

UNITED STATES DISTRICT COURT

for the

District of Idaho

United States of America

v.

IVAN TELLEZ

Case No.

1:25-mj-00263-DKG

Defendant(s)

CRIMINAL COMPLAINT

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

On or between the date(s) of June 2025 and September 2025 in the county of Canyon in the
 District of Idaho, the defendant(s) violated:

Code Section

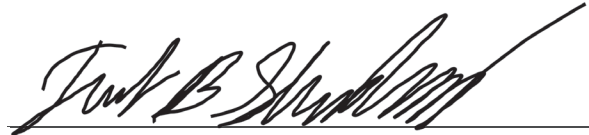
18 U.S.C. §§ 1955

Offense Description

Prohibition of Illegal Gambling Business

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent, Jake Sheridan, Federal Bureau of Investigations

☒ Continued on the attached sheet.

Complainant's signature

Jacob Sheridan

Printed name and title

Subscribed and Sworn to me via zoom.

Date: 10/15/2025

*Judge's signature*City and state: Boise, Idaho

Debora K. Grasham, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jacob Brian Sheridan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 of the United States Code. I have been employed by the FBI since August 1, 2021. I have received five months of training in criminal investigations and related legal matters at the FBI Training Academy in Quantico, Virginia. In my time as a Special Agent, I have gained experience in conducting investigations into federal criminal activity in the subject areas of violent crime, public corruption, white collar crime, and organized crime, to include drug trafficking, firearm violations, and illegal gambling. Furthermore, I have used investigative techniques including but not limited to electronic surveillance, physical surveillance, witness interviews, informant and undercover operations, and federal arrest and search warrants. Many of these investigations have been joint operations between federal and local agencies.
2. I make this affidavit in support of a criminal complaint to arrest and charge Ivan TELLEZ for violations of 18 U.S.C. § 1955 (illegal gambling).
3. The statements contained in this affidavit are based, in part, on information I have obtained during investigative activities. The statements are also based on law enforcement database searches, as well as my experience, training and background as a special agent with the FBI. Because this affidavit is submitted for the limited purpose of securing authorization for the requested criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause for the requested warrant.

STATUTORY AUTHORITY

4. As noted above, this investigation concerns violations of 18 U.S.C. § 1955 (illegal gambling). Title 18, United States Code, Section 1955 proscribes the prohibition of an illegal gambling business:
 - a. The defendant conducted, financed, managed, supervised, directed or owned all or part of a gambling business; and
 - b. that such gambling business violated the laws of the state(s) in which it was conducted; and
 - c. involved five or more persons who conducted, financed, managed, supervised, directed or owned all or part of said illegal gambling business; and
 - d. has been or remained in substantially continuous operation for more than 30 days, or had a gross revenue of \$2,000 or more on any single day.

PROBABLE CAUSE

Background

5. In February 2025, Special Agents of FBI Boise received a tip from a private citizen concerning a horse racetrack in Wilder, Idaho. The reporting party informed Agents that gambling was occurring at these horse races and that Ivan TELLEZ owned the property in Wilder, Idaho. During the investigation, Agents learned TELLEZ ran a horse track on the property called La Catedral Arena. La Catedral Arena is one of three registered businesses on TELLEZ's property. Based on the investigation to date, investigators believe the following people are involved in the illegal gambling business operating at La Catedral Arena:
 1. Samuel Bejarano – is the bookmaker and administrator of the illegal gambling operation;

