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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
February 2010 Grand Jury

UNITED STATES OF AMERICA, ) CR  
 )  
Plaintiff, ) I N D I C T M E N T  
 )  
v. ) [18 U.S.C. § 1962(d): Racketeer  
 ) Influenced and Corrupt  
RAFAEL MUNOZ GONZALEZ, ) Organizations Conspiracy;  
 aka "Cisco," ) 18 U.S.C. § 1962(c): Racketeer  
 aka "C," ) Influenced and Corrupt  
CESAR MUNOZ GONZALEZ, ) Organizations; 18 U.S.C.  
 aka "Blanco," ) § 1959: Violent Crime in Aid of  
 aka "B," ) Racketeering; 21 U.S.C. §§ 846,  
ABRAHAM ALDANA, ) 841(a)(1), 841(b)(1)(A):  
 aka "Listo," ) Conspiracy to Distribute  
MICHAEL ANTHONY TORRES, ) Methamphetamine; 21 U.S.C.  
 aka "Mikey," ) §§ 841(a)(1), 841(b)(1)(B):  
ANGEL FRANK TORRES, ) Possession with Intent to  
 aka "Smiley," ) Distribute Methamphetamine;  
STEVEN NUNEZ, ) 18 U.S.C. §§ 924(c)(1)(A)(i),  
 aka "Flaco," ) 924(c)(1)(B)(i): Use of a  
DANNY ARTHUR NUNEZ, ) Firearm in Furtherance of a  
 aka "Moe," ) Crime of Violence or Drug  
ALEJANDRO TRUJILLO, ) Trafficking Crime; 18 U.S.C.  
 aka "Spantos," ) § 922(g)(1): Felon in  
MARIO ALBERTO SANDOVAL, ) Possession of Firearms;  
 aka "Sonny," ) 21 U.S.C. § 860a: Distributing  
 aka "Junior," ) Possession With Intent to  
PATRICIA ANA AYALA-MARTINEZ, ) Distribute Methamphetamine on  
 aka "Dreams," ) Premises Where Children are  
ADRIAN RODRIGUEZ, ) Present and Reside; 18 U.S.C.  
 aka "Trips," ) §§ 113(a)(1), 113(a)(3):  
PAUL MEYERKAMP, ) Assault with a Dangerous  
SARA EMERT, ) Weapon, Assault with Intent to  
 ) Commit Murder within

1	OSCAR ZAMORA,	)	Territorial Jurisdiction;
	aka "Chino,"	)	21 U.S.C. § 843(b): Use of
2	ALEX RAMIREZ,	)	Communication Facility in
	HENRY ZABALA, and	)	Furtherance of Drug
3	VICTOR FLORES,	)	Trafficking; 18 U.S.C.
		)	§ 982(a)(1) and 21 U.S.C.
4	Defendants.	)	§ 853(a): Criminal Forfeiture]
5	<hr/>		

6 The Grand Jury charges:

7           GENERAL ALLEGATIONS

8           1. At all relevant times, defendants RAFAEL MUNOZ  
9 GONZALEZ, also known as ("aka") "Cisco," aka "C" ("GONZALEZ");  
10 CESAR MUNOZ GONZALEZ, aka "Blanco," aka "B" ("BLANCO"); ABRAHAM  
11 ALDANA, aka "Listo" ("ALDANA"); MICHAEL ANTHONY TORRES, aka  
12 "Mikey" ("M. TORRES"); ANGEL FRANK TORRES, aka "Smiley" ("A.  
13 TORRES"); STEVEN NUNEZ, aka "Flaco" ("S. NUNEZ"); DANNY ARTHUR  
14 NUNEZ, aka "Moe" ("D. NUNEZ"); ALEJANDRO TRUJILLO, aka "Spantos"  
15 ("TRUJILLO"); MARIO ALBERTO SANDOVAL, aka "Sonny," aka "Junior"  
16 ("SANDOVAL"); PATRICIA ANA AYALA-MARTINEZ, aka "Dreams"  
17 ("AYALA"); ADRIAN RODRIGUEZ, aka "Trips" ("RODRIGUEZ"); PAUL  
18 MEYERKAMP ("MEYERKAMP"); SARA EMERT ("EMERT"); OSCAR ZAMORA, aka  
19 "Chino" ("ZAMORA"); ALEX RAMIREZ ("RAMIREZ"); and HENRY ZABALA  
20 ("ZABALA"), and others, were members and associates of an  
21 organization engaged in, among other things, conspiracy to  
22 traffic narcotics, narcotics trafficking, murder, conspiracy to  
23 commit murder, attempted murder, and witness intimidation. At  
24 all relevant times, this organization, known as the "Puente-13"  
25 gang, operated in the Central District of California and  
26 elsewhere.

27                           BACKGROUND OF THE PUENTE-13 STREET GANG

28           2. The Puente-13 gang is a multi-generational, Hispanic

1 street gang that was founded in the early 1950s in La Puente,  
2 California. At the time of its conception, it was known as the  
3 "Bridgetown Gentlemen" or "Old Town Puente," and was comprised of  
4 Hispanic males who engaged in narcotics distribution and other  
5 street crimes, and viewed themselves as La Puente's guardians  
6 against outside gangs. Later, the gang became known simply as  
7 "Puente," or "Puente-13." Over the years, it has dramatically  
8 expanded its membership to number approximately 600 individuals,  
9 and expanded its territory into the neighboring Southern  
10 California cities of Walnut, Industry, Hacienda Heights, and West  
11 Covina. There are currently at least 14 subsets, or "cliques,"  
12 of the Puente-13 gang. New cliques were founded by members  
13 living in a particular geographical area, and named accordingly  
14 (i.e. Happy Homes was founded by residents of Hacienda Heights;  
15 cliques such as Blackwood Street, Northam Street, and Dial Avenue  
16 were founded by members residing on those respective streets in  
17 La Puente).

18 3. The Puente-13 gang is controlled by senior members of  
19 the individual cliques, who control admission into the gang. A  
20 new initiate may be admitted to the Puente-13 gang only after the  
21 approval of senior leaders, and after submitting to a violent  
22 beating ("getting jumped in") at the hands of other members.  
23 Some individuals are allowed to bypass this initiation process  
24 and are granted admission into Puente-13 ("walked in") based upon  
25 a senior leader's authority, or by earning significant drug sales  
26 commissions on behalf of the gang. These individuals also claim  
27 Puente-13 gang membership.

28 4. Puente-13 members frequently identify each other

1 through the use of hand gestures designating "P" for Puente,  
2 and/or various symbols of the members' respective cliques (i.e.  
3 "B" for Blackwood). Members commonly wear clothing depicting  
4 these same symbols (i.e. baseball caps for the Philadelphia  
5 Phillies, whose team insignia includes a "P", for Puente). In  
6 many documented instances, members have even specially designed  
7 their own apparel (i.e. screen-printed t-shirts reading  
8 "Blackwood Mob"). Gang tattoos, monikers, slogans, and  
9 spray-painted graffiti on street signs and walls are also  
10 commonly used to identify members and territory controlled by the  
11 gang. Additionally, since the senior gang members controlling  
12 Puente-13 are also members or associates of the Mexican Mafia  
13 prison gang, the number 13 (signifying M, the thirteenth letter  
14 of the alphabet) is commonly used to demonstrate that affiliation  
15 and loyalty.

