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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
January 2015 Grand Jury

UNITED STATES OF AMERICA,  
Plaintiff,

v.

CARLOS HERNANDEZ,  
aka "Creeper,"  
aka "Rider,"  
JOSE SAUCEDO,  
aka "Lil' Moe,"  
FRANCISCO FARIAS,  
aka "Bones,"  
JOSUE GARIBAY,  
aka "Malo,"  
EDWIN FELIX,  
aka "Boogie,"  
JONATHAN PORTILLO,  
aka "Pelon," and  
JOEL MATTHEW MONARREZ,  
aka "Gallo,"

Defendants.

CR No. 16-

**CR16-0442**

I N D I C T M E N T

[18 U.S.C § 241: Conspiracy to Violate Civil Rights; 18 U.S.C. § 1959(a)(3), (a)(6): Violent Crime in Aid of Racketeering; 42 U.S.C. § 3631: Interference with Housing Rights by Force; 18 U.S.C § 844(f): Attempted Arson of Federal Property; 18 U.S.C. § 844(n): Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony; 18 U.S.C § 844(h): Use Fire and Carry Explosive to Commit Another Federal Felony; 18 U.S.C § 924(c)(1)(A)(i): Possess, Use, and Carry a Firearm During and in Relation to, and in Furtherance of, a Crime of Violence; 18 U.S.C. § 1001: Making a False Statement; 18 U.S.C. § 2(a): Aiding and Abetting]

1 The Grand Jury charges:

2 INTRODUCTORY ALLEGATIONS

3 A. THE RACKETEERING ENTERPRISE

4 1. At all times relevant to this Indictment, defendants  
5 CARLOS HERNANDEZ, aka "Creeper," aka "Rider" ("HERNANDEZ"), JOSE  
6 SAUCEDO, aka "Lil' Moe" ("SAUCEDO"), FRANCISCO FARIAS, aka  
7 "Bones" ("FARIAS"), JOSUE GARIBAY, aka "Malo" ("GARIBAY"), EDWIN  
8 FELIX, aka "Boogie" ("FELIX"), JONATHAN PORTILLO, aka "Pelon"  
9 ("PORTILLO"), and JOEL MATTHEW MONARREZ, aka "Gallo"  
10 ("MONARREZ"), and others known and unknown to the Grand Jury,  
11 were members and associates of the Big Hazard, or Hazard Grande,  
12 street gang, a criminal organization whose members and  
13 associates engaged in, among other things, murder, robbery,  
14 extortion, witness intimidation, and trafficking and conspiracy  
15 to traffic in controlled substances. At all times relevant to  
16 this Indictment, the Hazard criminal organization ("Hazard" or  
17 "Hazard gang") operated within the Central District of  
18 California and elsewhere.

19 2. Hazard is a multi-generational gang that originated in  
20 the early 1940s and claimed a territory in the East Los Angeles  
21 Area, which grew to include the Ramona Gardens Housing Project  
22 ("Ramona Gardens"), a federally funded public housing  
23 development built in the 1950s. Hazard derived its name from a  
24 park in the neighborhood the gang controlled, Hazard Park, and  
25 uses Ramona Gardens as a base of operations. As of June 2016,  
26 Hazard had an estimated membership of approximately 350  
27 individuals.

1           3.    Hazard is part of a network of Latino gangs in the  
2 greater Los Angeles area controlled by senior gang members who  
3 are also members and associates of an organization known as the  
4 "Mexican Mafia" or "La Eme." The Mexican Mafia is an organized  
5 group of individuals that controls the narcotics trafficking and  
6 other criminal activities within California's penal system and,  
7 through that control, controls the activities of Latino gangs,  
8 like the Hazard gang, on the streets.

9 B.    PURPOSES OF THE HAZARD GANG

10          4.    The purposes of Hazard include, but are not limited  
11 to, the following:

12           a.    Promoting Hazard leaders' criminal reputation  
13 among other Latino gangs in Southern California and inside of  
14 state and federal prisons; carrying out Hazard leaders' orders  
15 against rival gang members and perceived enemies; and enhancing  
16 Hazard's reputation by promoting the criminal reputation of its  
17 members and associates.

18           b.    Maintaining Hazard's control and authority over  
19 its territory, often through threats, intimidation, civil rights  
20 crimes, and other acts of violence, including murder, committed  
21 against local residents and rival gangs.

22           c.    Violently retaliating against rival gang members  
23 who challenge Hazard's authority or who fail to pay debts owed  
24 to Hazard members and associates.

