

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

No. 08 CR 746

v.)

Violations: Title 18, United States
Code, Sections 2, 924(c), 1951,
1959(a)(3) & (a)(5), and 1962(d);
Title 21, United States Code,
Sections 841(a)(1) and 846
Hon. Charles Norgle

AUGUSTIN ZAMBRANO, aka "Big Tino,")

"Tino," "Old Man," "Viejo,")

VICENTE GARCIA, aka "DK",)

VALENTIN BAEZ, aka "Baby 24,")

"Valentin Biez,")

RUBEN CAQUIAS, aka "Flaco,")

ALPHONSO CHAVEZ, aka "Ponch,")

JUAN DEJESUS, aka "Baby 28,")

DANNY DOMINGUEZ, aka "Baby)

Trigger," "Baby T,")

LUIS GARCIA, aka "Wild," "Jose)

Campos,")

ERNESTO GRIMALDO, aka "Travasio,")

"Travieso,")

SAMUEL GUTIERREZ, aka "Wedo,")

"Guero,")

JOSE GUZMAN, aka "Boo Boo,")

NEDAL ISSA, aka "Lucky,")

FERNANDO KING, aka "Ace," "Pops,")

POLIN LOPEZ, aka "Baby 23,")

JAVIER RAMIREZ, aka "Convict,")

WILFREDO RIVERA, JR., aka "Boy,")

FERNANDO VAZQUEZ, aka "Pac Man,")

FELIPE ZAMORA, aka "Dough Boy,")

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL SEPTEMBER 2008 GRAND JURY charges:

RACKETEERING ENTERPRISE

1. At various times relevant to this superseding indictment, the defendants, and others known and unknown, were members and associates of the "Almighty Latin King Nation" Street Gang (hereinafter the "LATIN KINGS"), a criminal organization whose members and associates engaged in acts of violence, including murder, attempted murder, assault with a dangerous weapon, extortion, and narcotics distribution, and which operated principally in the city of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The LATIN KINGS, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4) (hereinafter "the enterprise"), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

STRUCTURE OF THE ENTERPRISE

3. The structure of the LATIN KINGS included, but was not limited to, the following:

a. The Latin Kings were organized by geographic locations into "Regions." Generally, each Region had a rank structure that included a "Regional Officer" or "Regional

Inca,” and one or more "Regional Enforcers." The Regional Officer was the highest authority within the Region. Regional Enforcers served to support the Regional Officer, and enforce discipline and adherence by gang members of established Latin King rules and by-laws. The Regional Officers reported to an individual known as the "Supreme Regional Officer," who was sometimes known as the “Supreme Regional Inca.”

b. The Supreme Regional Officer was the second highest ranking Latin King on the South Side of Chicago. In turn, the Supreme Regional Officer reported to the "Corona," the highest ranking Latin King gang member on the South side of the Chicago area.

c. Each Region was comprised of "Sections," "Branches," or "Chapters," hereinafter referred to as "Sections." Each Section was typically named after a street or streets that ran through the Section. Each section had its own rank structure, a leader or "Inca," a second in command or "Casique," an "Enforcer," a "Treasurer" and "Crown Council" members, all of whom were in charge of the non-ranking gang members or "Soldiers" within the section. Each section's membership of Soldiers numbered between approximately 12 to 80 individuals.

d. There were several Regions of Latin Kings operating throughout the Chicago and Northern Illinois area. One such Region was located in the Chicago neighborhood known as “Little Village.” Located on the city’s Southwest side, the territory of the Latin Kings operating in Little Village was along a main East-West thoroughfare, 26th Street. The general East-West boundaries of this Region stretched between Fairfield Avenue

(East) to Millard Avenue (West), and the North-South boundaries were generally between 21st Street (North) to 33rd Street (South). The Latin Kings who operated within the Little Village were known as the "26th Street Region of the Latin Kings Street Gang."