16 5. Puente-13 encompasses large portions of both the City  
17 of La Puente and unincorporated parts of Los Angeles County  
18 within the San Gabriel Valley. In the city of La Puente,  
19 Puente-13's boundaries are Orange Avenue in the west,  
20 Francisquito Avenue in the north, Valley Boulevard in the south,  
21 and Azusa Avenue in the east. The gang also controls portions  
22 of unincorporated Los Angeles County, specifically within those  
23 areas known as Hacienda Heights and Valinda.

24 MEXICAN MAFIA AUTHORITY FOR PUENTE-13

25 6. The Puente-13 gang is loyal and committed to the  
26 "Mexican Mafia," also known as "La Eme." The Mexican Mafia is a  
27 prison gang that originated within the prison system in order to  
28 control and direct the activities of Southern California Hispanic

1 street gangs. "Made" members of the Mexican Mafia have assumed  
2 authority for different regions in Southern California.  
3 Typically, a "made" member is a prison inmate who comes from the  
4 ranks of a local Hispanic street gang, including the Puente-13  
5 gang, and exercises control and direction over his territory both  
6 from within prison and from outside prison following his release.  
7 The Mexican Mafia leaders issue directions and orders, including  
8 orders to kill rival gang members, which are referred to as  
9 "green-lights." Those orders are to be executed by California  
10 street gang members, including members of Puente-13, and are  
11 understood by Puente-13 gang members as opportunities to gain  
12 elevated status within the organization or potentially become a  
13 "made" member of the organization.

14 7. The Mexican Mafia has established rules to govern acts  
15 of violence committed by local Hispanic street gang members and  
16 associates, including those of Puente-13. The Mexican Mafia thus  
17 requires Puente-13 gang members and associates to adhere to  
18 protocols for the conduct of violent attacks, narcotics  
19 trafficking, and murders, including the issuance of "green light"  
20 authorizations for murder and violence. Failure to adhere to  
21 Mexican Mafia rules can lead to the issuance of a "green light,"  
22 directing an attack on the offending member, or the requirement  
23 that money be paid. "Green lights" are also frequently issued in  
24 retaliation for a perceived "disrespect" to a Mexican Mafia  
25 leader, to punish the unauthorized collection of "tax" payments  
26 in a neighborhood controlled by the Puente-13 gang, or to  
27 sanction individuals who traffic in narcotics without the gang's  
28 authorization or without paying the required tax to

1 Puente-13 and the Mexican Mafia.

2 8. Mexican Mafia and Puente-13 gang members and associates  
3 regularly exploit prison visits, telephone calls, policies  
4 concerning letter-communications with attorneys, and prison  
5 monetary accounts in order to generate income from narcotics  
6 trafficking and other crimes of the enterprise, so as to promote  
7 the criminal enterprise and direct the operation of the Puente-13  
8 gang from within prison. Mexican Mafia leaders also require  
9 regular payments from Puente-13 members and associates who are  
10 incarcerated.

11 9. Mexican Mafia members collect "taxes" from the members  
12 and associates of Southern California street gangs, including  
13 Puente-13, in the form of a share of the proceeds from the gangs'  
14 drug sales and violent conduct. Puente-13 gang leaders, in turn,  
15 extort money from their subordinates, local drug traffickers, and  
16 members of other gangs. A portion of the "taxes" collected by  
17 the Puente-13 gang leaders is then paid to Mexican Mafia leaders  
18 who are incarcerated.

19 LEADERSHIP OF THE MEXICAN MAFIA

20 10. Currently one Puente-13 gang member is also a validated  
21 Mexican Mafia member. He is defendant GONZALEZ, and he claims as  
22 his territory, through the Mexican Mafia, the entire San Gabriel  
23 Valley, and parts of Orange County, in Southern California. The  
24 Mexican Mafia members use Mexican Mafia leaders and associates to  
25 communicate orders and authorizations to Puente-13 gang leaders,  
26 members, and associates, and to receive information about the  
27 activities of the Puente-13 gang.

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1 e. Exposing and punishing Puente-13 gang members and  
2 associates, as well as those living within Puente-13 territory,  
3 who cooperate with law enforcement.

4 f. Providing protection from physical assaults and  
5 excessive extortion to Puente-13 members and associates when  
6 those individuals enter the prison system.

7 THE MEANS AND METHODS OF THE ENTERPRISE

8 4. The means and methods by which the defendants and their  
9 co-racketeers conduct and participate in the conduct of the  
10 affairs of the Puente-13 gang include:

11 a. Members and associates of the Puente-13 gang  
12 commit, attempt, and threaten to commit acts of violence to  
13 protect and expand the enterprise's criminal operation, including  
14 assaults, murder, intimidation, and threats of violence directed  
15 against rival gang members and witnesses in criminal cases, and  
16 to violently discipline insubordinate members of the enterprise.

17 b. Members and associates of the Puente-13 gang  
18 promote a climate of fear through acts of violence and threats to  
19 commit acts of violence.

20 c. To enforce the authority of the Puente-13 gang,  
21 members and associates use the enterprise to murder, attempt to  
22 murder, assault, and threaten those who pose a threat to the  
23 enterprise.

24 d. Members and associates of the Puente-13 gang  
25 engage in trafficking controlled substances as a means to  
26 generate income.

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1 including methamphetamine and cocaine, in violation of Title 21,  
2 United States Code, Sections 841(a)(1) and 846; and

3 c. Multiple acts indictable under the following  
4 provisions of federal law:

5 i. Extortion, in interference with interstate  
6 commerce, in violation of Title 18, United States Code, Section  
7 1951; and

8 ii. Witness tampering, in violation of Title 18,  
9 United States Code, Section 1512.

10 It was a further part of the conspiracy that each defendant  
11 agreed that a conspirator would commit at least two acts of  
12 racketeering in the conduct of the affairs of the enterprise.

13 A. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
14 ACCOMPLISHED

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

17 1. Defendant GONZALEZ, as a member of the Mexican Mafia  
18 and as the leader of the Puente-13 gang, would exercise  
19 leadership over all of Puente-13's criminal activities, collect  
20 drug tax payments from Puente-13 members' and associates' drug  
21 dealing activities, direct Puente-13 members and associates to  
22 exert control in prison and over the neighborhoods controlled by  
23 Puente-13, and target rivals and enemies of Puente-13.

24 2. Defendant BLANCO would assist defendant GONZALEZ in  
25 maintaining control over the drug trafficking operations of  
26 Puente-13, including by supplying narcotics to, and collecting  
27 drug taxes from, Puente-13 members and associates, as well as by  
28 operating drug stash-houses.

1           3.     Defendant ALDANA would assist defendant GONZALEZ in  
2 maintaining control over Puente-13, including by assisting  
3 defendant GONZALEZ in carrying out retributive attacks against  
4 Puente-13's rivals, collecting taxes from Puente-13 drug  
5 traffickers, and supplying narcotics to Puente-13 members and  
6 associates.