2. Ivan TELLEZ - owner of the property facilitating the illegal gambling operation at La Catedral Arena (horse races occur), administer of the operation, and horse owner and “committee” member;
3. Dayana Fajardo - assists in taking wagers and paying/collecting the proceeds of the illegal gambling on race day;
4. Two backpack couriers¹ - take wages on race day prior to each race
 - Courier 1 – Cesar Iniguez Orozco
 - Courier 2 – Alejandro Torres Estrada; and
5. Horse owners - providing the horses used to race and managing decision making authority over race organization and dates, number of betting pools, and race entry requirements. Bejarano and TELLEZ refer to the horse owners as “the committee.” There are between six to eleven horse owners involved in the “committee” and the illegal gambling business.
6. Around the same time, a Confidential Human Source (Hereafter CHS-1) informed Agents that horse races were being held in both Emmett and Wilder, Idaho. CHS-1 is cooperating with the FBI out of a desire to assist law enforcement in investigating some individuals the CHS-1 believes be a danger to the local community. CHS-1 is not currently pending any state or federal criminal charges. No offers or promises have been made to the CHS-1, and the CHS-1 is currently not receiving monetary compensation from the FBI. The CHS-1 has minimal criminal history, which includes convictions for petty theft and driving without a license. CHS-1 does not have any felony convictions.
7. CHS-1 informed Agents that TELLEZ was organizing the races at La Catedral Arena, and that people were placing bets on the races. The type of gambling occurring at La Catedral Arena is called parimutuel betting. Parimutuel betting is a form of gambling often used in horse racing. In parimutuel betting, bets of a similar type are pooled together with the potential for larger payouts

¹ Couriers were both identified via driver’s license photos, recorded undercover (UC) footage, vehicle registrations, and UC observations during previous races.

and the ability to bet on multiple aspects of a sporting event rather than just picking the winner of an event.

8. TELLEZ has a conditional use permit from Canyon County to hold horse racing events at La Catedral Arena. Agents have confirmed through the Idaho State Racing Commission, that TELLEZ has never applied for a license to conduct parimutuel betting (a form of gambling) at La Catedral Arena. Furthermore, TELLEZ's event permit application includes a letter from the Idaho Racing Commission which specifically prohibits parimutuel betting activities during any event held at La Catedral Arena. Therefore, all parimutuel betting occurring at La Catedral Arena is illegal under Idaho law,² and as a result, federal law.

Ivan TELLEZ

9. Based on information obtained through law enforcement databases, Ivan TELLEZ is a permanent resident here in the United States legally. His date of birth is October 27, 1987. TELLEZ is known to reside at 27410 Peckham Road, Wilder, Idaho. This is the property that La Catedral Arena is located. The following is a photograph Ivan TELLEZ:

