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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
February 2008 Grand Jury

UNITED STATES OF AMERICA,	)	CR 08-
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	[18 U.S.C. § 1962(c):
	)	Racketeer Influenced and
FRANCISCO REAL,	)	Corrupt Organizations; 18
aka "Pancho,"	)	U.S.C. § 1962(d): Racketeer
MARIA LEON,	)	Influenced and Corrupt
aka "Chata,"	)	Organizations Conspiracy: 21
NICHOLAS REAL,	)	U.S.C. §§ 846, 841(a)(1),
aka "Monkey,"	)	841(b)(1)(A) and (B):
JOSE LEON,	)	Conspiracy to Distribute
aka "NeNe,"	)	Cocaine Base in the Form of
JESUS MARTINEZ, JR.,	)	Crack Cocaine; 18 U.S.C.
aka "JJ,"	)	§ 1959: Violent Crime in Aid
aka "Lil Clever,"	)	of Racketeering; 18 U.S.C.
LUIS LEON,	)	§§ 371, 1512(a): Conspiracy
aka "Sicko,"	)	to Tamper with a Witness or
NOE SEGURA,	)	Informant; 18 U.S.C.
aka "Muerto,"	)	§ 1512(a): Tampering with a
ALEX VALENCIA,	)	Witness or Informant;
aka "Gunner,"	)	21 U.S.C. §§ 841(a)(1),
CHRISTIAN SERRANO,	)	841(b)(1)(A), 841(b)(1)(B):
aka "Hefty,"	)	Possession with Intent to
ERIC ALVARADO,	)	Distribute Cocaine Base in
aka "Chito,"	)	the Form of Crack Cocaine; 21
MISAEAL CARRILLO,	)	U.S.C. §§ 846, 841(a)(1),
aka "Lil Toker,"	)	841(b)(1)(A): Conspiracy to
RAUL BORJA,	)	Distribute Methamphetamine;
aka "Spanky,"	)	21 U.S.C. §§ 846, 841(a)(1),
CARLOS RENTERIA,	)	841(b)(1)(A): Possession with
aka "Rider,"	)	Intent to Distribute
SERGIO MARTINEZ	)	Methamphetamine; 21 U.S.C.
aka "Bird,"	)	§§ 846, 841(a)(1),

CB:VOCS

1	NEO PEREZ,	)	841(b)(1)(A): Conspiracy to
	aka "Nito,"	)	Distribute Cocaine;
2	RAFAEL CARRILLO,	)	21 U.S.C. §§ 841(a)(1),
	aka "Stomper,"	)	841(b)(1)(B): Possession with
3	JOSE GOMEZ,	)	Intent to Distribute Cocaine;
	aka "Rival,"	)	18 U.S.C. § 922(g)(1): Felon
4	NESTOR REAL,	)	in Possession of a Firearm;
	aka "Sparky,"	)	18 U.S.C. § 922(g)(5):
5	DAVID TRETO	)	Illegal Alien in Possession
	aka "Flaps,"	)	of a Firearm; 18 U.S.C.
6	JORGE LARA,	)	§ 924(c)(1): Use of a Firearm
	aka "Oso,"	)	in Furtherance of a Crime of
7	JESUS ISRAEL MARTINEZ,	)	Violence or Drug-Trafficking
	WILLIAM REAL	)	Crime; 18 U.S.C. § 2(a):
8	aka "Plucky,"	)	Aiding and Abetting; 18
	JURY DANIEL VARGAS,	)	U.S.C. § 3: Accessory After
9	aka, "Danny Boy,"	)	the Fact; 21 U.S.C. § 843(b):
	LENNIN CATALAN,	)	Use of a Communication
10	IMELDA CATALAN,	)	Facility In Committing a
	FRANCISCO CAMPOS,	)	Felony Drug Offense; 18
11	aka "Kiko,"	)	U.S.C. §§ 1956(h),
	JUAN HERNANDEZ,	)	1956(a)(1): Conspiracy to
12	aka "Gordy,"	)	Launder Money; 18 U.S.C. §
	ANDREW GANDARA,	)	1957: Money Laundering; 18
13	aka, "Lil Silent,"	)	U.S.C. § 982(a)(1) and 21
	RIGOBERTO PEREZ,	)	U.S.C. § 853(a): Criminal
14	aka, "Toker,"	)	Forfeiture]
	JOSE ALVARADO,	)	
15	aka, "Minor,"	)	
	RIGOBERTO JIMENEZ,	)	
16	aka "Bully,"	)	
	JAMES CAMPBELL,	)	
17	aka "Drifter,"	)	
	OMAR MARTINEZ,	)	
18	JUAN LEMUS,	)	
	aka "Bola,"	)	
19	RAUL CARBAJAL,	)	
	aka "Raton,"	)	
20	LUIS VARGAS,	)	
	aka "Smalls,"	)	
21	CESAR LAGUNAS,	)	
	aka "Hans,"	)	
22	JUAN HUGARTE,	)	
	aka "Kano,"	)	
23	MIGUEL SILLAS,	)	
	aka "Jokey,"	)	
24	JOSEPH ESCANDON,	)	
	aka "Lokito,"	)	
25	JOSE MARTINEZ-MADRIGAL	)	
	aka "Pepito,"	)	
26	FELIPE TALAMANTE,	)	
	SERGIO DIAZ,	)	
27	MIGUEL LOPEZ,	)	
	aka "Shooter,"	)	

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1 MIGUEL HERNANDEZ, )  
 aka "Pelicano," )  
 2 MICHAEL VALCARCE, )  
 aka "Cuba," )  
 3 NAZARIO FLOREZ, )  
 JUANA ORROSTIETA, )  
 4 MIGUEL VENANCIO, )  
 GUILLERMO OCAMPO, )  
 5 aka "Slim," )  
 GERMAN REAL-AMPUDE, )  
 6 aka "Chispas," )  
 VALENTIN VENCES, )  
 7 RAFAEL AVILES, )  
 aka "Rafa," )  
 8 JOSE AVILES, )  
 aka "Papucho," )  
 9 ANTHONY NIETO, )  
 aka "Grizzly," )  
 10 ORBELIN HERNANDEZ, )  
 aka "Obee," )  
 11 RAFAEL GARCIA, )  
 CHRISTINA CRUZ, )  
 12 aka "Negra," )  
 DANIEL GUILLEN, )  
 13 LEONORA SOLARZANO, )  
 JACKIE DE LA CRUZ, )  
 14 JONATHAN MENDOZA, )  
 aka "Johnny," )  
 15 HECTOR NAVARETTE, )  
 CARLOS ANTHONY CERVANTES, )  
 16 aka "Psycho," )  
 CARLOS DEJESUS-CERVANTES, )  
 17 MAYRA ALEJANDRA FAJARDO, )  
 CLARA CAMPOS, )  
 18 ARELY ALBARRAN-SILVA, )  
 DAISY VALENCIA, and )  
 19 JOANNA FUERTE, )  
 )  
 20 Defendants. )

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21 The Grand Jury charges:

22 GENERAL ALLEGATIONS

23 1. At all relevant times, defendants FRANCISCO REAL, also  
 24 known as ("aka") "Pancho" ("F. REAL"), MARIA LEON, aka "Chata"  
 25 ("M. LEON"), NICHOLAS REAL, aka "Monkey" ("N. REAL"), JOSE LEON,  
 26 aka "NeNe" ("J. LEON"), JESUS MARTINEZ, JR., aka "JJ," aka "Lil  
 27 Clever" ("JESUS MARTINEZ, JR."), LUIS LEON, aka "Sicko" ("L.  
 28 LEON"), NOE SEGURA, aka "Muerto" ("SEGURA"), ALEX VALENCIA, aka

1 "Gunner" ("VALENCIA"), CHRISTIAN SERRANO, aka "Hefty"  
2 ("SERRANO"), ERIC ALVARADO, aka "Chito" ("ALVARADO"), MISHAEL  
3 CARRILLO, aka "Lil Toker" ("M. CARRILLO"), RAUL BORJA, aka  
4 "Spanky" ("BORJA"), CARLOS RENTERIA, aka "Rider" ("RENERIA"),  
5 SERGIO MARTINEZ, aka "Bird" ("S. MARTINEZ"), NEO PEREZ, aka  
6 "Nito" ("N. PEREZ"), RAFAEL CARRILLO, aka "Stomper" ("R.  
7 CARRILLO"), JOSE GOMEZ, aka "Rival" ("GOMEZ"), NESTOR REAL, aka  
8 "Sparky" ("NESTOR REAL"), DAVID TRETO, aka "Flaps" ("TRETO"),  
9 JORGE LARA, aka "Oso" ("LARA"), JESUS ISRAEL MARTINEZ ("JESUS  
10 MARTINEZ"), WILLIAM REAL ("W. REAL"), JURY DANIEL VARGAS, aka  
11 "Danny Boy" ("VARGAS"), LENNIN CATALAN ("CATALAN"), IMELDA  
12 CATALAN ("I. CATALAN"), FRANCISCO CAMPOS, aka "Kiko" ("CAMPOS"),  
13 JUAN HERNANDEZ, aka "Gordy" ("J. HERNANDEZ"), ANDREW GANDARA, aka  
14 "Lil Silent" ("GANDARA"), RIGOBERTO PEREZ, aka "Toker" ("R.  
15 PEREZ"), JOSE ALVARADO, aka "Minor" ("J. ALVARADO"), RIGOBERTO  
16 JIMENEZ, aka "Bully" ("JIMENEZ"), JAMES CAMPBELL, aka "Drifter"  
17 ("CAMPBELL"), OMAR MARTINEZ ("O. MARTINEZ"), JUAN LEMUS, aka  
18 "Bola" ("LEMUS"), RAUL CARBAJAL, aka "Raton" ("CARBAJAL"), LUIS  
19 VARGAS, aka "Smalls" ("L. VARGAS"), CESAR LAGUNAS, aka "Hans"  
20 ("LAGUNAS"), JUAN HUGARTE, aka "Kano" ("HUGARTE"), MIGUEL SILLAS,  
21 aka "Jokey" ("SILLAS"), JOSEPH ESCANDON, aka "Lokito"  
22 ("ESCANDON"), FELIPE TALAMANTE ("TALAMANTE"), SERGIO DIAZ  
23 ("DIAZ"), MIGUEL LOPEZ, aka "Shooter" ("LOPEZ"), MIGUEL  
24 HERNANDEZ, aka "Pelicano" ("M. HERNANDEZ"), MICHAEL VALCARCE, aka  
25 "Cuba" ("VALCARCE"), NAZARIO FLOREZ ("FLOREZ"), JUANA ORROSTIETA  
26 ("ORROSTIETA"), MIGUEL VENANCIO ("VENANCIO"), GUILLERMO OCAMPO,  
27 aka "Slim" ("OCAMPO"), GERMAN REAL-AMPUDE, aka "Chispas" ("REAL-  
28 AMPUDE"), VALENTIN VENCES ("VENCES"), RAFAEL AVILES, aka "Rafa"

1 ("R. AVILES"), JOSE AVILES, aka "Papucho" ("J. AVILES"), ORBELIN  
2 HERNANDEZ, aka "Obee" ("O. HERNANDEZ"), RAFAEL GARCIA ("GARCIA"),  
3 CHRISTINA CRUZ, aka "Negra" ("CRUZ"), DANIEL GUILLEN ("GUILLEN"),  
4 LEONORA SOLARZANO ("SOLARZANO"), JACKIE DE LA CRUZ ("J. DE LA  
5 CRUZ"), JONATHAN MENDOZA, aka "Johnny" ("MENDOZA"), HECTOR  
6 NAVARETTE ("NAVARETTE"), CARLOS ANTHONY CERVANTES, aka "Psycho"  
7 ("CERVANTES"), CARLOS DEJESUS-CERVANTES ("DEJESUS-CERVANTES"),  
8 MAYRA ALEJANDRA FAJARDO ("FAJARDO"), ARELY ALBARRAN-SILVA  
9 ("SILVA"), and others were members and associates of an  
10 organization engaged in, among other things, murder, conspiracy  
11 to commit murder, attempted murder, conspiracy to traffic in  
12 narcotics, narcotics-trafficking, robbery, extortion, money  
13 laundering, and witness intimidation. At all relevant times,  
14 this organization, known as the "Avenues" gang, which includes  
15 its "Drew Street" gang members, operated in the Central District  
16 of California and elsewhere. The Avenues gang, including its  
17 leadership, membership, and associates, constituted an  
18 "enterprise," as defined by Title 18, United States Code, Section  
19 1961(4), that is a group of individuals associated in fact. The  
20 enterprise engaged in, and its activities affected, interstate  
21 and foreign commerce. The enterprise constituted an ongoing  
22 organization whose members functioned as a continuing unit for a  
23 common purpose of achieving the objectives of the enterprise.



1           4. The Drew Street gang is a recently formed clique within  
2 the Avenues gang. The Drew Street gang is part of the Avenues  
3 gang, and it is authorized by the Avenues and the Mexican Mafia  
4 (aka, "La Eme") to control the area of Northeast Los Angeles in  
5 the neighborhood surrounding the intersection of Drew Street and  
6 Estara Avenue. The Drew Street clique of the Avenues gang is  
7 headed by defendant F. REAL, and he is authorized by the Avenues  
8 and the Mexican Mafia to act as the "shot-caller" for the Drew  
9 Street gang. The Drew Street gang is actively and continually  
10 engaged in the distribution of cocaine base in the form of crack  
11 cocaine ("crack cocaine"), methamphetamine, and other narcotic  
12 drugs. In particular, Drew Street gang leaders obtain narcotic  
13 drugs and control the distribution of narcotic drugs by providing  
14 "street-level" distribution amounts (typically a few grams of  
15 crack cocaine at a time) to numerous Drew Street gang members and  
16 associates in the area controlled by the Drew Street gang. The  
17 Drew Street gang leaders, in turn, collect extortion payments,  
18 referred to as "taxes," from drug traffickers. The Drew Street  
19 gang also extorts payment from persons who live and maintain  
20 businesses in the area controlled by the gang. Members extract  
21 payment under threat of physical violence, including the threat  
22 that individuals who do not adhere to the gang's demands will be  
23 "green-lighted" by the Mexican Mafia, that is, they will be  
24 targeted for murder.

25           5. A portion of the "taxes" collected by the Avenues and  
26 Drew Street gang leaders is then owed to the Mexican Mafia, and  
27 the leaders are required to make payments to representatives of  
28 the Mexican Mafia in the area, who, in turn, deliver payment to

1 members of the Mexican Mafia leadership incarcerated within the  
2 California prison system. Avenues and Drew Street gang members  
3 also raise funds for the organization by conducting armed home-  
4 invasion robberies, in which they target individuals believed to  
5 maintain large sums of cash or valuables in their homes.

6         6. Members of the Drew Street gang enforce the authority of  
7 the gang to commit its crimes by directing acts of violence and  
8 retaliation against non-compliant drug-traffickers and rival gang  
9 members. The organization also directs attacks against law  
10 enforcement officers and witnesses who would be willing to  
11 cooperate with law enforcement for the prosecution of the crimes  
12 committed by members of the Drew Street gang. The Drew Street  
13 gang includes approximately 500 members and controls narcotics  
14 trafficking, violent crimes, and other activity in the area  
15 around the intersection of Drew Street and Estara Avenue in Los  
16 Angeles, California. The Drew Street gang ordinarily is vigilant  
17 to the presence of "outsiders," or persons not immediately known  
18 to the gang, who may intentionally or inadvertently attempt to  
19 enter the territory controlled by the gang. Gang members are  
20 likely to identify such persons and physically threaten or kill  
21 them. The organization also is hostile to the presence of  
22 African-Americans in Drew Street gang territory.

23         7. The Drew Street and Avenues gang members generally  
24 identify one another through the use of hand gestures, or gang  
25 "signs." They typically display the letters "A" for Avenues or  
26 the interlocking "L-A" for "Los Avenidas." Members frequently  
27 wear the "Skull Camp" or "Skull Wear" brand clothing to identify  
28 themselves as members and associates of Drew Street and the

1 Avenues gang. The clothing depicts images of human skulls in  
2 various forms, such as a human skull depicted as part of the logo  
3 for the Oakland Raiders football team and, in particular, the  
4 depiction of a human skull wearing a fedora hat. Gang members  
5 frequently refer to one another as "skulls" and wear baseball  
6 caps for teams whose insignia includes an "A" or "L-A," for  
7 Avenues and Los Avenidas. Gang tattoos, gang names, and slogans  
8 are also used to identify members and territory controlled by the  
9 gang. The Drew Street gang also uses spray-painting, or  
10 "tagging," as a sign that demonstrates its control of the area  
11 against rival gang members and the local community. Gang  
12 "tagging" frequently appears on street signs, walls, buildings,  
13 and portions of the 110 Freeway, Interstate 5, and Highway 2 in  
14 the areas controlled by the gang. Rival gang members risk  
15 violence from the gang if they attempt to "tag" within the Drew  
16 Street or Avenues-controlled territory. Drew Street gang members  
17 will frequently tag or display the number "3200," which  
18 identifies the block number at the intersection of Drew Street  
19 and Estara Avenue. Members will also often use the number 13 in  
20 various forms (i.e., 13, X3, or XIII) to demonstrate loyalty to  
21 the Mexican Mafia ("m" being the 13th letter in the alphabet) and  
22 that the gang has "sureno" (Southern California) loyalty. The  
23 letters "NELA" are used to identify Northeast Los Angeles gang  
24 members, and the number 187 is frequently used by the gang to  
25 take "credit" for a murder that has been committed by the gang.

26 8. The Avenues and Drew Street gang members maintain a  
27 ready supply of firearms, including handguns, shotguns, automatic  
28 assault rifles, and machineguns, in order to enforce the

1 authority of the gang. Such weapons typically are stolen or  
2 unregistered, so that the use of the weapons cannot be readily  
3 connected to the gang member who either used the weapon or  
4 maintained it. Weapons often are discarded or destroyed after an  
5 incident. Therefore, gang leaders frequently need to maintain a  
6 source of supply for additional unregistered or non-traceable  
7 firearms. The Avenues gang, including Drew Street, also controls  
8 the activities of its members and enforces its authority and  
9 internal discipline by killing, attempting to kill, conspiring to  
10 kill, assaulting, and threatening its own members or others who  
11 would present a threat to the enterprise.

12 9. Leaders of the Avenues gang, including Drew Street gang  
13 leaders, recruit and initiate juveniles to join the gang and  
14 direct them to commit acts of violence and drug-trafficking  
15 crimes on behalf of the gang. New members frequently are  
16 recruited through their participation in a younger "tagging" unit  
17 or from a different sect of the larger organization. New members  
18 ordinarily are then "jumped in" to the gang. This initiation  
19 process ordinarily requires that the new member is physically  
20 beaten by senior, established members of the gang and must  
21 demonstrate his resilience during the beating. The new member is  
22 then rewarded and frequently provided with a firearm and  
23 narcotics.

24 10. Females are commonly disparaged and addressed  
25 derisively in the gang. Female associates, however, are  
26 frequently active in narcotics trafficking, as well as the  
27 collection and transfer of "tax" payments and narcotics proceeds.  
28 Female associates also play an integral role in directing and

1 maintaining communications within the organization, in particular  
2 communications with incarcerated gang members and leaders of the  
3 organization.

4 PURPOSES OF THE ENTERPRISE

5 11. The purposes of the Avenues gang, including its Drew  
6 Street members and associates, include, but are not limited to,  
7 the following:

8 a. Enriching members of the Avenues and Drew Street  
9 gang through, among other things, control of and participation in  
10 the distribution of narcotics in the territory controlled by the  
11 Avenues and the Drew Street gang.

12 b. Maintaining the control and authority of the  
13 Avenues gang and its Drew Street members over Drew Street and  
14 Avenues territory.

15 c. Preserving, protecting, and expanding the power of  
16 the Avenues and Drew Street gang through the use of intimidation,  
17 violence, threats of violence, assault, and murder.

18 d. Promoting and enhancing the authority of the  
19 Avenues and Drew Street gang members and associates.

20 THE MEANS AND METHODS OF THE ENTERPRISE

21 12. The means and methods by which the defendants and their  
22 co-racketeers conduct and participate in the conduct of the  
23 affairs of the Avenues gang, including its Drew Street members  
24 and associates, include:

25 a. Members of the Avenues, including Drew Street gang  
26 members, commit, attempt, and threaten to commit acts of  
27 violence, including murder, to protect and expand the  
28 enterprise's criminal operation, which includes assaults, murder,

1 intimidation and threats of violence directed against rival gang  
2 members, law enforcement, and witnesses in criminal cases.

3           b. Members of the Avenues, including Drew Street gang  
4 members, promote a climate of fear through violence and threats  
5 of violence.

6           c. To enforce the authority of the Avenues and Drew  
7 Street gang, members use the enterprise to murder, attempt to  
8 murder, assault, and threaten those who pose a threat to the  
9 enterprise.

10           d. Participants in the Avenues, including Drew Street  
11 gang members, engage in the trafficking of controlled substances  
12 as a means to generate income.

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1                                   THE PATTERN OF RACKETEERING ACTIVITY

2           3. The pattern of racketeering activity, as defined in  
3 Title 18, United States Code, Sections 1961(1) and 1961(5),  
4 consisted of the following acts:

5   Racketeering Act One

6   Conspiracy to Distribute Narcotics

7           4. Beginning on a date unknown to the Grand Jury and  
8 continuing to on or about June 4, 2008, in Los Angeles County,  
9 within the Central District of California, and elsewhere,  
10 defendants F. REAL, M. LEON, N. REAL, J. LEON, JESUS MARTINEZ,  
11 JR., L. LEON, SEGURA, VALENCIA, SERRANO, ALVARADO, BORJA,  
12 RENTERIA, S. MARTINEZ, R. CARRILLO, NESTOR REAL, TRETO, LARA,  
13 JESUS MARTINEZ, W. REAL, VARGAS, CAMPOS, J. HERNANDEZ, GANDARA,  
14 R. PEREZ, J. ALVARADO, LEMUS, CARBAJAL, L. VARGAS, HUGARTE,  
15 TALAMANTE, DIAZ, LOPEZ, M. HERNANDEZ, FLOREZ, ORROSTIETA, OCAMPO,  
16 REAL-AMPUDE, VENCES, R. AVILES, NIETO, O. HERNANDEZ, GARCIA,  
17 CRUZ, GUILLEN, SOLARZANO, J. DE LA CRUZ, MENDOZA, NAVARETTE,  
18 CERVANTES, DEJESUS-CERVANTES, FAJARDO, and others known and  
19 unknown to the Grand Jury, conspired and agreed with each other  
20 to knowingly and intentionally commit the following offenses:

21           a. To distribute at least 50 grams of a mixture or  
22 substance containing a detectable amount of cocaine base in the  
23 form of crack cocaine ("crack cocaine"), a schedule II controlled  
24 substance, in violation of Title 21, United States Code, Sections  
25 841(a)(1) and 841(b)(1)(A);

26           b. To distribute at least 5 grams of a mixture or  
27 substance containing a detectable amount of crack cocaine, a  
28 schedule II controlled substance, in violation of Title 21,

1 United States Code, Sections 841(a)(1) and 841(b)(1)(B);

2 c. To distribute at least 500 grams of a mixture or  
3 substance containing a detectable amount of cocaine, a schedule  
4 II controlled substance, in violation of Title 21, United States  
5 Code, Sections 841(a)(1) and 841(b)(1)(B).

6 d. To distribute at least 50 grams of actual  
7 methamphetamine, a schedule II controlled substance, in violation  
8 of Title 21, United States Code, Section 841(a)(1) and  
9 841(b)(1)(A); and

10 e. To distribute at least 5 grams of actual  
11 methamphetamine, a schedule II controlled substance, in violation  
12 of Title 21, United States Code, Section 841(a)(1) and  
13 841(b)(1)(B).