25           d.    Promoting and enhancing the power and authority  
26 of the Hazard gang and associated Latino gangs operating under  
27 Hazard's leadership.

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1 e. Exposing and punishing Hazard members and  
2 associates who are perceived as violating Hazard's rules.

3 f. Exposing and punishing potential witnesses to  
4 crimes committed by Hazard members and associates who are  
5 suspected of cooperating with law enforcement or otherwise  
6 "disrespecting" Hazard.

7 g. Imposing unwritten rules regarding the control of  
8 Hazard territory, including that African-American residents  
9 reside in Ramona Gardens at the pleasure of Hazard, and that the  
10 African-American residents face retaliation and expulsion from  
11 Ramona Gardens by Hazard if they offend Hazard members.

12 C. RAMONA GARDENS

13 5. As of June 2016, Ramona Gardens was occupied by  
14 approximately 95 percent Hispanic residents and approximately 3  
15 percent African-American residents. Ramona Gardens was  
16 originally constructed with money provided by the federal  
17 government, namely, the United States Housing Authority, and the  
18 residents' rent is subsidized by the federal government, namely,  
19 the United States Department of Housing and Urban Development,  
20 in order to provide affordable housing. At all times relevant  
21 to this Indictment, Ramona Gardens was managed by the Housing  
22 Authority of the City of Los Angeles.

23 D. THE VICTIMS

24 6. The victims in this case included the following:

25 a. Victim 1, an African-American adult female,  
26 Victim 1's African-American minor children, and Victim 2, an  
27 African-American adult male, who were residing in a unit inside  
28 Ramona Gardens ("Unit A").

1           b.     Victim 3, an African-American adult female,  
2 Victim 3's African-American minor children, and Victim 4, an  
3 African-American adult male, who were residing in a unit inside  
4 Ramona Gardens ("Unit B").

5           c.     Victim 5, an African-American adult female, and  
6 Victim 5's African-American children and African-American  
7 grandchildren, who were residing in a unit inside Ramona Gardens  
8 ("Unit C").

9           d.     Victim 6, a Hispanic adult female, who was  
10 residing in a unit directly adjacent to Victim 1's Unit A inside  
11 Ramona Gardens ("Unit D").

12         7.     These Introductory Allegations are hereby incorporated  
13 by reference into each count of this Indictment.

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COUNT ONE

[18 U.S.C. § 241]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, and continuing until at least on or about September 29, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, aka "Creeper," aka "Rider" ("HERNANDEZ"), JOSE SAUCEDO, aka "Lil' Moe" ("SAUCEDO"), FRANCISCO FARIAS, aka "Bones" ("FARIAS"), JOSUE GARIBAY, aka "Malo" ("GARIBAY"), EDWIN FELIX, aka "Boogie" ("FELIX"), JONATHAN PORTILLO, aka "Pelon" ("PORTILLO"), and JOEL MATTHEW MONARREZ, aka "Gallo" ("MONARREZ"), and other co-conspirators known and unknown to the Grand Jury who were also members or associates of the Hazard gang, willfully conspired to injure, oppress, threaten, and intimidate African-American residents in the Ramona Gardens Housing Project ("Ramona Gardens") in Boyle Heights, California, in the free exercise and enjoyment of rights secured to those residents by the Constitution and laws of the United States, namely, the right to occupy a dwelling free from injury, intimidation, and interference based on race and color.

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was accomplished and was to be accomplished, in substance, as follows:

1. Big Hazard criminal street gang ("Hazard") members and associates would claim Ramona Gardens as the gang's territory.
2. Hazard would adopt as one of its unwritten tenets that members of the gang would harass, intimidate, and use violence

1 to drive African-American residents out of the gang's territory,  
2 including Ramona Gardens, if the African-American residents  
3 offended Hazard.

4 3. In order to identify the territory controlled by  
5 Hazard, and to instill fear in African-Americans and other  
6 residents who lived in or near the gang's territory, including  
7 Ramona Gardens, members of Hazard would spray paint (or "tag")  
8 their gang monikers and gang symbols on businesses, residences,  
9 and property in the gang's territory, including Ramona Gardens.

10 4. Hazard members, including defendants HERNANDEZ and  
11 FARIAS, and associates would obtain and possess guns and other  
12 dangerous weapons in order to, among other things: enforce the  
13 authority of Hazard; intimidate rivals and residents; attack  
14 rivals and African-Americans; and protect Hazard members from  
15 retaliation or gang rivals.