7           4.     Defendants A. TORRES and S. NUNEZ would sell and  
8 manufacture drugs on behalf of Puente-13, as well as carry out  
9 violent acts, including murder, against Puente-13's rivals.

10          5.     Defendant TRUJILLO would exercise leadership on behalf  
11 of Puente-13 within the prison system, including by collecting  
12 drug taxes from other inmates and helping to retaliate against  
13 Puente-13's incarcerated rivals, and would sell drugs on behalf  
14 of Puente-13.

15          6.     Defendant EMERT would sell drugs on behalf of Puente-13  
16 and would assist Puente-13's leaders by relaying messages and  
17 using her residence as a place to store guns and narcotics.

18          7.     Defendant ZAMORA would collect drug tax payments from  
19 Puente-13 members and associates, and sell drugs, on defendant  
20 GONZALEZ' behalf.

21          8.     Defendant D. NUNEZ would sell drugs, and carry out  
22 violent attacks, on behalf of Puente-13.

23          9.     Defendants M. TORRES, ZABALA, and RAMIREZ would sell  
24 drugs on behalf of Puente-13.

25          10.    Defendant AYALA would help defendant GONZALEZ  
26 communicate with, and make drug tax payments to, defendant  
27 GONZALEZ' Mexican Mafia counterparts.

28          11.    Defendant SANDOVAL would collect drug tax payments on

1 defendant GONZALEZ's behalf as well as buy and sell  
2 methamphetamine and cocaine in Puente-13 territory.

3 12. Defendant MEYERKAMP would collect drug tax payments on  
4 defendant GONZALEZ' behalf and intimidate witnesses and carry out  
5 violent attacks on behalf of Puente-13.

6 13. Defendant RODRIGUEZ would collect drug tax payments  
7 from prison inmates on behalf of Puente-13 and would help  
8 retaliate against Puente-13's perceived rivals in prison.

9 B. OVERT ACTS

10 In furtherance of the conspiracy, and to accomplish the  
11 objects of the conspiracy, defendants GONZALEZ, BLANCO, ALDANA,  
12 M. TORRES, A. TORRES, S. NUNEZ, D. NUNEZ, TRUJILLO, SANDOVAL,  
13 AYALA, RODRIGUEZ, MEYERKAMP, EMERT, ZAMORA, RAMIREZ, and ZABALA,  
14 and others known and unknown to the Grand Jury, committed various  
15 overt acts, on or about the following times and dates, within the  
16 Central District of California and elsewhere, including but not  
17 limited to the following:

18 1. On May 24, 1997, defendant TRUJILLO stole a vehicle in  
19 order to enhance his position within the Puente-13 gang.

20 2. On January 26, 2000, defendants GONZALEZ and BLANCO, at  
21 a residence located in La Puente, California, possessed with  
22 intent to distribute approximately 81 grams of methamphetamine,  
23 as well as possessed packaging materials, a scale, precursor  
24 chemicals, and a stolen .380 caliber pistol.

25 3. On January 30, 2002, at a residence located in La  
26 Puente, defendant A. TORRES possessed approximately 15 grams of  
27 methamphetamine for sale, as well as possessed two firearms, one  
28 of which was stolen and the other of which had an obliterated

1 serial number, and diluent chemicals used for the manufacture of  
2 methamphetamine.

3 4. On October 9, 2002, at a residence located in West  
4 Covina, California, defendant S. NUNEZ possessed with intent to  
5 distribute 131 grams of methamphetamine, as well as possessed  
6 pay/owe sheets, two scales, baggies, ingredients for the  
7 production of methamphetamine, a stolen handgun, a shotgun, and  
8 several assault rifles.

9 5. On May 14, 2003, an unindicted co-conspirator deposited  
10 \$200 in drug taxes into the prison account of defendant GONZALEZ.

11 6. On July 5, 2003, an unindicted co-conspirator deposited  
12 \$100 in drug taxes into the prison account of defendant GONZALEZ.

13 7. On May 24, 2003, at a residence located in La Puente,  
14 defendant SANDOVAL possessed with intent to distribute  
15 approximately nine grams of methamphetamine as well as possessed  
16 a digital scale.

17 8. On August 10, 2004, an unindicted co-conspirator  
18 deposited \$150 in drug taxes into the prison account of defendant  
19 GONZALEZ.

20 9. On December 1, 2004, defendant D. NUNEZ possessed with  
21 intent to distribute approximately .26 grams of methamphetamine.

22 10. On July 3, 2006, defendants GONZALEZ, BLANCO, A.  
23 TORRES, and S. NUNEZ conspired to murder D.D. to punish D.D. for  
24 impermissibly collecting drug tax payments on defendant GONZALEZ'  
25 behalf.

26 11. On July 3, 2006, defendants A. TORRES and S. NUNEZ  
27 murdered victim D.D. outside of an apartment complex.

28 12. On July 6, 2006, defendants M. TORRES, A. TORRES, S.

1 NUNEZ, BLANCO, and GONZALEZ, at a residence located on Fourth  
2 Avenue in La Puente possessed with intent to distribute  
3 approximately 98 grams of methamphetamine, as well as possessed  
4 four digital scales, a 9mm handgun, multiple cellular phones, a  
5 short-barreled shotgun, two bullet-proof vests, a grenade, a .45  
6 caliber pistol, a cane sword, and framed artwork depicting  
7 Mexican Mafia images.

8 13. On February 21, 2007, in a vehicle in Valinda,  
9 defendant S. NUNEZ possessed with intent to distribute  
10 approximately .81 grams of methamphetamine.

11 14. On March 21, 2007, in a vehicle in Valinda, California,  
12 defendant S. NUNEZ possessed with intent to distribute  
13 approximately .14 grams of methamphetamine.

14 15. On April 9, 2007, defendants AYALA and GONZALEZ sent an  
15 unindicted Mexican Mafia co-conspirator a portion of defendant  
16 GONZALEZ' drug proceeds.

17 16. On May 11, 2007, an unindicted co-conspirator possessed  
18 with intent to distribute approximately 357 grams of  
19 methamphetamine as well as possessed approximately \$207,000 in  
20 drug proceeds and a firearm.

21 17. On July 25, 2007, defendant AYALA sent a letter to an  
22 unindicted Mexican Mafia co-conspirator in which she informed him  
23 that defendant GONZALEZ was concerned that the unindicted Mexican  
24 Mafia co-conspirator had not received a recent payment from  
25 defendant GONZALEZ.

26 18. On August 28, 2007, at a motel in Glendora, California,  
27 defendant S. NUNEZ possessed a loaded, stolen Colt .45 pistol.

28 19. In October 2007, defendant GONZALEZ met with several

1 unindicted co-conspirators, accused them of purchasing  
2 methamphetamine from an outside source, and demanded that the  
3 unindicted co-conspirators pay a further drug tax to defendant  
4 GONZALEZ.