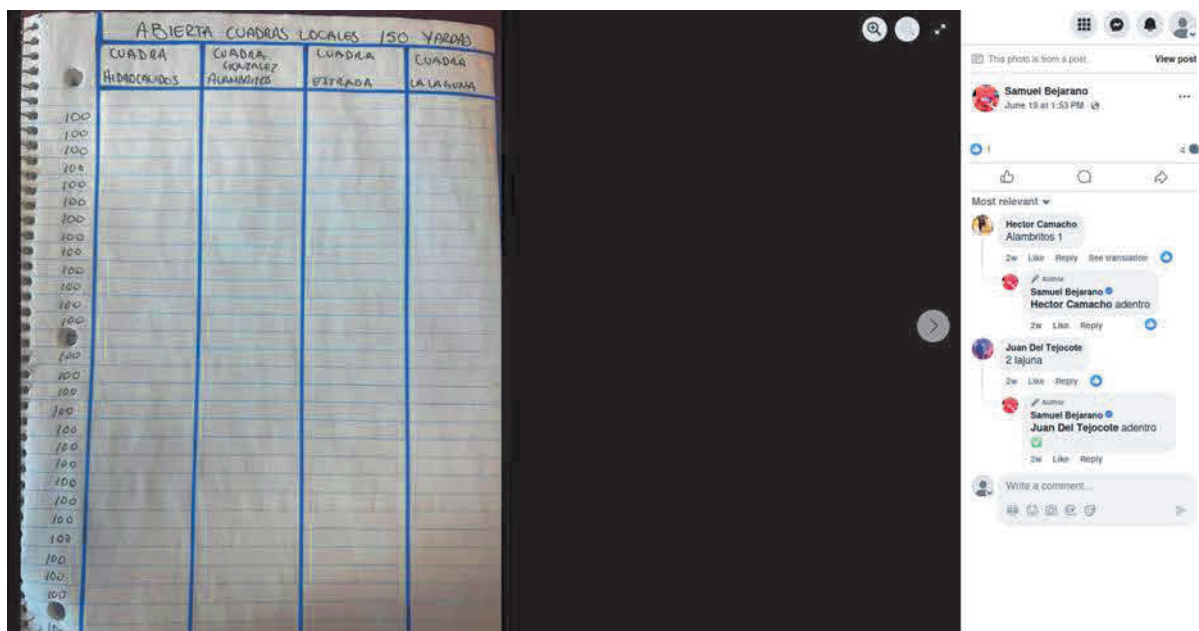


² Article III of the Idaho Constitution generally prohibits gambling. Idaho Const. art. III, § 20. One exception is pari-mutuel betting if conducted in conformity with enabling legislation. "Parimutuel" is "any system whereby wagers with respect to the outcome of a race are placed with, or in, a wagering pool conducted by a person licensed or otherwise permitted to do so under state law, and in which the participants are wagering with each other and not against the operator." See Idaho Code (I.C.) § 54-2502(8). To conduct parimutuel betting, a license must be obtained by the Idaho State Racing Commission. See I.C. § 54-2512. Furthermore, I.C. § 18-3802 prohibits unlicensed gambling in the State of Idaho.

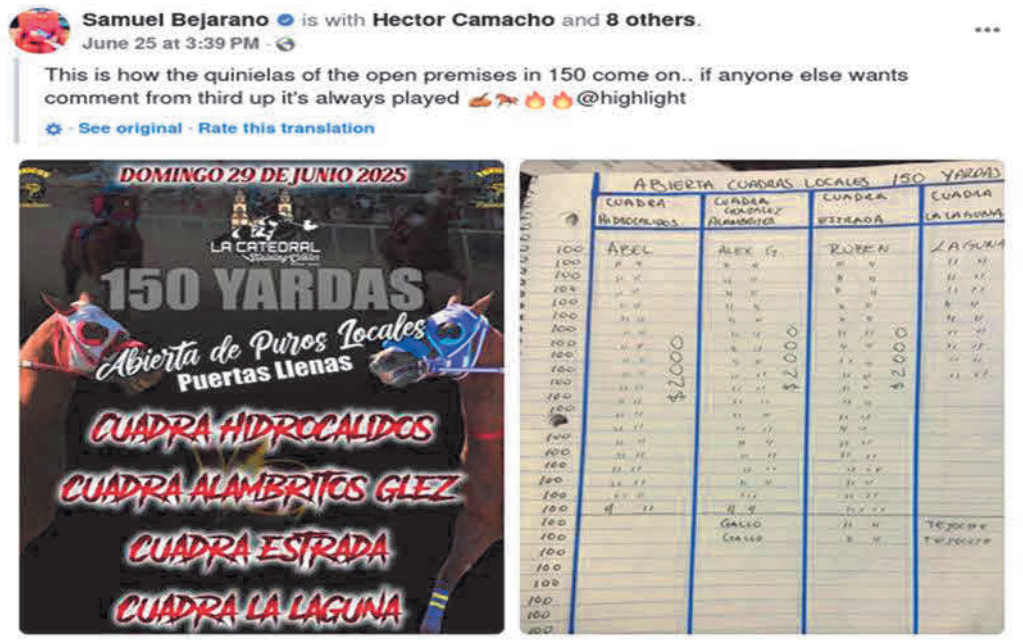
10. During toll analysis of Ivan TELLEZ's known cellular telephone number, (208) 318-8094, an Oregon cellular telephone number, (541) 709-4340, which TELLEZ's number was in contact with, was identified as belonging to Samuel Bejarano. Bejarano was one of TELLEZ's top 10 most frequent contacts. Open-source research resulted in the identification of Bejarano's Facebook account.

Facebook Account of Bejarano

11. FBI Boise personnel were able to locate the Facebook account of Bejarano. Bejarano has posted publicly on Facebook almost monthly, regarding the illegal gambling operation taking place at the horse races held at La Catedral Arena. On June 19, 2025, the following photo was publicly posted to Bejarano's Facebook account:



12. The above notebook sheet appears to be a betting bracket with \$100 betting increments. The word "Cuadra," as used above, is the Spanish word for "stable" or "a string of horses." Following this post, an account labeled "Juan Del Tejocote" requested "2 lajuna" which likely refers to two wagers on the stable "Cuadra La Laguna."
13. On June 25, 2025, Bejarano posted the following:



