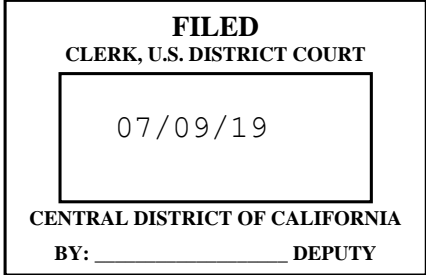


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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
January 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR No. 19-117(B)-ODW

S E C O N D
S U P E R S E D I N G
I N D I C T M E N T

GERMAN ARNULFO CRUZ HERNANDEZ,
aka "Arnol" and
"Malandro,"
ANGEL AMADEO GUZMAN,
aka "Splinter" and
"Desastre,"
EVER JOEL MORALES,
aka "Bandita,"
"Catracho,"
"Conejo," and
"Angel Malvado,"
FERNANDO GARCIA PARADA,
aka "Chaos,"
"Caprichoso," and
"Penny,"
JOSE BAQUIAX ALVAREZ,
aka "Alacran,"
KEVIN VILLALTA GOMEZ,
aka "Mentiroso,"
KEVIN ARTEAGA,
aka "Street Boy" and
"Lucifer,"
EDGARD VELASQUEZ,
aka "Snoopy,"
WALTER CHAVEZ LARIN,
aka "Delito,"
"Dexter,"
"Alexander Chavez," and
"Daniel Gomez,"

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 1111, 7(3): First Degree Murder Within the Special Maritime and Territorial Jurisdiction of the United States; 18 U.S.C. §§ 1959(a)(1), (a)(5): Violent Crime in Aid of Racketeering; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. § 3: Accessory After the Fact; 18 U.S.C. §§ 1963, 981(a)(1)(C), and 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 YEFRI ALEXANDER REVELO,
aka "Silent,"
2 WILFREDO VIDES,
aka "Skippy,"
3 GERARDO ALVARADO,
aka "Tato,"
4 ROBERTO CARLOS MENDEZ CRUZ,
aka "Desquiciado,"
5 BRYAN ALBERTO ORDONES,
ROBERTO ALEJANDRO CORADO ORTIZ,
6 aka "Infernal,"
EDWIN ISAAC MENDEZ,
7 aka "Chino" and
"Carabina,"
8 JOSUE BALMORE FLORES CASTRO,
aka "Swagger" and
9 "Lil Malvado,"
LUIS ARTURO GONZALEZ,
10 aka "Guanako,"
EDWIN MARTINEZ,
11 aka "Desorden" and
"El Omisidio,"
12 STEVEN EMMANUEL LINARES,
MARCO ANTONIO RAMOS,
13 aka "Bala" and
"Greedy," and
14 ERICK EDUARDO ROSALES ARIAS,
aka "Gix," and
15 "Extrano,"

16 Defendants.

17
18 The Grand Jury charges:

19 GENERAL ALLEGATIONS

20 At times relevant to this Second Superseding Indictment:

21 A. THE RACKETEERING ENTERPRISE

22 1. Defendants GERMAN ARNULFO CRUZ HERNANDEZ, also known as
23 ("aka") "Arnol" and "Malandro" ("CRUZ"); ANGEL AMADEO GUZMAN, aka
24 "Splinter" and "Desastre" ("GUZMAN"); EVER JOEL MORALES, aka
25 "Bandita," "Catracho," "Conejo," and "Angel Malvado" ("E. MORALES");
26 FERNANDO GARCIA PARADA, aka "Chaos," "Caprichoso," and "Penny"
27 ("GARCIA"); JOSE BAQUIAX ALVAREZ, aka "Alacran" ("BAQUIAX"); KEVIN
28 VILLALTA GOMEZ, aka "Mentiroso" ("GOMEZ"); KEVIN ARTEAGA, aka "Street