5 20. On October 2, 2007, at an apartment in Whittier,  
6 California, an unindicted co-conspirator possessed with intent to  
7 distribute approximately 148 grams of methamphetamine, as well as  
8 possessed 15 firearms, night vision cameras, approximately  
9 \$85,000 in U.S. currency, flasks for the production of  
10 methamphetamine, pay/owe sheets, and a scale.

11 21. On October 7, 2007, defendants AYALA and GONZALEZ sent  
12 an unindicted Mexican Mafia co-conspirator a portion of defendant  
13 GONZALEZ' drug proceeds.

14 22. In November 2007, defendant GONZALEZ instructed Puente-  
15 13's senior members to require each Puente-13 clique to sell an  
16 ounce of methamphetamine per week.

17 23. On November 18, 2007, using vague and coded language in  
18 a telephone conversation, an unindicted Mexican Mafia co-  
19 conspirator asked defendant AYALA to tell defendant GONZALEZ that  
20 defendant GONZALEZ' Mexican Mafia associates had authorized a  
21 murder.

22 24. On November 26, 2007, using vague and coded language in  
23 a telephone conversation, an unindicted co-conspirator told  
24 another unindicted co-conspirator that the second unindicted co-  
25 conspirator, along with the second unindicted co-conspirator's  
26 associates, still owed drug tax proceeds to both defendants  
27 GONZALEZ and BLANCO.

28 25. On November 26, 2007, using vague and coded language in

1 a telephone conversation, an unindicted co-conspirator told  
2 another unindicted co-conspirator that the second unindicted co-  
3 conspirator had been hiding his drug sales and drug proceeds from  
4 defendants GONZALEZ and BLANCO.

5 26. On November 26, 2007, using vague and coded language in  
6 a telephone conversation, an unindicted co-conspirator told  
7 another unindicted co-conspirator that the first unindicted co-  
8 conspirator and defendant SANDOVAL were aggressively collecting,  
9 on behalf of defendant GONZALEZ, drug debts from other Puente-13  
10 drug dealers.

11 27. On January 18, 2008, using vague and coded language in  
12 a telephone conversation, unindicted co-conspirators discussed  
13 how defendant GONZALEZ was aggressively collecting drug tax  
14 payments from Puente-13 drug dealers and requiring Puente-13 drug  
15 dealers to sell methamphetamine on defendant GONZALEZ's behalf.

16 28. On February 2, 2008, two unindicted co-conspirators  
17 discussed defendant SANDOVAL's distribution of cocaine with  
18 Puente-13, as well as defendant SANDOVAL's drug tax debt to  
19 defendant GONZALEZ.

20 29. On February 4, 2008, using vague and coded language in  
21 a telephone conversation, an unindicted co-conspirator made  
22 arrangements with another unindicted co-conspirator so that the  
23 second unindicted co-conspirator could make his drug tax payment  
24 to defendant GONZALEZ.

25 30. On February 4, 2008, using vague and coded language in  
26 a telephone conversation, defendant D. NUNEZ asked an unindicted  
27 co-conspirator if the unindicted co-conspirator wanted D. NUNEZ  
28 to accompany the unindicted co-conspirator on a visit to



1 negotiate drug taxes owed to defendant GONZALEZ.

2 31. On February 4, 2008, using vague and coded language in  
3 a telephone conversation, defendant D. NUNEZ offered to sell  
4 pound quantities of marijuana to an unindicted co-conspirator.

5 32. On February 4, 2008, using vague and coded language in  
6 a telephone conversation, an unindicted co-conspirator discussed  
7 with another unindicted co-conspirator how to make arrangements  
8 to pay drug taxes to defendant GONZALEZ.

9 33. On February 15, 2008, using vague and coded language in  
10 a telephone conversation, an unindicted co-conspirator told a  
11 second unindicted co-conspirator that the first unindicted co-  
12 conspirator had just purchased 2.2 grams of methamphetamine for  
13 \$120, for redistribution, from defendant RAMIREZ.

14 34. In or about February 2008, defendant RAMIREZ  
15 distributed several pounds of methamphetamine on behalf of  
16 Puente-13.

17 35. On February 14, 2008, defendant D. NUNEZ stole a  
18 vehicle and possessed approximately \$926 in drug proceeds.

19 36. On February 17, 2008, using vague and coded language in  
20 a telephone conversation, an unindicted co-conspirator told a  
21 second unindicted co-conspirator that defendant D. NUNEZ was,  
22 prior to a recent arrest, supposed to find narcotics for the  
23 first unindicted co-conspirator.

24 37. On February 29, 2008, an unindicted co-conspirator told  
25 a relative of an unindicted co-conspirator that the unindicted  
26 co-conspirator was required to forfeit his Chevrolet Impala to  
27 defendant GONZALEZ as payment for the unindicted co-conspirator's  
28 drug debt.

1           38. On February 29, 2008, an unindicted co-conspirator  
2 transferred ownership of his Chevrolet Impala to defendant  
3 GONZALEZ.

4           39. On March 8, 2008, defendant D. NUNEZ and unindicted co-  
5 conspirators plotted to commit a retaliatory attack against  
6 rivals of Puente-13 following an attack against a Puente-13  
7 member.

8           40. On March 11, 2008, two unindicted co-conspirators  
9 arranged a meeting with defendant GONZALEZ to allow defendant  
10 GONZALEZ to inspect narcotics.

11           41. On March 11, 2008, defendant S. NUNEZ spray-painted a  
12 taunting graffiti message on a brick wall in La Puente.

13           42. On March 13, 2008, an unindicted co-conspirator  
14 possessed with intent to distribute approximately 170 grams of  
15 methamphetamine and 11 kilograms of marijuana, as well as  
16 possessed approximately 7 firearms.

17           43. On March 13, 2008, an unindicted co-conspirator  
18 possessed with intent to distribute approximately 73 grams of  
19 methamphetamine, as well as possessed diluent chemicals, scales,  
20 packaging materials, and a firearm.

21           44. In August 2008, defendant ALDANA distributed ounce-  
22 quantities of methamphetamine, and collected drug proceeds from  
23 Puente-13 drug dealers, on behalf of defendant GONZALEZ.

24           45. In August 2008, defendant GONZALEZ issued a directive  
25 to all Puente-13 members requiring them to purchase their  
26 methamphetamine from defendants GONZALEZ and BLANCO exclusively.

27           46. On August 14, 2008, defendants GONZALEZ and RAMIREZ  
28 seized a vehicle from an unindicted co-conspirator as payment for

1 drug taxes owed by the unindicted co-conspirator.

2 47. In September 2008, defendants GONZALEZ, ALDANA, and S.  
3 NUNEZ conspired to rob a drug stash-house in La Puente that  
4 contained a half-pound of methamphetamine and three firearms.

5 48. On October 2, 2008, defendants AYALA and GONZALEZ sent  
6 an unindicted Mexican Mafia co-conspirator a portion of defendant  
7 GONZALEZ' drug proceeds

8 49. In October and November 2008, defendant ZAMORA  
9 distributed methamphetamine to Puente-13 members and associates.

