

UNITED STATES DISTRICT COURT

for the
Southern District of GeorgiaFiled
Clerk of Court
United States District Court
By M. Davenport
On: 9/2/2025In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
HL-GA BATTERY COMPANY, LLC, LOCATED AT
9730 US HIGHWAY 280, ELLABELL, GEORGIA
31308 AND CERTAIN PERSONS THEREIN

Case No. 4:25-MJ-81

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Southern District of Georgia
(identify the person or describe the property to be searched and give its location):

See Attachment A and Attachment A-1.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B and Attachment B-1.

YOU ARE COMMANDED to execute this warrant on or before September 14, 2025 (not to exceed 14 days)
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Christopher L. Ray, U.S. Magistrate Judge
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .Date and time issued: 08/31/2025 5:05 pm
Judge's signatureCity and state: Savannah, GeorgiaChristopher L. Ray, U.S. Magistrate Judge

Printed name and title

Case No.:
4:25-MJ-81

Copy of warrant and inventory left with:

Inventory of the property taken and name(s) of any person(s) seized:

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Executing officer's signature

Printed name and title

ATTACHMENT A

Property to be searched

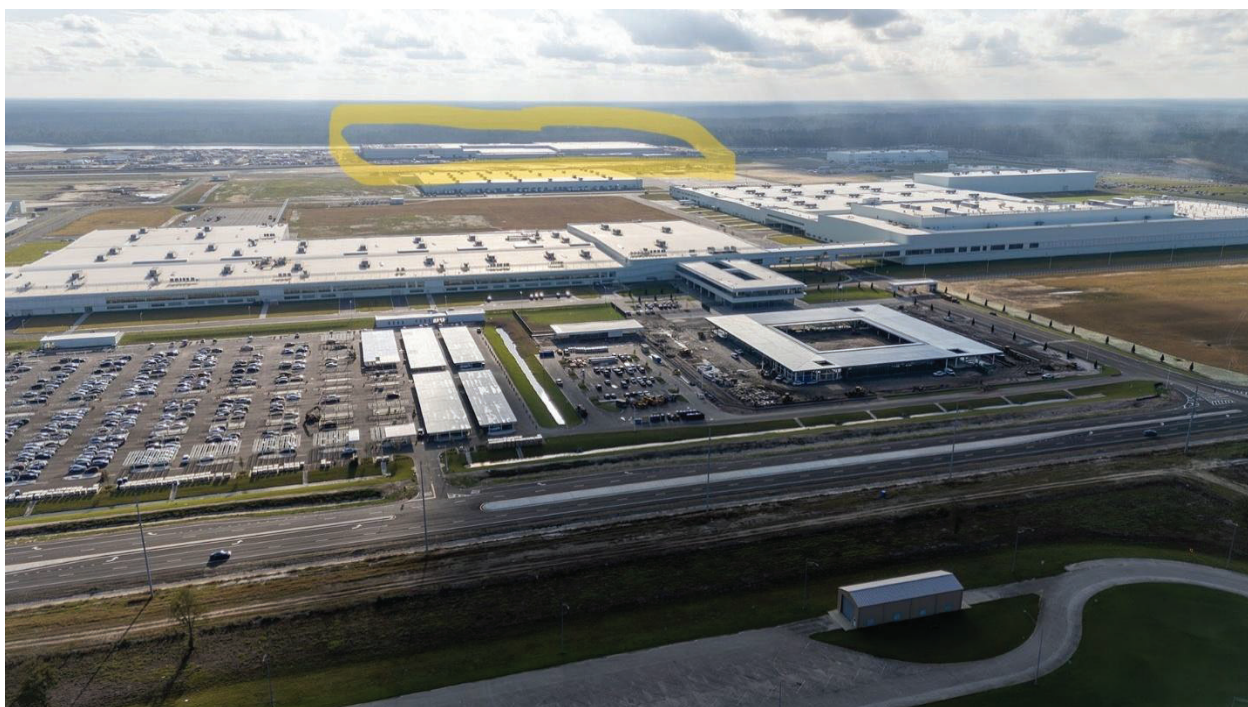
The property to be searched is HL-GA Battery Company, LLC, located at 9730 US Highway 280, Ellabell, Georgia 31308, hereinafter “Target Premises.” The Target Premises is located on the Hyundai Motor Group Metaplant American (HMGMA) campus in Ellabell, Georgia. The HMGMA campus is a sprawling campus and consists of multiple completed structures, while other structures are still under construction. The HMGMA campus is approximately 2,900 acres. The HMGMA is a large manufacturer of electric vehicles. The Target Premises is the lithium battery cell manufacturing plant on the HMGMA campus that is currently under construction. The Target Premises is approximately 35 acres and includes not only the building, but also the outbuildings and curtilages connected to the Target Premises.

Photographs of the Target Premises are on the Following Pages

The photograph below is a Google map image of the HMGMA campus and the Target Premises is highlighted in yellow.