16 5. Hazard members and associates would monitor the  
17 activity of African-Americans residing in the gang's territory,  
18 including Ramona Gardens, and defendants HERNANDEZ, SAUCEDO,  
19 FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others,  
20 would meet to discuss ways to threaten, intimidate, and attack  
21 African-Americans in their residences, on the streets, and  
22 elsewhere, to deter African-Americans from continuing to reside  
23 in Ramona Gardens and to drive African-Americans out of the  
24 gang's territory, including Ramona Gardens, because of their  
25 race and color.

26 6. Members of the Hazard gang, including defendant  
27 SAUCEDO, would confront African-American residents, including  
28 mixed-race children, and individually and collectively threaten

1 them by telling them that they were not welcome in Hazard gang  
2 territory, namely, Ramona Gardens, and that they risked harm if  
3 they remained as residents.

4 C. OVERT ACTS

5 In furtherance of the conspiracy, and to accomplish the  
6 object of the conspiracy, defendants HERNANDEZ, SAUCEDO, FARIAS,  
7 GARIBAY, FELIX, PORTILLO, and MONARREZ, and other members and  
8 associates of the Hazard gang known and unknown to the Grand  
9 Jury, committed various overt acts, on or about the following  
10 dates, within the Central District of California, and elsewhere,  
11 including, but not limited to, the following:

12 1. In early May of 2014, defendant HERNANDEZ led a Hazard  
13 meeting at a gang location in Hazard territory, at which  
14 defendants SAUCEDO, FARIAS, GARIBAY, FELIX, and PORTILLO, and  
15 others, attended, and told them they were going to use "Molotov  
16 cocktails" to firebomb residential units in Ramona Gardens  
17 occupied by African-American families, including children.

18 2. In early May of 2014, at the same meeting described  
19 above, defendant HERNANDEZ told defendants SAUCEDO, FARIAS,  
20 GARIBAY, FELIX, and PORTILLO, and others, that they were  
21 firebombing these units to "get the niggers out of the  
22 neighborhood," or words to that effect.

23 3. On May 11, 2014, Mother's Day, defendant HERNANDEZ  
24 contacted co-conspirators and instructed them to meet at a gang  
25 location in Hazard territory to prepare for the firebombing of  
26 the residential units occupied by the African-American families.

27 4. On May 11, 2014, defendants HERNANDEZ, SAUCEDO,  
28 FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, met



1 at a gang location in Hazard territory to prepare for the  
2 firebombing of the residential units occupied by the African-  
3 American families.

4 5. On May 11, 2014, at the same meeting, defendant  
5 HERNANDEZ provided defendants SAUCEDO, FARIAS, GARIBAY, FELIX,  
6 PORTILLO, and MONARREZ, and others, instructions as to how they  
7 were to conduct the firebombing of the residential units  
8 occupied by the African-American families, and distributed  
9 disguises, gloves, and materials for the firebombs.

10 6. On May 11, 2014, at the same meeting, defendants  
11 HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and  
12 MONARREZ, and others, split into two groups, and defendant  
13 HERNANDEZ assigned each a duty in the firebombing, including:  
14 (a) breaking the windows of the African-Americans' residences to  
15 allow the firebombs to make clean entries; (b) igniting the  
16 firebombs; and (c) throwing the firebombs into the residences  
17 through the broken windows in order to maximize damage.

18 7. On May 11, 2014, defendants HERNANDEZ, SAUCEDO,  
19 FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others,  
20 deliberately left behind their cellular telephones prior to  
21 engaging in the firebombing in order to thwart law enforcement's  
22 ability to track their movements through their cellular  
23 telephones.

24 8. On May 11, 2014, defendant HERNANDEZ armed himself  
25 with a semi-automatic handgun and used a stolen van to transport  
26 the group, including defendants SAUCEDO, FARIAS, also armed with  
27 a semi-automatic handgun, GARIBAY, FELIX, PORTILLO, and  
28 MONARREZ, and others, via a route where they knew the security

1 cameras inside of Ramona Gardens would be unable to record them  
2 as they exited the van to conduct their firebombing.