e. The 26th Street Region of the Latin Kings Street Gang contained approximately 24 Sections, all of whom answered to the Regional officers, also referred to as "Nation" leadership. The 24 Sections under the 26th Street Region of the Latin Kings included 21st and Albany; 21st and California; 21st and Fairfield; 22nd and Sawyer; 23rd and Homan; 23rd and Spaulding; 23rd and Whipple; 24th and Drake, aka "Chi-Town;" 24th and Sacramento, aka "The Boulevards;" 24th and St. Louis, aka "Coulter Kings;" 24th and Trumbull, aka "The Motherland;" 25th and California; 25th and Millard; 25th and Spaulding, aka "Spanish Harlem;" 25th and Trumbull; 27th and Drake; 27th and Homan; 28th and Lawndale; 28th and Spaulding; 30th and Sawyer, aka "Redrum City;" 30th and Trumbull; 31st and Drake; 33rd and Morgan; and 57th and Cicero, aka "Cicero."

PURPOSES OF THE ENTERPRISE

4. The purposes of the enterprise included, but were not limited to, the following:
 - a. Enriching the leaders, members, and associates of the enterprise through, among other things, the illegal trafficking of controlled substances and extortion.
 - b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, violence, and destruction including, but not limited to, acts of murder, attempted murder, assault with a dangerous weapon, extortion, and other acts of violence.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and violence. The leaders, members, and associates of the enterprise undertook all steps necessary to prevent the detection of their criminal activities, and sought to prevent and resolve the imposition of any criminal liabilities upon their leaders, members, and associates, by the use of murder, violence, and intimidation directed against witnesses, victims, and others. As part of this practice, the enterprise enforced what it referred to as an "SOS" – or, shoot on sight – order against Latin King members who cooperated with law enforcement.

ROLES IN THE ENTERPRISE

5. At times material to this indictment, the defendants performed multiple roles within the enterprise that included, but were not limited to, the following:

a. AUGUSTIN ZAMBRANO was a "Corona" of the Latin Kings. ZAMBRANO was the highest ranking member of the LATIN KINGS outside prison, and he was responsible for overseeing the activities of all of the factions of the LATIN KINGS. ZAMBRANO directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

b. VICENTE GARCIA was at times the "Regional Officer" for the 26th Street Region and was at times the "Supreme Regional Officer" overseeing the 26th Street Region and other Regions of the Latin Kings. GARCIA directed other members of the

enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

c. RUBEN CAQUIAS was at times a “Regional Enforcer” for the 26th Street Region. CAQUIAS directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

d. ALPHONSO CHAVEZ was at times the “Inca” of the 31st and Drake Section of the Latin Kings within the 26th Street Region. CHAVEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

e. JUAN DEJESUS was at times the “Inca” of the 28th and Spaulding Section of the Latin Kings within the 26th Street Region. DEJESUS directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

f. DANNY DOMINGUEZ was at times the “Inca” of the 30th and Sawyer Section of the Latin Kings within the 26th Street Region. DOMINGUEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

g. LUIS GARCIA was at times the “Inca” of the 21st and California Section of the Latin Kings within the 26th Street Region. GARCIA directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

h. SAMUEL GUTIERREZ was at times the “Inca” of the 23d and Homan Section of the Latin Kings within the 26th Street Region. GUTIERREZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

i. JOSE GUZMAN was at times a “Regional Enforcer” for the 26th Street Region. GUZMAN directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

j. NEDAL ISSA was at times the “Inca” of the Cicero Section of the Latin Kings within the 26th Street Region. ISSA directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

k. FERNANDO KING was at times the at times the “Regional Officer” for the 26th Street Region and was at times the “Supreme Regional Officer” of the Latin Kings. KING directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

l. JAVIER RAMIREZ was at times the “Inca” of the 23d and Spaulding Section of the Latin Kings within the 26th Street Region. RAMIREZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

m. WILFREDO RIVERA was at times the “Inca” of the 33d and Morgan Section of the Latin Kings within the 26th Street Region. RIVERA directed other members

of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

n. FERNANDO VAZQUEZ was at times the “Inca” of the 21st and Fairfield Section of the Latin Kings within the 26th Street Region. VAZQUEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

o. FELIPE ZAMORA was at times the “Regional Officer” of the 26th Street Region. ZAMORA directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LATIN KINGS.