1 Boy" and "Lucifer" ("ARTEAGA"); EDGARD VELASQUEZ, aka "Snoopy"
2 ("VELASQUEZ"); WALTER CHAVEZ LARIN, aka "Delito," "Dexter,"
3 "Alexander Chavez," and "Daniel Gomez" ("CHAVEZ"); YEFRI ALEXANDER
4 REVELO, aka "Silent" ("REVELO"); GERARDO ALVARADO, aka "Tato"
5 ("ALVARADO"); ROBERTO CARLOS MENDEZ CRUZ, aka "Desquiciado" ("R.
6 MENDEZ"); BRYAN ALBERTO ORDONES ("ORDONES"); ROBERTO ALEJANDRO CORADO
7 ORTIZ, aka "Infernal" ("CORADO"); EDWIN ISAAC MENDEZ, aka "Chino"
8 and "Carabina" ("E. MENDEZ"); JOSUE BALMORE FLORES CASTRO, aka
9 "Swagger," "Lil Malvado" ("FLORES"); LUIS ARTURO GONZALEZ, aka
10 "Guanako" ("GONZALEZ"); EDWIN MARTINEZ, aka "Desorden" and "El
11 Omisidio" ("MARTINEZ"), STEVEN EMMANUEL LINARES ("LINARES"); MARCO
12 ANTONIO RAMOS, aka "Bala" and "Greedy" ("RAMOS"), and ERICK EDUARDO
13 ROSALES ARIAS, aka "Gix" and "Extrano" ("ROSALES ARIAS")
14 (collectively, the "defendants"), and Wilfredo Vides, aka "Skippy"
15 ("Vides"); and others known and unknown to the Grand Jury, were
16 members and associates of the Mara Salvatrucha street gang in Los
17 Angeles, otherwise known as MS-13 (hereinafter referred to as "MS-
18 13"), a criminal organization operating in and around Los Angeles,
19 California, whose members and associates engaged in, among other
20 things, numerous acts of violence and other crimes, including murder,
21 assault, robbery, trafficking in narcotics, and possessing dangerous
22 weapons, including machetes and firearms. MS-13 operated within the
23 Central District of California and elsewhere. MS-13 in Los Angeles,
24 including its leaders, members, and associates, constituted an
25 "enterprise," as defined by Title 18, United States Code, Sections
26 1959(b)(2) and 1961(4), that is, a group of individuals associated in
27 fact, although not a legal entity, which was engaged in, and the
28 activities of which affect, interstate and foreign commerce. The

1 enterprise constituted an ongoing organization whose members and
2 associates functioned as a continuing unit for a common purpose of
3 achieving the objectives of the enterprise.

4 B. BACKGROUND OF THE RACKETEERING ENTERPRISE

5 2. Mara Salvatrucha was formed in Los Angeles in the mid-1980s
6 and has been active ever since. Mara Salvatrucha was a trans-
7 national gang with members in at least ten states and several Central
8 American countries, including El Salvador, Honduras, and Guatemala.
9 Mara Salvatrucha had a particular culture, as evidenced by the use of
10 hand signals, tattoos related to devil's horns, the words "Mara
11 Salvatrucha" or "MS-13," and tagging practices, all of which
12 demonstrated individuals' association with, and membership in, the
13 gang. Mara Salvatrucha was organized and structured, and it operated
14 pursuant to a code of conduct.

15 3. In the 1990s in Los Angeles, Mara Salvatrucha distinguished
16 itself by committing brutal acts of violence against rival gang
17 members and non-gang members. In the mid-1990s, Mara Salvatrucha
18 became associated with the Mexican Mafia, commonly referred to as "la
19 Eme" (which translates in English to "the M"), and added the number
20 "13" to its name. The number "13" marks the 13th letter of the
21 alphabet: "M." Thus, Mara Salvatrucha became "MS-13," signifying its
22 loyalty to the Mexican Mafia. The Mexican Mafia was a criminal
23 organization that operated within the California state prison system,
24 the federal prison system, and the streets and suburbs of large
25 cities throughout Southern California. By controlling the criminal
26 activities occurring within prison facilities, providing protection
27 for imprisoned members and associates of Hispanic gangs, and imposing
28 discipline, often in the form of acts of violence, against both

1 individuals and street gangs who fail to adhere to its directives,
2 the Mexican Mafia rose to the position where it exercised control
3 over Hispanic street gangs operating throughout the southern half of
4 the State of California. Specifically, its individual members
5 controlled one or more Hispanic street gangs, which served as the
6 power base through which the Mexican Mafia members operated their
7 individual criminal enterprises. In return for its integration into
8 the Mexican Mafia, MS-13 members received the Mexican Mafia's
9 protection in the neighborhoods and in prison.