14 Racketeering Act Two

15 Attempted Murder of Los Angeles Police Department Officers

16 5. On or about August 13, 2003, in Los Angeles County,  
17 within the Central District of California, defendant R. PEREZ  
18 committed the following acts, either one of which would  
19 constitute the commission of Racketeering Act Three:

20 a. Unlawfully did aid, abet, encourage and otherwise  
21 participate in the unlawful attempt to kill with malice  
22 aforethought Los Angeles Police Department Officers Castro and  
23 Langarica in order to prevent the performance of Officer Castro  
24 and Officer Langarica's official duties, in violation of  
25 California Penal Code, Sections 21a, 31, and 217.1(b).

26 b. Unlawfully, willfully, deliberately, and with  
27 premeditation, did aid, abet, advise, encourage, and otherwise  
28 participate in the unlawful attempt to kill with malice

1 aforethought Los Angeles Police Department Officers Castro and  
2 Langarica, in violation of California Penal Code, Sections 21a,  
3 31, 664, 187, and 189.

4 Racketeering Act Three

5 Murder

6 6. On or about December 29, 2003, in Los Angeles County,  
7 within the Central District of California, defendants F. REAL,  
8 TRETO, and J. HERNANDEZ willfully, deliberately, and with  
9 premeditation, unlawfully did kill E.A. with malice aforethought,  
10 in violation of California Penal Code, Sections 31, 187, and 189.

11 Racketeering Act Four

12 Possession with Intent to Distribute Crack Cocaine

13 7. On or about January 28, 2004, in Los Angeles County,  
14 within the Central District of California, defendant TRETO  
15 knowingly and intentionally possessed with the intent to  
16 distribute cocaine base in the form of crack cocaine, a schedule  
17 II controlled substance, in violation of Title 21, United States  
18 Code, Section 841(a)(1).

19 Racketeering Act Five

20 Possession with Intent to Distribute Crack Cocaine

21 8. On or about September 19, 2006, in Los Angeles County,  
22 within the Central District of California, defendant RENTERIA  
23 knowingly and intentionally possessed with the intent to  
24 distribute cocaine base in the form of crack cocaine, a schedule  
25 II controlled substance, in violation of Title 21, United States  
26 Code, Section 841(a)(1).

27 Racketeering Act Six

28 Possession with Intent to Distribute Crack Cocaine

1           9. On or about April 7, 2007, in Los Angeles County, within  
2 the Central District of California, defendant HUGARTE knowingly  
3 and intentionally possessed with the intent to distribute more  
4 than 5 grams, that is, approximately 8.91 grams, of cocaine base  
5 in the form of crack cocaine, a schedule II controlled substance,  
6 in violation of Title 21, United States Code, Sections 841(a)(1)  
7 and 841(b)(1)(B).

8 Racketeering Act Seven

9 Attempted Murder

10           10. On or about June 30, 2007, in Los Angeles County,  
11 within the Central District of California, defendant RENTERIA  
12 willfully, deliberately, and with premeditation, unlawfully did  
13 attempt to kill with malice aforethought rival gang members L.O.  
14 and R.J. with malice aforethought, in violation of California  
15 Penal Code, Sections 21a, 31, 664, 187, and 189.

16 Racketeering Act Eight

17 Threat to Commit Murder

18           11. On or about July 2, 2007, in Los Angeles County, within  
19 the Central District of California, defendant N. REAL committed a  
20 threat involving murder, i.e., N. REAL knowingly threatened C.B.  
21 and V.H. with a firearm, in violation of California Penal Code,  
22 Sections 422 and 187.

23 Racketeering Act Nine

24 Possession with Intent to Distribute Crack Cocaine

25           12. On or about August 1, 2007, in Los Angeles County,  
26 within the Central District of California, defendant R. PEREZ  
27 knowingly and intentionally possessed with the intent to  
28 distribute cocaine base in the form of crack cocaine, a schedule

1 II controlled substance, in violation of Title 21, United States  
2 Code, Section 841(a)(1).

3 Racketeering Act Ten

4 Possession with Intent to Distribute Crack Cocaine

5 13. On or about September 3, 2007, in Los Angeles County,  
6 within the Central District of California, defendant ALVARADO  
7 knowingly and intentionally possessed with the intent to  
8 distribute more than 5 grams, that is, approximately 9.5 grams,  
9 of cocaine base in the form of crack cocaine, a schedule II  
10 controlled substance, in violation of Title 21, United States  
11 Code, Sections 841(a)(1) and 841(b)(1)(B).

12 Racketeering Act Eleven

13 Possession with Intent to Distribute Crack Cocaine

14 14. On or about September 12, 2007, in Los Angeles County,  
15 within the Central District of California, defendant VARGAS  
16 knowingly and intentionally possessed with the intent to  
17 distribute more than 5 grams, that is, approximately 10.55 grams,  
18 of cocaine base in the form of crack cocaine, a schedule II  
19 controlled substance, in violation of Title 21, United States  
20 Code, Sections 841(a)(1) and 841(b)(1)(B).

21 Racketeering Act Twelve

22 Possession with Intent to Distribute Crack Cocaine

23 15. On or about September 20, 2007, in Los Angeles County,  
24 within the Central District of California, defendant GUILLEN  
25 knowingly and intentionally possessed with the intent to  
26 distribute cocaine base in the form of crack cocaine, a schedule  
27 II controlled substance, in violation of Title 21, United States  
28 Code, Section 841(a)(1).

1 Racketeering Act Thirteen

2 Extortion

3 16. On or about October 1, 2007, in Los Angeles County,  
4 within the Central District of California, defendant ALVARADO  
5 knowingly and intentionally extorted money from others by means  
6 of force or threat of force, in violation of California Penal  
7 Code, Sections 518, 519, and 520.

8 Racketeering Act Fourteen

9 Distribution of Crack Cocaine

10 17. On or about October 2, 2007, in Los Angeles County,  
11 within the Central District of California, defendant FLOREZ  
12 knowingly and intentionally distributed cocaine base in the form  
13 of crack cocaine, a schedule II controlled substance, in  
14 violation of Title 21, United States Code, Section 841(a)(1).

15 Racketeering Act Fifteen

16 Distribution of Crack Cocaine

17 18. On or about October 3, 2007, in Los Angeles County,  
18 within the Central District of California, defendant FLOREZ  
19 knowingly and intentionally distributed cocaine base in the form  
20 of crack cocaine, a schedule II controlled substance, in  
21 violation of Title 21, United States Code, Section 841(a)(1).

22 Racketeering Act Sixteen

23 Possession with Intent to Distribute Crack Cocaine

24 19. On or about October 18, 2007, in Los Angeles County,  
25 within the Central District of California, defendants W. REAL, J.  
26 MENDOZA, and OCAMPO knowingly and intentionally possessed with  
27 the intent to distribute more than 5 grams, that is,  
28 approximately 5.33 grams, of cocaine base in the form of crack

1 cocaine, a schedule II controlled substance, in violation of  
2 Title 21, United States Code, Sections 841(a)(1) and  
3 841(b)(1)(B).

4 Racketeering Act Seventeen

5 Distribution of Crack Cocaine

6 20. On or about October 23, 2007, in Los Angeles County,  
7 within the Central District of California, defendant J. DE LA  
8 CRUZ knowingly and intentionally distributed cocaine base in the  
9 form of crack cocaine, a schedule II controlled substance, in  
10 violation of Title 21, United States Code, Section 841(a)(1).

11 Racketeering Act Eighteen

12 Distribution of Crack Cocaine

13 21. On or about November 1, 2007, in Los Angeles County,  
14 within the Central District of California, defendant L. LEON  
15 knowingly and intentionally distributed cocaine base in the form  
16 of crack cocaine, a schedule II controlled substance, in  
17 violation of Title 21, United States Code, Section 841(a)(1).

18 Racketeering Act Nineteen

19 Distribution of Crack Cocaine

20 22. On or about November 2, 2007, in Los Angeles County,  
21 within the Central District of California, defendant DIAZ  
22 knowingly and intentionally distributed cocaine base in the form  
23 of crack cocaine, a schedule II controlled substance, in  
24 violation of Title 21, United States Code, Section 841(a)(1).

25 Racketeering Act Twenty

26 Distribution of Crack Cocaine

27 23. On or about November 6, 2007, in Los Angeles County,  
28 within the Central District of California, defendant REAL-AMPUDE

1 knowingly and intentionally distributed cocaine base in the form  
2 of crack cocaine, a schedule II controlled substance, in  
3 violation of Title 21, United States Code, Section 841(a)(1).

4 Racketeering Act Twenty-One

5 Distribution of Crack Cocaine

6 24. On or about November 7, 2007, in Los Angeles County,  
7 within the Central District of California, defendants GUILLEN and  
8 GARCIA knowingly and intentionally distributed cocaine base in  
9 the form of crack cocaine, a schedule II controlled substance, in  
10 violation of Title 21, United States Code, Section 841(a)(1).

11 Racketeering Act Twenty-Two

12 Distribution of Crack Cocaine

13 25. On or about November 12, 2007, in Los Angeles County,  
14 within the Central District of California, defendant J. DE LA  
15 CRUZ knowingly and intentionally distributed cocaine base in the  
16 form of crack cocaine, a schedule II controlled substance, in  
17 violation of Title 21, United States Code, Section 841(a)(1).

18 Racketeering Act Twenty-Three

19 Distribution of Crack Cocaine

20 26. On or about November 13, 2007, in Los Angeles County,  
21 within the Central District of California, defendant J. ALVARADO  
22 knowingly and intentionally distributed cocaine base in the form  
23 of crack cocaine, a schedule II controlled substance, in  
24 violation of Title 21, United States Code, Section 841(a)(1).

25 Racketeering Act Twenty-Four

26 Distribution of Crack Cocaine

27 27. On or about November 14, 2007, in Los Angeles County,  
28 within the Central District of California, defendant GUILLEN

1 knowingly and intentionally distributed cocaine base in the form  
2 of crack cocaine, a schedule II controlled substance, in  
3 violation of Title 21, United States Code, Section 841(a)(1).

4 Racketeering Act Twenty-Five

5 Distribution of Crack Cocaine

6 28. On or about November 14, 2007, in Los Angeles County,  
7 within the Central District of California, defendants NAVARETTE  
8 and VENCES knowingly and intentionally distributed cocaine base  
9 in the form of crack cocaine, a schedule II controlled substance,  
10 in violation of Title 21, United States Code, Section 841(a)(1).

11 Racketeering Act Twenty-Six

12 Distribution of Crack Cocaine

13 29. On or about November 16, 2007, in Los Angeles County,  
14 within the Central District of California, defendant NAVARETTE  
15 knowingly and intentionally distributed cocaine base in the form  
16 of crack cocaine, a schedule II controlled substance, in  
17 violation of Title 21, United States Code, Section 841(a)(1).

18 Racketeering Act Twenty-Seven

19 Distribution of Crack Cocaine

20 30. On or about November 19, 2007, in Los Angeles County,  
21 within the Central District of California, defendant J. ALVARADO  
22 knowingly and intentionally distributed cocaine base in the form  
23 of crack cocaine, a schedule II controlled substance, in  
24 violation of Title 21, United States Code, Section 841(a)(1).

25 Racketeering Act Twenty-Eight

26 Distribution of Crack Cocaine

27 31. On or about November 19, 2007, in Los Angeles County,  
28 within the Central District of California, defendant JESUS

1 MARTINEZ knowingly and intentionally distributed cocaine base in  
2 the form of crack cocaine, a schedule II controlled substance, in  
3 violation of Title 21, United States Code, Section 841(a)(1).

4 Racketeering Act Twenty-Nine

5 Robbery

6 32. On or about November 26, 2007, in Los Angeles County,  
7 within the Central District of California, defendants J. LEON,  
8 LARA, and S. MARTINEZ knowingly and intentionally took property  
9 from the possession of another, and against their will, by means  
10 of force or fear, and within an inhabited dwelling house, in  
11 violation of California Penal Code Sections 211, 212.5(a), and  
12 213.

13 Racketeering Act Thirty

14 Distribution of Crack Cocaine

15 33. On or about December 5, 2007, in Los Angeles County,  
16 within the Central District of California, defendant L. LEON  
17 knowingly and intentionally distributed cocaine base in the form  
18 of crack cocaine, a schedule II controlled substance, in  
19 violation of Title 21, United States Code, Section 841(a)(1).

20 Racketeering Act Thirty-One

21 Distribution of Crack Cocaine

22 34. On or about December 6, 2007, in Los Angeles County,  
23 within the Central District of California, defendant L. LEON  
24 knowingly and intentionally distributed cocaine base in the form  
25 of crack cocaine, a schedule II controlled substance, in  
26 violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Thirty-Two

2 Extortion

3 35. On or about December 8, 2007, in Los Angeles County,  
4 within the Central District of California, defendant J. ALVARADO  
5 knowingly and intentionally extorted money from others by means  
6 of force or threat of force, in violation of California Penal  
7 Code, Sections 518, 519, and 520.

8 Racketeering Act Thirty-Three

9 Distribution of Crack Cocaine

10 36. On or about December 10, 2007, in Los Angeles County,  
11 within the Central District of California, defendant BORJA  
12 knowingly and intentionally distributed cocaine base in the form  
13 of crack cocaine, a schedule II controlled substance, in  
14 violation of Title 21, United States Code, Section 841(a)(1).

15 Racketeering Act Thirty-Four

16 Distribution of Crack Cocaine

17 37. On or about December 11, 2007, in Los Angeles County,  
18 within the Central District of California, defendant BORJA  
19 knowingly and intentionally distributed cocaine base in the form  
20 of crack cocaine, a schedule II controlled substance, in  
21 violation of Title 21, United States Code, Section 841(a)(1).

22 Racketeering Act Thirty-Five

23 Distribution of Crack Cocaine

24 38. On or about December 12, 2007, in Los Angeles County,  
25 within the Central District of California, defendant R. AVILES  
26 knowingly and intentionally distributed cocaine base in the form  
27 of crack cocaine, a schedule II controlled substance, in  
28 violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Thirty-Six

2 Distribution of Crack Cocaine

3 39. On or about December 12, 2007, in Los Angeles County,  
4 within the Central District of California, defendants L. LEON and  
5 LEMUS knowingly and intentionally distributed cocaine base in the  
6 form of crack cocaine, a schedule II controlled substance, in  
7 violation of Title 21, United States Code, Section 841(a)(1).

8 Racketeering Act Thirty-Seven

9 Distribution of Crack Cocaine

10 40. On or about December 27, 2007, in Los Angeles County,  
11 within the Central District of California, defendant L. LEON  
12 knowingly and intentionally distributed cocaine base in the form  
13 of crack cocaine, a schedule II controlled substance, in  
14 violation of Title 21, United States Code, Section 841(a)(1).

15 Racketeering Act Thirty-Eight

16 Distribution of Crack Cocaine

17 41. On or about December 27, 2007, in Los Angeles County,  
18 within the Central District of California, defendants VARGAS and  
19 NIETO knowingly and intentionally distributed cocaine base in the  
20 form of crack cocaine, a schedule II controlled substance, in  
21 violation of Title 21, United States Code, Section 841(a)(1).

22 Racketeering Act Thirty-Nine

23 Distribution of Crack Cocaine

24 42. On or about December 28, 2007, in Los Angeles County,  
25 within the Central District of California, defendant DIAZ  
26 knowingly and intentionally distributed cocaine base in the form  
27 of crack cocaine, a schedule II controlled substance, in  
28 violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Forty

2 Distribution of Crack Cocaine

3 43. On or about December 28, 2007, in Los Angeles County,  
4 within the Central District of California, defendants BORJA,  
5 OCAMPO, and R. AVILES knowingly and intentionally distributed  
6 cocaine base in the form of crack cocaine, a schedule II  
7 controlled substance, in violation of Title 21, United States  
8 Code, Section 841(a)(1).

9 Racketeering Act Forty-One

10 Distribution of Crack Cocaine

11 44. On or about January 2, 2008, in Los Angeles County,  
12 within the Central District of California, defendant GARCIA  
13 knowingly and intentionally distributed cocaine base in the form  
14 of crack cocaine, a schedule II controlled substance, in  
15 violation of Title 21, United States Code, Section 841(a)(1).

16 Racketeering Act Forty-Two

17 Distribution of Crack Cocaine

18 45. On or about January 3, 2008, in Los Angeles County,  
19 within the Central District of California, defendant BORJA  
20 knowingly and intentionally distributed cocaine base in the form  
21 of crack cocaine, a schedule II controlled substance, in  
22 violation of Title 21, United States Code, Section 841(a)(1).

23 Racketeering Act Forty-Three

24 Distribution of Crack Cocaine

25 46. On or about January 4, 2008, in Los Angeles County,  
26 within the Central District of California, defendant NIETO  
27 knowingly and intentionally distributed cocaine base in the form  
28 of crack cocaine, a schedule II controlled substance, in

1 violation of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Forty-Four

3 Distribution of Crack Cocaine

4 47. On or about January 4, 2008, in Los Angeles County,  
5 within the Central District of California, defendant BORJA  
6 knowingly and intentionally distributed cocaine base in the form  
7 of crack cocaine, a schedule II controlled substance, in  
8 violation of Title 21, United States Code, Section 841(a)(1).

9 Racketeering Act Forty-Five

10 Distribution of Crack Cocaine

11 48. On or about January 9, 2008, in Los Angeles County,  
12 within the Central District of California, defendant BORJA  
13 knowingly and intentionally distributed cocaine base in the form  
14 of crack cocaine, a schedule II controlled substance, in  
15 violation of Title 21, United States Code, Section 841(a)(1).

16 Racketeering Act Forty-Six

17 Distribution of Crack Cocaine

18 49. On or about January 10, 2008, in Los Angeles County,  
19 within the Central District of California, defendant DIAZ  
20 knowingly and intentionally distributed cocaine base in the form  
21 of crack cocaine, a schedule II controlled substance, in  
22 violation of Title 21, United States Code, Section 841(a)(1).

23 Racketeering Act Forty-Seven

24 Distribution of Crack Cocaine

25 50. On or about January 10, 2008, in Los Angeles County,  
26 within the Central District of California, defendant L. LEON  
27 knowingly and intentionally distributed cocaine base in the form  
28 of crack cocaine, a schedule II controlled substance, in

1 violation of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Forty-Eight

3 Robbery

4 51. On or about January 11, 2008, in Los Angeles County,  
5 within the Central District of California, defendants F. REAL and  
6 VENANCIO knowingly and intentionally took property from the  
7 possession of another, and against their will, by means of force  
8 or fear, and within an inhabited dwelling house, in violation of  
9 California Penal Code Sections 211, 212.5(a), and 213.

10 Racketeering Act Forty-Nine

11 Distribution of Crack Cocaine

12 52. On or about January 17, 2008, in Los Angeles County,  
13 within the Central District of California, defendant DIAZ  
14 knowingly and intentionally distributed cocaine base in the form  
15 of crack cocaine, a schedule II controlled substance, in  
16 violation of Title 21, United States Code, Section 841(a)(1).

17 Racketeering Act Fifty

18 Distribution of Crack Cocaine

19 53. On or about January 17, 2008, in Los Angeles County,  
20 within the Central District of California, defendant O. HERNANDEZ  
21 knowingly and intentionally distributed cocaine base in the form  
22 of crack cocaine, a schedule II controlled substance, in  
23 violation of Title 21, United States Code, Section 841(a)(1).

24 Racketeering Act Fifty-One

25 Distribution of Crack Cocaine

26 54. On or about January 18, 2008, in Los Angeles County,  
27 within the Central District of California, defendants VENCES and  
28 CRUZ knowingly and intentionally distributed cocaine base in the

1 form of crack cocaine, a schedule II controlled substance, in  
2 violation of Title 21, United States Code, Section 841(a)(1).

3 Racketeering Act Fifty-Two

4 Distribution of Crack Cocaine

5 55. On or about January 23, 2008, in Los Angeles County,  
6 within the Central District of California, defendants VENCES and  
7 CRUZ knowingly and intentionally distributed cocaine base in the  
8 form of crack cocaine, a schedule II controlled substance, in  
9 violation of Title 21, United States Code, Section 841(a)(1).

10 Racketeering Act Fifty-Three

11 Distribution of Crack Cocaine

12 56. On or about January 23, 2008, in Los Angeles County,  
13 within the Central District of California, defendants TRETO,  
14 SOLARZANO, and DEJESUS-CERVANTES knowingly and intentionally  
15 distributed cocaine base in the form of crack cocaine, a schedule  
16 II controlled substance, in violation of Title 21, United States  
17 Code, Section 841(a)(1).

18 Racketeering Act Fifty-Four

19 Distribution of Crack Cocaine

20 57. On or about January 23, 2008, in Los Angeles County,  
21 within the Central District of California, defendant JESUS  
22 MARTINEZ knowingly and intentionally distributed cocaine base in  
23 the form of crack cocaine, a schedule II controlled substance, in  
24 violation of Title 21, United States Code, Section 841(a)(1).

25 Racketeering Act Fifty-Five

26 Distribution of Crack Cocaine

27 58. On or about January 30, 2008, in Los Angeles County,  
28 within the Central District of California, defendant DIAZ

1 knowingly and intentionally distributed cocaine base in the form  
2 of crack cocaine, a schedule II controlled substance, in  
3 violation of Title 21, United States Code, Section 841(a)(1).

4 Racketeering Act Fifty-Six

5 Distribution of Crack Cocaine

6 59. On or about January 30, 2008, in Los Angeles County,  
7 within the Central District of California, defendant R. AVILES  
8 knowingly and intentionally distributed cocaine base in the form  
9 of crack cocaine, a schedule II controlled substance, in  
10 violation of Title 21, United States Code, Section 841(a)(1).

11 Racketeering Act Fifty-Seven

12 Use of a Communication Facility to Facilitate Narcotics

13 Distribution

14 60. On or about January 30, 2008, in Los Angeles County,  
15 within the Central District of California, defendants F. REAL and  
16 FAJARDO knowingly and intentionally used a communication  
17 facility, namely, a telephone, in causing or facilitating the  
18 commission of acts constituting a felony under the Controlled  
19 Substances Act, that is, conspiracy to distribute a controlled  
20 substance, in violation of Title 21, United States Code, Sections  
21 846 and 841(a)(1), all in violation of Title 21, United States  
22 Code, Section 843(b).

23 Racketeering Act Fifty-Eight

24 Distribution of Crack Cocaine

25 61. On or about January 31, 2008, in Los Angeles County,  
26 within the Central District of California, defendant BORJA  
27 knowingly and intentionally distributed cocaine base in the form  
28 of crack cocaine, a schedule II controlled substance, in

1 violation of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Fifty-Nine

3 Robbery

4 62. On or about February 4, 2008, in Los Angeles County,  
5 within the Central District of California, defendant ORROSTIETA  
6 knowingly and intentionally took property from the possession of  
7 another, and against her will, by means of force or fear, and  
8 within a vehicle, in violation of California Penal Code Sections  
9 211, 212.5(a), and 213.

10 Racketeering Act Sixty

11 Distribution of Crack Cocaine

12 63. On or about February 5, 2008, in Los Angeles County,  
13 within the Central District of California, defendant DIAZ  
14 knowingly and intentionally distributed cocaine base in the form  
15 of crack cocaine, a schedule II controlled substance, in  
16 violation of Title 21, United States Code, Section 841(a)(1).

17 Racketeering Act Sixty-One

18 Robbery

19 64. On or about February 11, 2008, in Los Angeles County,  
20 within the Central District of California, defendant O. MARTINEZ  
21 knowingly and intentionally took property from the possession of  
22 another, and against their will, by means of force or fear, and  
23 within an inhabited dwelling house, in violation of California  
24 Penal Code Sections 211, 212.5(a), and 213.

25 Racketeering Act Sixty-Two

26 Conspiracy to Commit Murder

27 65. Defendants committed the following acts, any one of  
28 which constitutes Racketeering Act Sixty-Two:

1 a. Between on or about February 14, 2008 and February 21,  
2 2008, in Los Angeles County, within the Central District of  
3 California, defendants F. REAL, SERRANO, SEGURA, R. CARRILLO,  
4 GOMEZ, and VALENCIA unlawfully, willfully, and with premeditation  
5 conspired to kill with malice aforethought rival gang member  
6 M.S., in violation of California Penal Code, Sections 21a, 31,  
7 182, 187, and 189.