RACKETEERING CONSPIRACY

6. Beginning at least from in or about January 2000, and continuing through to the present, the exact dates being unknown to the Grand Jury, in Chicago, Illinois, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants,

AUGUSTIN ZAMBRANO,
VICENTE GARCIA,
RUBEN CAQUIAS,
ALPHONSO CHAVEZ,
JUAN DEJESUS,
DANNY DOMINGUEZ,
LUIS GARCIA,
SAMUEL GUTIERREZ,
JOSE GUZMAN,
NEDAL ISSA,
FERNANDO KING,
JAVIER RAMIREZ,
WILFREDO RIVERA,
FERNANDO VAZQUEZ,
FELIPE ZAMORA,

together with others known and unknown, being persons employed by and associated with the LATIN KINGS, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly, and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity involving multiple acts indictable under the following provisions of federal law:

- a. Title 21, United States Code, Sections 841(a)(1) and 846 (drug trafficking);
- b. Title 18, United States Code, Section 1951 (extortion);
- c. Title 18, United States Code, Section 1503 (obstructing the due administration of justice); and
- d. Title 18, United States Code, Section 1512 (Witness tampering);

and multiple acts involving state offenses chargeable under the following provisions of state law:

- a. Title 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1.1, 5/8-2, 5/8-4, and 5/9-1 (murder, attempted murder, and solicitation to commit murder); and
- b. Title 720, Illinois Compiled Statutes, Section 5/12-6 (intimidation; extortion).

7. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the

affairs of the enterprise.

MEANS AND METHODS OF THE CONSPIRACY

8. It was further part of this conspiracy that the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates operated and conducted their affairs through a series of laws and policies, some of which were codified in a constitution and a series of laws.

b. The members of the enterprise and their associates attended regular meetings, known as "demos" – or, when held by Nation officers, "Nation demos" – at which they discussed, planned, and otherwise engaged in criminal activity, including murder, attempted murder, narcotics distribution, and obstruction of justice.

c. Members of the enterprise and their associates initiated members through the practice of causing them to endure physical assaults conducted by members of the enterprise at various gang-related gatherings.

d. To enforce discipline and the rules of the enterprise, members of the enterprise and their associates engaged in a system of "violations," in which the defendants and others attempted to murder, conspired to murder, and physically beat and threatened those members of the enterprise who violated rules, questioned authority, or posed a threat to the leaders or purposes of the enterprise.

e. Members of the enterprise and their associates employed and used

gang-related terminology, symbols, gestures, and color schemes.

f. To perpetuate the enterprise and to maintain and extend their power, members of the enterprise and their associates committed illegal acts known as “burns,” including murder, attempted murder, aggravated battery, intimidation, and assault against individuals who posed a threat to the enterprise or jeopardized its operations, including rival gang members and witnesses to the illegal activities of the enterprise. Pursuant to gang policy, members of the enterprise and their associates were required to participate in such “burns,” received standing orders to shoot rival gang members, and were instructed to retaliate for gang-related attacks upon the members and associates of the enterprise.

g. Members of the enterprise and their associates managed the procurement, transfer, use, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect gang-related territory, personnel, and operations, and to deter, eliminate, and retaliate against competitors and other rival criminal organizations and persons.

h. Members of the enterprise and their associates monitored law enforcement radio frequencies, and acquired radio equipment and monitors to do so, in order to detect and avoid law enforcement inquiry into their activities, including during gang-related missions.

i. Members of the enterprise and their associates acquired automobiles, which were known by several names, including “rammers,” for the purpose of using such “rammers” during missions against rival criminal organizations.

j. Members of the enterprise and their associates earned money for their members and regularly financed their activities through funds obtained in the illegal trafficking of controlled substances, including the distribution and possession with intent to distribute cocaine and marijuana.