10 50. In November 2008, unindicted co-conspirators demanded  
11 that Victim 1 pay drug taxes to the gang while he was  
12 incarcerated in county jail.

13 51. In November 2008, defendants GONZALEZ, ALDANA, and  
14 TRUJILLO, and others, agreed to carry out a beating against rival  
15 gang members at the Los Angeles County Pitchess Detention Center  
16 - East ("East Max") in retaliation for the death of one of  
17 defendant GONZALEZ' close associates.

18 52. In November 2008, defendants GONZALEZ and MEYERKAMP  
19 collected drug proceed taxes from Puente-13 members and  
20 associates at the Los Angeles Metropolitan Detention Center and  
21 the San Bernardino County Jail.

22 53. On November 3, 2008, defendant TRUJILLO possessed with  
23 intent to distribute approximately 4.2 grams of methamphetamine  
24 in Hacienda Heights.

25 54. On November 23, 2008, using vague and coded language in  
26 a telephone conversation, defendant ALDANA and another unindicted  
27 Mexican Mafia co-conspirator discussed defendant GONZALEZ' plan  
28 for Puente-13 members to beat rival gang members at East Max.

1           55. On November 23, 2008, using vague and coded language in  
2 a telephone conversation, an unindicted co-conspirator told  
3 defendant ALDANA that the unindicted co-conspirator sympathized  
4 with defendant GONZALEZ's plan to attack rival gang members in  
5 retaliation for the death of defendant GONZALEZ' close associate.

6           56. On November 23, 2008, unindicted co-conspirators  
7 discussed how defendant TRUJILLO was, on defendant GONZALEZ'  
8 behalf, seizing control of portions of East Max.

9           57. On November 26, 2008, defendant TRUJILLO sent a letter  
10 in which defendant TRUJILLO asked an unindicted Mexican Mafia co-  
11 conspirator for assistance in carrying out a beating against  
12 rival gang members at East Max.

13           58. On November 30, 2008, using vague and coded language in  
14 a telephone conversation, an unindicted co-conspirator confirmed  
15 to another unindicted co-conspirator that defendant GONZALEZ and  
16 other Puente-13 members were still authorized to carry out a  
17 beating against rival gang members at East Max.

18           59. On December 3, 2008, defendant TRUJILLO possessed a  
19 letter in his jail cell in which an unindicted co-conspirator  
20 granted defendants TRUJILLO and GONZALEZ permission to beat rival  
21 gang members at East Max.

22           60. On December 4, 2008, at his residence in West Covina,  
23 defendant ALDANA possessed with intent to distribute  
24 approximately 3.17 grams of methamphetamine, as well as possessed  
25 a letter in which he described his new leadership position within  
26 Puente-13.

27           61. On December 5, 2008, using vague and coded language in  
28 a telephone conversation, defendant RODRIGUEZ told an unindicted

1 co-conspirator that an inmate at East Max had deposited a drug  
2 tax payment into defendant RODRIGUEZ' inmate account.

3 62. On December 7, 2008, using vague and coded language in  
4 a telephone conversation, an unindicted co-conspirator stated  
5 that defendants TRUJILLO and RODRIGUEZ were responsible for  
6 collecting remittances from a section of the inmate population at  
7 East Max.

8 63. On December 15, 2008, Victim 1 transferred  
9 approximately \$300, through a money order, to defendant GONZALEZ  
10 in an attempt to satisfy a drug debt.

11 64. On December 31, 2008, defendant AYALA sent a letter to  
12 an unindicted Mexican Mafia co-conspirator that included a  
13 photograph of defendant GONZALEZ.

14 65. On January 6, 2009, defendant ZABALA, using vague and  
15 coded language in text messages on a cell phone, asked an  
16 unindicted co-conspirator to help defendant ZABALA sell a  
17 quarter-ounce of methamphetamine.

18 66. On January 8, 2009, defendant ZABALA, using vague and  
19 coded language in text messages on a cell phone, informed an  
20 unindicted co-conspirator that defendant ZABALA had  
21 methamphetamine for sale.

22 67. On January 15, 2009, defendant ZAMORA collected, on  
23 behalf of defendant GONZALEZ, a \$5,000 drug tax payment from the  
24 associate of an unindicted co-conspirator.

25 68. On January 16, 2009, an unindicted co-conspirator  
26 stabbed Victim 1 over an unpaid drug debt owed by Victim 1 to  
27 defendant GONZALEZ and Puente-13.

28 69. On January 17, 2009, using vague and coded language in

1 a telephone conversation, defendants ALDANA and EMERT discussed  
2 acquiring marijuana from defendant D. NUNEZ and others.

3 70. On January 17, 2009, using vague and coded language in  
4 a telephone conversation, defendant ALDANA asked an unindicted  
5 co-conspirator whether the unindicted co-conspirator had timely  
6 paid his drug taxes to the unindicted co-conspirator's superiors  
7 in Puente-13, and instructed the unindicted co-conspirator to  
8 alert defendant EMERT once the payment was made.

9 71. On January 17, 2009, using vague and coded language in  
10 a telephone conversation, defendants ALDANA and EMERT reminded an  
11 unindicted co-conspirator that the unindicted co-conspirator  
12 still owed drug proceeds to the gang.

13 72. On January 17, 2009, using vague and coded language in  
14 a telephone conversation, defendant ALDANA told defendant S.  
15 NUNEZ that defendant ALDANA intended to pressure an unindicted  
16 co-conspirator to pay drug taxes or face consequences.

17 73. On January 30, 2009, using vague and coded language in  
18 a telephone conversation, defendant SANDOVAL offered to help an  
19 unindicted co-conspirator find someone willing to smuggle  
20 narcotics into prison for the unindicted co-conspirator.

21 74. On February 10, 2009, using vague and coded language in  
22 a telephone conversation, defendant ALDANA told defendants EMERT  
23 and S. NUNEZ to tell defendant GONZALEZ that defendant ALDANA was  
24 not cooperating with law enforcement.

25 75. On February 10, 2009, using vague and coded language in  
26 a telephone conversation, defendant ALDANA instructed defendant  
27 EMERT to find out if an unindicted co-conspirator was collecting  
28 drug taxes on defendant ALDANA's behalf and, if so, to help

1 defendant ALDANA stop the unindicted co-conspirator.

2 76. On February 27, 2009, using vague and coded language in  
3 a telephone conversation, following defendant S. NUNEZ' arrest,  
4 defendant BLANCO reassured defendant S. NUNEZ and offered to  
5 place money on defendant S. NUNEZ' prison bank account.

6 77. On March 3, 2009, defendant AYALA sent an unindicted  
7 Mexican Mafia co-conspirator a letter informing him that  
8 defendant GONZALEZ had just been released from jail.

9 78. On March 5, 2009, using vague and coded language in a  
10 telephone conversation, defendant S. NUNEZ instructed a relative  
11 of defendant ALDANA to tell defendant ALDANA that defendant  
12 GONZALEZ was instructing defendant ALDANA to not cooperate with  
13 law enforcement.

14 79. On March 6, 2009, using vague and coded language in a  
15 telephone conversation, defendants M. TORRES and BLANCO discussed  
16 law enforcement's actions against the Puente-13 gang.