14. In the lower right corner of the betting sheet posted, appears two \$100 wagers on Cuadra La Laguna for an individual with the name “Tejocote.” This shows that Bejarano has granted Juan Del Tejocote’s earlier request for two wagers to be placed on Cuadra La Laguna for an upcoming horse race. Furthermore, the sheet is filled out with the names of other gamblers who have placed wagers on the horse race, with wagers ranging from \$1,000 to \$2,000.
15. At the top of the banner on the left, the location of the race is titled, “La Catedral Training Center.” As previously mentioned, La Catedral Arena, LLC. is a business registered to TELLEZ and the known name of the horse racetrack operated on his property in Wilder, Idaho. TELLEZ has never submitted an application to be licensed by the Idaho State Racing Commission to conduct parimutuel betting at La Catedral Arena. Therefore, all gambling taking place at horse races held at La Catedral Arena is illegal under state law, and subsequently federal law.
16. There is a key word used in the June 25, 2025, Facebook post that indicates the poster is specifically talking about gambling on horse races. The word “Quiniela” is a Spanish/English (English spelling “Quinella”) word that only refers to a specific type of wager that can be placed on horse races under the parimutuel system of betting. A quiniela wager is when a gambler bets on which horses will finish first and second in a race, or possibly which stables will place first and second over the course of a racing meet.

17. Subpoenaed financial records show that Bejarano is receiving gambling wagers for the horse races via electronic money services, such as Venmo and Zelle, which are linked to his checking account with Idaho Central Credit Union. Current subpoenaed records for both Zelle, Venmo, and Cash App show approximately 36 transactions that investigators believe, for the following reasons, to be wagers for horse racing. First, the dates of the transactions are spread throughout the horse racing seasons (May to October) of 2023, 2024, and 2025, with the most recent being July 27, 2025. Second, these transactions were identified and filtered out from the rest of the account transactions by filtering for any notes or memos containing the word “Quiniela” or a spelling variation of it. The resulting 36 transactions containing “Quiniela” total approximately \$17,000 in wagers on horse races. Investigators believe this amount is a fraction of the amount of illegal wagers that Bejarano’s gambling operation has facilitated over the last two years. Additionally, these 36 transactions are a small sample from the large volume of transactions conducted through Bejarano’s financial accounts from 2023 to 2025. Further, based on law enforcement investigation, it does not appear that Bejarano has any lawful employment.

Search Warrant return with Facebook messages of Bejarano

18. On September 17, 2025, the Honorable Debora K. Grasham signed a federal search warrant for the contents of Bejarano’s Facebook account. *See* 1:25-mj-00238-DKG, ECF 4. Upon return of the search warrant for Bejarano’s Facebook account, investigators located messages where Bejarano is engaged in discussions related to, and accepting bets on, future horse races. For example, Bejarano frequently posts updated betting brackets in his Facebook messages to bettors, such as the July 2025 betting brackets for one of the four race heats below:

[illegible]

19. A July 2025 message thread obtained from Bejarano’s Facebook account, which took place from July 14 through July 27, details a conversation between Bejarano, TELLEZ, and eleven horse owners who regularly compete in the races at La Catedral Arena. These individuals are referred to by TELLEZ and Bejarano as the “committee.” Based on the content of the conversation, it is evident that TELLEZ and these 11 horse owners, with Bejarano, are responsible for deciding the dates that races are held, what horses can compete, what horse owners can run their horses at La Catedral Arena, what horses run in what heats, the cost to owners to compete, the minimum wager required for owners, how many betting pools Bejarano will create for each race, and a host of other operational aspects of the races. The below excerpts from that conversation have been translated by Spanish-speaking law enforcement officers from the original Spanish message into English.
- a. On July 14, 2025, Bejarano wrote: “Cuadra el hermano dice que el se sale del maturity quiere su depósito de \$2000 Por que el dice que está cumplido con las reglas Pero que si no quieren dejarlo jugar quiere su depósito y que \$3000 por qué ya invirtió en su caballo. Así que la decisión de no dejarlo jugar fue de todas en este caso yo como organizador y para no tener problema ocupo llegar a una solución hoy mismo.”