10 4. While MS-13 originated in Los Angeles, over the years, MS-
11 13's ranks increased dramatically as its members were deported to El
12 Salvador. The Salvadoran civil war left El Salvador's civilian
13 population uneasy and mistrustful of the new government, making room
14 for anti-establishment groups, including MS-13. As MS-13's numbers
15 swelled in Los Angeles and El Salvador, MS-13 members also traveled
16 to, and settled in, other cities and areas in the United States,
17 including New York, Virginia, Maryland, and Texas. As a result, MS-
18 13 operated nationally and internationally, with more than ten
19 thousand members regularly conducting gang activities in at least ten
20 states and Washington, D.C., with tens of thousands more conducting
21 gang activities in El Salvador, Honduras, Guatemala, and Mexico.

22 5. In 2012, as El Salvador faced increasing violent crime and
23 homicide rates, caused in part by Salvadoran MS-13 members, the
24 Salvadoran government attempted to stem the violence by coming to an
25 agreement with some of MS-13's highest-ranking incarcerated members.
26 In 2015, when news of the agreement became public, other high-ranking
27 MS-13 members spoke out against the Salvadoran government's efforts
28 and were ultimately murdered. Out of this divide, the "503" sub-

1 group of MS-13 originated. The number 503 is relevant because it is
2 the telephone country code for El Salvador. MS-13 members who upheld
3 the values of extreme violence often claimed to belong to "503,"
4 which typically denoted Salvadoran nationalism and adherence to MS-
5 13's violent roots.

6 6. In Los Angeles, MS-13 operated under the "Los Angeles
7 Program," whereby its leaders and members made all decisions
8 concerning how and when a new member was initiated into MS-13, how
9 MS-13 operated, when discipline was meted out, when a subgroup or
10 "clique" was responsible for paying extortionate rent payments, the
11 geographical boundaries of each clique, and the identity of the shot
12 callers and leaders. MS-13 in Los Angeles was distinct from MS-13
13 cliques in other parts of the country, because in Los Angeles, MS-13
14 had to pay extortionate rent payments to the Mexican Mafia, to which
15 MS-13 swore fealty.

16 7. MS-13 in Los Angeles operated through subsets known as
17 "cliques," which were usually named for a street within a clique's
18 territory, or for the neighborhood in which the clique operates. MS-
19 13 had approximately 20 cliques operating in Los Angeles, including,
20 but not limited to, "7-11," "Adams," "Centrales," "Coronado,"
21 "Francis," "Fulton," "Harvard," "Hollywood," "Leeward," "MLK,"
22 "Normandie," "Parkview," "Pasadena," "Southside," "Tiny Winos,"
23 "Travieso," and "Vagos." Each clique typically had one or more
24 leaders at any given point, commonly referred to as "shot callers,"
25 who were responsible for, among other things, managing the narcotics
26 trafficking operation in the clique's territory, collecting extortion
27 payments, authorizing or approving violence, including murder,
28 directing the day-to-day management of the clique, enforcing MS-13's

1 and the Mexican Mafia's codes of conduct, resolving intra-clique
2 disputes, and representing their respective cliques at the MS-13
3 general meetings. Shot callers were also responsible for meeting
4 with other clique leaders in order to achieve their common criminal
5 purposes and to resolve disputes between the cliques.

6 8. The Salvadoran MS-13 members who had recently come to
7 reside in Los Angeles over the past few years often identified with
8 the 503 group. Although these MS-13 members were technically members
9 of Salvadoran cliques, including "Directos Locos" and "Los Angeles
10 Locos," they were all associates of Los Angeles-based cliques,
11 including the Fulton clique. Through this association, Fulton clique
12 members and 503 associates of the Fulton clique joined together to
13 commit the murders identified herein.

14 9. In Los Angeles, a clique added new members through an
15 initiation ritual known as "jumping in," during which several
16 existing MS-13 members beat up a prospective MS-13 member for 13
17 seconds while the shot caller counted aloud for 13 seconds.
18 Beginning in 2017 in Los Angeles, MS-13 members who identified with
19 "503" had been required to kill an MS-13 rival or someone perceived
20 to be adverse to MS-13 to be initiated into MS-13. Once jumped in,
21 MS-13 members sometimes took on new monikers, or nicknames, and were
22 expected to participate fully in MS-13's criminal activities.