17 80. On March 11, 2009, defendants AYALA and GONZALEZ sent  
18 an unindicted Mexican Mafia co-conspirator a portion of defendant  
19 GONZALEZ' drug proceeds.

20 81. On March 13, 2009, an unindicted co-conspirator threw a  
21 severed pig's head, labeled with the warning "silver or lead" in  
22 Spanish, through the window of defendant ZABALA's residence.

23 82. On March 19, 2009, an unindicted Mexican Mafia co-  
24 conspirator sent defendant AYALA a letter expressing his sympathy  
25 following the arrest of defendant GONZALEZ.

26 83. On April 4, 2009, using vague and coded language in a  
27 telephone conversation, defendant EMERT told defendant ALDANA  
28 that defendant D. NUNEZ had a copy of a key to defendant EMERT's

1 residence on Las Vecinas Street in La Puente.

2 84. On April 24, 2009, using vague and coded language in a  
3 telephone conversation, defendant S. NUNEZ told his girlfriend  
4 that defendant S. NUNEZ aspired to rise in the gang and become a  
5 member of the Mexican Mafia.

6 85. On May 8, 2009, using vague and coded language in a  
7 telephone conversation, defendant S. NUNEZ offered to connect  
8 defendant D. NUNEZ with defendant S. NUNEZ' methamphetamine  
9 supplier.

10 86. On May 14, 2009, at the Los Angeles Metropolitan  
11 Detention Center, defendant MEYERKAMP and unindicted co-  
12 conspirators stabbed Victim 2 in order to prevent Victim 2 from  
13 cooperating with law enforcement.

14 87. On June 17, 2009, an unindicted co-conspirator mailed  
15 \$100 to defendants GONZALEZ, BLANCO, and S. NUNEZ in order to  
16 satisfy a drug tax.

17 88. On July 26, 2009, defendant AYALA sent a letter to an  
18 unindicted Mexican Mafia co-conspirator indicating that defendant  
19 AYALA and defendant GONZALEZ were only able to send the  
20 unindicted Mexican Mafia co-conspirator a payment of \$100.

21 89. On February 3, 2010, at her residence in La Puente,  
22 defendant EMERT possessed methamphetamine, two digital scales, a  
23 police scanner, and small plastic baggies.

24 90. On April 7, 2010, in a vehicle in Hacienda Heights,  
25 defendant TRUJILLO possessed a fully loaded .32 revolver.

26 91. On April 7, 2010, at his residence in Phillips Ranch,  
27 California, defendant TRUJILLO possessed a digital scale and  
28 packing materials for the purpose of distributing narcotics.



1  
2 SPECIAL SENTENCING ALLEGATIONS

3 THE GRAND JURY FURTHER ALLEGES THAT:

4 1. Beginning on a date unknown, and continuing to on or  
5 about June 2, 2010, in Los Angeles County, with the Central  
6 District of California, and elsewhere, defendants GONZALEZ,  
7 BLANCO, ALDANA, M. TORRES, A. TORRES, S. NUNEZ, D. NUNEZ,  
8 TRUJILLO, and EMERT, and others known and unknown to the Grand  
9 Jury, conspired and agreed with each other to knowingly and  
10 intentionally distribute, and possess with intent to distribute,  
11 at least 50 grams of actual methamphetamine or at least 500 grams  
12 of a mixture or substance containing a detectable amount of  
13 methamphetamine, in violation of Title 21, United States Code,  
14 Sections 846, 841(a)(1), and 841(b)(1)(A).

15 2. On or about July 3, 2006, in Los Angeles County, within  
16 the Central District of California, defendants GONZALEZ, BLANCO,  
17 S. NUNEZ, and A. TORRES willfully, deliberately, and with  
18 premeditation, unlawfully killed with malice aforethought D.D.,  
19 in violation of California Penal Code, Sections 21a, 31, 187, and  
20 189.



1 Racketeering Act One

2 Conspiracy to Distribute Narcotics

3 \_\_\_\_\_ 4. Beginning on a date unknown to the Grand Jury and  
4 continuing to on or about June 2, 2010, in Los Angeles County,  
5 within the Central District of California, and elsewhere,  
6 defendants GONZALEZ, BLANCO, ALDANA, M. TORRES, A. TORRES, S.  
7 NUNEZ, TRUJILLO, and EMERT, and others known and unknown to the  
8 Grand Jury, conspired and agreed with each other to knowingly and  
9 intentionally distribute, and possess with intent to distribute,  
10 at least 50 grams of actual methamphetamine, a schedule II  
11 controlled substance, in violation of Title 21, United States  
12 Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

13 Racketeering Act Two

14 Possession with Intent to Distribute Methamphetamine

15 5. On or about January 26, 2000, defendants GONZALEZ and  
16 BLANCO possessed with intent to distribute approximately 50 grams  
17 or more, that is, 81 grams, of a mixture or substance containing  
18 a detectable amount of methamphetamine, a schedule II controlled  
19 substance, in violation of Title 21, United States Code, Sections  
20 841(a)(1) and 841(b)(1)(B).

21 Racketeering Act Three

22 Possession with Intent to Distribute Methamphetamine

23 6. On or about January 30, 2002, defendant A. TORRES  
24 possessed with intent to distribute approximately 15 grams of a  
25 mixture or substance containing a detectable amount of  
26 methamphetamine, a schedule II controlled substance, in violation  
27 of Title 21, United States Code, Sections 841(a)(1) and  
28 841(b)(1)(C).

1 Racketeering Act Four

2 Possession with Intent to Distribute Methamphetamine

3 7. On or about October 9, 2002, defendant S. NUNEZ  
4 possessed with intent to distribute 50 grams or more, that is,  
5 approximately 131 grams, of a mixture or substance containing a  
6 detectable amount of methamphetamine, a schedule II controlled  
7 substance, in violation of Title 21, United States Code, Sections  
8 841(a) (1) and 841(b) (1) (B).

9 Racketeering Act Five

10 Possession with Intent to Distribute Methamphetamine

11 8. On or about May 24, 2003, defendant SANDOVAL possessed  
12 with intent to distribute approximately nine grams of a mixture  
13 or substance containing a detectable amount of methamphetamine, a  
14 schedule II controlled substance, in violation of Title 21,  
15 United States Code, Sections 841(a) (1) and 841(b) (1) (C).

16 Racketeering Act Six

17 Conspiracy to Murder and Murder of D.D.

18 9. Defendants GONZALEZ, BLANCO, S. NUNEZ, and A. TORRES  
19 committed the following acts, any one of which constitutes  
20 Racketeering Act Six:

21 a. Beginning on a date unknown and continuing to on  
22 or about July 3, 2006, in Los Angeles County, within the Central  
23 District of California, defendants GONZALEZ, BLANCO, S. NUNEZ,  
24 and A. TORRES, and others, unlawfully, willfully, and with  
25 premeditation conspired to kill with malice aforethought D.D., in  
26 violation of California Penal Code Sections 21a, 182, 187, and  
27 189.