3 9. On May 12, 2014, shortly after midnight, defendants  
4 HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and  
5 MONARREZ, and others, entered Ramona Gardens, split into their  
6 two groups, and firebombed four residential units in Ramona  
7 Gardens, three of which were occupied by African-American  
8 families and one of which was immediately adjacent to a unit  
9 occupied by an African-American family, as follows:

10 a. Unit A, occupied by Victim 1, Victim 1's five  
11 minor children, and Victim 2; Victim 1 was on the couch with her  
12 baby immediately prior to the firebombing, and the firebomb  
13 landed where Victim 1 and her baby had been sleeping before  
14 hearing the sound of a window breaking;

15 b. Unit B, occupied by Victim 3, Victim 3's minor  
16 children, and Victim 4;

17 c. Unit C, occupied by Victim 5 and Victim 5's  
18 children and grandchildren; defendant HERNANDEZ, in the process  
19 of throwing one of the ignited Molotov cocktails into Unit C,  
20 cut his right arm on broken glass, causing it to bleed profusely  
21 and require later medical attention; and

22 d. Unit D, occupied by Victim 6, directly adjacent  
23 to Victim 1's Unit A.

24 10. On May 12, 2014, defendant FARIAS, driving the stolen  
25 van the group had utilized earlier, transported defendant  
26 HERNANDEZ to White Memorial Hospital where defendant HERNANDEZ  
27 received medical treatment for the cut he sustained to his right  
28 arm while carrying out the firebombing, before returning the

1 remaining co-conspirators to a gang location in Hazard  
2 territory.

3 11. On May 12, 2014, and within a few days following the  
4 firebombing, defendants SAUCEDO, PORTILLO, and MONARREZ, and  
5 others, returned to the gang location in Hazard territory to  
6 collect their personal items they had left behind in order to  
7 thwart law enforcement tracking.

8 12. On September 29, 2014, defendant SAUCEDO, while in  
9 Ramona Gardens, confronted and threatened a mixed-race family  
10 that resided in Ramona Gardens, including a young mixed-race  
11 child, and warned that they should leave Ramona Gardens or that  
12 they too would get firebombed.

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COUNT TWO

[18 U.S.C. §§ 1959(a)(3), 2(a)]

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3 1. At all times relevant to Counts Two and Three, the Big  
4 Hazard criminal street gang ("Hazard"), as described more  
5 particularly in Paragraphs 1 through 4 of the Introductory  
6 Allegations, constituted an enterprise, as that term is defined  
7 in Title 18, United States Code, Section 1959(b)(2), that is, a  
8 group of individuals associated in fact, which was engaged in,  
9 and the activities of which affected, interstate and foreign  
10 commerce. The enterprise constituted an ongoing organization  
11 whose members functioned as a continuing unit for a common  
12 purpose of achieving the objectives of the enterprise.

13 2. At all times relevant to Counts Two and Three, Hazard,  
14 through its members and associates, engaged in racketeering  
15 activity, as defined in Title 18, United States Code, Sections  
16 1959(b)(1) and 1961(1), that is, acts involving murder, robbery,  
17 and extortion in violation of California law; offenses involving  
18 the manufacturing, selling, and otherwise dealing in controlled  
19 substances, in violation of Title 21, United States Code,  
20 Sections 846 and 841(a)(1); and acts indictable under Title 18,  
21 United States Code, Section 1951 (Interference with Commerce by  
22 Threats or Violence), and Title 18, United States Code, Section  
23 1512 (Tampering with a Witness, Victim, or Informant).

24 3. On or about May 12, 2014, in Los Angeles County,  
25 within the Central District of California, for the purpose of  
26 gaining entrance to and maintaining and increasing position in  
27 Hazard, an enterprise engaged in racketeering activity,  
28 defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper,"

1 aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka  
2 "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie,"  
3 JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka  
4 "Gallo," each aiding and abetting the other, and others known  
5 and unknown to the Grand Jury, committed assault with dangerous  
6 weapons, namely, Molotov cocktails (i.e., firebombs), against  
7 African-American Victims 1, 2, 3, 4, 5, and others, in violation  
8 of California Penal Code Section 245.

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COUNT THREE

[18 U.S.C. § 1959(a)(6)]

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3 1. Paragraphs 1 and 2 of Count Two are re-alleged and  
4 incorporated by reference as if fully set forth herein.

5 2. On or about May 12, 2014, in Los Angeles County,  
6 within the Central District of California, for the purpose of  
7 gaining entrance to and maintaining and increasing position in  
8 Hazard, an enterprise engaged in racketeering activity,  
9 defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper,"  
10 aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka  
11 "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie,"  
12 JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka  
13 "Gallo," and others known and unknown to the Grand Jury,  
14 attempted to commit assault with dangerous weapons, namely,  
15 Molotov cocktails (i.e., firebombs), against African-American  
16 Victims 1, 2, 3, 4, 5, and others, in violation of California  
17 Penal Code Sections 245 and 664.