k. Members of the enterprise and their associates operated and conducted their affairs, in part, through a “Box” system in which the Section and Region leadership of the LATIN KINGS and others, possessed, controlled, and otherwise maintained a monetary stash on behalf of the enterprise. As part of this practice, the members of the enterprise and their associates paid requisite monthly dues into the Box which, in turn, the enterprise used to bail gang members out of jail, to send money to incarcerated gang members, and to purchase and sell firearms and controlled substances. At times, the members of the enterprise and their associates paid money into the “Box” by selling narcotics supplied by Nation-level members of the gang.

l. Members of the enterprise and their associates also generated funds for the Nation “Box” and for Nation officers by extorting a monthly “street tax” from non-gang members referred to as “miqueros” who sold fraudulent identification documents in the Little Village area of Chicago. Members of the enterprise and their associates enforced these “street tax” payments by engaging in acts of violence and threats of violence to ensure that the “miqueros” paid the monthly “street tax.”

m. Members of the enterprise and their associates hid, misrepresented, concealed, and caused to be misrepresented, concealed, and hidden, the objectives of acts

done in furtherance of the conspiracy, and used coded language and other means to avoid detection and apprehension by law enforcement authorities.

All of the above in violation of Title 18, United States Code, Sections 1962(d) and 2.

COUNT TWO

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates herein by reference the allegations of paragraphs 1 through 2 of Count One of the Superseding Indictment.
2. On or about March 2, 2006, at Cicero, in the Northern District of Illinois, Eastern Division,

VICENTE GARCIA,
ERNESTO GRIMALDO, and
NEDAL ISSA,

defendants herein, and others known and unknown to the grand jury, for the purpose of maintaining and increasing the defendants' position in, the LATIN KINGS, did knowingly and intentionally commit assault with a dangerous weapon upon an individual, that is, Victim A, in violation of the laws of the State of Illinois;

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT THREE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about March 2, 2006, at Cicero, in the Northern District of Illinois, Eastern
Division,

VICENTE GARCIA,
ERNESTO GRIMALDO, and
NEDAL ISSA,

defendants herein, used and carried a firearm during and in relation to a crime of violence
for which they may be prosecuted in a court of the United States, namely, a violation of Title
18, United States Code, Section 1959(a)(3), as charged in Count Two of this Superseding
Indictment;

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates herein by reference the allegations contained in paragraphs 1 through 2 of Count One of the Superseding Indictment.

2. On or about September 24, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSE GUZMAN,

defendant herein, and others known and unknown to the grand jury, for the purpose of maintaining and increasing the defendant's position in, the LATIN KINGS, did knowingly and intentionally commit assault with a dangerous weapon, that is, Victim B, in violation of the laws of the State of Illinois;

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT FIVE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about September 24, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOSE GUZMAN,

defendant herein, used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, a violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Four of this Superseding Indictment;

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIX

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates herein by reference the allegations contained in paragraphs 1 through 2 of Count One of the Superseding Indictment.

2. On or about January 21, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

DANNY DOMINGUEZ,

defendant herein, along with Rudolfo Salazar (since deceased) and others known and unknown to the grand jury, for the purpose of maintaining and increasing the defendant's position in, the LATIN KINGS, did knowingly and intentionally commit assault with a dangerous weapon upon an individual, that is, Victim D, in violation of the laws of the State of Illinois;

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT SEVEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates herein by reference the allegations contained in paragraphs 1 through 2 of Count One of the Superseding Indictment.

2. On or about January 21, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

DANNY DOMINGUEZ,

defendant herein, along with Rudolfo Salazar (since deceased) and others known and unknown to the grand jury, for the purpose of maintaining and increasing the defendant's position in, the LATIN KINGS, did knowingly and intentionally attempt to murder an individual, that is, Victim D, in violation of the laws of the State of Illinois;

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT EIGHT

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about January 21, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

DANNY DOMINGUEZ,

defendant herein, along with Rudolfo Salazar (now deceased) and others known and unknown, used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, a violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Six of this Superseding Indictment;

All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT NINE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates herein by reference the allegations contained in paragraphs 1 through 2 of Count One of the Superseding Indictment.