8 b. On or about February 21, 2008, in Los Angeles County,  
9 within the Central District of California, defendants F. REAL and  
10 GOMEZ willfully, deliberately, and with premeditation, unlawfully  
11 killed with malice aforethought rival gang member M.S., in  
12 violation of California Penal Code, Sections 21a, 31, 182, 187,  
13 and 189.

14 Racketeering Act Sixty-Three

15 Attempted Murder

16 66. On or about February 21, 2008, in Los Angeles County,  
17 within the Central District of California, defendant GOMEZ  
18 willfully, deliberately, and with premeditation aided, abetted,  
19 advised, encouraged, and otherwise participated in the unlawful  
20 attempt to kill with malice aforethought Los Angeles Police  
21 Officers Langarica and Baine, in violation of California Penal  
22 Code, Sections 31, 664, and 187.

23 Racketeering Act Sixty-Four

24 Distribution of Crack Cocaine

25 67. On or about February 26, 2008, in Los Angeles County,  
26 within the Central District of California, defendants L. LEON and  
27 J. DE LA CRUZ knowingly and intentionally distributed cocaine  
28 base in the form of crack cocaine, a schedule II controlled

1 substance, in violation of Title 21, United States Code, Section  
2 841(a) (1) .

3 Racketeering Act Sixty-Five

4 Distribution of Crack Cocaine

5 68. On or about February 27, 2008, in Los Angeles County,  
6 within the Central District of California, defendants ORROSTIETA  
7 and VENCES knowingly and intentionally distributed cocaine base  
8 in the form of crack cocaine, a schedule II controlled substance,  
9 in violation of Title 21, United States Code, Section 841(a) (1) .

10 Racketeering Act Sixty-Six

11 Distribution of Crack Cocaine

12 69. On or about February 27, 2008, in Los Angeles County,  
13 within the Central District of California, defendant DIAZ  
14 knowingly and intentionally distributed more than 5 grams, that  
15 is, approximately 14.36 grams, of cocaine base in the form of  
16 crack cocaine, a schedule II controlled substance, in violation  
17 of Title 21, United States Code, Sections 841(a) (1) and  
18 841(b) (1) (B) .

19 Racketeering Act Sixty-Seven

20 Distribution of Crack Cocaine

21 70. On or about February 27, 2008, in Los Angeles County,  
22 within the Central District of California, defendants ORROSTIETA  
23 and VENCES knowingly and intentionally distributed cocaine base  
24 in the form of crack cocaine, a schedule II controlled substance,  
25 in violation of Title 21, United States Code, Section 841(a) (1) .

26 Racketeering Act Sixty-Eight

27 Distribution of Crack Cocaine

28 71. On or about February 28, 2008, in Los Angeles County,

1 within the Central District of California, defendants SOLARZANO  
2 and DEJESUS-CERVANTES knowingly and intentionally distributed  
3 cocaine base in the form of crack cocaine, a schedule II  
4 controlled substance, in violation of Title 21, United States  
5 Code, Section 841(a)(1).

6 Racketeering Act Sixty-Nine

7 Distribution of Crack Cocaine

8 72. On or about March 3, 2008, in Los Angeles County,  
9 within the Central District of California, defendant FLOREZ  
10 knowingly and intentionally distributed cocaine base in the form  
11 of crack cocaine, a schedule II controlled substance, in  
12 violation of Title 21, United States Code, Section 841(a)(1).

13 Racketeering Act Seventy

14 Distribution of Crack Cocaine

15 73. On or about March 3, 2008, in Los Angeles County,  
16 within the Central District of California, defendants SOLARZANO  
17 and DEJESUS-CERVANTES knowingly and intentionally distributed  
18 cocaine base in the form of crack cocaine, a schedule II  
19 controlled substance, in violation of Title 21, United States  
20 Code, Section 841(a)(1).

21 Racketeering Act Seventy-One

22 Distribution of Methamphetamine

23 74. On or about March 5, 2008, in Los Angeles County,  
24 within the Central District of California, defendant FLOREZ  
25 knowingly and intentionally distributed more than 5 grams, that  
26 is, approximately 5.87 grams, of actual methamphetamine, a  
27 schedule II controlled substance, in violation of Title 21,  
28 United States Code, Sections 841(a)(1) and 841(b)(1)(B).

1 Racketeering Act Seventy-Two

2 Distribution of Methamphetamine

3 75. On or about March 5, 2008, in Los Angeles County,  
4 within the Central District of California, defendant NESTOR REAL  
5 knowingly and intentionally distributed more than 5 grams, that  
6 is, approximately 7 grams, of actual methamphetamine, a schedule  
7 II controlled substance, in violation of Title 21, United States  
8 Code, Sections 841(a)(1) and 841(b)(1)(B).

9 Racketeering Act Seventy-Three

10 Distribution of Crack Cocaine

11 76. On or about March 5, 2008, in Los Angeles County,  
12 within the Central District of California, defendants SOLARZANO  
13 and DEJESUS-CERVANTES knowingly and intentionally distributed  
14 cocaine base in the form of crack cocaine, a schedule II  
15 controlled substance, in violation of Title 21, United States  
16 Code, Section 841(a)(1).

17 Racketeering Act Seventy-Four

18 Murder

19 77. On or about March 9, 2008, in Los Angeles County,  
20 within the Central District of California, defendant VALENCIA  
21 willfully, deliberately, and with premeditation killed with  
22 malice aforethought M.F., in violation of California Penal Code,  
23 Sections 21a, 31, 187, 182, and 189.

24 Racketeering Act Seventy-Five

25 Attempted Murder

26 78. On or about March 9, 2008, in Los Angeles County,  
27 within the Central District of California, defendant VALENCIA  
28 willfully, deliberately and with premeditation unlawfully

1 attempted to kill with malice aforethought J.M., in violation of  
2 California Penal Code, Sections 31, 664, 187, and 189.

3 Racketeering Act Seventy-Six

4 Witness Tampering

5 79. On or about March 11, 2008, in Los Angeles County,  
6 within the Central District of California, defendants F. REAL,  
7 CARBAJAL, TALAMANTE, and S. DIAZ knowingly attempted to use  
8 physical force or the threat of physical force against a witness  
9 with the intent to influence, delay, or prevent the testimony of  
10 the witness in an official proceeding, or cause the witness to  
11 withhold testimony from an official proceeding, appear as a  
12 witness or be absent from an official proceeding, or otherwise to  
13 hinder, delay, or prevent the communication to a law enforcement  
14 officer or judge of the United States of information relating to  
15 the commission or possible commission of a federal offense, in  
16 violation of Title 18, United States Code, Section 1512(a)(2).

17 Racketeering Act Seventy-Seven

18 Distribution of Methamphetamine

19 80. On or about March 12, 2008, in Los Angeles County,  
20 within the Central District of California, defendant FLOREZ  
21 knowingly and intentionally distributed more than 5 grams, that  
22 is, approximately 11.53 grams, of actual methamphetamine, a  
23 schedule II controlled substance, in violation of Title 21,  
24 United States Code, Sections 841(a)(1) and 841(b)(1)(B).

25 Racketeering Act Seventy-Eight

26 Distribution of Crack Cocaine

27 81. On or about March 15, 2008, in Los Angeles County,  
28 within the Central District of California, defendant ORROSTIETA

1 knowingly and intentionally possessed with the intent to  
2 distribute more than 5 grams, that is, approximately 5.54 grams,  
3 of cocaine base in the form of crack cocaine, a schedule II  
4 controlled substance, in violation of Title 21, United States  
5 Code, Sections 841(a)(1) and 841(b)(1)(B).

6 Racketeering Act Seventy-Nine

7 Extortion

8 82. On or about March 19, 2008, in Los Angeles County,  
9 within the Central District of California, defendants F. REAL and  
10 CARBAJAL knowingly and intentionally attempted to extort money  
11 from others by means of force or threat of force, in violation of  
12 California Penal Code, Sections 518, 519, and 520.

13 Racketeering Act Eighty

14 Robbery

15 83. On or about March 29, 2008, in Los Angeles County,  
16 within the Central District of California, defendants GANDARA and  
17 CERVANTES knowingly and intentionally took property from the  
18 possession of another, and against their will, by means of force  
19 or fear, and within an inhabited dwelling house, in violation of  
20 California Penal Code Sections 211, 212.5(a), and 213.

21 Racketeering Act Eighty-One

22 Distribution of Crack Cocaine

23 84. On or about April 1, 2008, in Los Angeles County,  
24 within the Central District of California, defendants NESTOR  
25 REAL, SERRANO, and BORJA knowingly and intentionally possessed  
26 with the intent to distribute cocaine, a schedule II controlled  
27 substance, in violation of Title 21, United States Code, Section  
28 841(a)(1).

1 Racketeering Act Eighty-Two

2 Use of a Communication Facility to Facilitate Narcotics

3 Distribution

4 85. On or about April 9, 2008, in Los Angeles County,  
5 within the Central District of California, defendants M. LEON and  
6 J. AVILES knowingly and intentionally used a communication  
7 facility, namely, a telephone, in causing or facilitating the  
8 commission of acts constituting a felony under the Controlled  
9 Substances Act, that is, conspiracy to distribute a controlled  
10 substance, in violation of Title 21, United States Code, Sections  
11 846 and 841(a)(1), all in violation of Title 21, United States  
12 Code, Section 843(b).

13 Racketeering Act Eighty-Three

14 Distribution of Crack Cocaine

15 86. On or about April 16, 2008, in Los Angeles County,  
16 within the Central District of California, defendant REAL-AMPUDE  
17 knowingly and intentionally distributed cocaine base in the form  
18 of crack cocaine, a schedule II controlled substance, in  
19 violation of Title 21, United States Code, Section 841(a)(1).

20 Racketeering Act Eighty-Four

21 Distribution of Crack Cocaine

22 87. On or about May 5, 2008, in Los Angeles County, within  
23 the Central District of California, defendants L. VARGAS and  
24 LOPEZ knowingly and intentionally distributed cocaine base in the  
25 form of crack cocaine, a schedule II controlled substance, in  
26 violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Eighty-Five

2 Distribution of Crack Cocaine

3 88. On or about May 6, 2008, in Los Angeles County, within  
4 the Central District of California, defendant LOPEZ knowingly and  
5 intentionally distributed cocaine base in the form of crack  
6 cocaine, a schedule II controlled substance, in violation of  
7 Title 21, United States Code, Section 841(a)(1).

8 Racketeering Act Eighty-Six

9 Distribution of Crack Cocaine

10 89. On or about May 12, 2008, in Los Angeles County, within  
11 the Central District of California, defendant L. VARGAS knowingly  
12 and intentionally distributed cocaine base in the form of crack  
13 cocaine, a schedule II controlled substance, in violation of  
14 Title 21, United States Code, Section 841(a)(1).

15 Racketeering Act Eighty-Seven

16 Possession with Intent to Distribute Crack Cocaine

17 90. On or about May 15, 2008, in Los Angeles County, within  
18 the Central District of California, defendant F. REAL, JESUS  
19 MARTINEZ, JR., M. HERNANDEZ, and FAJARDO knowingly and  
20 intentionally possessed with the intent to distribute more than  
21 50 grams, that is, approximately 54 grams, of cocaine base in the  
22 form of crack cocaine, a schedule II controlled substance, in  
23 violation of Title 21, United States Code, Sections 841(a)(1) and  
24 841(b)(1)(A).



1 multiple acts involving murder, in violation of California Penal  
2 Code Sections 31, 182, 187, 189, 217.1, and 664; extortion, in  
3 violation of California Penal Code Sections 518, 519, and 520;  
4 robbery, in violation of California Penal Code Sections 211,  
5 212.5(a), and 213; distribution of controlled substances,  
6 including cocaine base in the form of crack cocaine and  
7 methamphetamine, in violation of Title 21, United States Code,  
8 Sections 841(a)(1), 843(b), and 846; and multiple acts indictable  
9 under Title 18, United States Code, Sections 1956 and 1957 (money  
10 laundering) and Title 18, United States Code, Section 1512  
11 (witness tampering). It was a further part of the conspiracy  
12 that each defendant agreed that a conspirator would commit at  
13 least two acts of racketeering in the conduct of the affairs of  
14 the enterprise.

15 A. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
16 ACCOMPLISHED

17 The objects of the conspiracy were to be accomplished in  
18 substance as follows:

19 1. Defendant F. REAL would direct other Drew Street gang  
20 members to conduct robberies, murders, extortion, witness  
21 intimidation, and drug trafficking in order to promote and  
22 further the activities of the Avenues and Drew Street gang.

23 2. Defendants N. PEREZ, R. PEREZ, ESCANDON, and others  
24 would advise defendant F. REAL about his leadership of the Drew  
25 Street gang and obtain authorizations for actions of the Drew  
26 Street gang from Avenues and Mexican Mafia ("La Eme")  
27 representatives.

28 3. Defendants F. REAL, M. LEON, and JESUS MARTINEZ, JR.,

1 would obtain crack cocaine from defendants CATALAN, I. CATALAN,  
2 CAMPOS, and other narcotics suppliers.

3 4. Defendants F. REAL and JESUS MARTINEZ, JR., would  
4 provide quantities of crack cocaine for distribution to  
5 defendants L. LEON, SEGURA, VALENCIA, SERRANO, ALVARADO, BORJA,  
6 RENTERIA, S. MARTINEZ, R. CARRILLO, NESTOR REAL, TRETO, LARA,  
7 JESUS MARTINEZ, W. REAL, VARGAS, CAMPOS, J. HERNANDEZ, GANDARA,  
8 R. PEREZ, J. ALVARADO, JIMENEZ, LEMUS, CARBAJAL, L. VARGAS,  
9 HUGARTE, TALAMANTE, DIAZ, LOPEZ, M. HERNANDEZ, VALCARCE, FLOREZ,  
10 ORROSTIETA, OCAMPO, REAL-AMPUDE, VENCES, R. AVILES, J. AVILES,  
11 NIETO, O. HERNANDEZ, GARCIA, CRUZ, GUILLEN, SOLARZANO, J. DE LA  
12 CRUZ, MENDOZA, NAVARETTE, DEJESUS-CERVANTES, FAJARDO, SILVA, and  
13 others.

14 5. Defendants F. REAL, M. LEON, L. LEON, SEGURA, VALENCIA,  
15 SERRANO, ALVARADO, BORJA, RENTERIA, S. MARTINEZ, R. CARRILLO,  
16 NESTOR REAL, TRETO, LARA, JESUS MARTINEZ, W. REAL, VARGAS,  
17 CATALAN, CAMPOS, J. HERNANDEZ, GANDARA, R. PEREZ, J. ALVARADO,  
18 JIMENEZ, LEMUS, CARBAJAL, L. VARGAS, HUGARTE, TALAMANTE, DIAZ,  
19 LOPEZ, M. HERNANDEZ, VALCARCE, FLOREZ, ORROSTIETA, OCAMPO, REAL-  
20 AMPUDE, VENCES, R. AVILES, J. AVILES, NIETO, O. HERNANDEZ,  
21 GARCIA, CRUZ, GUILLEN, SOLARZANO, J. DE LA CRUZ, MENDOZA,  
22 NAVARETTE, DEJESUS-CERVANTES, FAJARDO, SILVA, and others would  
23 distribute crack cocaine in the area controlled by the Avenues  
24 and Drew Street gang.

25 6. Defendants F. REAL, JESUS MARTINEZ, JR., ALVARADO  
26 CARBAJAL, and others would extort "tax" payments from narcotics  
27 traffickers in the area controlled by the Avenues and Drew Street  
28 gang.

1           7.     Defendants F. REAL and JESUS MARTINEZ, JR., would  
2 deliver payment to defendants N. PEREZ and CAMPBELL to account  
3 for a portion of the "taxes" owed by F. REAL and the Avenues and  
4 Drew Street gang to the Mexican Mafia.

5           8.     Defendants F. REAL, LAGUNAS, and others would obtain  
6 firearms from defendant M. CARRILLO and others and provide them  
7 to Avenues and Drew Street Gang members, so they could be used to  
8 enforce the authority of the Avenues and Drew Street gang.

9           9.     Defendants F. REAL, SERRANO, SEGURA, R. CARRILLO,  
10 GOMEZ, R. PEREZ, GOMEZ, VALENCIA, SILLAS, and others would use  
11 firearms to retaliate against, attempt to kill, and kill rival  
12 gang members, law enforcement officers, and potential witnesses  
13 to criminal activities committed by Avenues and Drew Street gang  
14 members, in order to enforce the authority of the Avenues and  
15 Drew Street gang.

16          10.    Defendants F. REAL, N. REAL, J. LEON, LARA, O.  
17 MARTINEZ, ORROSTIETA, VENANCIO, and others would commit armed  
18 robberies of persons within their cars, businesses, and  
19 residences in the area controlled by the Avenues and Drew Street  
20 gang.

21          11.    Defendant F. REAL would obtain information about the  
22 identities of victims and witnesses who might testify or provide  
23 information to law enforcement about the crimes of the Avenues  
24 and Drew Street gang.

25          12.    Defendants F. REAL, CARBAJAL, TALAMANTE, and others  
26 would threaten victims and potential witnesses of crimes  
27 committed by Avenues and Drew Street gang members in order to  
28 prevent them from testifying or cooperating with law enforcement

1 about the crimes of the Avenues and Drew Street gang.

2 13. Defendants F. REAL and CARBAJAL would make extortionate  
3 threats to local business owners to compel them to pay money to  
4 F. REAL and the Avenues and Drew Street gang for conducting their  
5 business in the area controlled by the Avenues and Drew Street  
6 gang.

7 14. Defendant F. REAL would recruit juveniles and direct  
8 their initiation into the Avenues and Drew Street gang.

9 B. OVERT ACTS

10 In furtherance of the conspiracy, and to accomplish the  
11 objects of the conspiracy, defendants F. REAL, M. LEON, N. REAL,  
12 J. LEON, JESUS MARTINEZ, JR., L. LEON, SEGURA, VALENCIA, SERRANO,  
13 ALVARADO, M. CARRILLO, BORJA, RENTERIA, S. MARTINEZ, N. PEREZ, R.  
14 CARRILLO, GOMEZ, NESTOR REAL, TRETO, LARA, JESUS MARTINEZ, W.  
15 REAL, VARGAS, CATALAN, I. CATALAN, CAMPOS, J. HERNANDEZ, GANDARA,  
16 R. PEREZ, J. ALVARADO, JIMENEZ, CAMPBELL, O. MARTINEZ, LEMUS,  
17 CARBAJAL, L. VARGAS, LAGUNAS, HUGARTE, SILLAS, ESCANDON,  
18 TALAMANTE, DIAZ, LOPEZ, M. HERNANDEZ, VALCARCE, FLOREZ,  
19 ORROSTIETA, VENANCIO, OCAMPO, REAL-AMPUDE, VENCES, R. AVILES, J.  
20 AVILES, NIETO, O. HERNANDEZ, GARCIA, CRUZ, GUILLEN, SOLARZANO, J.  
21 DE LA CRUZ, MENDOZA, NAVARETTE, CERVANTES, DEJESUS-CERVANTES,  
22 FAJARDO, SILVA, and others known and unknown to the Grand Jury  
23 committed various overt acts, on or about the following times and  
24 dates, within the Central District of California and elsewhere,  
25 including but not limited to the following:

26 1. On October 31, 2002, in Los Angeles, California,  
27 defendants M. LEON, J. LEON, JESUS MARTINEZ, JR., and D.L., aka  
28 "Clever," maintained a loaded Intratech 9 mm sub-machine gun, a

1 Smith Corona model 03-A3 assault rifle, explosive devices, 85  
2 grams of crack cocaine, 31 grams of cocaine, approximately two  
3 pounds of marijuana, and approximately 14 grams of  
4 methamphetamine at a residence located at 3304 Drew Street in Los  
5 Angeles, California.

6 2. On August 13, 2003, defendant R. PEREZ possessed a .223  
7 assault rifle and body armor in his apartment at 3253 Drew Street  
8 in Los Angeles, California.

9 3. On August 13, 2003, defendant R. PEREZ and D.L. attacked  
10 Los Angeles Police Department ("LAPD") Officers Castro and  
11 Langarica and attempted to shoot them with Officer Castro's  
12 firearm when Officers Castro and Langarica attempted to arrest R.  
13 PEREZ for being under the influence of a controlled substance.

14 4. On December 29, 2003, defendants F. REAL, TRETO, and J.  
15 HERNANDEZ murdered E.A. after E.A. drove his car into an area of  
16 Los Angeles controlled by the Avenues and Drew Street gang.

17 5. On January 28, 2004, defendant TRETO possessed with the  
18 intent to distribute approximately 1.69 grams of cocaine base in  
19 the form of crack cocaine.

20 6. On September 19, 2006, defendant RENTERIA possessed with  
21 the intent to distribute approximately 4.5 grams of cocaine and  
22 approximately 2.6 grams of methamphetamine.

23 7. On March 29, 2007, defendant SILLAS possessed a Cobray  
24 M-11 9 mm assault rifle, ammunition, a smoke grenade, and cocaine  
25 at his residence on Fletcher Drive in Los Angeles, California.

26 8. On April 5, 2007, defendant HUGARTE possessed with the  
27 intent to distribute approximately 8.91 grams of cocaine base in  
28 the form of crack cocaine at 3407 Drew Street in Los Angeles,

1 California.

2 9. On June 30, 2007, defendant RENTERIA shot two rival gang  
3 members in an area of Los Angeles controlled by the Avenues and  
4 Drew Street gang.

5 10. On July 2, 2007, defendant N. REAL pursued victims C.B.  
6 and V.H. and threatened to shoot them after they sounded a car  
7 horn in an area of Los Angeles controlled by the Drew Street  
8 gang.

9 11. On August 1, 2007, defendants L. LEON, BORJA, and an  
10 unindicted co-conspirator distributed methamphetamine and crack  
11 cocaine on Drew Street, in Los Angeles, California, while a  
12 second unidentified co-conspirator acted as a "look-out" to watch  
13 for the presence of law enforcement.

14 12. On August 1, 2007, defendant R. PEREZ possessed  
15 approximately .46 grams of crack cocaine and approximately .89  
16 grams of methamphetamine and took a female victim hostage by  
17 holding a .40 caliber Smith and Wesson handgun to her head in  
18 order to deter the pursuit by law enforcement.

19 13. On August 2, 2007, defendant GANDARA possessed a loaded  
20 9 mm Beretta handgun, a Smith & Wesson 9 mm handgun, and a Smith  
21 & Wesson .357 Magnum revolver in an apartment at 3351 Drew  
22 Street, in Los Angeles, California.

23 14. On August 26, 2007, by telephone using coded language,  
24 defendant J. LEON advised defendant JESUS MARTINEZ, JR., that  
25 Mexican Mafia leadership had approved the formation of the Drew  
26 Street clique of Avenues gang under the leadership of defendant  
27 F. REAL, with defendant ALVARADO as a member, and that defendant  
28 J. LEON had been initiated into the Drew Street Gang by

1 defendants SERRANO, HUGARTE, RENTERIA, and an unindicted co-  
2 conspirator.

3 15. On August 28, 2007, by telephone using coded language,  
4 defendant JESUS MARTINEZ, JR., discussed the distribution of  
5 illegal drugs with defendant CRUZ.

6 16. On September 1, 2007, defendant ALVARADO possessed a  
7 loaded .357 Magnum handgun, which he left in a parked car as he  
8 fled from law enforcement.

9 17. On September 2, 2007, by telephone using coded  
10 language, defendant F. REAL told an unindicted co-conspirator  
11 that defendant ALVARADO had been directed to collect extortionate  
12 "tax" payments from traffickers selling illegal drugs in the area  
13 controlled by the Avenues and Drew Street gang, and the  
14 unindicted co-conspirator asked F. REAL if F. REAL would provide  
15 him with drugs to sell when he was released from prison the  
16 following year.