COUNT FOUR

[42 U.S.C. § 3631; 18 U.S.C. § 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, attempted to and did, by force and threat of force, willfully injure, intimidate, and interfere with African-American residents of the Ramona Gardens Housing Project ("Ramona Gardens") in Boyle Heights, California, namely, African-American Victims 1, 2, 3, 4, and 5 ("the Victims"), and others, by the use and attempted use of a dangerous weapon, explosives, and fire, namely, by making and throwing Molotov cocktails (i.e., firebombs) at and into the Victims' residential units in Ramona Gardens, because of the Victims' race and color, and because the Victims were occupying dwellings in Ramona Gardens.

COUNT FIVE

[18 U.S.C. §§ 844(f)(1), (2), 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, maliciously damaged and attempted to damage, by means of fire and explosives, buildings and real property, namely, four residential units in the Ramona Gardens Housing Project, which were in whole or in part owned, possessed, and operated and administered by the Housing Authority of the City of Los Angeles, an organization receiving financial assistance from the United States Department of Housing and Urban Development, and in so doing, created a substantial risk of injury to Victims 1, 2, 3, 4, and 5, and others.



1                                   COUNT SIX

2                                   [18 U.S.C. § 844(n)]

3 A.    OBJECTS OF THE CONSPIRACY

4           Beginning on a date unknown to the Grand Jury, and  
5 continuing to on or about September 29, 2014, in Los Angeles  
6 County, within the Central District of California, and  
7 elsewhere, defendants CARLOS HERNANDEZ, aka "Creeper," aka  
8 "Rider" ("HERNANDEZ"), JOSE SAUCEDO, aka "Lil' Moe" ("SAUCEDO"),  
9 FRANCISCO FARIAS, aka "Bones" ("FARIAS"), JOSUE GARIBAY, aka  
10 "Malo" ("GARIBAY"), EDWIN FELIX, aka "Boogie" ("FELIX"),  
11 JONATHAN PORTILLO, aka "Pelon" ("PORTILLO"), and JOEL MATTHEW  
12 MONARREZ, aka "Gallo" ("MONARREZ"), and others known and unknown  
13 to the Grand Jury (collectively, "defendants"), conspired to  
14 knowingly and intentionally use fire to commit, and carry  
15 explosives during the commission of, at least one of the  
16 following federal felonies:

17           1.    Conspiracy Against Civil Rights, in violation of Title  
18 18, United States Code, Section 241, as charged in Count One of  
19 the Indictment;

20           2.    Violent Crime In Aid of Racketeering, namely, assault  
21 with a deadly weapon, in violation of Title 18, United States  
22 Code, Section 1959(a)(3), as charged in Count Two of the  
23 Indictment;

24           3.    Violent Crime In Aid of Racketeering, namely, attempt  
25 to commit assault with a deadly weapon, in violation of Title  
26 18, United States Code, Section 1959(a)(6), as charged in Count  
27 Three of the Indictment; and

1           4.       Interference with Housing Rights by Force, in  
2 violation of Title 42, United States Code, Section 3631, as  
3 charged in Count Four of the Indictment;  
4 all in violation of Title 18, United States Code, Section  
5 844(h).

6 B.     MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
7         ACCOMPLISHED

8         The object of the conspiracy was accomplished and was to be  
9 accomplished, in substance, as follows:

10        1.       Big Hazard criminal street gang ("Hazard") members and  
11 associates would claim Ramona Gardens as the gang's territory.

12        2.       Hazard would adopt as one of its unwritten tenets that  
13 members of the gang would harass, intimidate, and use violence  
14 to drive African-American residents out of the gang's territory,  
15 including Ramona Gardens, if the African-American residents  
16 offended Hazard.

17        3.       In order to identify the territory controlled by  
18 Hazard, and to instill fear in African-Americans and other  
19 residents who lived in or near the gang's territory, including  
20 Ramona Gardens, members of Hazard would spray paint (or "tag")  
21 their gang monikers and gang symbols on businesses, residences,  
22 and property in the gang's territory, including Ramona Gardens.

23        4.       Hazard members, including defendants HERNANDEZ and  
24 FARIAS, and associates would obtain and possess guns and other  
25 dangerous weapons in order to, among other things: enforce the  
26 authority of Hazard; intimidate rivals and residents; attack  
27 rivals and African-Americans; and protect Hazard members from  
28 retaliation or gang rivals.