2. On or about April 14, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

AUGUSTIN ZAMBRANO,
VICENTE GARCIA, and
RUBEN CAQUIAS,

defendants herein, and others known and unknown to the grand jury, for the purpose of maintaining and increasing the defendants' position in, the LATIN KINGS, did knowingly and intentionally commit assault with a dangerous weapon upon an individual, that is, Victims E and F, in violation of the laws of the State of Illinois;

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT TEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

From sometime in at least 2000 and continuing until at least September 2008, in the Northern District of Illinois and elsewhere,

AUGUSTIN ZAMBRANO,
VICENTE GARCIA,
FERNANDO KING,
SAMUEL GUTIERREZ, and
FELIPE ZAMORA,

defendants herein, knowingly conspired to commit extortion, which extortion affected interstate and foreign commerce, by obtaining property from another with his consent, induced by the wrongful use of actual and threatened force, violence, and fear; in that defendants demanded and received payments from an organization illegally selling fraudulent immigration documents in the Little Village area of Chicago by threatening and actually engaging in the use of force and violence against members of that organization unless and until defendants received regular cash payments;

In violation of Title 18, United States Code, Section 1951.

COUNT ELEVEN

The SPECIAL SEPTEMBER 2008 GRAND JURY charges:

1. Beginning at least as early as September 2007, and continuing until in or around December 2007, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICENTE GARCIA,
VALENTIN BAEZ,
ALPHONSO CHAVEZ,
JUAN DEJESUS,
DANNY DOMINGUEZ,
LUIS GARCIA,
SAMUEL GUTIERREZ,
JOSE GUZMAN,
POLIN LOPEZ,
JAVIER RAMIREZ,
WILFREDO RIVERA, JR.,
FERNANDO VAZQUEZ,

defendants herein, conspired with each other, with Rolando Bautista, Jose Dominguez, Daniel Galindo, Christopher Gonzalez, Pol Gonzalez, Roberto Guzman, David Hernandez, Gregory Mendoza, Jose Perez, Steven Rangel, Belsain Rodriguez, Joseph Segura, and Adolfo Zuniga, and with others known and unknown to the Grand Jury knowingly and intentionally to distribute and to possess with intent to distribute a controlled substance, namely, 500 grams or more of mixtures and substances containing cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of the conspiracy that the defendants were members of the 26th Street Region of the Latin Kings who distributed cocaine in the “Little Village” area of

Chicago, located along 26th Street between approximately Fairfield Avenue to the East to Millard Avenue to the West to 21st Street to the North and 33d Street to the South.

3. It was further part of the conspiracy that there were 24 Sections within the 26th Street Region, and each Section was led by an “Inca.” The “Incas” included ALFONSO CHAVEZ, JUAN DEJESUS, DANNY DOMINGUEZ, LUIS GARCIA, SAMUEL GUTIERREZ, POLIN LOPEZ, JAVIER RAMIREZ, WILFREDO RIVERA, and FERNANDO VAZQUEZ. The second-in-command to each “Inca” for individual sections within the 26th Street Region was a “Cacique.” The “Caciques” included VALENTIN BAEZ. The “Incas” and “Caciques” reported to and took directions from VICENTE GARCIA, the Regional Officer of the 26th Street Region, and JOSE GUZMAN, the Regional Enforcer.

4. It was further part of the conspiracy that beginning in or around September 2007 and continuing until in or around December 2007, defendant VICENTE GARCIA caused each Section of the 26th Street Region to be supplied with 1/4 ounce quantities of cocaine approximately twice per month. GARCIA ordered each Section to pay \$200 for each 1/4 ounce quantity of cocaine that it received. GARCIA gave each Section several days to sell the 1/4 ounce quantity of cocaine before requiring payment for the cocaine. GARCIA told other members of the 26th Street Region of the Latin Kings that the money raised from selling the cocaine would be used to purchase, among other things, firearms for the gang members to protect themselves, their narcotics, and their Sections.