17 18. On September 2, 2007, by telephone using coded  
18 language, defendant J. LEON told defendant RENTERIA that rival  
19 Cypress Park gang members had shot at Avenues and Drew Street  
20 gang members and asked if Avenues and Drew Street gang members  
21 had returned fire in response to the attack.

22 19. On September 2, 2007, by telephone using coded  
23 language, defendant RENTERIA told defendant J. LEON that RENTERIA  
24 wanted defendant F. REAL to keep his .357 Magnum handgun for him  
25 after RENTERIA's arrest, and J. LEON told RENTERIA that J. LEON  
26 would hold his supply of illegal drugs for RENTERIA because  
27 RENTERIA believed that he would be released from custody soon.

28 20. On September 3, 2007, defendants ALVARADO and SEGURA

1 possessed approximately 9.5 grams of cocaine base in the form of  
2 crack cocaine, approximately 84.59 grams of marijuana, a Ruger 9  
3 mm semi-automatic handgun, a "bullet-proof" vest, ammunition, and  
4 a high-capacity 30-round magazine in the rear bedroom of an  
5 apartment located at 3218 Drew Street in Los Angeles, California.

6 21. On September 7, 2007, by telephone using coded  
7 language, defendant F. REAL directed defendant N. REAL to be  
8 careful about what he discussed on the telephone, stated that he  
9 was concerned someone might be "snitching" after the arrests of  
10 defendants JESUS MARTINEZ, VALENCIA, and N. REAL, and N. REAL  
11 stated that defendants ALVARADO and RENTERIA had been arrested  
12 the previous Monday.

13 22. On September 10, 2007, by telephone using coded  
14 language, defendant ALVARADO asked defendant F. REAL to contact  
15 defendant ESCANDON and obtain a list of persons who had been  
16 "green-lighted" for death because they had not "taken care of  
17 business" and would therefore be "smashed" when they went into  
18 the prison yard.

19 23. On September 10, 2007, by telephone using coded  
20 language, defendant ALVARADO told defendant F. REAL that an  
21 unidentified co-conspirator would contact defendant R. PEREZ in  
22 order to obtain "green light" authorization to kill non-compliant  
23 gang members in prison.

24 24. On September 10, 2007, by telephone using coded  
25 language, defendant ALVARADO advised defendant F. REAL about the  
26 collection of extortionate "tax" payments from traffickers  
27 selling narcotics in the areas controlled by the Avenues and Drew  
28 Street gang, and specifically advised F. REAL to afford defendant

1 R. AVILES one final warning and then, if he still did not pay, to  
2 "fuck him up."

3 25. On September 10, 2007, by telephone using coded  
4 language, defendant ALVARADO directed defendant F. REAL to  
5 contact defendant ESCANDON in order to obtain a "wila," or "green  
6 light" authorization for gang members to kill rival Cypress Park  
7 gang members who had defied the authority of ALVARADO and the  
8 Drew Street gang while in prison, and F. REAL advised ALVARADO  
9 that these rival gang members had all been "green-lighted" and  
10 that F. REAL would inform Mexican Mafia leaders of the action so  
11 that ALVARADO would not be retaliated against for killing them.

12 26. On September 12, 2007, defendant VARGAS possessed  
13 approximately 10.55 grams of cocaine base in the form of crack  
14 cocaine, as well as a Glock 21 9 mm semi-automatic handgun and a  
15 Bryco .380 semi-automatic handgun in Los Angeles, California.

16 27. On September 12, 2007, defendant R. PEREZ advised  
17 defendant F. REAL that R. PEREZ was still actively involved in  
18 communicating orders on behalf of the Mexican Mafia and  
19 participating in the crimes of the Avenues and Drew Street gang,  
20 despite his arrest on August 1, 2007, and that R. PEREZ had  
21 directed an unidentified co-conspirator to communicate with F.  
22 REAL because F. REAL had received the authority from the Mexican  
23 Mafia to lead the Drew Street clique of the Avenues gang in the  
24 areas controlled by the Avenues and Drew Street gang.

25 28. On September 12, 2007, by telephone using coded  
26 language, defendant F. REAL advised defendant R. PEREZ that  
27 defendant VARGAS had been arrested on September 12, 2007, and  
28 that law enforcement officers had found his weapons in his car,

1 and F. REAL also told R. PEREZ that he should advise VARGAS not  
2 to attempt to speak to F. REAL on the telephone but that F. REAL  
3 would bail VARGAS out once they identified his location.

4 29. On September 12, 2007, by telephone using coded  
5 language, defendant R. PEREZ told defendant F. REAL that F. REAL  
6 would not be required to pay "taxes" to the Mexican Mafia for his  
7 use of "runners" to deliver narcotics for him, because F. REAL  
8 had been authorized by the Mexican Mafia to lead the Drew Street  
9 faction of the Avenues gang.

10 30. On September 13, 2007, defendant F. REAL possessed an  
11 Ithaca 12-gauge shotgun, two SKS 7.62 assault rifles, a Marlin  
12 30-30 rifle, a Ruger revolver, and 313 rounds of ammunition at  
13 3318 Drew Street, in Los Angeles, California.

14 31. On September 14, 2007, by telephone using coded  
15 language, defendant F. REAL reported to defendant R. PEREZ that  
16 law enforcement officers had seized eight firearms and three  
17 bulletproof vests on September 13, 2007.

18 32. On September 20, 2007, by telephone using coded  
19 language, defendant ALVARADO told an unidentified co-conspirator  
20 that ALVARADO had been selling illegal drugs in the area  
21 controlled by the Avenues and Drew Street gang and that law  
22 enforcement officers would likely find his fingerprints on the  
23 .357 Magnum handgun that he maintained in the center console of  
24 his car during drug transactions, but that he did not believe  
25 that his fingerprints would be found on his Ruger 9 mm handgun.

26 33. On September 20, 2007, an unindicted co-conspirator  
27 possessed with the intent to distribute approximately 13 grams of  
28 cocaine base in the form of crack cocaine at 3351 Drew Street, in

1 Los Angeles, California.

2 34. On September 20, 2007, defendant GUILLEN possessed with  
3 the intent to distribute approximately 3.35 grams of cocaine base  
4 in the form of crack cocaine on Drew Street, in Los Angeles,  
5 California.

6 35. On September 21, 2007, by telephone using coded  
7 language, defendant R. PEREZ told defendant F. REAL that  
8 defendant N. PEREZ would have access to Mexican Mafia members who  
9 would verify the authority of persons to appear in the areas  
10 controlled by F. REAL and the Drew Street gang.

11 36. On September 21, 2007, by telephone using coded  
12 language, defendant F. REAL told defendant R. PEREZ that F. REAL  
13 had been distributing approximately \$1200 worth of narcotics each  
14 day and that the co-conspirators under his control had been  
15 distributing approximately \$900 to \$920 worth of narcotics each  
16 day, and R. PEREZ stated that he had been distributing  
17 approximately \$1000 worth of narcotics each day before he was  
18 arrested.

19 37. On September 21, 2007, by telephone using coded  
20 language, defendant F. REAL told defendant R. PEREZ that he had  
21 initiated defendants VALENCIA, SERRANO, J. LEON, and a juvenile  
22 into the Drew Street clique of the Avenues gang.

23 38. On September 22, 2007, by telephone using coded  
24 language, defendant F. REAL told defendant N. REAL that no one  
25 could stop the Drew Street clique of the Avenues gang from  
26 selling narcotics in the area it controlled, that defendant N.  
27 PEREZ was afraid to come into the area controlled by the Drew  
28 Street clique of the Avenues gang, and that N. PEREZ could enter

1 the area controlled by the Drew Street clique of the Avenues gang  
2 as long as he did not display antagonism toward the gang's  
3 members.

4 39. On October 1, 2007, by telephone using coded language,  
5 defendant ALVARADO told an unidentified co-conspirator that he  
6 received \$600 per week as his "cut" for collecting "taxes" on  
7 behalf of the Avenues and Drew Street gang because the  
8 neighborhood "belonged" to him, and told this unindicted co-  
9 conspirator that he provided \$1000 every week to his mother to  
10 hold for him.

11 40. On October 1, 2007, by telephone using coded language,  
12 defendant ALVARADO told an unidentified co-conspirator that law  
13 enforcement had searched his residence and found guns and a  
14 bullet-proof vest.

15 41. On October 2, 2007, in Los Angeles, California,  
16 defendant FLOREZ and Clara Campos distributed approximately .45  
17 grams of crack cocaine from 3351 Drew Street in Los Angeles,  
18 California.

19 42. On October 3, 2007, in Los Angeles, California,  
20 defendant FLOREZ and Clara Campos distributed approximately .47  
21 grams of crack cocaine from 3351 Drew Street in Los Angeles,  
22 California.

23 43. On October 17, 2007, by telephone using coded language,  
24 defendant R. PEREZ told defendants F. REAL and N. PEREZ that  
25 another inmate had been challenging his authority to direct  
26 events in prison, and N. PEREZ stated that he would advise an  
27 unidentified co-conspirator to address the challenges to R.  
28 PEREZ's authority.

1           44. On October 18, 2007, defendants W. REAL, MENDOZA, and  
2 OCAMPO possessed with the intent to distribute approximately 5.45  
3 grams of crack cocaine, a skull belt to identify membership in  
4 the Avenues and Drew Street gang, a loaded .32 caliber revolver,  
5 and approximately .05 grams of methamphetamine in the area  
6 controlled by the Avenues and Drew Street gang.

7           45. On October 19, 2007, by telephone using coded language,  
8 defendant F. REAL told defendant R. PEREZ that defendants W.  
9 REAL, MENDOZA, and OCAMPO had been arrested on October 17, 2007,  
10 but that defendant SERRANO had escaped, and R. PEREZ stated that  
11 they had been "stupid" because they had been using narcotics.

12           46. On October 19, 2007, by telephone using coded language,  
13 defendant F. REAL advised defendant R. PEREZ about his efforts to  
14 resolve a dispute with "Rascals" gang members over the collection  
15 of extortionate "tax" payments for the Mexican Mafia and that he  
16 had contacted defendant N. PEREZ to resolve the conflict  
17 following a meeting at a McDonald's restaurant.

18           47. On October 23, 2007, defendant J. DE LA CRUZ sold  
19 approximately .14 grams of crack cocaine at 3320 Chapman Street  
20 in Los Angeles, California.

21           48. On October 25, 2007, defendant LARA possessed an  
22 assault rifle, a .357 magnum revolver, and ammunition at 3323  
23 Drew Street in Los Angeles, California.

24           49. On October 30, 2007, by telephone using coded language,  
25 defendant N. REAL directed defendant F. REAL to deliver \$1000 in  
26 drug proceeds to Daisy Valencia, and F. REAL said that he would  
27 also deposit funds in jail accounts for N. REAL and defendant  
28 JESUS MARTINEZ, JR.

1           50. On October 30, 2007, by telephone using coded language,  
2 defendant F. REAL told defendant HUGARTE that F. REAL had been  
3 providing HUGARTE's mother with an ounce of narcotics every week  
4 and that she was earning \$1000 every week from narcotics sales,  
5 but that the mother only had one "runner" who sold \$300 to \$400  
6 worth of narcotics per day, and HUGARTE stated that the father of  
7 another unidentified co-conspirator had also returned to selling  
8 narcotics.

9           51. On October 31, 2007, by telephone using coded language,  
10 defendant LAGUNAS told defendant RENTERIA that LAGUNAS was doing  
11 well selling narcotics, but that "paisas" had been resisting  
12 paying "taxes," and RENTERIA told LAGUNAS that defendant BORJA  
13 possessed RENTERIA's Tech-9 firearm if LAGUNAS wanted to use it  
14 against the "paisas."

15           52. On November 1, 2007, defendant L. LEON and a juvenile  
16 co-conspirator sold approximately .59 grams of crack cocaine on  
17 Drew Street in Los Angeles, California.

18           53. On November 2, 2007, defendant S. DIAZ sold  
19 approximately .27 grams of crack cocaine on Estara Street in Los  
20 Angeles, California.

21           54. On November 3, 2007, by telephone using coded language,  
22 defendant ALVARADO told an unindicted co-conspirator that his  
23 attorney had advised him that federal and local law enforcement  
24 agencies were coordinating efforts to prosecute local gang  
25 members but that they would abandon such efforts in another  
26 month.

27           55. On November 7, 2007, defendant GUILLEN sold  
28 approximately .41 grams of crack cocaine on Drew Street in Los

1 Angeles, California.

2 56. On November 6, 2007, defendant REAL-AMPUDE sold  
3 approximately .35 grams of cocaine base on Drew Street in Los  
4 Angeles, California.

5 57. On November 7, 2007, defendants GUILLEN and GARCIA sold  
6 approximately .23 grams of crack cocaine on Drew Street in Los  
7 Angeles, California.

8 58. On November 8, 2007, defendant VENCES and an unindicted  
9 co-conspirator sold approximately .60 grams of crack cocaine on  
10 Drew Street in Los Angeles, California.

11 59. On November 12, 2007, defendant J. DE LA CRUZ sold  
12 approximately .37 grams of crack cocaine on Drew Street in Los  
13 Angeles, California.

14 60. On November 13, 2007, defendant J. ALVARADO sold  
15 approximately .84 grams of crack cocaine on Drew Street in Los  
16 Angeles, California.

17 61. On November 14, 2007, defendant GUILLEN sold  
18 approximately .14 grams of crack cocaine on Drew Street in Los  
19 Angeles, California.

20 62. On November 14, 2007, defendant VENCES sold  
21 approximately .63 grams of crack cocaine on Drew Street in Los  
22 Angeles, California.

23 63. On November 14, 2007, defendants VENCES and NAVARETTE  
24 sold approximately 3.05 grams of crack cocaine on Drew Street in  
25 Los Angeles, California.

26 64. On November 16, 2007, defendant NAVARETTE possessed  
27 with the intent to distribute approximately 8.67 grams of crack  
28 cocaine and a .38 caliber Smith and Wesson revolver on Drew

1 Street in Los Angeles, California.

2 65. On November 19, 2007, defendant J. ALVARADO sold  
3 approximately .37 grams of crack cocaine on Drew Street in Los  
4 Angeles, California.

5 66. On November 19, 2007, defendant JESUS MARTINEZ sold  
6 approximately .71 grams of crack cocaine on Drew Street in Los  
7 Angeles, California.

8 67. On November 26, 2007, defendants J. LEON, LARA, and S.  
9 MARTINEZ used a Ruger 9 mm handgun and an M-11 assault rifle to  
10 rob four victims at a residence on Marmion Way, in an area  
11 controlled by the Drew Street gang.

12 68. On November 27, 2007, by telephone using coded  
13 language, defendant J. LEON asked defendant Joanna Fuerte if she  
14 had been able to identify the witnesses who might be able to  
15 identify him as having committed the robbery on November 26,  
16 2007, and J. LEON asked Joanna Fuerte if anyone had located a  
17 firearm that he and defendants LARA and S. MARTINEZ had attempted  
18 to hide after the robbery.

19 69. On November 27, 2007, defendant VENCES sold  
20 approximately .65 grams of crack cocaine on Drew Street in Los  
21 Angeles, California.

22 70. On November 28, 2007, by telephone using coded  
23 language, defendant J. ALVARADO directed defendant O. HERNANDEZ  
24 to collect extortionate tax payments from "paisas" who were  
25 trafficking narcotics in the area controlled by the Drew Street  
26 gang.

27 71. On November 29, 2007, by telephone using coded  
28 language, defendant S. MARTINEZ directed an unindicted co-

1 conspirator to lie to S. MARTINEZ's parole officer and falsely  
2 claim that he and defendants J. LEON and LARA had merely been  
3 walking together near Avenue 53 in Los Angeles, California, when  
4 they robbed two victims on November 26, 2007, and S. MARTINEZ  
5 also stated that defendant F. REAL would hire attorneys to  
6 represent each of the Drew Street gang members involved in this  
7 crime.

8         72. On November 30, 2007, by telephone using coded  
9 language, defendant J. LEON told defendant F. REAL that F. REAL  
10 needed to require drug traffickers working for him to sell more  
11 narcotics and stated that he had \$30,000 saved, and F. REAL  
12 stated that he had paid \$10,000 in bills, including depositing  
13 funds for gang members who were incarcerated and \$2,000 for  
14 defendant FAJARDO to pay for a residence on Drew Street.

15         73. On December 2, 2007, defendant RENTERIA possessed  
16 approximately 2.58 grams of crack cocaine for distribution.

17         74. On December 4, 2007, by telephone using coded language,  
18 defendant F. REAL told defendant J. LEON that F. REAL had a  
19 supply of narcotics that he would sell in order to raise money to  
20 pay for J. LEON's legal costs for criminal charges brought  
21 against J. LEON.

22         75. On December 4, 2007, defendant GARCIA sold  
23 approximately .23 grams of crack cocaine on Drew Street in los  
24 Angeles, California.

25         76. On December 5, 2007, defendant L. LEON sold  
26 approximately 1.71 grams of crack cocaine at 3259 Drew Street in  
27 Los Angeles, California.

28         77. On December 6, 2007, by telephone using coded language,

1 defendant J. LEON told defendant F. REAL that law enforcement  
2 officers had been able to locate him after he committed a robbery  
3 because two co-conspirators had followed him to the place he had  
4 been hiding, but added that he believed he had successfully  
5 hidden the weapons used in the robbery before being arrested, and  
6 F. REAL stated that he would search in the area where J. LEON had  
7 hidden the weapons.

8       78. On December 6, 2007, defendant L. LEON and an  
9 unindicted co-conspirator sold approximately 2.05 grams of crack  
10 cocaine at 3259 Drew Street in Los Angeles, California.

11       79. On December 8, 2007, defendant J. ALVARADO directed an  
12 unindicted co-conspirator to collect extortionate "tax" payments  
13 from narcotics traffickers operating in the area controlled by  
14 the Avenues and Drew Street gang and to call him while she  
15 collected the "taxes" so that J. ALVARADO could speak to the  
16 traffickers.

17       80. On December 10, 2007, defendant BORJA sold  
18 approximately 1.01 grams of crack cocaine on Drew Street, in Los  
19 Angeles, California.

20       81. On December 10, 2007, defendant O. HERNANDEZ sold  
21 approximately .14 grams of methamphetamine on Drew Street, in Los  
22 Angeles, California.

23       82. On December 11, 2007, defendant BORJA sold  
24 approximately .97 grams of crack cocaine on Drew Street, in Los  
25 Angeles, California.

26       83. On December 12, 2007, defendant R. AVILES sold  
27 approximately .35 grams of crack cocaine on Drew Street, in Los  
28 Angeles, California.

1           84. On December 12, 2007, defendants L. LEON and LEMUS sold  
2 approximately .56 grams of crack cocaine on Drew Street, in Los  
3 Angeles, California.

4           85. On December 14, 2007, defendant NESTOR REAL possessed a  
5 loaded .22 caliber American Arms handgun on Drew Street, in Los  
6 Angeles, California.

7           86. On December 14, 2007, by telephone using coded  
8 language, defendant S. MARTINEZ told defendant F. REAL that S.  
9 MARTINEZ had learned the identity of a witness who would be  
10 called on to testify against a Drew Street gang member known as  
11 "Fly," and that S. MARTINEZ would "get at" the witness to prevent  
12 the witness from testifying.

13           87. On December 15, 2007, by telephone using coded  
14 language, defendant F. REAL told defendant N. REAL that defendant  
15 RENTERIA had been caught with narcotics and arrested.

16           88. On December 27, 2007, defendant L. LEON sold  
17 approximately .33 grams of crack cocaine on Drew Street, in Los  
18 Angeles, California.

19           89. On December 27, 2007, defendants VARGAS and NIETO sold  
20 approximately .90 grams of crack cocaine on Drew Street, in Los  
21 Angeles, California.

22           90. On December 27, 2007, defendant GARCIA sold  
23 approximately .39 grams of crack cocaine on Drew Street, in Los  
24 Angeles, California.

25           91. On December 27, 2007, defendant NIETO sold  
26 approximately .98 grams of crack cocaine on Drew Street, in Los  
27 Angeles, California.

28           92. On December 28, 2007, defendant DIAZ sold approximately

1 .32 grams of crack cocaine on Estara Drive, in Los Angeles,  
2 California.

3 93. On December 28, 2007, defendants BORJA, OCAMPO, and R.  
4 AVILES sold approximately .94 grams of crack cocaine on Drew  
5 Street, in Los Angeles, California.

6 94. On January 1, 2008, by telephone using coded language,  
7 defendant F. REAL told defendant J. LEON that F. REAL was  
8 "cutting" up and selling narcotics "as always," and that their  
9 father was out selling narcotics and making money "every day."

10 95. On January 2, 2008, defendant GARCIA sold approximately  
11 .90 grams of crack cocaine on Drew Street, in Los Angeles,  
12 California.

13 96. On January 3, 2008, defendant BORJA sold approximately  
14 1.46 grams of crack cocaine on Drew Street, in Los Angeles,  
15 California.

16 97. On January 4, 2008, defendant NIETO and a juvenile co-  
17 conspirator sold approximately 3.9 grams of crack cocaine and  
18 approximately 1.08 grams of methamphetamine on Drew Street, in  
19 Los Angeles, California.

20 98. On January 4, 2008, defendant BORJA sold approximately  
21 1.29 grams of crack cocaine on Drew Street, in Los Angeles,  
22 California.

23 99. On January 9, 2008, defendant BORJA sold approximately  
24 1.49 grams of crack cocaine on Estara Street, in Los Angeles,  
25 California.

26 100. On January 10, 2008, defendant DIAZ sold approximately  
27 1.26 grams of crack cocaine on Estara Street, in Los Angeles,  
28 California.

1           101. On January 10, 2008, defendant L. LEON sold  
2 approximately 2.28 grams of crack cocaine on Drew Street, in Los  
3 Angeles, California.

4           102. On January 11, 2008, defendant F. REAL directed J.R.,  
5 defendant VENANCIO, and other Drew Street gang members to conduct  
6 a home-invasion robbery of a residence located at 240 South  
7 Avenue 54, Los Angeles, California.

8           103. On January 11, 2008, defendant VENANCIO, J.R., and  
9 other unidentified Avenues and Drew Street gang members wore ski  
10 masks and bandanas, carried firearms, and invaded a residence  
11 located at 240 South Avenue 54, Los Angeles, California, in order  
12 to conduct a robbery, before one of the victims shot and killed  
13 Ruiz during the course of the robbery.

14           104. On January 11, 2008, by telephone using coded  
15 language, defendant S. MARTINEZ told an unindicted co-conspirator  
16 that defendant F. REAL was holding money for S. MARTINEZ while S.  
17 MARTINEZ was incarcerated, and S. MARTINEZ then used the  
18 telephone to speak to a small child in order to teach the child  
19 to yell, "Fuck a nigger!"

20           105. On January 12, 2008, by telephone using coded  
21 language, defendant F. REAL told defendant J. LEON that their  
22 fellow Avenues and Drew Street gang member J.R. had been killed  
23 during the robbery on January 11, 2008, and that F. REAL knew the  
24 identity of the person who had killed Ruiz, but F. REAL did not  
25 want to say the name over the telephone.

26           106. On January 17, 2008, defendant O. HERNANDEZ sold  
27 approximately .73 grams of crack cocaine on Estara Avenue, in Los  
28 Angeles, California.

1           107. On January 17, 2008, defendant DIAZ and a juvenile co-  
2 conspirator sold approximately 1.03 grams of crack cocaine on  
3 Estara Avenue, in Los Angeles, California.

4           108. On January 18, 2008, defendants VENCES and CRUZ sold  
5 approximately .68 grams of crack cocaine on Drew Street, in Los  
6 Angeles, California.

7           109. On January 23, 2008, defendants VENCES and CRUZ sold  
8 approximately .46 grams of crack cocaine on Drew Street, in Los  
9 Angeles, California.

10           110. On January 23, 2008, defendants DEJESUS-CERVANTES and  
11 SOLARZANO sold approximately 1.40 grams of crack cocaine on Drew  
12 Street, in Los Angeles, California.

13           111. On January 23, 2008, defendant JESUS MARTINEZ sold  
14 approximately 2.57 grams of crack cocaine on Drew Street, in Los  
15 Angeles, California.

