

**AFFIDAVIT**

I, Stephanie A. Romo, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

I am a Special Agent ("SA") with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been a Special Agent for approximately four years. As a Special Agent, I have received training in federal firearms and narcotics laws and regulations at the ATF National Academy and Federal Law Enforcement Criminal Investigator Training Program. I regularly refer to state and federal firearms and narcotics laws and regulations during the course of my duties. I have received a Bachelor of Arts degree in Sociology. During my employment with ATF, I have participated in a variety of investigations, to include those regarding unlawful sales, possession, manufacturing, transportation, and importation of firearms, as well as those regarding unlawful sales, possession, transportation, and importation of narcotics. I have participated in several aspects of those investigations, including surveillance and the execution of search and arrest warrants. Additionally, I have worked in an undercover capacity for ATF on investigations related to individuals selling narcotics and firearms. I am currently assigned to the ATF Long Beach Field Office.

## II. PURPOSE OF AFFIDAVIT

This affidavit is being submitted for the purpose of establishing probable cause in support of a criminal complaint and issuance of an arrest warrant for Adelina Cristobal ("CRISTOBAL") and Antonio Quevedo, also known as "Kora," aka "Korita" ("QUEVEDO"), for violations of 18 U.S.C. § 1958(a): conspiracy and use of interstate commerce facilities in the commission of murder-for-hire, that is, a murder that would constitute a violation of California Penal Code Section 187.

This affidavit does not include all the facts that have been learned during the course of the investigation. When the contents of documents or statements of others are reported herein, they are reported in substance and part unless otherwise indicated

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. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of 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.

### **III. STATEMENT OF PROBABLE CAUSE**

1. On or about January 22, 2013, I received a call from a confidential informant ("CI"). This CI has been working with ATF and the Los Angeles Police Department ("LAPD") for approximately three years as a paid informant and has participated in approximately seven ATF investigations and approximately ten LAPD investigations, in which he has been directed to conduct controlled undercover purchases of drugs and firearms. The CI has also provided law enforcement with information about targets suspected of distributing drugs or firearms. I have found him to be reliable as an informant, in which information he has provided me has been independently corroborated.<sup>1</sup> In this particular investigation, all but two substantive phone calls between the CI and the targets were recorded, and all in-person meetings between the CI and the

---

<sup>1</sup> The CI has no prior felony convictions and is working for monetary compensation, not for relief from any prosecution. To my knowledge he has not engaged in unauthorized criminal activity during the period he has worked as an informant. I was recently notified by an LAPD officer that an LAPD informant identified the CI as a suspect in an alleged homicide. However, none of the allegations, including the homicide itself, have been verified. In an abundance of caution, however, I note that the probable cause basis for this affidavit relies on information obtained independent of the CI's statements to me in debrief, such as recorded conversations that I or other agents simultaneously monitored and the observations of the undercover agent.

targets were both recorded and also attended by an undercover agent, who was also equipped with a recording device.

2. On or about January 22, 2013, the CI told me that he had just received a call from QUEVEDO. QUEVEDO asked the CI if the CI or someone he knew would be willing to commit a murder-for-hire for a husband and wife in exchange for \$5,000.

3. At my direction, the CI placed a recorded call to QUEVEDO, in which the CI stated his interest in participating in the murder-for-hire. When the CI asked for details, QUEVEDO said he would introduce the CI to "her," referencing the wife, and that she would provide the CI with all the details. They agreed that the CI would pick QUEVEDO up at QUEVEDO's residence in Hawthorne, California, the next evening, and they would meet the wife and husband at the restaurant that they own in Lawndale, California.

4. On January 23, 2013, the CI, accompanied by an undercover surveillance team, drove to QUEVEDO's residence, but QUEVEDO was not there, and the operation was cancelled.

5. The next day, on January 24, 2013, during a recorded and monitored phone call between the CI and QUEVEDO, QUEVEDO apologized for missing the meeting the previous night, and they arranged for the CI to pick QUEVEDO up in the evening to meet with the wife and husband at the restaurant.

6. In the evening of January 24, 2013, the CI, equipped with a video recording device, and ATF Task Force Officer ("TFO") Robledo, posing undercover as the intended "hit man" (the "UC"), also equipped with a video recording device, picked QUEVEDO up from a barber shop in Hawthorne, accompanied by an undercover surveillance team. QUEVEDO got into the front passenger seat of the CI's car and directed the CI to drive to Mar de Oro, a restaurant on Hawthorne Boulevard in Lawndale, California.