1           5.     Hazard members and associates would monitor the  
2 activity of African-Americans residing in the gang's territory,  
3 including Ramona Gardens, and defendants HERNANDEZ, SAUCEDO,  
4 FARIAS, FELIX, GARIBAY, PORTILLO, and MONARREZ, and others,  
5 would meet to discuss ways to threaten, intimidate, and attack  
6 African-Americans in their residences, on the streets, and  
7 elsewhere, to deter African-Americans from continuing to reside  
8 in Ramona Gardens and to drive African-Americans out of the  
9 gang's territory, including Ramona Gardens, because of their  
10 race and color.

11           6.     Members of the Hazard gang, including defendant  
12 SAUCEDO, would confront African-American residents, including  
13 mixed-race children, and individually and collectively threaten  
14 them by telling them that they were not welcome in Hazard gang  
15 territory, namely, Ramona Gardens, and that they risked harm if  
16 they remained as residents.

17           7.     Defendants HERNANDEZ, SAUCEDO, FARIAS, FELIX, GARIBAY,  
18 PORTILLO, and MONARREZ, and others, would make Molotov cocktails  
19 (i.e., firebombs) to throw into the residences of African-  
20 American families.

21 C.     OVERT ACTS

22           In furtherance of the conspiracy and to accomplish the  
23 object of the conspiracy, on or about the listed dates,  
24 defendants HERNANDEZ, SAUCEDO, FARIAS, FELIX, GARIBAY, PORTILLO,  
25 and MONARREZ, and others known and unknown to the Grand Jury,  
26 committed various overt acts within the Central District of  
27 California, and elsewhere, including, but not limited to, Overt  
28 Acts numbered 1 through 12 as set forth in Count One, which are

1 re-alleged and incorporated by reference as if fully set forth  
2 herein.

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COUNT SEVEN

[18 U.S.C. §§ 844(h)(1), (h)(2), 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, knowingly used fire, namely, Molotov cocktails (i.e., firebombs), to commit, and carried explosives during the commission of, at least one of the following felonies prosecutable in a court of the United States:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime In Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Two of the Indictment;

3. Violent Crime In Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Three of the Indictment; and

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment.

COUNT EIGHT

[18 U.S.C. § 924(c) (1) (A) (i)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendant CARLOS HERNANDEZ, also known as ("aka") "Rider," aka "Creeper," knowingly used and carried a firearm, namely, a semi-automatic handgun, during and in relation to, and possessed that firearm in furtherance of, at least one of the following crimes of violence:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime in Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a) (3), as charged in Count Two of the Indictment;

3. Violent Crime in Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a) (6), as charged in Count Three of the Indictment;

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment;

5. Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(n), as charged in Count Six of the Indictment; and

6. Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(h), as charged in Count Seven of the Indictment.

COUNT NINE

[18 U.S.C. § 924(c) (1) (A) (i)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendant FRANCISCO FARIAS, also known as "Bones," knowingly used and carried a firearm, namely, a semi-automatic handgun, during and in relation to, and possessed that firearm in furtherance of, at least one of the following crimes of violence:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime in Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a) (3), as charged in Count Two of the Indictment;

3. Violent Crime in Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a) (6), as charged in Count Three of the Indictment;

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment;

5. Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(h), as charged in Count Six of the Indictment; and

6. Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(n), as charged in Count Seven of the Indictment.

COUNT TEN

[18 U.S.C. § 1001(a)(2)]

On or about June 23, 2015, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the government of the United States, namely, the Federal Bureau of Investigation ("FBI"), defendant EDWIN FELIX, also known as "Boogie" ("FELIX"), willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation, in that defendant FELIX falsely stated that he did not use the gang

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1 moniker "Boogie," during an interview with an FBI Special Agent.  
2 In fact, as defendant FELIX then knew, defendant FELIX used the  
3 gang moniker "Boogie."

4  
5 A TRUE BILL

6  
7 151  
8 Foreperson

9  
10 EILEEN M. DECKER  
11 United States Attorney

12   
13 LAWRENCE S. MIDDLETON  
14 Assistant United States Attorney  
15 Chief, Criminal Division

16 BRANDON D. FOX  
17 Assistant United States Attorney  
18 Chief, Public Corruption & Civil Rights  
19 Section

20 MACK E. JENKINS  
21 Assistant United States Attorney  
22 Public Corruption & Civil Rights Section

23 DOUGLAS M. MILLER  
24 Assistant United States Attorney  
25 Public Corruption & Civil Rights Section

26 PATRICIA A. SUMNER  
27 Trial Attorney  
28 Department of Justice, Civil  
Rights Division