16           112. On January 26, 2008, by telephone using coded  
17 language, defendant FAJARDO told defendant F. REAL that F. REAL's  
18 narcotics supplier had arrived.

19           113. On January 27, 2008, defendant SEGURA attempted to  
20 flee from law enforcement officers with .08 grams of  
21 methamphetamine in his possession.

22           114. On January 28, 2008, by telephone, defendant S.  
23 MARTINEZ told an unindicted co-conspirator that defendant J. LEON  
24 had hired an attorney to represent all of the Avenues and Drew  
25 Street gang members who had been charged with having committed  
26 the home-invasion robbery they committed on November 26, 2007,  
27 and S. MARTINEZ said that the attorney would ask for the case to  
28 be dismissed the following week, which was after the witnesses

1 were scheduled to identify them as the robbers.

2 115. On January 30, 2008, defendant DIAZ and an unindicted  
3 co-conspirator sold approximately 1.42 grams of crack cocaine on  
4 Estara Avenue, in Los Angeles, California.

5 116. On January 30, 2008, defendant R. AVILES sold  
6 approximately .67 grams of crack cocaine on Drew Street, in Los  
7 Angeles, California.

8 117. On January 30, 2008, defendant NESTOR REAL sold  
9 approximately 1.38 grams of crack cocaine on Drew Street, in Los  
10 Angeles, California.

11 118. On January 30, 2008, defendant FAJARDO told defendant  
12 F. REAL that defendant CATALAN had been trying to contact F.  
13 REAL, and F. REAL directed FAJARDO to tell CATALAN that F. REAL  
14 needed a quantity of narcotics, and FAJARDO asked F. REAL if the  
15 amount indicated would be enough.

16 119. On January 31, 2008, defendant BORJA sold  
17 approximately .62 grams of crack cocaine on Drew Street, in Los  
18 Angeles, California.

19 120. On February 1, 2008, by telephone using coded  
20 language, defendant FLOREZ asked defendant F. REAL if F. REAL had  
21 narcotics available, and F. REAL told FLOREZ that he did.

22 121. On February 1, 2008, defendant F. REAL maintained a  
23 bullet-proof vest and numerous rounds of ammunition at his  
24 residence on Drew Street.

25 122. On February 1, 2008, by telephone using coded  
26 language, defendant F. REAL told defendant N. PEREZ that law  
27 enforcement had been active in the Drew Street area and had  
28 seized one of his bullet-proof vests and ammunition.

1           123. On February 2, 2008, by telephone using coded  
2 language, defendant F. REAL directed defendant FAJARDO to pay  
3 \$2000 to defendant CAMPOS.

4           124. On February 2, 2008, by telephone using coded  
5 language, defendant F. REAL directed Joanna Fuerte to deliver  
6 \$1500 to an unidentified co-conspirator who would be delivering  
7 narcotics, and Joanna Fuerte agreed to do so.

8           125. On February 2, 2008, by telephone using coded  
9 language, defendant F. REAL spoke to defendant TALAMANTE in order  
10 to persuade TALAMANTE to assist F. REAL in intimidating the  
11 witnesses against Drew Street gang members J. LEON, S. MARTINEZ,  
12 and LARA.

13           126. On February 2, 2008, by telephone using coded  
14 language, defendant F. REAL arranged to meet with defendant  
15 TALAMANTE and several unidentified co-conspirators at TALAMANTE's  
16 residence and then move to another, unidentified location.

17           127. On February 2, 2008, by telephone using coded  
18 language, defendant FAJARDO asked defendant F. REAL for access to  
19 a storage location in order to store narcotics.

20           128. On February 3, 2008, by telephone using coded  
21 language, defendant F. REAL told defendant TALAMANTE that F. REAL  
22 had organized co-conspirators to await their direction.

23           129. On February 5, 2008, by telephone using coded  
24 language, defendant VENCES asked defendant F. REAL if F. REAL  
25 could distribute more narcotics to VENCES in addition to the  
26 narcotics that F. REAL provided to him the previous day.

27           130. On February 4, 2008, defendant ORROSTIETA and an  
28 unindicted co-conspirator robbed S.L. when S.L. drove her car

1 into the area controlled by the Drew Street gang.

2 131. On February 4, 2008, by telephone using coded  
3 language, defendant F. REAL told defendant TRETO that he had  
4 crack cocaine available, and TRETO stated that he would collect  
5 his money to purchase crack cocaine from F. REAL.

6 132. On February 4, 2008, by telephone using coded  
7 language, defendant LEMUS told defendant F. REAL that LEMUS was  
8 going to send defendant CRUZ to deliver a payment of \$300 to F.  
9 REAL.

10 133. On February 5, 2008, defendant DIAZ sold approximately  
11 1.33 grams of crack cocaine on Drew Street, in Los Angeles,  
12 California.

13 134. On February 5, 2008, by telephone using coded  
14 language, defendant F. REAL told defendant N. PEREZ that the Drew  
15 Street gang had recruited defendant LOPEZ into the Drew Street  
16 gang and that they were going to "jump" him into the gang that  
17 day.

18 135. On February 5, 2008, defendant F. REAL told defendant  
19 TALAMANTE that the victims of the November 26, 2007 robbery would  
20 be present at a police "line-up" to identify the perpetrators of  
21 the crime, and TALAMANTE told F. REAL that he had already  
22 directed the victims that they would not be permitted to identify  
23 defendants J. LEON, S. MARTINEZ, or LARA.

24 136. On February 5, 2008, by telephone using coded  
25 language, defendant F. REAL again directed defendant TALAMANTE to  
26 instruct the victims of the November 26, 2007 robbery that they  
27 were to "keep their mouths shut" and not identify any of the  
28 Avenues and Drew Street gang members at the lineup later that day

1 or F. REAL would retaliate against them, and TALAMANTE said he  
2 would deliver the message to the victims and inform F. REAL if  
3 any indicated they would not comply.

4 137. On February 5, 2008, by telephone using coded  
5 language, defendant TALAMANTE told defendant F. REAL that he had  
6 instructed the victims that they were not to attend the lineup  
7 and that there would be trouble for them if they went, and F.  
8 REAL stated that the victims were not to identify anyone at the  
9 lineup, that F. REAL would know the outcome of the lineup by 7:30  
10 p.m. that night, and that if any witness identified any of the  
11 Drew Street gang members at the lineup, then F. REAL's "people"  
12 would "take care of them."

13 138. On February 5, 2008, by telephone using coded  
14 language, an unindicted co-conspirator advised defendant F. REAL  
15 that his "strategy" had "worked out well" because none of the  
16 victims of the November 26, 2007 robbery had identified defendant  
17 J. LEON, but that one had identified defendant LARA and the  
18 prosecution might be compelled to dismiss its case as a result,  
19 and F. REAL stated that F. REAL had done his part to achieve the  
20 result, while the unindicted co-conspirator had also done his  
21 part.

22 139. On February 5, 2008, by telephone using coded  
23 language, defendant F. REAL told defendant TALAMANTE that he had  
24 just been informed that the three victims of the November 26,  
25 2007 robbery had not identified two of the three Avenues and Drew  
26 Street gang members involved in that crime and the lawyer would  
27 provide F. REAL with the name of the victim who had identified  
28 defendant LARA, and F. REAL directed TALAMANTE to reward the

1 victims who had complied with their direction and threaten the  
2 victim who identified LARA.

3 140. On February 5, 2008, defendant F. REAL drove to the  
4 residence of one of the victims of the November 26, 2007 robbery,  
5 who had previously appeared at the police lineup, and directed an  
6 unidentified co-conspirator to tell the victim that "Pancho"  
7 would retaliate against the victim and his/her family if s/he  
8 went to court again.

9 141. On February 6, 2008, by telephone using coded  
10 language, defendant F. REAL asked defendant LAGUNAS to identify  
11 his location and directed LAGUNAS to hide narcotics.

12 142. On February 8, 2008, defendant JIMENEZ possessed with  
13 the intent to distribute approximately 5.72 grams of crack  
14 cocaine.

15 143. On February 8, 2008, by telephone using coded  
16 language, defendant F. REAL assured defendant TRETO that F. REAL  
17 had good quality crack cocaine for distribution, and TRETO told  
18 F. REAL that he would go to F. REAL's residence immediately to  
19 collect it from F. REAL.

20 144. On February 9, 2008, by telephone using coded  
21 language, defendant F. REAL directed defendant FAJARDO to pay  
22 defendant CAMPOS \$1000.

23 145. On February 9, 2008, by telephone using coded  
24 language, defendant F. REAL asked defendant DIAZ if he had sold  
25 all of the crack cocaine that had been provided to him, and DIAZ  
26 stated that he had only "three" left and would need F. REAL to  
27 provide him with more when he returned.

28 146. On February 9, 2008, by telephone using coded

1 language, defendant LEMUS told defendant F. REAL that his  
2 children were with him on the weekend and that he would deliver  
3 the "tax" payment for trafficking narcotics to F. REAL later.

4 147. On February 10, 2008, by telephone using coded  
5 language, defendant LAGUNAS advised defendant F. REAL that  
6 LAGUNAS was delivering narcotics for F. REAL.

7 148. On February 11, 2008, defendant O. MARTINEZ and three  
8 unidentified co-conspirators robbed the residents of a home  
9 located on Tonawanda Drive, in Los Angeles, California.

10 149. On February 12, 2008, defendant R. AVILES possessed  
11 approximately 1.68 grams of crack cocaine and fought with law  
12 enforcement officers on Drew Street, in Los Angeles, California.

13 150. On February 12, 2008, by telephone using coded  
14 language, defendant FLOREZ told defendant F. REAL that FLOREZ  
15 would arrive at F. REAL's residence on Drew Street to take  
16 delivery of crack cocaine if F. REAL would prepare it for FLOREZ.

17 151. On February 14, 2008, by telephone using coded  
18 language, defendant F. REAL asked defendant VENCES if VENCES  
19 needed additional narcotics that day, and VENCES stated that he  
20 still had some narcotics remaining but would collect money to pay  
21 F. REAL for additional amounts.

22 152. On February 14, 2008, by telephone using coded  
23 language, defendant F. REAL sought authorization from defendant  
24 N. PEREZ to direct an attack on rival Cypress Park gang members  
25 during a funeral proceeding, even though the Cypress Park gang  
26 was not on the Mexican Mafia "green light" list, and N. PEREZ  
27 advised that F. REAL could direct the attack.

28 153. On February 19, 2008, by telephone using coded

1 language, defendant CAMPBELL told defendant F. REAL that CAMPBELL  
2 needed to collect "tax" payments from F. REAL, and F. REAL agreed  
3 to meet CAMPBELL at the Super 8 Motel, near the Kentucky Fried  
4 Chicken restaurant on Eagle Rock Boulevard, in Los Angeles,  
5 California.

6 154. On February 16, 2008, by telephone using coded  
7 language, defendant JIMENEZ told defendant F. REAL that JIMENEZ  
8 only had \$60 in narcotics proceeds to pay to F. REAL.

9 155. On February 18, 2008, by telephone using coded  
10 language, defendant JIMENEZ told defendant F. REAL that JIMENEZ  
11 would be coming to F. REAL's residence on Drew Street in order to  
12 obtain narcotics, but F. REAL told JIMENEZ that too many law  
13 enforcement officers were in the area to complete the transaction  
14 without being observed.

15 156. On February 18, 2008, defendant F. REAL told defendant  
16 N. PEREZ that F. REAL was anticipating an attack by rival Cypress  
17 Park gang members in order to assert their authority to  
18 distribute narcotics in the Drew Street area, and F. REAL planned  
19 an attack on the Cypress Park gang in response to the threat.

20 157. On February 19, 2008, prior to a February 21, 2008  
21 attack on a rival Cypress Park gang member and LAPD officers,  
22 now-deceased Avenues and Drew Street gang member D.L., aka  
23 "Clever," told an unidentified co-conspirator that he was loading  
24 multiple firearms, and D.L. asked the unidentified co-conspirator  
25 to bring bullet-proof vests for the attack.

26 158. On February 20, 2008, unidentified Avenues and Drew  
27 Street gang members stood in front of the residence of D.C. and  
28 shouted racial epithets at D.C. in order to persuade D.C. to move

1 from Drew Street, because he is African-American.

2 159. On February 20, 2008, by telephone using coded  
3 language, defendant J. HERNANDEZ told defendant F. REAL that J.  
4 HERNANDEZ observed what he believed to be an undercover law  
5 enforcement vehicle in front of F. REAL's residence on Drew  
6 Street, in Los Angeles, California.

7 160. On February 21, 2008, by telephone using coded  
8 language, defendant M. HERNANDEZ told defendant F. REAL that he  
9 observed Avenues and Drew Street gang member D.L. with a firearm.

10

11 161. On February 21, 2008, defendants SEGURA, SERRANO, R.  
12 CARRILLO, GOMEZ, VALENCIA, and D.L. murdered rival Cypress Park  
13 gang member M.S. by shooting M.S. multiple times as he walked his  
14 two year-old granddaughter near Avenues and Drew Street gang  
15 territory.

16 162. On February 21, 2008, by telephone using coded  
17 language, defendant SERRANO asked defendant F. REAL to retrieve  
18 SERRANO and defendant SEGURA after the murder of M.S. and drive  
19 them from the area to a place where they could hide from police  
20 helicopters.

21 163. On February 21, 2008, defendant GOMEZ and D.L.  
22 attempted to kill Los Angeles Police Department officers on Drew  
23 Street by shooting at them with an assault rifle and a handgun,  
24 and defendant R. CARRILLO fled from the scene in a car.

25 164. On February 22, 2008, by telephone using coded  
26 language, defendant F. REAL told an unidentified co-conspirator  
27 that D.L. had been killed in the attack on LAPD officers and  
28 stated that "shit happens."

1           165. On February 22, 2008, by telephone using coded  
2 language, defendant F. REAL told an unidentified co-conspirator  
3 that defendant GOMEZ also had participated and been injured in  
4 the February 21, 2008 attacks with D.L. and that others had  
5 escaped, but F. REAL stated he did not want to identify these  
6 individuals over the telephone.

7           166. On February 22, 2008, by telephone using coded  
8 language, defendant S. MARTINEZ discussed the February 21, 2008  
9 attacks with defendant LAGUNAS, who was present at defendant F.  
10 REAL's residence.

11           167. On February 22, 2008, by telephone using coded  
12 language, defendant R. CARRILLO told defendant F. REAL that R.  
13 CARRILLO was hiding from law enforcement after the February 21,  
14 2008 attacks, and F. REAL told R. CARRILLO that law enforcement  
15 had found the weapon used in the attacks and that they should  
16 meet in person to discuss the attacks, but that R. CARRILLO  
17 should wait for F. REAL to call him and not initiate a call to F.  
18 REAL.

19           168. On February 22, 2008, by telephone using coded  
20 language, defendant SEGURA spoke with defendant F. REAL and  
21 discussed his participation in the murder of Cypress Park gang  
22 member M.S. with D.L., and F. REAL said that M.S. had been  
23 reported to be carrying a child when he was murdered.

24           169. On February 22, 2008, by telephone using coded  
25 language, defendant CARBAJAL arranged to meet with defendant  
26 TALAMANTE in order to collect a "tax" payment on behalf of  
27 defendant F. REAL.

28           170. On February 22, 2008, by telephone using coded

1 language, defendant F. REAL told defendant M. LEON that he had  
2 arranged for M. LEON and "Beto" to be smuggled into the United  
3 States from Mexico and that he had directed defendant M.  
4 HERNANDEZ to transport M. LEON's property into the United States.

5 171. On February 22, 2008, by telephone using coded  
6 language, defendant F. REAL directed defendant M. HERNANDEZ to  
7 assist in transporting defendant M. LEON and her property into  
8 the United States from Mexico, and M. HERNANDEZ asked F. REAL to  
9 direct defendant LAGUNAS to go to Mexico with M. HERNANDEZ to  
10 assist him.

11 172. On February 22, 2008, by telephone using coded  
12 language, defendant F. REAL told defendant M. LEON that he had  
13 arranged with unidentified co-conspirators for her to be  
14 transported from Mexico into the United States and advised her  
15 that she would need to be prepared to walk part of the distance.

16 173. On February 25, 2008, by telephone using coded  
17 language, defendant SEGURA told defendant F. REAL that, while he  
18 knew that F. REAL was probably busy preparing for his brother  
19 D.L.'s funeral, SEGURA wanted to obtain narcotics from F. REAL,  
20 and F. REAL told SEGURA that defendant JESUS MARTINEZ, JR., would  
21 distribute narcotics to SEGURA for F. REAL.

22 174. On February 26, 2008, by telephone using coded  
23 language, defendant R. CARRILLO told defendant F. REAL that R.  
24 CARRILLO had been apprehended by law enforcement and charged with  
25 murder, and he had been told that defendant GOMEZ had "snitched"  
26 on him, and F. REAL told R. CARRILLO to stay alert and be careful  
27 in his conversations because his calls were probably being  
28 recorded.

1           175. On February 26, 2008, defendants L. LEON and J. DE LA  
2 CRUZ sold approximately 1.48 grams of crack cocaine on Drew  
3 Street, in Los Angeles, California.

4           176. On February 26, 2008, by telephone using coded  
5 language, defendant DIAZ told defendant F. REAL that DIAZ needed  
6 more crack cocaine, and F. REAL stated that he would direct his  
7 brother, defendant JESUS MARTINEZ, JR., to deliver it  
8 immediately.

9           177. On February 27, 2008, defendant ORROSTIETA and an  
10 unindicted co-conspirator possessed with the intent to distribute  
11 approximately 1.7 grams of crack cocaine on Drew Street, in Los  
12 Angeles, California.

13           178. On February 27, 2008, defendant ORROSTIETA sold  
14 approximately 1.21 grams of crack cocaine on Drew Street, in Los  
15 Angeles, California.

16           179. On February 27, 2008, by telephone using coded  
17 language, defendant ORROSTIETA told defendant F. REAL that she  
18 would deliver a "tax" payment to him, and F. REAL directed her to  
19 deliver the payment to defendant CARBAJAL.

20           180. On February 27, 2008, defendant DIAZ sold  
21 approximately 14.36 grams of crack cocaine on Estara Avenue, in  
22 Los Angeles, California.

23           181. On February 27, 2008, by telephone using coded  
24 language, defendant F. REAL told an unidentified co-conspirator  
25 that he was trying to find a false identification for defendant  
26 M. LEON and that an unindicted co-conspirator would drive M. LEON  
27 from Mexico into the United States.

28           182. On February 27, 2008, by telephone using coded

1 language, defendant F. REAL advised defendant M. LEON that Daisy  
2 Valencia would drive her into the United States from Mexico in F.  
3 REAL's Toyota Camry and that an unidentified co-conspirator would  
4 smuggle "Beto" into the United States.

5 183. On February 28, 2008, at approximately 2:59 a.m.,  
6 Daisy Valencia drove defendant M. LEON into the United States in  
7 a Toyota Camry.

8 184. On February 28, 2008, by telephone using coded  
9 language, an unidentified co-conspirator told defendant F. REAL  
10 that he had arranged to smuggle "Beto" into the United States for  
11 F. REAL and that he did not want another alien smuggler to  
12 transport him instead.

13 185. On February 28, 2008, defendants SOLARZANO and  
14 DEJESUS-CERVANTES sold approximately 3.45 grams of crack cocaine  
15 on Drew Street, in Los Angeles, California.

16 186. On February 28, 2008, defendants ORROSTIETA sold  
17 approximately .42 grams of crack cocaine on Drew Street, In Los  
18 Angeles, California.

19 187. On March 2, 2008, by telephone using coded language,  
20 defendant ORROSTIETA asked defendant F. REAL if he had received  
21 additional quantities of narcotics, and F. REAL directed her to  
22 come to his location.

23 188. On March 3, 2008, defendant FLOREZ sold approximately  
24 4.03 grams of crack cocaine and approximately 5.77 grams of  
25 methamphetamine on Drew Street, in Los Angeles, California.

26 189. On March 3, 2008, defendants SOLARZANO and DEJESUS-  
27 CERVANTES sold approximately 3.45 grams of crack cocaine and 3.02  
28 grams of methamphetamine on Drew Street, in Los Angeles,

1 California.

2 190. On March 4, 2008, by telephone using coded language,  
3 defendant F. REAL told an unindicted co-conspirator that he had  
4 been to her home to pay a second unindicted co-conspirator for  
5 smuggling "Beto" into the United States from Mexico and that the  
6 second unindicted co-conspirator had increased the price from  
7 \$1800 to \$2300, and the first unindicted co-conspirator told  
8 defendant F. REAL that her husband would not have charged him as  
9 much.

10 191. On March 4, 2008, by telephone using coded language,  
11 defendant F. REAL told an unindicted co-conspirator that the  
12 unindicted co-conspirator had charged F. REAL \$500 more than they  
13 initially agreed to smuggle "Beto" into the United States from  
14 Mexico, and the unindicted co-conspirator asked F. REAL if F.  
15 REAL could identify an alien who had remained at her residence  
16 after being transported.

17 192. On March 4, 2008, by telephone using coded language,  
18 defendant F. REAL told defendant DIAZ that he would have more  
19 crack cocaine delivered to DIAZ within a few minutes.

20 193. On March 4, 2008, defendant L. LEON sold approximately  
21 .87 grams of crack cocaine on Drew Street, in Los Angeles,  
22 California.

23 194. On March 4, 2008, by telephone using coded language,  
24 defendant F. REAL told defendant VALCARCE that F. REAL could  
25 provide him with a large enough amount of narcotics to ensure  
26 that VALCARCE would not need to return to F. REAL for more.

27 195. On March 5, 2008, defendant FLOREZ sold approximately  
28 5.87 grams of methamphetamine on Drew Street, in Los Angeles,

1 California.

2 196. On March 5, 2008, defendant NESTOR REAL sold  
3 approximately 5.87 grams of methamphetamine on Drew Street, in  
4 Los Angeles, California.

5 197. On March 5, 2008, defendants SOLARZANO and DEJESUS-  
6 CERVANTES sold approximately 1.58 grams of crack cocaine and  
7 approximately 2.41 grams of methamphetamine on Drew Street, in  
8 Los Angeles, California.

9 198. On March 6, 2008, defendant SOLARZANO sold  
10 approximately 1.82 grams of crack cocaine on Drew Street, in Los  
11 Angeles, California.

12 199. On March 7, 2008, by telephone using coded language,  
13 defendant F. REAL directed Joanna Fuerte to pay defendant CAMPOS  
14 \$1500.

15 200. On March 9, 2008, defendant VALENCIA identified  
16 himself as an Avenues gang member at a residence in Northridge,  
17 California, and then shot J.M. and M.F., killing M.F.

18 201. On March 11, 2008, defendant SEGURA possessed  
19 approximately .88 grams of methamphetamine, approximately 1.23  
20 grams of cocaine, a .25 caliber Phoenix Arms handgun and a 9 mm  
21 Jimenez Arms handgun.

22 202. On March 11, 2008, defendant F. REAL drove to the  
23 residence of R.G. and threatened to kill R.G. if R.G. identified  
24 defendants J. LEON, LARA, and S. MARTINEZ to law enforcement as  
25 the individuals who committed the armed home-invasion robbery on  
26 Marmion Way on November 26, 2007.

27 203. On March 11, 2008, by telephone using coded language,  
28 defendant CAMPBELL asked defendant F. REAL if F. REAL understood

1 the direction F. REAL had received from defendant N. PEREZ about  
2 the collection of "taxes," and F. REAL stated that he would do  
3 what was required the next day.

4 204. On March 11, 2008, by telephone using coded language,  
5 defendant F. REAL told defendant TALAMANTE that F. REAL had been  
6 in the courtroom where he expected the victims of the November  
7 26, 2007 robbery to be present, but that he had needed to leave  
8 because of the strong law enforcement presence in the courtroom.

9 205. On March 11, 2008, by telephone using coded language,  
10 defendant F. REAL told defendant N. PEREZ that two "paisas" had  
11 identified defendant LARA in court as having been one of the  
12 perpetrators of the November 26, 2007 robbery, but they had not  
13 identified defendants J. LEON or S. MARTINEZ.