- *In English: “el Hermano stable said wanted to remove his deposit of \$2000 from the Maturity because he said that he has fulfilled the rules and that if yall don’t want to let him race he wants his deposit and the \$3000 that he already invested on his horse. Since the decision to not let him race was from everyone (in this chat), in this case I, as the organizer and to not have problems in the future, want to find a solution today”.*
- b. Julio Almazan (Facebook: 100008025340472) replied, “ 🤔 ”
- c. Bejarano responded, “Entonces que se salga ? Pasó la puerta a otra cuadra ? Oh que se quede así!!
- *In English, “So what do i do? Let another stable in? Or just leave it be!!*
- d. Letty Loya Hurtado (Facebook: 100002228572552) replied, “En mi opinión las reglas son para todos, se habló muy claro y no es justo que a él se le regrese el dinero cuando ya está adentro y sabía los requisitos y al devolverle el depósito a él se están cambiando las reglas y van a empezar los problemas yo no estoy de acuerdo haber las otras cuadras que dicen”.
- *In English, “In my opinion the rules are for everyone, it was spoken very clearly and its not right that the money is returned to him when its already here and he knew the requirements and the return of the deposit to him it is changing the rules and that will create problems I am not in agreement lets see what the other stables say”.*
- e. Letty Loya Hurtado (Facebook: 100002228572552) then wrote: “Como dice la película ya no hay devoluciones”.
- *In English: “like the movies says no returns”.*
- f. Bejarano (Facebook: 100095006866641) responded: “Aquí está el mismo mensaje que les mandé a todos cuadras locales / con caballos locales A todos les mandé el mismo mensaje”

- *In English, “Here is the same message that I sent to all the local stables with horses I sent the same message to all”.*
- g. Julio Almazan (Facebook: 100008025340472) wrote: “Estoy de acuerdo con mi paisana Letty...”.
- *In English, “I am in agreement with my friend Letty...”.*
- h. Letty Loya Hurtado (Facebook: 100002228572552) replied: “Y está muy bien así todos coludos”.
- *In English, “and its very good that all collude”.*
- i. Bejarano (Facebook: 100095006866641) wrote: “Ese mensaje se los mandé a todos en cuanto me pedían la puerta y yo les confirmaba dejándoles saber las reglas a todos”
- *In English, “This message I sent to all when they asked for entry and I confirmed all the rules with them”.*
- j. Ruben Estrada (Facebook: 100005608538178) wrote: “Pues lo justo es que no se le regrese nada pero el está asiendolo como que nosotros lo estamos votando fuera yo por mi que se salga y así nos vamos! Solo trata de que se respete cuando me los dos mil (edited)”.
- *In English, “Well the fair thing is that nothing is returned but he is making it as if we voted him out I think that he should be out! Just that the two thousand should be respected”.*

[This conversation continues with others weighing in. Below is another part of this conversation regarding bets placed by the horse owners.]

- k. On July 15, 2025, Ruben Estrada messaged, “Mil en los 3 trials mios sam please”.
- *In English, “Thousand on my 3 trails sam please”.*
- l. Bejarano replied, “Adentro \$1000 Estrada hit 4 (checkmark emoji)”.
- *In English, “\$1000 down Estrada heat 4”*

m. Bejarano then stated, “Ya es tercia de \$1000 hit 4 Doble m/ melena Alacran Villanueva Estrada suerte (checkmark emoji)”.

- *In English, “It’s already a third of \$1000 hit 4 Double m/ malena Alacran Villanueva Estrada luck (checkmark emoji)”.*

n. Bejarano said, “Adentro \$2000 Estrada hit 2 (checkmark emoji)”.

- *In English, “\$2000 down Estrada heat 2 (checkmark emoji)”.*

o. Bejarano then stated, “Adentro \$2000 Estrada hit # 3 (checkmark emoji)”.

- *In English, “\$2000 down Estrada heat # 3”.*

p. Bejarano stated, “Adentro \$2000 Estrada hit # 4 (checkmark emoji)”.