7. After they parked in the restaurant parking lot, QUEVEDO went inside. He returned and got back into the front passenger seat and told the CI and the UC that the woman, later identified as ADELINA CRISTOBAL ("CRISTOBAL"), was not at the restaurant yet. They waited for approximately 10 minutes, then CRISTOBAL drove into the parking lot. She got out of her car and got into the CI's car next to the UC in the back seat.

8. In the ensuing recorded conversation,<sup>2</sup> QUEVEDO introduced the UC and the CI to CRISTOBAL as "the guys I told you about." CRISTOBAL introduced herself as "Adelina."

9. She stated that her husband, later identified as Carlos Hernandez ("HERNANDEZ") was aware of the plan, but her

---

<sup>2</sup> The conversation was in Spanish. The UC is fluent in Spanish. I have relied on the UC's description and debrief to me of the conversation.

daughter, who was working that night in the restaurant, was not. She asked that the CI re-park the car farther from the restaurant's entrance to avoid having her daughter see her. The CI did so.

10. CRISTOBAL identified the intended victim as HERNANDEZ's nephew, later identified as Samuel Juan (the "victim"). CRISTOBAL said that she wanted the victim killed because the victim owed her money, the victim was romantically involved with her daughter, and that the victim had threatened HERNANDEZ, causing HERNANDEZ to have a minor stroke, resulting in hospitalization.

11. The UC asked CRISTOBAL if her husband, HERNANDEZ, was aware of the plan. CRISTOBAL responded yes, that HERNANDEZ was going to provide the money for the hit.

12. CRISTOBAL then provided the UC with details about the victim, including his name, his physical description, and his age.

13. CRISTOBAL said that she had the victim's photograph and address and ID in her purse, which she had left in her car. She said she could not go get her purse without her daughter spotting her.

14. CRISTOBAL then pulled out her phone, searched in her cell phone's contacts, looked up a contact that the UC saw was listed "Sam," and read the phone number to the UC.

15. After receiving the details about the victim, the UC asked CRISTOBAL: "Do you want it quick or do you want me to do it slow," referring to the intended murder, and also asked whether she wanted the victim to know that she had ordered the hit. CRISTOBAL responded yes and told the UC to tell the victim: "This is so you remember not to get involved with my daughter and me."

16. At that point, the UC asked CRISTOBAL if she really intended to go through with the murder. CRISTOBAL said that she had reached out to QUEVEDO for this purpose, in fact on numerous occasions, and thanked QUEVEDO for coming through. QUEVEDO said, "I told you, Senora, that these guys are the real deal." Also during the conversation, QUEVEDO and CRISTOBAL discussed reaching out to other individuals for the job, and that QUEVEDO had told CRISTOBAL not to hire anyone else until she had met with the CI and the CI's associate, that is, the UC.

17. The UC then asked CRISTOBAL if she had a firearm or if she wanted him to use his own. CRISTOBAL indicated that she and HERNANDEZ did not have firearms, which was why they were looking for someone to help. She again stated that HERNANDEZ was aware of the conspiracy, but she did not want her daughter to find out.

18. The UC then asked CRISTOBAL how much she was willing to pay. She responded that she had told QUEVEDO that she would

pay \$4,000. QUEVEDO said that they had discussed \$6,000 as a fair price. CRISTOBAL repeated that she could pay \$4,000. The UC said that \$4,000 was too low because he had to pay the "driver," meaning the CI, and possibly also QUEVEDO for brokering the meeting. CRISTOBAL then agreed that she would pay the UC \$6,500, adding that the UC need not pay QUEVEDO because she would pay QUEVEDO \$500 herself.

19. CRISTOBAL agreed to pay the UC \$500 as a deposit. She said that she did not have any money on her, and that she had her ATM card in her purse in her car. She said that she did not want to go into the restaurant to get her husband's bank card because she did not want her daughter to see her. QUEVEDO suggested that the CI go into the restaurant and retrieve \$500 from HERNANDEZ. CRISTOBAL pulled out her phone, SUBJECT DEVICE #2, and began texting, then said out loud that she was texting HERNANDEZ that she needed \$500 and that it was urgent.