14 206. On March 11, 2008, by telephone using coded language,  
15 defendant CARBAJAL told defendant TALAMANTE that defendant F.  
16 REAL was busy at that time, but that TALAMANTE needed to call F.  
17 REAL concerning the court proceedings from earlier that day.

18 207. On March 11, 2008, by telephone using coded language,  
19 defendant F. REAL told defendant N. PEREZ that defendant  
20 TALAMANTE was going to speak to the victims of the November 26,  
21 2008 robbery to convince them not to testify and that TALAMANTE  
22 would be fully responsible for the actions of the victims.

23 208. On March 12, 2008, by telephone using coded language,  
24 defendant F. REAL told defendant N. PEREZ that the victims of the  
25 November 26, 2007 robbery were going to testify that the police  
26 had paid them to testify falsely in court.

27 209. On March 12, 2008, by telephone using coded language,  
28 an unidentified co-conspirator told defendant F. REAL that

1 TALAMANTE had successfully persuaded the victims of the November  
2 26, 2007 robbery not to cooperate with law enforcement against  
3 the Drew Street gang members involved in the robbery and that the  
4 victims had not understood the harm that could come to them at F.  
5 REAL's direction.

6 210. On March 12, 2008, defendant BORJA threatened to kill  
7 a person whom BORJA suspected to be assisting law enforcement  
8 officers while BORJA was distributing crack cocaine on Drew  
9 Street, in Los Angeles, California.

10 211. On March 12, 2008, defendant FLOREZ sold approximately  
11 11.53 grams of actual methamphetamine on Drew Street, in Los  
12 Angeles, California.

13 212. On March 12, 2008, by telephone using coded language,  
14 defendant VALCARCE told defendant F. REAL that he needed to  
15 obtain narcotics for distribution but that he did not have money  
16 to pay F. REAL, and F. REAL told VALCARCE to contact defendant  
17 JESUS MARTINEZ, JR., and to tell JESUS MARTINEZ, JR., to provide  
18 him with narcotics and money for beer.

19 213. On March 12, 2008, by telephone using coded language,  
20 defendant F. REAL directed defendant JESUS MARTINEZ, JR., to  
21 provide \$40 and seven "chunks" of narcotics to defendant  
22 VALCARCE.

23 214. On March 12, 2008, by telephone using coded language,  
24 defendant F. REAL told defendant VARGAS that F. REAL intended to  
25 collect the weekly "tax" payment from VARGAS for VARGAS'  
26 narcotics trafficking in the Drew Street area, and VARGAS  
27 arranged to meet with F. REAL to make the "tax" payment.

28 215. On March 13, 2008, by telephone, an unindicted co-

1 conspirator told defendant F. REAL that defendant J. LEON would  
2 likely be held to answer to the charges related to the November  
3 26, 2007 robbery because the victims had appeared and identified  
4 him and that the unidentified co-conspirator and F. REAL would  
5 then need to meet and plan what they would do next.

6 216. On March 14, 2008, defendant O. MARTINEZ, a juvenile  
7 co-conspirator, and two unidentified co-conspirators possessed a  
8 .44 caliber Sturm Ruger handgun, with an altered serial number,  
9 and gang paraphernalia in a car on Drew Street, in Los Angeles,  
10 California.

11 217. On March 14, 2008, defendant F. REAL directed  
12 defendant JESUS MARTINEZ, JR., to retrieve narcotics from the  
13 residence of defendants FAJARDO and M. LEON.

14 218. On March 15, 2008, defendant ORROSTIETA possessed with  
15 the intent to distribute approximately 5.54 grams of crack  
16 cocaine on Drew Street, in Los Angeles, California.

17 219. On March 15, 2008, defendant F. REAL directed Joanna  
18 Fuerte to have defendant LAGUNAS contact F. REAL.

19 220. On March 17, 2008, by telephone using coded language,  
20 defendant F. REAL arranged to purchase cocaine and crack cocaine  
21 from defendant CATALAN.

22 221. On March 17, 2008, by telephone using coded language,  
23 defendant CATALAN advised defendant M. HERNANDEZ that CATALAN  
24 would deliver cocaine and crack cocaine for defendant F. REAL and  
25 M. HERNANDEZ, and CATALAN also told M. HERNANDEZ that defendant  
26 CAMPOS had reported to CATALAN that M. HERNANDEZ had previously  
27 been "short" in his payment for narcotics.

28 222. On March 17, 2008, defendant CAMPOS drove to a

1 residence located on Poinsettia Avenue, in Long Beach,  
2 California, and took delivery of approximately 111.9 grams of  
3 crack cocaine and approximately 27.7 grams of methamphetamine for  
4 defendant CATALAN.

5 223. On March 17, 2008, by telephone using coded language,  
6 defendant CAMPOS advised defendant CATALAN that law enforcement  
7 officers had seized his car with the crack cocaine and cocaine  
8 that he had attempted to deliver to defendant F. REAL and  
9 defendant M. HERNANDEZ.

10 224. On March 17, 2008, defendant CATALAN told defendant I.  
11 CATALAN that law enforcement officers had seized the car driven  
12 by defendant CAMPOS, and I. CATALAN asked CATALAN where the  
13 narcotics had been hidden in the car.

14 225. On March 17, 2008, by telephone using coded language,  
15 defendant CATALAN again discussed the narcotics seizure with  
16 defendant I. CATALAN, and defendant I. CATALAN stated that they  
17 were fortunate the officers had not searched defendant CAMPOS'  
18 person.

19 226. On March 17, 2008, by telephone using coded language,  
20 defendant M. HERNANDEZ asked defendant CATALAN if CATALAN had  
21 already sent defendant CAMPOS to deliver narcotics to M.  
22 HERNANDEZ, and CATALAN told M. HERNANDEZ that law enforcement had  
23 seized CAMPOS' car with the narcotics and CATALAN would need to  
24 find a different driver for the next delivery.

25 227. On March 17, 2008, by telephone using coded language,  
26 defendant CATALAN arranged with Jose Martinez-Madrugal to deliver  
27 narcotics with defendant CAMPOS for CATALAN, in exchange for  
28 \$250.

1           228. On March 17, 2008, defendant CAMPOS and Jose Martinez-  
2 Madrigal transported packages containing approximately 109.8  
3 grams of crack cocaine and labeled for delivery to defendants F.  
4 REAL and M. HERNANDEZ, as well as foil that contained  
5 approximately 17.1 grams of actual methamphetamine.

6           229. On March 17, 2008, by telephone using coded language,  
7 defendant CAMPOS told defendant CATALAN that law enforcement  
8 officers had stopped him again and found the narcotics, and  
9 CAMPOS warned CATALAN that law enforcement was probably watching  
10 him.

11           230. On March 17, 2008, by telephone using coded language,  
12 defendant CAMPOS told defendant CATALAN that law enforcement  
13 officers were going to arrest Jose Martinez-Madrigal, and that  
14 CAMPOS could not confirm whether officers had located all of the  
15 narcotics, but that law enforcement would find the remainder of  
16 the narcotics if they continued searching the car.

17           231. On March 17, 2008, by telephone using coded language,  
18 defendant CATALAN told defendant I. CATALAN that defendant CAMPOS  
19 had been stopped by law enforcement again and that Jose Martinez-  
20 Madrigal would be arrested because officers had found the  
21 narcotics in the car.

22           232. On March 19, 2008, by telephone using coded language,  
23 defendants F. REAL and CARBAJAL contacted J.A. and told J.A. that  
24 F. REAL would afford J.A. twenty-four hours to comply with F.  
25 REAL's demands for an extortion payment of \$30,000 for J.A.'s  
26 tire shop, but that F. REAL already knew where to find J.A.'s  
27 other business and had already located family members of J.A., in  
28 the event that J.A. resolved not to pay F. REAL.

1           233. On March 19, 2008, by telephone, defendant F. REAL  
2 spoke to V., who owned the tire shop that adjoined the shop of  
3 J.A., and told V. that J.A. had until 6:00 p.m. the next day to  
4 deliver \$30,000 as an extortion payment to F. REAL, either in the  
5 form of \$30,000 cash or by delivering a Hummer truck to F. REAL.

6           234. On March 19, 2008, by telephone, F. REAL told V. that  
7 F. REAL knew who V. was, knew what he looked like and knew the  
8 car that V. drove, that F. REAL was willing to meet with V. and  
9 guarantee V.'s safety for the meeting, but that F. REAL would  
10 "hit" each of their businesses if V. and J.A. did not deliver a  
11 \$30,000 extortion payment to F. REAL, and that V. and J.A. should  
12 "know the consequences" of their decision.

13           235. On March 19, 2008, by telephone, V. told defendant F.  
14 REAL that he did not understand why V. or J.A. had to pay F.  
15 REAL, and F. REAL stated that their businesses were in F. REAL's  
16 territory.

17           236. On March 19, 2008, defendants F. REAL, CARBAJAL and an  
18 unidentified co-conspirator drove to the location of J.A.'s  
19 businesses, in Los Angeles, California, told victim J.A. that F.  
20 REAL controlled the area in which the shop was located and that  
21 J.A. would be required to pay \$30,000 to F. REAL or F. REAL would  
22 kill him and burn his businesses, and CARBAJAL told J.A. that he  
23 would not be permitted to call the police.

24           237. On March 20, 2008, by telephone using coded language,  
25 defendant F. REAL directed defendant JESUS MARTINEZ, JR., to  
26 deliver narcotics to an unidentified co-conspirator.

27           238. On March 21, 2008, an unidentified co-conspirator  
28 warned defendant F. REAL that a specific victim of the November

1 26, 2007 robbery, whom he named as "Ramon," had identified  
2 defendant F. REAL to law enforcement as having made threats to  
3 kill the victim's family if s/he went to court to testify against  
4 Avenues and Drew Street gang members and described the vehicle F.  
5 REAL used when he made the threats.

6 239. On March 21, 2008, by telephone using coded language,  
7 defendant F. REAL told defendant TALAMANTE that "Ramon" had  
8 identified F. REAL and his vehicle in connection with the threats  
9 that F. REAL had directed on February 5, 2008.

10 240. On March 21, 2008, by telephone, defendant F. REAL  
11 told defendant N. REAL that an unindicted co-conspirator had  
12 warned him that law enforcement officers were looking to arrest  
13 him for the threats he had made against a victim of the November  
14 26, 2007 robbery, and F. REAL told N. REAL that he needed to be  
15 careful with what he was doing.

16 241. On March 22, 2008, by telephone using coded language,  
17 defendant F. REAL arranged to obtain firearms and large-capacity  
18 magazines, including an assault rifle with a magazine capable of  
19 holding 100 rounds of ammunition, from defendant M. CARRILLO.

20 242. On March 23, 2008, by telephone using coded language,  
21 defendant M. CARRILLO offered to sell defendant F. REAL a large  
22 caliber firearm with a magazine that would hold 30 rounds of  
23 ammunition for \$600.

24 243. On March 23, 2007, by telephone using coded language,  
25 defendant F. REAL arranged to purchase an AK-47 assault rifle  
26 with two magazines from defendant M. CARRILLO.

27 244. On March 23, 2008, by telephone using coded language,  
28 defendant F. REAL asked defendant J. HERNANDEZ if J. HERNANDEZ

1 had successfully retrieved guns and ammunition, and J. HERNANDEZ  
2 told F. REAL that he had only obtained weapons for J. HERNANDEZ  
3 and defendant LAGUNAS but that he would ask the weapons supplier  
4 for more guns and magazines.

5 245. On March 29, 2008, defendants GANDARA and CERVANTES  
6 and an unindicted co-conspirator robbed victims K.C., A.P., and  
7 J.P. at gunpoint in the driveway of a residence located on Drew  
8 Street, in Los Angeles California.

9 246. On March 29, 2008, by telephone using coded language,  
10 defendant LOPEZ asked defendant F. REAL to permit LOPEZ to pay  
11 less than the full amount of the "tax" payment that LOPEZ owed  
12 because LOPEZ only had \$100 at that time.

13 247. On April 1, 2008, defendants BORJA, SERRANO, and  
14 NESTOR REAL possessed with the intent to distribute approximately  
15 1.21 grams of crack cocaine and approximately 76 grams of  
16 marijuana on Drew Street, in Los Angeles, California.

17 248. On April 9, 2008, by telephone using coded language,  
18 defendant M. LEON directed defendant J. AVILES to deliver the  
19 narcotics to M. LEON that J. AVILES would ordinarily deliver to  
20 defendant F. REAL.

21 249. On April 10, 2008, by telephone using coded language,  
22 defendant F. REAL directed defendant CATALAN to deliver narcotics  
23 to F. REAL that day, and CATALAN told F. REAL the amount of money  
24 F. REAL owed CATALAN for narcotics.

25 250. On April 10, 2008, by telephone using coded language,  
26 defendant CATALAN advised defendant I. CATALAN that CATALAN was  
27 going to deliver narcotics, and I. CATALAN asked if CATALAN would  
28 pick her up before making the delivery.

1           251. On April 10, 2008, defendant CATALAN possessed  
2 approximately 57.1 grams of crack cocaine in the center console  
3 area of a Nissan Maxima.

4           252. On April 10, 2008, defendants CATALAN and I. CATALAN  
5 possessed approximately 502.8 grams of crack cocaine; 24.1 grams  
6 of cocaine; items used to manufacture crack cocaine, including  
7 glassware, pots, and baking soda; a scale; containers; and  
8 approximately \$2,310 in United States currency at a residence  
9 located on Cummings Lane, in Long Beach, California.

10           253. On April 11, 2008, by telephone using coded language,  
11 defendant REAL-AMPUDE told defendant F. REAL that they could not  
12 obtain narcotics from his brother, but that REAL-AMPUDE would  
13 provide a half-ounce of narcotics to F. REAL, and F. REAL said  
14 that he would contact defendant CARBAJAL to determine if they  
15 could obtain narcotics from defendant CAMPOS' sister.

16           254. On April 13, 2008, by telephone using coded language,  
17 defendant M. LEON told defendant F. REAL that M. LEON and an  
18 unidentified co-conspirator would retrieve narcotics for F. REAL  
19 and that M. LEON would direct defendant M. HERNANDEZ to collect  
20 money for the narcotics.

21           255. On April 13, 2008, by telephone using coded language,  
22 defendant F. REAL told defendant M. LEON that an unidentified co-  
23 conspirator would deliver \$500 to M. LEON and that it would be  
24 the same person who had previously delivered drug proceeds for  
25 defendant SERRANO.

26           256. On April 13, 2008, by telephone using coded language,  
27 defendant BORJA advised defendant F. REAL that law enforcement  
28 officers were conducting surveillance from a van located in the

1 cemetery near Drew Street and that he would alert Avenues and  
2 Drew Street gang members about the presence of law enforcement in  
3 the area.

4 257. On April 14, 2008, by telephone using coded language,  
5 defendant I. CATALAN told defendant F. REAL that I. CATALAN would  
6 deliver narcotics to F. REAL on a weekly basis, instead of  
7 everyday, as defendant CATALAN had done prior to his arrest, and  
8 F. REAL told I. CATALAN to take all the narcotics to him and he  
9 would deliver the narcotics to the traffickers on Drew Street.

10 258. On April 16, 2008, defendant REAL-AMPUDE sold  
11 approximately .65 grams of crack cocaine on Drew Street, in Los  
12 Angeles, California.

13 259. On April 16, 2008, by telephone using coded language,  
14 defendant F. REAL asked defendant M. HERNANDEZ if M. HERNANDEZ  
15 was going to distribute all of the narcotics M. HERNANDEZ had  
16 obtained, and M. HERNANDEZ told F. REAL that M. HERNANDEZ had to  
17 pay his supplier but that he could provide F. REAL with some of  
18 the narcotics he had prepared.

19 260. On April 16, 2008, defendant SILVA sold approximately  
20 .74 grams of crack cocaine on Drew Street, in Los Angeles,  
21 California.

22 261. On April 17, 2008, by telephone using coded language,  
23 defendant FAJARDO told defendant F. REAL that she had paid him  
24 \$2000.

25 262. On April 17, 2008, by telephone using coded language,  
26 defendant BORJA told defendant F. REAL that BORJA had identified  
27 a narcotics law enforcement officer conducting surveillance on  
28 Andrita Avenue, near Drew Street, and that BORJA would alert

1 Avenues and Drew Street gang members to the presence of law  
2 enforcement in the area.

3 263. On April 17, 2008, defendant SILVA sold approximately  
4 1.84 grams of crack cocaine on Drew Street, in Los Angeles,  
5 California.

6 264. On April 21, 2008, defendant SILVA sold approximately  
7 3.1 grams of crack cocaine on Drew Street, in Los Angeles,  
8 California.

9 265. On April 22, 2008, by telephone using coded language,  
10 defendant HUGARTE told defendant F. REAL that he was trying to  
11 obtain narcotics from F. REAL, and F. REAL stated that he was  
12 attempting to obtain narcotics for distribution.

13 266. On April 22, 2008, by telephone using coded language,  
14 defendant F. REAL directed defendant CARBAJAL to collect proceeds  
15 from narcotics sales and to then direct defendant FAJARDO to  
16 document those persons who had not paid.

17 267. On April 23, 2008, defendant J. HERNANDEZ sold  
18 approximately 3.4 grams of crack cocaine on Drew Street, in Los  
19 Angeles, California.

20 268. On April 24, 2008, defendant J. AVILES possessed with  
21 the intent to distribute approximately 18.87 grams of cocaine at  
22 his residence in Los Angeles, California.

23 269. On April 24, 2008, defendant JESUS MARTINEZ, JR., sold  
24 approximately 4.01 grams of crack cocaine on Drew Street, in Los  
25 Angeles, California.

26 270. On May 3, 2008, by telephone using coded language,  
27 defendant FLOREZ asked defendant F. REAL to deliver crack cocaine  
28 to Clara Campos, so that Clara Campos could sell it from a

1 produce truck, and FLOREZ told F. REAL that Clara Campos had  
2 money to pay F. REAL for crack cocaine.

3 271. On May 4, 2008, by telephone using coded language,  
4 defendant LEMUS asked defendant F. REAL to deliver crack cocaine  
5 to defendant SILVA, and F. REAL directed LEMUS to instruct SILVA  
6 to come to F. REAL's residence to obtain crack cocaine.

7 272. On May 5, 2008, defendants LOPEZ and L. VARGAS sold  
8 approximately .63 grams of crack cocaine on Drew Street, in Los  
9 Angeles, California.

10 273. On May 6, 2008, defendant LOPEZ sold approximately  
11 3.46 grams of crack cocaine on Drew Street, in Los Angeles,  
12 California.

13 274. On May 12, 2008, defendant L. VARGAS sold  
14 approximately 2.86 grams of crack cocaine on Drew Street in Los  
15 Angeles, California.

16 275. On May 12, 2008, by telephone using coded language,  
17 Joanna Fuerte advised defendant F. REAL that Joanna Fuerte had  
18 delivered narcotics to defendant NIETO and that Joanna Fuerte had  
19 retrieved the narcotics from the refrigerator.

20 276. On May 15, 2008, by telephone using coded language,  
21 defendant M. HERNANDEZ asked defendant F. REAL if law enforcement  
22 officers had identified a location where they stored narcotics  
23 and ammunition, and F. REAL told M. HERNANDEZ that they had not  
24 identified the location yet.

25 277. On May 15, 2008, by telephone using coded language,  
26 defendant FAJARDO asked defendant F. REAL if law enforcement  
27 officers were likely to identify the location in the back of a  
28 residence where they had hidden narcotics and ammunition, and F.

1 REAL directed FAJARDO to send Joanna Fuerte to get a car and pick  
2 him up so that he could leave.

3 278. On May 15, 2008, by telephone using coded language,  
4 defendant LAGUNAS told defendant F. REAL that law enforcement  
5 officers had identified the location where they had hidden  
6 narcotics and ammunition.

7 279. On May 15, 2008, defendants F. REAL, JESUS MARTINEZ,  
8 JR., M. HERNANDEZ, LAGUNAS, and FAJARDO possessed approximately  
9 46.6 grams of crack cocaine, 13 grams of methamphetamine, plastic  
10 bags, containers, digital scales, and ammunition.

11 280. On May 15, 2008, by telephone using coded language,  
12 defendant F. REAL asked defendant JESUS MARTINEZ, JR., where he  
13 kept his gun, because law enforcement officers were searching in  
14 the area where they maintained narcotics and ammunition, and M.  
15 HERNANDEZ asked F. REAL if he believed that law enforcement would  
16 search his residence after they identified his fingerprints on a  
17 "tupperware" container used to store narcotics.

18 281. On May 15, 2008, by telephone using coded language,  
19 defendant FAJARDO told defendant F. REAL that FAJARDO had removed  
20 a bag from the location where law enforcement officers were  
21 expected to search.

22 282. On May 17, 2008, by telephone using coded language,  
23 defendant F. REAL told defendant REAL-AMPUDE that F. REAL had  
24 obtained narcotics for distribution, and REAL-AMPUDE told F. REAL  
25 that he wanted some of the narcotics and that he would come to F.  
26 REAL's location to help him.

27 283. On May 22, 2008, by telephone using coded language,  
28 defendant LEMUS arranged to obtain crack cocaine from defendant

1 F. REAL.

2 284. On May 22, 2008, by telephone using coded language,  
3 defendant F. REAL directed defendant FAJARDO to deliver 32  
4 "pieces" of crack cocaine to defendant LEMUS and advised FAJARDO  
5 that LEMUS would pay \$300.

6 285. On May 22, 2008, defendant LEMUS possessed  
7 approximately 4.32 grams of crack cocaine and a .25 caliber  
8 handgun near Drew Street in Los Angeles, California.

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10 THE GRAND JURY FURTHER ALLEGES THAT:

11 1. Beginning on a date unknown and continuing to on or  
12 about June 4, 2008, in Los Angeles County, within the Central  
13 District of California, defendants F. REAL, M. LEON, N. REAL, J.  
14 LEON, JESUS MARTINEZ, JR., L. LEON, SEGURA, VALENCIA, SERRANO,  
15 ALVARADO, BORJA, RENTERIA, S. MARTINEZ, R. CARRILLO, NESTOR REAL,  
16 TRETO, LARA, JESUS MARTINEZ, W. REAL, VARGAS, CATALAN, I.  
17 CATALAN, CAMPOS, J. HERNANDEZ, GANDARA, R. PEREZ, J. ALVARADO, O.  
18 MARTINEZ, LEMUS, CARBAJAL, L. VARGAS, HUGARTE, TALAMANTE, DIAZ,  
19 LOPEZ, M. HERNANDEZ, FLOREZ, ORROSTIETA, OCAMPO, REAL-AMPUDE,  
20 VENCES, R. AVILES, NIETO, O. HERNANDEZ, GARCIA, CRUZ, GUILLEN,  
21 SOLARZANO, J. DE LA CRUZ, MENDOZA, NAVARETTE, CERVANTES, DEJESUS-  
22 CERVANTES, FAJARDO, and others known and unknown to the Grand  
23 Jury, knowingly and intentionally conspired and agreed with each  
24 other to distribute at least 50 grams of a mixture or substance  
25 containing a detectable amount of cocaine base in the form of  
26 crack cocaine, a schedule II controlled substance, in violation  
27 of Title 21, United States Code, Sections 846, 841(a)(1), and  
28 841(b)(1)(A).

1           2. On or about December 29, 2003, in Los Angeles County,  
2 within the Central District of California, defendants F. REAL,  
3 TRETO, and J. HERNANDEZ did unlawfully, willfully, deliberately,  
4 and with premeditation kill with malice aforethought E.A., in  
5 violation of California Penal Code Sections 31, 187, and 189.

6           3. On or about June 30, 2007, in Los Angeles County, within  
7 the Central District of California, defendant RENTERIA did  
8 unlawfully, willfully, deliberately, and with premeditation  
9 attempt to kill with malice aforethought L.O. and R.J., in  
10 violation of California Penal Code Sections 31, 187, and 189.