28 b. On or about July 3, 2006, in Los Angeles County,

1 within the Central District of California, defendants GONZALEZ,  
2 BLANCO, S. NUNEZ, and A. TORRES willfully, deliberately, and with  
3 premeditation, unlawfully killed with malice aforethought D.D.,  
4 in violation of California Penal Code, Sections 21a, 31, 187, and  
5 189.

6 Racketeering Act Seven

7 Possession with Intent to Distribute Methamphetamine

8 10. On or about July 6, 2006, in Los Angeles County, within  
9 the Central District of California, defendants M. TORRES, A.  
10 TORRES, S. NUNEZ, GONZALEZ, and BLANCO possessed with intent to  
11 distribute 50 grams or more, that is, approximately 98.35 grams,  
12 of a mixture or substance containing a detectable amount of  
13 methamphetamine, a schedule II controlled substance, in violation  
14 of Title 21, United States Code, Sections 841(a)(1) and  
15 841(b)(1)(B).

16 Racketeering Act Eight

17 Possession with Intent to Distribute Methamphetamine

18 11. On February 21, 2007, in Los Angeles County, within the  
19 Central District of California, defendant S. NUNEZ possessed with  
20 intent to distribute approximately .81 grams of a mixture or  
21 substance containing a detectable amount of methamphetamine, a  
22 schedule II controlled substance, in violation of Title 21,  
23 United States Code, Sections 841(a)(1) and 841(b)(1)(C).

24 Racketeering Act Nine

25 Conspiracy to Murder Rival Gang Members

26 12. Beginning on a date unknown and continuing to on or  
27 about October 31, 2008, in Los Angeles County, within the Central  
28 District of California, defendants GONZALEZ and TRUJILLO, and

1 others, unlawfully, willfully, and with premeditation conspired  
2 to kill with malice aforethought rival gang members, in violation  
3 of California Penal Code Sections 21a, 182, 187, and 189.

4 Racketeering Act Ten

5 Possession with Intent to Distribute Methamphetamine

6 13. On or about December 4, 2008, in Los Angeles County,  
7 within the Central District of California, defendant ALDANA  
8 possessed with intent to distribute approximately 3.17 grams of a  
9 mixture or substance containing a detectable amount of  
10 methamphetamine, a schedule II controlled substance, in violation  
11 of Title 21, United States Code, Sections 841(a)(1) and  
12 841(b)(1)(C).

13 Racketeering Act Eleven

14 Possession with Intent to Distribute Methamphetamine

15 14. On or about February 3, 2010, in Los Angeles County,  
16 within the Central District of California, defendant EMERT  
17 possessed with intent to distribute approximately 1.8 grams of a  
18 mixture or substance containing a detectable amount of  
19 methamphetamine, a schedule II controlled substance, in violation  
20 of Title 21, United States Code, Sections 841(a)(1) and  
21 841(b)(1)(C).

22  
23 (All in violation of Title 18, United States Code, Section  
24 1962(c).)



1 in racketeering activity, defendants RAFAEL MUNOZ GONZALEZ, also  
2 known as ("aka") "Cisco," aka "C," CESAR MUNOZ GONZALEZ, aka  
3 "Blanco," aka "B," STEVEN NUNEZ, aka "Flaco," and ANGEL FRANK  
4 TORRES, aka "Smiley," unlawfully conspired to murder rival gang  
5 member D.D., in violation of California Penal Code, Sections 21a,  
6 182, and 187, all in violation of 18 U.S.C. § 1959(a)(5).

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COUNT FOUR

[18 U.S.C. §§ 1959(a)(1), (2)]

1. Paragraphs 1 and 2 of Count Three are hereby  
reincorporated and realleged herein as if set forth in full.

2. On or about July 3, 2006, in Los Angeles County, within  
the Central District of California, for the purpose of  
maintaining and increasing position in the Puente-13 gang, an  
enterprise engaged in racketeering activity, defendants RAFAEL  
MUNOZ GONZALES, also known as ("aka") "Cisco," CESAR MUNOZ  
GONZALEZ, aka "Blanco," aka "B," STEVEN NUNEZ, aka "Flaco," and  
ANGEL FRANK TORRES, aka "Smiley" unlawfully killed with malice  
aforethought D.D., in violation of California Penal Code,  
Sections 21a, 31, and 187, all in violation of 18 U.S.C. §§  
1959(a)(1) and (2).

COUNT FIVE

[18 U.S.C. § 1959(a)(6)]

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3 1. Paragraphs 1 and 2 of Count Three are hereby  
4 incorporated and re-alleged herein as if set forth in full.

5 2. Beginning on an unknown date, and continuing until on  
6 or about December 3, 2008, in Los Angeles County, within the  
7 Central District of California, for the purpose of maintaining  
8 and increasing position in the Puente-13 gang, an enterprise  
9 engaged in racketeering activity, defendants RAFAEL MUNOZ  
10 GONZALEZ, also known as ("aka") "Cisco," aka "C," ABRAHAM ALDANA,  
11 aka "Listo," ALEJANDRO TRUJILLO, aka "Spantos," and ADRIAN  
12 RODRIGUEZ, aka "Trips," and others, conspired to commit assault  
13 with intent to cause serious bodily injury, against incarcerated  
14 rival gang members in the Los Angeles County jail system, in  
15 violation of California Penal Code Sections 240 and 245, in  
16 violation of Title 18, United States Code, Section 1959(a)(6).  
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COUNT SIX

[18 U.S.C. § 1959(a) (5)]

1. Paragraphs 1 and 2 of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. Beginning on an unknown date, and continuing until on or about December 3, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Puente-13 gang, an enterprise engaged in racketeering activity, defendants RAFAEL MUNOZ GONZALEZ, also known as ("aka") "Cisco," aka "C," and ALEJANDO TRUJILLO, aka "Spantos," and others, conspired to murder incarcerated rival gang members in the Los Angeles County jail system, in violation of California Penal Code Sections 21a, 182, 187, and 189, all in violation of Title 18, United States Code, Section 1959(a) (5).



1 in substance as follows:

2 Section A of Count One is hereby incorporated by reference.

3 C. OVERT ACTS

4 1. In furtherance of the conspiracy, and to accomplish the  
5 objects of the conspiracy, defendants GONZALEZ, BLANCO, ALDANA,  
6 M. TORRES, A. TORRES, S. NUNEZ, D. NUNEZ, TRUJILLO, EMERT,  
7 ZAMORA, RAMIREZ, and ZABALA, and others known and unknown to the  
8 Grand Jury, committed various overt acts, within the Central  
9 District of California and elsewhere, including the overt acts  
10 numbered 1 through 91 as set forth in Count One and hereby  
11 incorporated by reference, on or about the dates specified  
12 therein.