20. After waiting a bit, CRISTOBAL said that HERNANDEZ was not responding to her text message and that she could not call him at the restaurant without alerting her daughter.

21. The UC stated that he needed \$2,500 up front and that she could pay him the rest afterwards. CRISTOBAL then made a call on her phone to an unknown person. The call was conducted in Nahuatl, a Native Mexican dialect. The UC asked QUEVEDO what



CRISTOBAL was saying, and QUEVEDO said she was asking the person for money.

22. After CRISTOBAL hung up, she said they should go to her brother's apartment to pick up \$500. She directed the CI to drive them to an apartment complex in the area of Prairie Avenue and Rosecrans Avenue. On the way there, QUEVEDO provided directions to the CI and directed him to take shortcuts through side streets.

23. During the drive, CRISTOBAL and the UC exchanged phone numbers and agreed to use those numbers to communicate about the murder.

24. Then CRISTOBAL asked: "You guys aren't going to leave the body there?" QUEVEDO said: "No, we'll make it disappear," and suggested they would take the body to Tijuana. CRISTOBAL then said to the UC: "After you make it [the body] disappear, you need to get rid of your phone because my daughter is very good with phones."

25. When they arrived at the apartment complex, CRISTOBAL went inside. A few minutes later, she got back into the car and handed \$500 in United States currency to the UC. The UC said that she could still change her mind and he would give her back the money, but she again insisted that she wanted it done. The UC then extended his hand and said, "Once we shake hands to seal

the deal, the deal will be done." CRISTOBAL took the UC's hand, looked him in the eye, and thanked him.

26. On the way back to the restaurant, CRISTOBAL then said that she just remembered she had a photograph of the victim in her phone. The UC asked if she would send it to him. She agreed and pulled out her phone to text message a photo of the victim to the UC's phone. The UC confirmed receipt of the photo, which appeared to be a photo from a driver's license. The photo was later confirmed to be that of the victim.

27. The UC asked CRISTOBAL if she wanted photos of the victim's body "after it's done," and she said yes. The UC said he would spend the \$500 on a firearm. The UC asked if she could pay him \$2,500 later that night; she said she would not have the money until Saturday, January 26, 2013. They agreed they would meet on Saturday for the UC to pick up the \$2,500.

28. CRISTOBAL got out of the CI's car near the restaurant. The CI, QUEVEDO, and the UC drove away from the restaurant. Surveillance units saw CRISTOBAL go into the restaurant. Shortly thereafter, she and her daughter came out of the restaurant, got into her car, and began to drive out of the parking lot. At that point, law enforcement surrounded her car and arrested CRISTOBAL.

29. Agents followed the CI's car away from the parking lot. Shortly thereafter, police stopped the car and QUEVEDO was arrested.

30. After her arrest, CRISTOBAL was advised of her rights, which she orally waived. She stated that she did intend to target the victim because she was angry about his relationship with her daughter, although she claimed she had meant only to have him beat up.

31. I spoke with both the victim and CRISTOBAL's daughter after CRISTOBAL's arrest. They both confirmed that CRISTOBAL and HERNANDEZ were upset about their relationship. The victim said that he had spotted CRISTOBAL following him recently in Santa Monica. They both described a recent incident in which CRISTOBAL and HERNANDEZ secretly followed their daughter to a meeting with the victim, whom they then confronted and ordered to stay away, and CRISTOBAL slapped the victim across the face.

32. From my review of the above facts, I believe that CRISTOBAL and QUEVEDO intended for the UC to murder the victim such that this murder would constitute a violation of California Penal Code Section 187.

**IV. CONCLUSION**

33. For all the reasons described above, there is probable cause to believe CRISTOBAL and QUEVEDO<sup>3</sup> have committed violations of 18 U.S.C. § 1958(a): conspiracy and use of interstate commerce facilities in the commission of murder-for-hire.

---

STEPHANIE A. ROMO, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms & Explosives

Subscribed to and sworn before me  
this \_\_\_\_ day of January, 2013.

---

HONORABLE  
UNITED STATES MAGISTRATE JUDGE

---

<sup>3</sup> At this time, I have not charged HERNANDEZ in this complaint, as I have not been able to corroborate CRISTOBAL's statements that HERNANDEZ was a knowing and willing co-conspirator. Should I obtain such corroborating evidence, I will consider seeking a complaint against HERNANDEZ.