- *In English, “\$2000 down Estrada heat # 4 (checkmark emoji)”.*

q. On July 17, 2025 Bejarano (Facebook: 100095006866641) wrote, “Quien guste más quinielas mándeme mensaje o comente aquí y les voy dejando saber cómo van muchas gracias 📩 @everyone”

- *In English, “Who would like more Quinielas send me a message or comment here and I will let you know how they go thanks @everyone”.*

r. Letty Loya Hurtado (Facebook: 100002228572552) reacted: “Letty reacted to your message”

20. There were also messages on Bejarano’s Facebook between Bejarano, TELLEZ, and other horse racing team owners, which took place in late August 2025. Bejarano messaged the group participants and advertised a 300-yard race between two horses, El Chavo and El Mosky. A Facebook account bearing the name Cuadra Centenario responded requesting a thousand-dollar bet on El Chavo. TELLEZ responded after Cuadra Centenario’s comment, stating words to the effect, “I’ll grab that.” This post appears to indicate TELLEZ is matching Centenario’s bet of \$1,000. The other participants in the conversation continue to place bets on the upcoming race by responding to Bejarano with what horse and amount they would like.

21. In late August 2025, an UC went to a horse race at La Catedral Arena. At the horse racing event there were betting couriers wearing backpacks and walking around the crowd at the horse races. Individuals would flag down the couriers and place cash in the backpacks. The UC observed Bejarano communicating and conducting hand-to-hand transactions of US Currency with the couriers.
22. In late September 2025, a second UC operation, involving two UCs) revealed the same backpack courier activity at the horse racing event. During the horse racing event, both UCs observed Fajardo conducting similar illicit activities as observed in August 2025. Fajardo was making and collecting bets using US Currency with various individuals within the crowd. In September 2025, Fajardo initiated a verbal debt with one of the UCs. At the conclusion of the race, Fajardo located the (UC) and collected her winnings. During that time, the UC observed Fajardo holding a large amount of US Currency in her left hand. The UC observed Fajardo using this large amount of US Currency to make change for those debts collected and/or what winnings she owed. Furthermore, video footage captured hand-to-hand exchanges between individuals carrying backpacks (Orozco and Estrada) and race attendees. Video footage captured by the UC also showed Bejarano, and his wife Fajardo, taking wagers from the UC on horse races.

TELLEZ's Financial Accounts

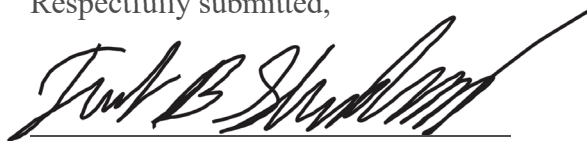
23. TELLEZ has made a significant number of cash deposits to three different bank accounts at Zions Bank. The cash deposits are so numerous over the last 24 months that Zions Bank began charging TELLEZ fees with each subsequent deposit. Many of the deposits made to the La Catedral Arena LLC were made within 1-2 days after a race was held at La Catedral Arena. According to subpoenaed financial records, the total deposited into the La Catedral Arena bank account is approximately \$100,000. However, based on search warrant returns from Bejarano's Facebook account, La Catedral Arena does not appear to charge horse owners for training at La Catedral Arena, although there is a fee for race entry.

24. Furthermore, memos obtained which relate to agricultural loans TELLEZ acquired from Zions Bank, show bank officials questioning the source of funds that TELLEZ was depositing into his accounts. TELLEZ did not provide a definitive answer to the loan officers on the source of funds. One of the loan officers even assessed that TELLEZ had diverted crop proceeds, which should have been used to repay the loans. TELLEZ appears to have unexplained income and is likely profiting from the illegal gambling operation taking place at La Catedral Arena.
25. Based on the foregoing, TELLEZ is involved in the illegal gambling business taking place at La Catedral Arena, because:
- a. TELLEZ owns the racetrack where the illegal gambling is taking place;
 - b. has knowledge of the illegal gambling given his presence in Facebook threads where the gambling is discussed and his presence at the racetrack during the races;
 - c. is a member of the “committee,” which sets horse entry and minimum wager amounts for horse owners;
 - d. runs his horses in the races; and
 - e. even places his own bets on the horse races through the bookmaker, Bejarano.

CONCLUSION

26. Therefore, your Affiant submits that there is probable cause to believe TELLEZ violated 18 U.S.C. § 1955 (illegal gambling) and respectfully asks that this Court authorize an arrest warrant.

Respectfully submitted,



Jacob Brian Sheridan
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me via zoom on October 15, 2025.



Honorable Debora K. Grasham
United States Magistrate Judge