11           4. On or about February 21, 2008, in Los Angeles County,  
12 within the Central District of California, defendants F. REAL,  
13 SERRANO, SEGURA, R. CARRILLO, GOMEZ, and VALENCIA did unlawfully,  
14 willfully, deliberately and with premeditation conspire to kill  
15 with malice aforethought rival gang member M.S., in violation of  
16 California Penal Code, Sections 21a, 31, 182, and 187.

17           5. On or about February 21, 2008, in Los Angeles County,  
18 within the Central District of California, defendants F. REAL and  
19 GOMEZ, willfully, deliberately, and with premeditation,  
20 unlawfully killed with malice aforethought rival gang member  
21 M.S., in violation of California Penal Code, Sections 21a, 31,  
22 182, 187, and 189.

23           6. On or about February 21, 2008, in Los Angeles County,  
24 within the Central District of California, defendant GOMEZ:

25           a. Unlawfully did aid, abet, encourage, and otherwise  
26 participate in the unlawful attempt to kill with malice  
27 aforethought Los Angeles Police Department Officers Langarica and  
28 Baine in order to prevent the performance of Officer Langarica

1 and Officer Baine's official duties, in violation of California  
2 Penal Code, Sections 21a, 31, 664, and 217.1(b); and

3           b. Unlawfully, willfully, deliberately, and with  
4 premeditation and malice aforethought, did aid, abet, advise,  
5 encourage and otherwise participate in the attempted murder of  
6 Los Angeles Police Department Officers Langarica and Baine, in  
7 violation of California Penal Code, Sections 21a, 31, 664, 187,  
8 and 189.

9           7. On or about March 9, 2008, in Los Angeles County, within  
10 the Central District of California, defendant VALENCIA,  
11 willfully, deliberately, and with premeditation, unlawfully  
12 killed with malice aforethought M.F., in violation of California  
13 Penal Code, Sections 21a, 31, 182, 187, and 189.

14           8. On or about March 9, 2008, in Los Angeles County,  
15 within the Central District of California, defendant VALENCIA,  
16 willfully, deliberately, and with premeditation, unlawfully  
17 attempted to kill with malice aforethought J.M., in violation of  
18 California Penal Code, Sections 21a, 31, 182, 187, and 189.



1 knowingly murdered E.A., in violation of California Penal Code  
2 Sections 31 and 187, all in violation of Title 18, United States  
3 Code, Section 1959(a)(1).

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COUNT FOUR

[18 U.S.C. § 1959(a) (5)]

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3 1. Paragraphs One through Twelve of the General  
4 Allegations and Paragraphs One and Two of Count Three are hereby  
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about June 30, 2007, in Los Angeles County,  
7 within the Central District of California, for the purpose of  
8 maintaining and increasing position in the Avenues and Drew  
9 Street gang, an enterprise engaged in racketeering activity,  
10 defendant RENTERIA did unlawfully and knowingly attempt to murder  
11 L.O. and R.J., in violation of California Penal Code, Sections  
12 31, 664, and 187, all in violation of Title 18, United States  
13 Code, Section 1959(a) (5).

COUNT FIVE

[18 U.S.C. § 1959(a)(3)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about July 2, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendant N. REAL assaulted with a dangerous weapon C.B. and V.H., in violation of California Penal Code, Section 245(a)(2), in violation of Title 18, United States Code, Section 1959(a)(3).

COUNT SIX

[18 U.S.C. § 1959(a)(3); 18 U.S.C. § 3]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about November 26, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendants J. LEON, LARA, and S. MARTINEZ unlawfully did assault individuals with a dangerous weapon, namely, firearms, in violation of California Penal Code Sections 240, and in violation of Title 18, United States Code, Section 1959(a)(3).

3. After the commission of the above-described offense, defendants F. REAL, CARBAJAL, and TALAMANTE received, relieved, comforted, and assisted J. LEON, LARA, and S. MARTINEZ in order to hinder or prevent their apprehension, trial, or punishment, in violation of Title 18, United States Code, Section 3.

COUNT SEVEN

[18 U.S.C. § 1959(a) (5)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about February 21, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendants F. REAL, SERRANO, SEGURA, R. CARRILLO, GOMEZ, and VALENCIA unlawfully conspired to murder rival gang member M.S., in violation of California Penal Code, Sections 21a, 31, 182, and 187, all in violation of Title 18, United States Code, Section 1959(a) (5).

COUNT EIGHT

[18 U.S.C. § 1959(a)(1)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about February 21, 2008, within the Central District of California and elsewhere, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendants F. REAL and GOMEZ unlawfully and knowingly murdered M.S., in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT NINE

[18 U.S.C. § 1959(a) (5)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about February 21, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendant GOMEZ attempted to murder Los Angeles Police Department Officers Langarica and Baine, in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a) (5).

COUNT TEN

[18 U.S.C. § 1959(a)(1)]

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2  
3 1. Paragraphs One through Twelve of the General  
4 Allegations and Paragraphs One and Two of Count Three are hereby  
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about March 9, 2007, within the Central District  
7 of California and elsewhere, for the purpose of maintaining and  
8 increasing position in the Avenues and Drew Street gang, an  
9 enterprise engaged in racketeering activity, defendant VALENCIA  
10 unlawfully, willfully, deliberately, and with premeditation  
11 killed with malice aforethought M.F., in violation of California  
12 Penal Code Sections 31, 187, and 189, all in violation of Title  
13 18, United States Code, Section 1959(a)(1).

COUNT ELEVEN

[18 U.S.C. § 1959(a) (5)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about March 9, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendant VALENCIA did attempt to murder J.M., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a) (5).

COUNT TWELVE

[18 U.S.C. § 1959(a)(3)]

1. Paragraphs One through Twelve of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about March 29, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Avenues and Drew Street gang, an enterprise engaged in racketeering activity, defendants GANDARA and CERVANTES unlawfully did assault individuals with a dangerous weapon, namely, firearms, in violation of California Penal Code Sections 240, and in violation of Title 18, United States Code, Section 1959(a)(3).



1 Code, Sections 841(a)(1) and 841(b)(1)(B)(iii); and

2 3. To distribute 500 grams or more of a mixture or  
3 substance containing a detectable amount of cocaine, a schedule  
4 II narcotic drug controlled substance, in violation of Title 21,  
5 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

6 4. To distribute 50 grams or more of actual  
7 methamphetamine, in violation of Title 21, United States Code,  
8 Sections 841(a)(1) and 841(b)(1)(A)(viii); and

9 5. To distribute 5 grams or more of actual methamphetamine,  
10 a schedule II controlled substance, in violation of Title 21,  
11 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

12 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
13 ACCOMPLISHED

14 The objects of the conspiracy were to be accomplished in  
15 substance as follows:

16 1. Defendants F. REAL, M. LEON, JESUS MARTINEZ, JR., M.  
17 HERNANDEZ, and others would obtain crack cocaine,  
18 methamphetamine, and cocaine from defendants CATALAN, I. CATALAN,  
19 CAMPOS, and other suppliers.

20 2. Defendants F. REAL, M. LEON, JESUS MARTINEZ, JR., and  
21 others would provide quantities of crack cocaine,  
22 methamphetamine, and cocaine for distribution to defendants N.  
23 REAL, J. LEON, L. LEON, SEGURA, VALENCIA, SERRANO, ALVARADO, M.  
24 CARRILLO, BORJA, RENTERIA, S. MARTINEZ, R. CARRILLO, NESTOR REAL,  
25 TRETO, LARA, JESUS MARTINEZ, W. REAL, VARGAS, J. HERNANDEZ,  
26 GANDARA, R. PEREZ, J. ALVARADO, O. MARTINEZ, CARBAJAL, HUGARTE,  
27 JOSE MARTINEZ, TALAMANTE, DIAZ, ORROSTIETA, LOPEZ, FLOREZ,  
28 OCAMPO, REAL-AMPUDE, VENCES, R. AVILES, CRUZ, GUILLEN, SOLARZANO,

1 MENDOZA, NAVARETTE, DEJESUS-CERVANTES, C. CAMPOS, FAJARDO, SILVA,  
2 and others.

3 3. Defendants N. REAL, J. LEON, JESUS MARTINEZ, JR., L.  
4 LEON, SEGURA, VALENCIA, SERRANO, ALVARADO, M. CARRILLO, BORJA,  
5 RENTERIA, S. MARTINEZ, R. CARRILLO, NESTOR REAL, TRETO, LARA,  
6 JESUS MARTINEZ, W. REAL, VARGAS, CATALAN, I. CATALAN, CAMPOS, J.  
7 HERNANDEZ, GANDARA, R. PEREZ, J. ALVARADO, O. MARTINEZ, CARBAJAL,  
8 HUGARTE, JOSE MARTINEZ, TALAMANTE, DIAZ, ORROSTIETA, LOPEZ,  
9 FLOREZ, OCAMPO, REAL-AMPUDE, VENCES, R. AVILES, CRUZ, GUILLEN,  
10 SOLARZANO, MENDOZA, NAVARETTE, DEJESUS-CERVANTES, C. CAMPOS,  
11 FAJARDO, SILVA, FUERTE, and others would distribute crack  
12 cocaine, methamphetamine, and cocaine in the area controlled by  
13 the Avenues and Drew Street gang.

14 4. Defendants F. REAL, JESUS MARTINEZ, JR., ALVARADO,  
15 CARBAJAL, and others would extort "tax" payments from narcotics  
16 traffickers in the area controlled by the Avenues and Drew Street  
17 gang.

18 5. Defendant F. REAL and JESUS MARTINEZ, JR. would deliver  
19 to defendants CAMPBELL and SEGURA payment for a portion of the  
20 "taxes" owed by F. REAL and the Avenues and Drew Street gang to  
21 the Mexican Mafia.

22 6. Defendants F. REAL, LAGUNAS, and others would obtain  
23 firearms from defendant M. CARRILLO and others and provide them  
24 to Avenues and Drew Street gang members in order to enforce the  
25 authority of the Avenues and Drew Street gang to distribute  
26 narcotics in the area controlled by the gang.

27 7. Defendants F. REAL, SERRANO, SEGURA, R. CARRILLO, R.  
28 PEREZ, GOMEZ, VALENCIA, and CERVANTES would use firearms to

1 threaten, retaliate against, attempt to kill, and kill rival gang  
2 members, law enforcement officers, and potential witnesses of  
3 criminal activities committed by Avenues or Drew Street gang  
4 members in order to enforce the authority of the gang.

5 8. Defendant F. REAL would obtain information about the  
6 identities of victims and witnesses who might testify or provide  
7 information to law enforcement about crimes committed by members  
8 of the Avenues and Drew Street gang.

9 9. Defendants F. REAL, CARBAJAL, TALAMANTE, and others  
10 would threaten victims and potential witnesses in order to  
11 prevent them from testifying or cooperating with law enforcement  
12 about the crimes of the Avenues and Drew Street gang.

13 10. Defendant F. REAL would recruit juveniles and direct  
14 their initiation into the Avenues and Drew Street gang.

15 C. OVERT ACTS

16 In furtherance of the conspiracy, and to accomplish the  
17 objects of the conspiracy, defendants F. REAL, M. LEON, N. REAL,  
18 J. LEON, JESUS MARTINEZ, JR., L. LEON, SEGURA, VALENCIA, SERRANO,  
19 ALVARADO, M. CARRILLO, BORJA, RENTERIA, S. MARTINEZ, R. CARRILLO,  
20 NESTOR REAL, TRETO, LARA, JESUS MARTINEZ, W. REAL, VARGAS,  
21 CATALAN, I. CATALAN, CAMPOS, J. HERNANDEZ, GANDARA, R. PEREZ, J.  
22 ALVARADO, O. MARTINEZ, CARBAJAL, HUGARTE, JOSE MARTINEZ,  
23 TALAMANTE, DIAZ, ORROSTIETA, LOPEZ, FLOREZ, OCAMPO, REAL-AMPUDE,  
24 VENCES, R. AVILES, J. AVILES, CRUZ, GUILLEN, SOLARZANO, MENDOZA,  
25 NAVARETTE, CERVANTES, DEJESUS-CERVANTES, C. CAMPOS, FAJARDO,  
26 SILVA, FUERTE, and others known and unknown to the Grand Jury  
27 committed various overt acts, within the Central District of  
28 California and elsewhere, including overt acts numbered 1 through

1 285 as set forth in Count Two and hereby incorporated by  
2 reference, on or about the dates specified therein.

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COUNT FOURTEEN

[21 U.S.C. §§ 841(a) (1), 841(b) (1) (B) (iii)]

On or about April 7, 2007, in Los Angeles County, within the Central District of California, defendant JUAN HUGARTE, also known as "Kano," knowingly and intentionally possessed with the intent to distribute more than 5 grams, that is, approximately 8.91 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii)]

On or about September 3, 2007, in Los Angeles County, within the Central District of California, defendant ERIC ALVARADO, also known as ("aka") "Chito," and defendant NOE SEGURA, aka "Muerto," knowingly and intentionally possessed with the intent to distribute more than 5 grams, that is, approximately 9.65 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii)]

On or about September 12, 2007, in Los Angeles County, within the Central District of California, defendant JURY DANIEL VARGAS, also known as "Danny Boy," knowingly and intentionally possessed with the intent to distribute more than 5 grams, that is, approximately 10.55 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT SEVENTEEN

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii)]

On or about October 18, 2007, in Los Angeles County, within the Central District of California, defendants WILLIAM REAL, also known as ("aka") "Plucky," GUILLERMO OCAMPO, aka "Slim," and JONATHAN MENDOZA, aka "Johnny," knowingly and intentionally possessed with the intent to distribute more than 5 grams, that is, approximately 5.45 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT EIGHTEEN

[21 U.S.C. §§ 841(a) (1), 841(b) (1) (B) (iii)]

On or about November 16, 2007, in Los Angeles County, within the Central District of California, defendant HECTOR NAVARETTE knowingly and intentionally distributed more than 5 grams, that is, approximately 8.67 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT NINETEEN

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii)]

On or about February 8, 2008, in Los Angeles County, within the Central District of California, defendant RIGOBERTO JIMENEZ, also known as "Bully," knowingly and intentionally distributed more than 5 grams, that is, approximately 5.72 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT TWENTY

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii)]

On or about February 27, 2008, in Los Angeles County, within the Central District of California, defendant SERGIO DIAZ knowingly and intentionally distributed more than 5 grams, that is, approximately 14.36 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT TWENTY-ONE

[21 U.S.C. §§ 841(a) (1), 841(b) (1) (B) (viii)]

On or about March 3, 2008, in Los Angeles County, within the Central District of California, defendants NAZARIO FLOREZ and CARLOS DEJESUS-CERVANTES knowingly and intentionally distributed more than 5 grams, that is, approximately 5.77 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-TWO

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

On or about March 5, 2008, in Los Angeles County, within the Central District of California, defendant NAZARIO FLOREZ knowingly and intentionally distributed more than 5 grams, that is, approximately 5.87 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-THREE

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

On or about March 5, 2008, in Los Angeles County, within the Central District of California, defendant NESTOR REAL, also known as "Sparky," knowingly and intentionally distributed more than 5 grams, that is, approximately 7.04 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-FOUR

[21 U.S.C. §§ 841(a) (1), 841(b) (1) (B) (viii)]

On or about March 12, 2008, in Los Angeles County, within the Central District of California, defendant NAZARIO FLOREZ knowingly and intentionally distributed more than 5 grams, that is, approximately 11.53 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-FIVE

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(iii)]

On or about March 17, 2008, in Los Angeles County, within the Central District of California, defendants FRANCISCO REAL, also known as ("aka") "Pancho," MIGUEL HERNANDEZ, aka "Pelicano," LENNIN CATALAN, and FRANCISCO CAMPOS, also known as "Kiko," knowingly and intentionally possessed with the intent to distribute more than 50 grams, that is, approximately 111.9 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT TWENTY-SIX

[21 U.S.C. §§ 841(a) (1), 841(b) (1) (A) (iii)]

On or about April 10, 2008, in Los Angeles County, within the Central District of California, defendants LENNIN CATALAN and IMELDA CATALAN knowingly and intentionally possessed with the intent to distribute more than 50 grams, that is, approximately 502.8 grams, of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.



1 prevent them from providing information to law enforcement  
2 officers about crimes committed by members of the Avenues and  
3 Drew Street gang.

4 3. Defendants F. REAL, CARBAJAL, and TALAMANTE would  
5 threaten witnesses in order to prevent them from cooperating with  
6 law enforcement.

7 C. OVERT ACTS

8 In furtherance of the conspiracy and to accomplish the  
9 objects of the conspiracy, defendants F. REAL, CARBAJAL,  
10 TALAMANTE, and others known and unknown to the Grand Jury  
11 committed various overt acts, within the Central District of  
12 California, including overt acts numbered 1 through 285 as set  
13 forth in Count Two and hereby incorporated by reference, on or  
14 about the dates specified therein.

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COUNT TWENTY-EIGHT

[18 U.S.C. § 1512(a)(2)]

On or about February 5, 2008, in Los Angeles County, within the Central District of California, defendants FRANCISCO REAL, also known as ("aka") "Pancho," and FELIPE TALAMANTE knowingly attempted to use physical force or the threat of physical force, with the intent to influence, delay, or prevent the testimony of another person in an official proceeding; cause or induce a person to withhold testimony from an official proceeding; or hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information related to the commission or possible commission of a federal offense.

COUNT TWENTY-NINE

[18 U.S.C. § 1512(a)(2)]

On or about March 11, 2008, in Los Angeles County, within the Central District of California, defendants FRANCISCO REAL, also known as ("aka") "Pancho," RAUL CARBAJAL, and FELIPE TALAMANTE knowingly attempted to use physical force or the threat of physical force, with the intent to influence, delay, or prevent the testimony of another person in an official proceeding; cause or induce a person to withhold testimony from an official proceeding; or hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information related to the commission or possible commission of a federal offense.







1 California Health and Safety Code Section 11352A, both in the Los  
2 Angeles Superior Court, Case Number BA28035603, on or about  
3 December 10, 2004.

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COUNT THIRTY-THREE

[18 U.S.C. § 922(g)(5)]

On or about September 12, 2007, in Los Angeles County, within the Central District of California, defendant JURY DANIEL VARGAS, also known as "Danny Boy," who was then an alien illegally and unlawfully in the United States, knowingly possessed at least one of the following firearms: a Glock 21 9 mm handgun, serial number CWM007; and a Bryco .380 caliber semi-automatic handgun, serial number 1224089, in and affecting interstate and foreign commerce.

COUNT THIRTY-FOUR

[18 U.S.C. § 924(c)]

On or about September 3, 2007, in Los Angeles County, within the Central District of California, defendant ERIC ALVARADO, also known as "Chito," knowingly possessed a firearm, namely, a loaded Ruger P89 9 mm handgun, serial number 31048767, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(c), and the racketeering conspiracy set forth on Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT THIRTY-FIVE

[18 U.S.C. § 924(c)]

On or about September 12, 2007, in Los Angeles County, within the Central District of California, defendant JURY DANIEL VARGAS, also known as "Danny Boy," knowingly possessed firearms, namely, a loaded Glock 21 9 mm handgun, serial number CWM007, and a loaded Smith and Wesson .40 caliber handgun, serial number PBP0709, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(c), and the racketeering conspiracy set forth on Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).



COUNT THIRTY-SEVEN

[18 U.S.C. § 924(c)]

On or about October 18, 2007, in Los Angeles County, within the Central District of California, defendant WILLIAM REAL, also known as ("aka") "Plucky," GUILLERMO OCAMPO, aka "Slim," and JONATHAN MENDOZA, aka "Johnny," knowingly possessed firearms, namely, a loaded Harrington and Richardson .32 caliber revolver, serial number 454990, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, and conspiracy to distribute methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(c), and the racketeering conspiracy set forth in Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT THIRTY-EIGHT

[18 U.S.C. § 924(c)]

On or about November 16, 2007, in Los Angeles County, within the Central District of California, defendant HECTOR NAVARETTE knowingly possessed a firearm, namely, a loaded .38 caliber revolver handgun, serial number C126745, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and possession with the intent to distribute crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-NINE

[18 U.S.C. § 924(c); 18 U.S.C. § 2(a)]

On or about November 26, 2007, in Los Angeles County, within the Central District of California, defendants FRANCISCO REAL, also known as ("aka") "Pancho," JOSE LEON, aka "NeNe," SERGIO MARTINEZ, aka "Bird," JORGE LARA, aka "Oso," and FELIPE TALAMANTE, aiding and abetting each other, knowingly used, carried, possessed, brandished, and discharged firearms, namely, a loaded M-11 9 mm assault rifle, serial number 890008760, and a loaded Ruger P85 9 mm handgun, a serial number 30123669, during and in relation to, and in furtherance of, a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment (specifically, the robbery set forth in Racketeering Act 31), a violation of Title 18, United States Code, Section 1962(c), and the conspiracy set forth in Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT FORTY

[18 U.S.C. § 924(c); 18 U.S.C. § 2(a)]

On or about February 21, 2008, in Los Angeles County, within the Central District of California, defendants FRANCISCO REAL, also known as ("aka") "Pancho," NOE SEGURA, aka "Muerto," ALEX VALENCIA, aka "Gunner," CHRISTIAN SERRANO, aka "Hefty," RAFAEL CARRILLO, aka "Stomper," and JOSE GOMEZ, aka "Rival," aiding and abetting each other, knowingly used, carried, possessed, brandished, and discharged firearms, namely, a Polytech AK-47 7.62 mm, serial number P47-05892, and a Grendel P-12 .380 caliber handgun, a serial number 6960, during and in relation to, and in furtherance of, a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment (specifically, the conspiracy to commit murder of M.S. and the attempted murder of police officers set forth in Racketeering Acts 63 and 64), a violation of Title 18, United States Code, Section 1962(c), and the racketeering conspiracy set forth in Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT FORTY-ONE

[18 U.S.C. § 924(c)]

On or about March 29, 2008, in Los Angeles County, within the Central District of California, defendants ANDREW GANDARA, also known as ("aka") "Lil Silent," and CARLOS CERVANTES, aka "Psycho," knowingly used, carried, possessed and brandished a firearm, namely, a loaded KSI 9 mm semi-automatic handgun, serial number 39000723, during and in relation to, and in furtherance of, a crime violence, namely, the racketeering offense set forth in Count One of this Indictment (specifically, the robbery set forth in Racketeering Act 83), a violation of Title 18, United States Code, Section 1962(c), and the conspiracy set forth in Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT FORTY-TWO

[18 U.S.C. § 924(c)]

On or about May 22, 2008, in Los Angeles County, within the Central District of California, defendant JUAN LEMUS, also known as "Bola," knowingly possessed a firearm, namely, a .25 caliber ACP handgun, serial number DK30515, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute cocaine base in the form of crack cocaine ("crack cocaine"), a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and possession with the intent to distribute crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1), and a crime of violence, namely, the racketeering offense set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(c), and the racketeering conspiracy set forth in Count Two of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT FORTY-THREE

[21 U.S.C. § 843(b)]

On or about October 30, 2007, in Los Angeles County, within the Central District of California, defendant DAISY VALENCIA knowingly and intentionally used a communication facility, to wit, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, the conspiracy to possess with intent to distribute and the distribution of more than 50 grams of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, a violation of 21 U.S.C. § 846.

COUNT FORTY-FOUR

[21 U.S.C. § 843(b)]

On or about January 30, 2008, in Los Angeles County, within the Central District of California, defendant MAYRA ALEJANDRA FAJARDO knowingly and intentionally used a communication facility, to wit, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to possess with intent to distribute and the distribution of more than 50 grams of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, a violation of 21 U.S.C. § 846.

COUNT FORTY-FIVE

[21 U.S.C. § 843(b)]

On or about May 12, 2008, in Los Angeles County, within the Central District of California, defendant JOANNA FUERTE knowingly and intentionally used a communication facility, to wit, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to possess with intent to distribute and the distribution of more than 50 grams of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, a violation of 21 U.S.C. § 846.