5. It was further a part of the conspiracy that DANNY DOMINGUEZ and JOSE

GUZMAN at various times supplied Sections of the 26th Street Region of the Latin Kings with the 1/4 ounce quantities of cocaine that VICENTE GARCIA ordered to be distributed.

6. It was further a part of the conspiracy that between September and December 2007, various Latin King coconspirators, including DANNY DOMINGUEZ and JOSE GUZMAN, at the direction of VICENTE GARCIA, supplied 1/4 ounce quantities of cocaine to Incas for Sections within the 26th Street Region, including ALFONSO CHAVEZ, JUAN DEJESUS, DANNY DOMINGUEZ, LUIS GARCIA, SAMUEL GUTIERREZ, POLIN LOPEZ, JAVIER RAMIREZ, WILFREDO RIVERA, and FERNANDO VAZQUEZ, and, at times, Casiques for Sections within the 26th Street Region, including VALENTIN BAEZ. The above-named Incas and Casiques for sections within the 26th Street Region paid \$200 for the 1/4 ounce quantities of cocaine which they received from Latin King coconspirators working on behalf of VICENTE GARCIA.

7. It was further part of the conspiracy that defendants misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purpose of and the acts done in furtherance of the conspiracy.

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWELVE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about June 19, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

VICENTE GARCIA,

defendant herein, knowingly and intentionally distributed a controlled substance, namely, in
excess of 50 grams of mixtures containing cocaine base in the form of crack cocaine, a
Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about July 19, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

VICENTE GARCIA,

defendant herein, knowingly and intentionally distributed a controlled substance, namely, in
excess of 5 grams of mixtures containing cocaine base in the form of crack cocaine, a
Schedule II Narcotic Drug Controlled Substance;

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

COUNT FOURTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about September 30, 2007, at Bolingbrook, in the Northern District of Illinois,
Eastern Division,

VICENTE GARCIA,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FIFTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT SIXTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

LUIS GARCIA,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT SEVENTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

FERNANDO VAZQUEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT EIGHTEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

POLIN LOPEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT NINETEEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

VALENTIN BAEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

JUAN DEJESUS,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-ONE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 8, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

WILFREDO RIVERA, JR.,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-TWO

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 9, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

SAMUEL GUTIERREZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-THREE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 23, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

VALENTIN BAEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-FOUR

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 23, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

JUAN DEJESUS,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-FIVE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 25, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

LUIS GARCIA,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-SIX

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 25, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

FERNANDO VAZQUEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-SEVEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 25, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

ALPHONSO CHAVEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-EIGHT

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 25, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

WILFREDO RIVERA, JR.,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT TWENTY-NINE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 29, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 29, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

SAMUEL GUTIERREZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT THIRTY-ONE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about October 29, 2007, at Chicago, in the Northern District of Illinois, Eastern
Division,

JAVIER RAMIREZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled
substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled
Substance;

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

COUNT THIRTY-TWO

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-THREE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

LUIS GARCIA,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-FOUR

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

FERNANDO VAZQUEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-FIVE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAVIER RAMIREZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-SIX

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

POLIN LOPEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-SEVEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

VALENTIN BAEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-EIGHT

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 7, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

ALPHONSO CHAVEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT THIRTY-NINE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 8, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 8, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN DEJESUS,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-ONE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-TWO

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

FERNANDO VAZQUEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-THREE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAVIER RAMIREZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-FOUR

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

POLIN LOPEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-FIVE

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN DEJESUS,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-SIX

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 21, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

ALPHONSO CHAVEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-SEVEN

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 23, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

VALENTIN BAEZ,

defendant herein, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

COUNT FORTY-EIGHT

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about November 27, 2007, at Chicago, in the Northern District of Illinois,
Eastern Division,

DANNY DOMINGUEZ,

defendant herein, knowingly and intentionally distributed a controlled substance, namely,
mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

A TRUE BILL:

FOR PERSON

UNITED STATES ATTORNEY