The photograph below is an image from the HMGMA campus depicted on their website at www.hmgma.com/our-facility. The Target Premises is highlighted in yellow:



The photograph below is an image taken by HSI aerial surveillance of the HMGMA facility, and the highlighted area is the Target Premises:



ATTACHMENT A-1

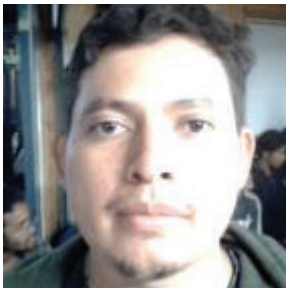
Persons to be searched

The Target Persons to be searched are identified as follows:

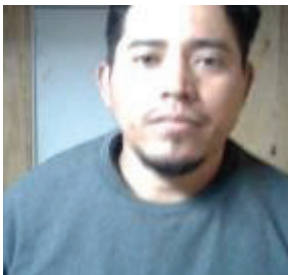
- A. **Andreina FUENTES-Tovar**, described as a female [REDACTED]
[REDACTED] and pictured below:



- B. **Kevin ZAVALA-Ramirez**, described as a [REDACTED]
[REDACTED] and pictured below:



C. **David ZAVALA-Ramirez**, described as a male, [REDACTED]
[REDACTED] and pictured below:



D. **Julio GONZALEZ Alvarado**, described as a male, [REDACTED]
[REDACTED] and pictured below:



ATTACHMENT B

Property to be seized

1. All records relating to violations of (1) 8 U.S.C. § 1324(a)(1)(A)(v)(I), conspiracy to conceal, harbor, or shield aliens; (2) 8 U.S.C. § 1324(a)(1)(A)(iii), concealing, harboring, or shielding aliens; and (3) 8 U.S.C. § 1324a, unlawful employment of aliens, hereinafter referred to as the Target Offenses, those violations involving the Target Premises and occurring after March 1, 2025, including:

- a. Employment records for current and former employees, including but not limited to, personnel files, time cards, production cards, payroll information, bank account information, employee work schedules, employment applications, video recordings of employees, photographs of employees, employment verification documents, Social Security Administration Employer Correction Requests (No-Match letters), Social Security Administration Request for Employee Information (No-Match letters), and Department of Homeland Security (DHS) immigration eligibility documents including DHS Forms I-9;
- b. Any employee identification documents and immigration documents in any form, to include but not limited to, immigration visas, entry documents, passports, Social Security cards, Form I-551s, employment authorization documents;

- c. Any correspondence with government agencies pertaining to employment, such as the Department of Homeland Security, Social Security Administration, and United States Citizenship and Immigration Services;
- d. Any documents pertaining to the identities of the individuals identified in Attachment A-1;
- e. Documents and records pertaining to the ownership and management of HL-GA Battery Company, LLC, TK LLC, Autorica LLC, SBY America, Beyond Iron Construction LLC, and Steel Brothers Development, Inc;
- f. Documents and records pertaining to contractors of HL-GA Battery Company, LLC, TK LLC, Autorica LLC, SBY America, Beyond Iron Construction LLC, and Steel Brothers Development, Inc;
- g. Documents and records pertaining to subcontractors of HL-GA Battery Company, LLC, TK LLC, Autorica LLC, SBY America, Beyond Iron Construction LLC, and Steel Brothers Development, Inc;
- h. Records and information relating to recruiting individuals, hiring individuals, verification of an individual's true identity, and their status to legally work in the United States;

- i. Communications regarding the use, sourcing, manufacturing, and/or procurement of fraudulent identification documents.
2. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information that is otherwise called for by this warrant (hereinafter, “COMPUTER”):
 - a. evidence of who used, owned, or controlled the COMPUTER at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, “chat,” instant messaging logs, photographs, and correspondence;
 - b. evidence indicating how and when the computer was accessed or used to determine the chronological context of computer access, use, and events relating to crime under investigation and to the computer user;
 - c. evidence indicating the computer user’s state of mind as it relates to the crime under investigation;
 - d. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;

- e. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the COMPUTER;
- f. evidence of the times the COMPUTER was used;
- g. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER;
- h. documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;
- i. records of or information about Internet Protocol addresses used by the COMPUTER;
- j. records of or information about the COMPUTER's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses;
- k. contextual information necessary to understand the evidence described in this attachment.

As used above, the terms "records" and "information" includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disk drives or other media that can store data); any handmade form (such as writing);

any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).

The term “computer” includes all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook computers, mobile phones, tablets, server computers, and network hardware.

The term “storage medium” includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

ATTACHMENT B-1

Property to be seized

1. All records relating to violations of (1) 8 U.S.C. § 1324(a)(1)(A)(v)(I), conspiracy to conceal, harbor, or shield aliens; (2) 8 U.S.C. § 1324(a)(1)(A)(iii), concealing, harboring, or shielding aliens; and (3) 8 U.S.C. § 1324a, unlawful employment of aliens, hereinafter referred to as the Target Offenses, those violations involving the Target Persons and occurring after March 1, 2025, including:

- a. Identity documents or copies of identity documents, in any form, and whether fraudulent or not, including but not limited to:
 - i. Form I-551 Permanent Resident Card (“Green Card”);
 - ii. Form I-766 Employment Authorization Document Card;
 - iii. U.S. and Foreign Passports;
 - iv. Visas;
 - v. I-94 Departure Records;
 - vi. Birth Certificates;
 - vii. Social Security Cards;
 - viii. Foreign National Identity Documents;
 - ix. Driver’s Licenses;
 - x. Any applications to obtain such documents;

- b. Pay stubs or other records reflecting employment at the Target Premises.