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COUNT EIGHT

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

Beginning on an unknown date, and continuing to on or about July 6, 2006, in Los Angeles County, within the Central District of California, defendants ANGEL FRANK TORRES, also known as ("aka") "Smiley," MICHAEL ANTHONY TORRES, aka "Mikey," STEVEN NUNEZ, aka "Flaco," RAFAEL MUNOZ GONZALEZ, aka "Cisco," and CESAR MUNOZ GONZALEZ, aka "Blanco," knowingly and intentionally possessed with intent to distribute more than 50 grams, that is, approximately 98 grams, of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

COUNT NINE

[18 U.S.C. §§ 924(c) (1) (A) (i), 924(c) (1) (B) (i)]

Beginning on an unknown date, and continuing to on or about July 6, 2006, in Los Angeles County, within the Central District of California, defendants ANGEL FRANK TORRES, also known as ("aka") "Smiley," MICHAEL ANTHONY TORRES, aka "Mikey," STEVEN NUNEZ, aka "Flaco," RAFAEL MUNOZ GONZALEZ, aka "Cisco," and CESAR MUNOZ GONZALEZ, aka "Blanco," knowingly used and carried a firearm, namely, a loaded Smith & Wesson 9mm handgun, with one round chambered; a loaded Hi-Point .45 caliber handgun, with one round chambered; and a modified short-barreled Stevens Model 9478 "Texas Ranger" 12 gauge shotgun, during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One; and a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 846, 841(a) (1), as charged in Count Seven; and possession with intent to distribute methamphetamine, in violation of Title 21, United States Code, Section 841(a) (1), as charged in Count Eight.

COUNT TEN

[18 U.S.C. § 924(c) (1) (A) (i)]

Beginning on an unknown date, and continuing to on or about August 28, 2007, in Los Angeles County, within the Central District of California, defendant STEVEN NUNEZ, also known as "Flaco," knowingly used and carried a firearm, namely, a Colt MK IV Series 80 semiautomatic pistol, during and in relation to, and possessed that firearm in furtherance of, a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a) (1), as charged in Count Seven; and a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One.



COUNT ELEVEN

[18 U.S.C. § 924(c)(1)(A)(i)]

Beginning on an unknown date, and continuing to or about April 7, 2010, in Los Angeles County, within the Central District of California, defendant ALEJANDRO TRUJILLO, also known as "Spantos," knowingly used and carried a firearm, namely, a loaded Sociedad Alfa .32 caliber revolver, bearing serial number 26707, during and in relation to, and possessed that firearm in furtherance of, a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count Seven; and a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One.

COUNT TWELVE

[18 U.S.C. § 922(g)(1)]

Beginning on an unknown date, and continuing to on or about July 6, 2006, in Los Angeles County, within the Central District of California, defendant MICHAEL ANTHONY TORRES, also known as "Mikey," knowingly possessed a firearm, namely, a loaded Hi-Point .45 caliber handgun, bearing serial number 335883 with one round chambered, and ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant MICHAEL ANTHONY TORRES had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely, possession of a controlled substance, in violation of California Health & Safety Code section 11350(a), in Los Angeles Superior Court case number KA-011430, on or about February 5, 1992.

COUNT THIRTEEN

[18 U.S.C. § 922(g)(1)]

Beginning on an unknown date, and continuing to on or about July 6, 2006, in Los Angeles County, within the Central District of California, defendant ANGEL FRANK TORRES, also known as "Smiley," knowingly possessed a firearm, namely, a modified short-barreled Stevens Model 9478 "Texas Ranger" 12 gauge shotgun, with an obliterated serial number, and ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant ANGEL FRANK TORRES had been convicted of the following felonies, each punishable by a term of imprisonment exceeding one year:

Resisting a peace officer, in violation of California Penal Code section 69, in Los Angeles Superior Court case number KA-027977, on or about July 12, 1995.

Receiving stolen property, in violation of California Penal Code section 496(a), in Los Angeles Superior Court case number KA-023239, on or about July 12, 1995.

COUNT FOURTEEN

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

Beginning on an unknown date, and continuing to on or about February 3, 2010, in Los Angeles County, within the Central District of California, defendant SARA EMERT knowingly and intentionally possessed with intent to distribute approximately 1.8 grams of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

COUNT FIFTEEN

[21 U.S.C. § 860a]

Beginning on an unknown date, and continuing to on or about February 3, 2010, in Los Angeles County, within the Central District of California, defendant SARA EMERT knowingly and intentionally possessed with intent to distribute methamphetamine on premises, namely, a residence located in La Puente, California, in which individuals, namely K.W. and L.W., both of whom were under 18 years of age during the above dates, were present and resided.

COUNT SIXTEEN

[18 U.S.C. § 113(a)(1)]

On or about May 14, 2009, in Los Angeles County, within the Central District of California, within the territorial jurisdiction of the United States, namely the federal Metropolitan Detention Center in Los Angeles, California, defendants PAUL MEYERKAMP and VICTOR FLORES knowingly and intentionally assaulted, with the intent to commit murder, Victim 2.

COUNT SEVENTEEN

[18 U.S.C. § 113(a)(3)]

On or about May 14, 2009, in Los Angeles County, within the Central District of California, within the territorial jurisdiction of the United States, namely the federal Metropolitan Detention Center in Los Angeles, California, defendants PAUL MEYERKAMP and VICTOR FLORES knowingly and intentionally assaulted, with a deadly weapon with the intent to do bodily harm, and without just cause or excuse, Victim 2.

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COUNT EIGHTEEN

[21 U.S.C. § 843(b)]

On or about February 4, 2008, in Los Angeles County, within the Central District of California, defendant ALEX RAMIREZ knowingly and intentionally used a communication facility, namely, a telephone, to facilitate the crime of conspiracy to distribute, and possess with intent to distribute, methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Seven of the Indictment.



COUNT NINETEEN

[21 U.S.C. § 843(b)]

On or about December 5, 2008, in Los Angeles County, within the Central District of California, defendant ADRIAN RODRIGUEZ, also known as "Trips," knowingly and intentionally used a communication facility, namely, a telephone, to facilitate the crime of conspiracy to distribute, and possess with intent to distribute, methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Seven of the Indictment.

COUNT TWENTY

[21 U.S.C. § 843(b)]

On or about January 8, 2009, in Los Angeles County, within the Central District of California, defendant HENRY ZABALA knowingly and intentionally used a communication facility, namely, a telephone, to facilitate the crime of conspiracy to distribute, and possess with intent to distribute, methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Seven of the Indictment.

COUNT TWENTY-ONE

[21 U.S.C. § 843(b)]

On or about January 30, 2009, in Los Angeles County, within the Central District of California, defendant MARIO ALBERTO SANDOVAL, also known as ("aka") "Sonny," aka "Junior," knowingly and intentionally used a communication facility, namely, a telephone, to facilitate the crime of conspiracy to distribute, and possess with intent to distribute, methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Seven of the Indictment.

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COUNT TWENTY-TWO

[21 U.S.C. § 843(b)]

On or about March 11, 2009, in Los Angeles County, within the Central District of California, defendant PATRICIA AYALA, also known as "Dreams," knowingly and intentionally used a communication facility, namely, the mail, to facilitate the crime of conspiracy to distribute, and possess with intent to distribute, methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Seven of the Indictment.

A TRUE BILL

\_\_\_\_\_  
Foreperson

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