COUNT FORTY-SIX

[18 U.S.C. § 1956(h)]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about June 4, 2006, in Los Angeles County, within the Central District of California, and elsewhere, defendants FRANCISCO REAL, also known as ("aka") "Pancho" ("F. REAL"), MARIA LEON, aka "Chata" ("M. LEON"), NICOLAS REAL, aka "Nico," aka "Monkey" ("N. REAL"), JOSE LEON, aka "NeNe" ("J. LEON"), RAUL CARBAJAL, aka "Raton" ("CARBAJAL"), MAYRA ALEJANDRA FAJARDO ("FAJARDO"), DAISY VALENCIA ("D. VALENCIA"), JOANNA FUERTE ("FUERTE"), and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other to conduct financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, that is, conspiracy to distribute cocaine base in the form of crack cocaine ("crack cocaine"), cocaine, and methamphetamine, with the intent to promote the carrying on of said specified unlawful activity, and to conceal and disguise the nature, location, source, ownership, and control the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

1. The Grand Jury re-alleges and incorporates by reference

1 paragraphs 1 through 14 of Count Two setting forth the means  
2 described in the conspiracy charged in Count Two of this  
3 Indictment.

4         2. The Grand Jury re-alleges and incorporates by reference  
5 paragraphs 1 through 10 of Count Thirteen setting forth the means  
6 described in the conspiracy charged in Count Ten of this  
7 Indictment.

8         3. Defendants F. REAL, M. LEON, and N. REAL would conspire  
9 and arrange with others to obtain crack cocaine and  
10 methamphetamine.

11         4. Defendants F. REAL, M. LEON, N. REAL, and J. LEON would  
12 sell and direct others to sell crack cocaine and methamphetamine  
13 and collect the proceeds from the illegal distribution of crack  
14 cocaine and methamphetamine.

15         5. Defendants F. REAL, M. LEON, D. VALENCIA, CARBAJAL, and  
16 others would maintain Bank of America bank accounts to maintain  
17 the proceeds from illegal methamphetamine and cocaine  
18 distribution.

19         6. Defendant F. REAL, M. LEON, N. REAL, and J. LEON would  
20 provide proceeds from the Bank of America accounts, as well as  
21 additional amounts of United States currency, to a co-  
22 conspirator.

23         7. Defendant FUERTE would record title in her name on  
24 vehicles in order to conceal defendant F. REAL's involvement in  
25 crack cocaine and methamphetamine trafficking.

26         8. Defendant CARBAJAL would purchase and take title in  
27 residential property in his name in order to conceal the  
28 involvement of defendants F. REAL, M. LEON, N. REAL, and J. LEON

1 in crack cocaine and methamphetamine trafficking.

2 C. OVERT ACTS

3 In furtherance of the conspiracy, and to accomplish the  
4 objects of the conspiracy, defendants F. REAL, M. LEON, N. REAL,  
5 J. LEON, CARBAJAL, FAJARDO, D. VALENCIA, FUERTE, and others known  
6 and unknown to the Grand Jury, committed various overt acts on or  
7 about the following dates, within the Central District of  
8 California and elsewhere, including but not limited to the  
9 following:

10 1-285. The Grand Jury re-alleges and incorporates by  
11 reference paragraphs 1 through 285 of Count Two setting forth the  
12 overt acts of the conspiracy charged in Count Two of this  
13 Indictment.

14 286. On April 3, 2006, defendant CARBAJAL completed a  
15 Uniform Residential Loan Application requesting funding to  
16 purchase a residence located on Falcon Trail, Victorville,  
17 California ("the Falcon Trail residence").

18 287. On April 5, 2006, defendant CARBAJAL submitted United  
19 States Postal Service money orders for \$5,500 to First American  
20 Title Company as a down payment for the purchase of the Falcon  
21 Trail residence.

22 288. On April 10, 2006, defendant CARBAJAL purchased the  
23 Falcon Trail residence for defendants F. REAL, M. LEON, N. REAL,  
24 and J. LEON.

25 289. On June 2, 2006, defendants F. REAL, M. LEON, N. REAL,  
26 and J. LEON provided \$3,120 to defendant D. VALENCIA to deposit  
27 into D. VALENCIA's Bank of America account so that D. VALENCIA  
28 could make a payment on the Falcon Trail residence.

1           290. On June 2, 2006, defendant D. VALENCIA deposited  
2 \$3,120 into her Bank of America account.

3           291. On June 6 2006, defendant D. VALENCIA provided Bank of  
4 America checks in the amounts of \$2,243.92 and \$874.82 to New  
5 Century Mortgage Corporation as payment on the Falcon Trail  
6 residence.

7           292. On July 11, 2006, defendants F. REAL, M. LEON, N.  
8 REAL, and J. LEON provided \$3,120 to defendant D. VALENCIA for  
9 payment on the Falcon Trail residence.

10          293. On July 11, 2006, defendant D. VALENCIA deposited  
11 \$3,120 into her Bank of America account.

12          294. On July 18, 2006, defendant D. VALENCIA authorized  
13 electronic mortgage payments of \$2,243.92 and \$874.82 from her  
14 Bank of America account to New Century Mortgage Corporation for  
15 payment on the Falcon Trail residence.

16          295. On August 9, 2006, defendants F. REAL, M. LEON, N.  
17 REAL, and J. LEON provided \$3,120 to defendant D. VALENCIA for  
18 payment on the Falcon Trail residence.

19          296. On August 9, 2006, defendant D. VALENCIA deposited  
20 \$3,120 into her Bank of America account.

21          297. On August 11, 2006, defendant D. VALENCIA authorized  
22 electronic mortgage payments of \$2,243.92 and \$874.82 from her  
23 Bank of America account to New Century Mortgage Corporation for  
24 payment on the Falcon Trail residence.

25          298. On September 7, 2006, defendants F. REAL, M. LEON, N.  
26 REAL, and J. LEON provided \$3,180 to defendant D. VALENCIA for  
27 payment on the Falcon Trail residence.

28          299. On September 7, 2006, defendant D. VALENCIA deposited

1 \$3,180 into her Bank of America account.

2 300. On September 15, 2006, defendant D. VALENCIA  
3 authorized electronic mortgage payments of \$2,258.92 and \$874.82  
4 from her Bank of America account to New Century Mortgage  
5 Corporation for payment on the Falcon Trail residence.

6 301. On October 3, 2006, defendants F. REAL, M. LEON, N.  
7 REAL, and J. LEON provided \$3,300 to defendant D. VALENCIA for  
8 payment on the Falcon Trail residence.

9 302. On October 3, 2006, defendant D. VALENCIA deposited  
10 \$3,300 into her Bank of America account.

11 303. On October 5, 2006, defendant D. VALENCIA authorized  
12 electronic mortgage payments of \$2,243.92 and \$889.82 from her  
13 Bank of America account to New Century Mortgage Corporation for  
14 payment on the Falcon Trail residence.

15 304. On November 2, 2006, defendants F. REAL, M. LEON, N.  
16 REAL, and J. LEON provided \$3,135 to defendant D. VALENCIA for  
17 payment on the Falcon Trail residence.

18 305. On November 2, 2006, defendant D. VALENCIA deposited  
19 \$3,135 into her Bank of America account.

20 306. On November 6, 2006, defendant D. VALENCIA authorized  
21 electronic mortgage payments of \$2,258.92 and \$874.82 from her  
22 Bank of America account to New Century Mortgage Corporation and  
23 HSBC Bank for payment on the Falcon Trail residence.

24 307. On December 11, 2006, defendants F. REAL, M. LEON, N.  
25 REAL, and J. LEON provided \$1,865 to defendant D. VALENCIA for  
26 payment on the Falcon Trail residence.

27 308. On December 11, 2006, defendant D. VALENCIA deposited  
28 \$1,865 into her Bank of America account.

1           309. On December 12, 2006, defendants F. REAL, M. LEON, N.  
2 REAL, and J. LEON provided \$2,640 to defendant D. VALENCIA for  
3 payment on the Falcon Trail residence.

4           310. On December 12, 2006, defendant D. VALENCIA deposited  
5 \$2,640 into her Bank of America account.

6           311. On December 14, 2006, defendant D. VALENCIA provided a  
7 Bank of America check in the amount of \$2,243.92 to New Century  
8 Mortgage Corporation for payment on the Falcon Trail residence.

9           312. On December 15, 2006, defendant D. VALENCIA provided a  
10 Bank of America check in the amount of \$874.82 to HSBC Bank for  
11 payment on the Falcon Trail residence.

12           313. On January 10, 2007, defendants F. REAL, M. LEON, N.  
13 REAL, and J. LEON provided \$3,200 to defendant D. VALENCIA for  
14 payment on the Falcon Trail residence.

15           314. On January 10, 2007, defendant D. VALENCIA deposited  
16 \$3,200 into her Bank of America account.

17           315. On January 11, 2007, defendant D. VALENCIA provided a  
18 Bank of America check in the amount of \$2,243.92 to New Century  
19 Mortgage Corporation for payment on the Falcon Trail residence.

20           316. On January 18, 2007, defendant D. VALENCIA provided a  
21 Bank of America check in the amount of \$874.82 to HSBC Bank for  
22 payment on the Falcon Trail residence.

23           317. On February 12, 2007, defendants F. REAL, M. LEON, N.  
24 REAL, and J. LEON provided \$3,380 to defendant D. VALENCIA for  
25 payment on the Falcon Trail residence.

26           318. On February 12, 2007, defendant D. VALENCIA deposited  
27 \$3,380 into her Bank of America account.

28           319. On February 14, 2007, defendant D. VALENCIA provided a

1 Bank of America check in the amount of \$915.56 to HSBC Bank for  
2 payment on the Falcon Trail residence.

3 320. On February 15, 2006, defendant D. VALENCIA provided a  
4 Bank of America check in the amount of \$2,243.92 to New Century  
5 Mortgage Corporation for payment on the Falcon Trail residence.

6 321. On March 12, 2007, defendant D. VALENCIA provided a  
7 Bank of America check in the amount of \$2,243.92 to New Century  
8 Mortgage Corporation for payment on the Falcon Trail residence.

9 322. On March 13, 2007, defendants F. REAL, M. LEON, N.  
10 REAL, and J. LEON provided \$1,850 to defendant D. VALENCIA for  
11 payment on the Falcon Trail residence.

12 323. On March 13, 2007, defendant D. VALENCIA deposited  
13 \$1,850 into her Bank of America account.

14 324. On March 14, 2007, defendants F. REAL, M. LEON, N.  
15 REAL, and J. LEON provided \$1,600 to defendant D. VALENCIA for  
16 payment on the Falcon Trail residence.

17 325. On March 14, 2007, defendant D. VALENCIA deposited  
18 \$1,600 into her Bank of America account.

19 326. On October 7, 2007, defendant FUERTE recorded title in  
20 her name on a 1999 Jeep Grand Cherokee for defendant F. REAL.

21 327. On November 30, 2007, defendants F. REAL, M. LEON, N.  
22 REAL, and J. LEON provided \$4,700 to defendant D. VALENCIA for  
23 payment on the Falcon Trail residence.

24 328. On November 30, 2007, defendant D. VALENCIA deposited  
25 \$4,700 into her Bank of America account.

26 329. On December 4, 2007, defendant D. VALENCIA provided a  
27 Bank of America check in the amount of \$2,243.92 to New Century  
28 Mortgage Corporation for payment on the Falcon Trail residence.

1           330. On December 4, 2007, by telephone using coded  
2 language, defendant F. REAL told defendant N. REAL that F. REAL  
3 did not want to sell the Falcon Trail residence, but that he  
4 needed defendant CARBAJAL to transfer the title to him, and  
5 defendant N. REAL stated that CARBAJAL was not the actual owner  
6 of the Falcon Trail residence.

7           331. On December 5, 2007, defendant D. VALENCIA provided a  
8 Bank of America check in the amount of \$874.82 to HSBC Bank for  
9 payment on the Falcon Trail residence.

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1                   COUNTS FORTY-SEVEN THROUGH EIGHTY-SEVEN

2                   [18 U.S.C. §§ 1956(a)(1)(B)(i), 2(a)]

3                   On or about the following dates, in Los Angeles County,  
4 within the Central District of California, defendants FRANCISCO  
5 REAL, also known as ("aka") "Pancho" (F. REAL), MARIA LEON, aka  
6 "Chata" ("M. LEON"), NICOLAS REAL, aka "Nico," aka "Monkey" ("N.  
7 REAL"), JOSE LEON, aka "NeNe" ("J. LEON"), RAUL CARBAJAL, aka  
8 "Raton" ("CARBAJAL"), MAYRA ALEJANDRA FAJARDO ("FAJARDO"), and  
9 DAISY VALENCIA ("D. VALENCIA"), knowingly and willfully conducted  
10 and aided, abetted, counseled, commanded, induced, and procured  
11 the following financial transactions affecting interstate and  
12 foreign commerce, knowing that the property involved in each of  
13 the financial transactions represented the proceeds of some form  
14 of unlawful activity, and which property was, in fact, the  
15 proceeds of specified unlawful activity, that is, conspiracy to  
16 distribute methamphetamine and cocaine, knowing that each of the  
17 transactions was designed in whole or in part to conceal and  
18 disguise the nature, location, source, ownership, and control of  
19 the proceeds of specified unlawful activity:

20	<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
21	FORTY-SEVEN	3/09/06	Money Order 09134790884 Payment in the
22			amount of \$1,000 to First American Title
			Company
23	FORTY-EIGHT	3/09/06	Money Order 09134790895 Payment in the
24			amount of \$1,000 to First American Title
			Company
25	FORTY-NINE	4/05/06	Money Order 09415073790 Payment in the
26			amount of \$1,000 to First American Title
			Company
27	FIFTY	4/05/06	Money Order 09415073766 Payment in the
28			amount of \$1,000 to First American Title
			Company

1	FIFTY-ONE	4/05/06	Money Order 09415073777 Payment in the amount of \$1,000 to First American Title Company
2			
3	FIFTY-TWO	4/05/06	Money Order 09415073788 Payment in the amount of \$1,000 to First American Title Company
4			
5	FIFTY-THREE	4/05/06	Money Order 09415073755 Payment in the amount of \$1,000 to First American Title Company
6			
7	FIFTY-FOUR	4/05/06	Money Order 009415073801 Payment in the amount of \$500 to First American Title Company
8			
9	FIFTY-FIVE	6/02/06	Deposit of \$3,120 in Bank of America account number xxxxxx8242
10			
11	FIFTY-SIX	6/06/06	Payment by personal check of \$2,243.92 to New Century Mortgage Corporation from Bank of America account number xxxxxx8242
12			
13	FIFTY-SEVEN	6/06/06	Payment by personal check of \$874.82 to New Century Mortgage Corporation from Bank of America account number xxxxxx8242
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16	FIFTY-EIGHT	7/11/06	Deposit of \$3,120 in Bank of America account number xxxxxx8242
17			
18	FIFTY-NINE	7/18/06	Payment by personal check of \$2,243.92 to New Century Mortgage Corporation from Bank of America account number xxxxxx8242
19			
20	SIXTY	7/18/06	Payment by personal check of \$874.82 to New Century Mortgage from Bank of America account number xxxxxx8242
21			
22	SIXTY-ONE	8/09/06	Deposit of \$3,120 in Bank of America account number xxxxxx8242
23			
24	SIXTY-TWO	8/11/06	Transfer of \$2,243.92 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
25			
26	SIXTY-THREE	8/11/06	Transfer of \$874.82 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
27			
28	SIXTY-FOUR	9/07/06	Deposit of \$3,180 in Bank of America account number xxxxxx8242

1	SIXTY-FIVE	9/15/06	Transfer of \$2,258.92 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
2			
3	SIXTY-SIX	9/15/06	Transfer of \$874.82 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
4			
5	SIXTY-SEVEN	10/03/05	Deposit of \$3,300 in Bank of America account number xxxxxx8242
6			
7	SIXTY-EIGHT	10/05/06	Transfer of \$2,243.92 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
8			
9	SIXTY-NINE	10/05/06	Transfer of \$889.82 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
10			
11	SEVENTY	11/02/06	Deposit of \$3,135 in Bank of America account number xxxxxx8242
12			
13	SEVENTY-ONE	11/06/06	Transfer of \$2,258.92 from Bank of America account number xxxxxx8242 to New Century Mortgage Corporation
14			
15	SEVENTY-TWO	11/15/06	Payment of \$874.82 by personal check to HSBC Bank
16			
17	SEVENTY-THREE	12/11/06	Deposit of \$1,865 in Bank of America account number xxxxxx8242
18			
19	SEVENTY-FOUR	12/12/06	Deposit of \$2,640 in Bank of America account number xxxxxx8242
20			
21	SEVENTY-FIVE	12/15/06	Payment of \$874.82 by personal check to HSBC Bank from Bank of America account number xxxxxx8242
22			
23	SEVENTY-SIX	1/10/07	Deposit of \$3,200 in Bank of America account number xxxxxx8242
24			
25	SEVENTY-SEVEN	1/11/07	Payment of \$2,243.92 by personal check to New Century Mortgage from Bank of America account number xxxxxx8242
26			
27	SEVENTY-EIGHT	1/18/07	Payment of \$874.82 by personal check to HSBC Bank from Bank of America account number xxxxxx8242
28			
	SEVENTY-NINE	2/12/07	Deposit of \$3,380 in Bank of America account number xxxxxx8242

1	EIGHTY	2/14/07	Payment of \$915.56 by personal check to HSBC Bank from Bank of America account number xxxxxx8242
2			
3	EIGHTY-ONE	2/15/07	Payment of \$2,243.92 by personal check to New Century Mortgage from Bank of America account number xxxxxx8242
4			
5	EIGHTY-TWO	3/12/07	Payment of \$2,243.92 by personal check to New Century Mortgage from Bank of America account number xxxxxx8242
6			
7	EIGHTY-THREE	3/13/07	Deposit of \$1,850 in Bank of America account number xxxxxx8242
8			
9	EIGHTY-FOUR	3/14/07	Deposit of \$1,600 in Bank of America account number xxxxxx8242
10	EIGHTY-FIVE	11/30/07	Deposit of \$4,700 in Bank of America account number xxxxxx8242
11			
12	EIGHTY-SIX	12/04/07	Payment of \$2,243.92 by personal check to New Century Mortgage from Bank of America account number xxxxxx8242
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14	EIGHTY-SEVEN	12/05/07	Payment of \$874.82 by personal check to HSBC from Bank of America account number xxxxxx8242
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COUNT EIGHTY-EIGHT

[18 U.S.C. § 982(a)(1); 21 U.S.C. § 853(a)]

1 Pursuant to Title 21, United States Code, Section  
2 853(a), and Title 18, United States Code, Section 982(a)(1),  
3 defendants FRANCISCO REAL, also known as ("aka") "Pancho," MARIA  
4 LEON, aka "Chata," NICHOLAS REAL, aka "Monkey," JOSE LEON, aka  
5 "NeNe," JESUS MARTINEZ, JR., aka "JJ," aka "Lil Clever," LUIS  
6 LEON, aka "Sicko," NOE SEGURA, aka "Muerto," ALEX VALENCIA, aka  
7 "Gunner," CHRISTIAN SERRANO, aka "Hefty," ERIC ALVARADO, aka  
8 "Chito," MISAEL CARRILLO, aka "Lil Toker," RAUL BORJA, aka  
9 "Spanky," CARLOS RENTERIA, aka "Rider," SERGIO MARTINEZ, aka  
10 "Bird," NEO PEREZ, aka "Nito," RAFAEL CARRILLO, aka "Stomper,"  
11 JOSE GOMEZ, aka "Rival," NESTOR REAL, aka "Sparky," DAVID TRETO,  
12 aka "Flaps," JORGE LARA, aka "Oso," JESUS ISRAEL MARTINEZ,  
13 WILLIAM REAL, JURY DANIEL VARGAS, aka "Danny Boy," LENNIN  
14 CATALAN, IMELDA CATALAN, FRANCISCO CAMPOS, aka "Kiko," JUAN  
15 HERNANDEZ, aka "Gordy," ANDREW GANDARA, aka "Lil Silent,"  
16 RIGOBERTO PEREZ, aka "Toker," JOSE ALVARADO, aka "Minor,"  
17 RIGOBERTO JIMENEZ, aka "Bully," JAMES CAMPBELL, aka "Drifter,"  
18 OMAR MARTINEZ, JUAN LEMUS, aka "Bola," RAUL CARBAJAL, aka  
19 "Raton," LUIS VARGAS, aka "Smalls," CESAR LAGUNAS, aka "Hans,"  
20 JUAN HUGARTE, aka "Kano," MIGUEL SILLAS, aka "Jokey," JOSEPH  
21 ESCANDON, aka "Lokito," JOSE MARTINEZ-MADRIGAL, aka "Pepito,"  
22 FELIPE TALAMANTE, SERGIO DIAZ, MIGUEL LOPEZ, aka "Shooter,"  
23 MIGUEL HERNANDEZ, aka "Pelicano," MICHAEL VALCARCE, aka "Cuba,"  
24 NAZARIO FLOREZ, JUANA ORROSTIETA, MIGUEL VENANCIO, GUILLERMO  
25 OCAMPO, aka "Slim," GERMAN REAL-AMPUDE, aka "Chispas," VALENTIN  
26 VENCES, RAFAEL AVILES, aka "Rafa," JOSE AVILES, aka "Papucho,"  
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1 ANTHONY NIETO, aka "Grizzly," ORBELIN HERNANDEZ, aka "Obee,"  
2 RAFAEL GARCIA, CHRISTINA CRUZ, aka "Negra," DANIEL GUILLEN,  
3 LEONORA SOLARZANO, JACKIE DE LA CRUZ, JONATHAN MENDOZA, aka  
4 "Johnny," HECTOR NAVARETTE, CARLOS ANTHONY CERVANTES, aka  
5 "Psycho," CARLOS DEJESUS-CERVANTES, MAYRA ALEJANDRA FAJARDO,  
6 CLARA CAMPOS, ARELY ALBARRAN-SILVA, DAISY VALENCIA, and JOANNA  
7 FUERTE shall forfeit to the United States the following property:

8 a. All right, title, and interest in -

9 (i) any and all property constituting, or derived  
10 from, any proceeds obtained, directly or  
11 indirectly, as a result of any of the  
12 offenses described in Counts One through  
13 Twenty-Six;

14 (ii) any property, real or personal, used, or  
15 intended to be used, in any manner or part,  
16 to commit, or to facilitate the commission  
17 of, any of the offenses described in Counts  
18 One through Twenty-Six; and

19 (iii) any property, real or personal, which was  
20 involved in any of the offenses described in  
21 Counts Thirty-Six through Sixty-Four, or  
22 traceable to such property.

23 The property described in paragraph 1(a)(i), (ii),  
24 and (iii) includes, without limitation the  
25 residence located at 13241 Falcon Trail, in  
26 Victorville, California.

27 b. A sum of money equal to the total value of the  
28 property described in paragraph 1(a)(i), (ii) and

1 (iii). If more than one defendant is convicted of  
2 an offense, the defendants so convicted are  
3 jointly and severally liable for the amount  
4 involved in such offense.

5 2. Pursuant to Title 21, United States Code, Section  
6 853(p), each defendant shall forfeit substitute property, up to  
7 the value of the total amount described in paragraph 1(a), if, as  
8 the result of any act or omission of said defendant, said  
9 property, or any portion thereof, cannot be located upon the  
10 exercise of due diligence; has been transferred, sold to or  
11 deposited with a third party; has been placed beyond the  
12 jurisdiction of the court; has been substantially diminished in  
13 value; or has been commingled with other property that cannot be  
14 divided without difficulty.

15 A TRUE BILL

16  
17  
18 Foreperson

19  
20 THOMAS P. O' BRIEN  
21 United States Attorney

22 CHRISTINE C. EWELL  
23 Assistant United States Attorney  
24 Chief, Criminal Division

25 ROBERT E. DUGDALE  
26 Assistant United States Attorney  
27 Chief, Violent and Organized Crime Section

28 CHRISTOPHER BRUNWIN  
Assistant United States Attorney  
Acting Deputy Chief, Violent and Organized Crime Section

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