine, a Schedule II controlled substance, to the UC; and
- b. The substance was in fact cocaine.

Additional Means and Methods Used by ORONA-RODRIGUEZ

62. In addition to the text messages recited above, investigators also recovered text messages on ORONA-RODRIGUEZ's cell phone related to the unlawful sale of firearms. The following images and text messages relate to the sale of firearms to an illegal alien present without admission in the United States, identified herein as "ALIEN1."

63. Throughout September 2024, ORONA-RODRIGUEZ engaged in the following text message exchange with a phone associated with ALIEN1. I believe that ALIEN1 was attempting to purchase a gun through ORONA-RODRIGUEZ by paying partially in cocaine, and partially in cash. Throughout the series of these message, ORONA-RODRIGUEZ sent ALIEN1 several photos and videos of firearms that appear to be available for ALIEN1 to purchase from ORONA-RODRIGUEZ. I have included some, but not all of those photographs below.

64. The following messages occurred on or about September 5, 2024, between the x1379 phone associated with ORONA-RODRIGUEZ and the phone associated with ALIEN1. I have also included the original Spanish text below, as well as a translation provided to me by an FBI linguist

DIRECTION	USER	MESSAGE (SPANISH)	MESSAGE (TRANSLATED)
Incoming	ALIEN1	Dile k si acepta coca	Ask him if they accept cocaine.
Outgoing	X1379	El quiere 500 en efectivo	He wants 500 in cash.
Outgoing	X1379	Me dijo que no tenía nadie que le guste lo blanco	He told me that he doesn't have anyone who likes the white stuff.

65. As mentioned above, on or about September 6 of 2024, the user of ORONA-RODRIGUEZ's phone sent the following photographs/videos to the user of the ALIEN1 phone with a text message suggesting the below handgun was available for sale:



Screen shots of a video showing a pistol with a high-capacity magazine for sale



Screen shots of a video showing a pistol with a high-capacity magazine for sale

66. Also on or about September 6, 2024, the user of ORONA-RODRIGUEZ's phone sent ALIEN1 another photo of a Glock pistol.

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67. On or about September 7, 2024, the user of ORONA-RODRIGUEZ's phone sent the following photo to the user of the ALIEN1 phone with the included text message (translated from Spanish to English by a FBI linguist): "Hey está no es Glock pero es una p80 es similar, es la única que puede conseguir", with a translation of "Hey, this isn't a Glock, but it's a P80, which is similar. It's the only one I could get".

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68. Based on my training, experience, and knowledge the context of these communications, I understand that the user of the ALIEN1 phone contacted to ask whether an unspecified third-party would accept cocaine as payment for a then-unspecified item. I further understand ORONA-RODRIGUEZ's response as indicating that the third party would not accept cocaine as payment, instead asking for \$500. I further understand the photographs that ORONA-RODRIGUEZ sent to the user of the ALIEN1 phone between September 5 and 7, 2024, as evidencing the subject of the transaction, namely a firearm.

CONCLUSION

69. For the reasons described above, there is probable cause to believe that JUAN GABRIEL ORONA-RODRIGUEZ committed violations of 21 U.S.C. § 846 and 21 U.S.C. § 841(a)(1) and (b)(1)(C).

70. As such, I respectfully request the Court issue a criminal complaint and a corresponding arrest warrant for JUAN GABRIEL ORONA-RODRIGUEZ.

71. I, Andrew Cohen, a Special Agent with the FBI, being duly sworn, hereby depose and state that the above-mentioned information is true to the best of my information, knowledge, and belief.

s/ Andrew Cohen
Andrew Cohen, Special Agent
Federal Bureau of Investigation

Submitted, attested to, and acknowledged by reliable electronic means before me on this 30th day of April, 2025.

**Timothy P.
OHara**

Digitally signed by
Timothy P. OHara
Date: 2025.04.30 19:35:48
-06'00'

HON. TIMOTHY P. O'HARA
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF COLORADO

Affidavit reviewed and submitted by Assistant United States Attorney Michael F. Houlihan