23 10. MS-13 had zero tolerance for members and associates who
24 cooperate with law enforcement. Once MS-13 had evidence that someone
25 cooperated with law enforcement, by reputation, word of mouth, or by
26 receiving and reviewing law enforcement reports or videos of
27 interviews, MS-13 would issue a "green light" as to that person,
28 which was an order that if any MS-13 member saw the person who was

1 allegedly or actually cooperating with law enforcement, that person
2 was to be killed on sight.

3 11. MS-13 members also engaged in acts of violence against
4 innocent citizens and rival gang members in its territory.
5 Participation in violent acts increased the respect accorded to
6 members who committed violent acts. Additionally, commission of
7 violent acts by MS-13 members enhanced the gang's overall reputation
8 for violence in the community, resulting in the intimidation of
9 citizens in MS-13's territory.

10 12. MS-13 claimed territory throughout the City and County of
11 Los Angeles. Historically, MS-13's territorial strongholds were the
12 geographical areas encompassing Rampart, Koreatown, Hollywood, and
13 parts of the San Fernando Valley, including North Hollywood and Van
14 Nuys. MS-13 members wrote or painted graffiti in the areas they
15 controlled to identify the area as controlled by MS-13.

16 13. MS-13 controlled Lafayette Park located at Wilshire
17 Boulevard and North Hoover Street in Los Angeles, which was
18 controlled by the Coronado clique. MS-13 members often met at
19 Lafayette Park to discuss gang business and mete out punishment for
20 violations of MS-13's code of conduct. Additionally, MS-13
21 controlled approximately one fourth of MacArthur Park, located
22 between S. Park View Street and S. Alvarado Street, and 6th and 7th
23 Streets, bisected by Wilshire Boulevard. In the late 1990s, the
24 Mexican Mafia divided MacArthur Park into four sections, to be
25 controlled by four separate gangs, including MS-13.

26 14. MS-13's Fulton clique also controlled the Whitsett Sports
27 Field, located in North Hollywood and bordered on the west by
28 Whitsett Avenue, the north by Sherman Way, the south by Vanowen

1 Street, and the east by the Hollywood Freeway (CA 170) in North
2 Hollywood, California ("Whitsett Park"). Nearly every available
3 surface of Whitsett Park, including walls, construction containers,
4 bathrooms, adjacent residences, trees, and alleys, was covered in MS-
5 13 and Fulton clique graffiti. MS-13 and Fulton clique members
6 routinely gathered and met at Whitsett Park to sell drugs, ingest
7 drugs, extort park vendors, discuss gang business, and commit acts of
8 violence, including shootings and robberies.

9 15. Additionally, Fulton clique members controlled and
10 congregated in the wash area located at the entrance to the Los
11 Angeles riverbed at Fulton Avenue and Vanowen Street in North
12 Hollywood, California ("the Wash"). MS-13 and Fulton clique members
13 routinely gathered at the Wash to ingest drugs, tag graffiti, and
14 discuss gang business.

15 16. MS-13 members in Los Angeles also assembled at
16 "destroyers," which were typically abandoned structures, including
17 houses and apartments, to ingest drugs, socialize, and discuss gang
18 business. The destroyers were typically covered in MS-13 graffiti.
19 On some occasions, MS-13 members have carried out acts of violence,
20 including murder, at destroyers.

21 17. MS-13 derived income from narcotics sales, extortion, and
22 robbery. With respect to narcotics sales, MS-13 members sold
23 narcotics, including methamphetamine and marijuana in MS-13-
24 controlled territory. Individual MS-13 members who sold narcotics
25 were often required to provide a portion of their narcotics proceeds
26 to the shot caller of the clique. With respect to extortion, the
27 shot caller typically identified targets for extortion and identified
28 clique members who were authorized to extort particular vendors. MS-

1 13 extorted both legitimate and illegitimate businesses alike. These
2 businesses were often owned or run by illegal immigrants, who rarely
3 reported this extortion to law enforcement, despite the threats of
4 violence that usually accompanied the extortion. MS-13 members who
5 recently came to Los Angeles were also resorting to robbery for cash,
6 cellular telephones, and Nike Cortez tennis shoes, favored by MS-13
7 members.

8 C. PURPOSES OF THE ENTERPRISE IN LOS ANGELES

9 18. The purposes of the MS-13 enterprise in Los Angeles
10 included, but were not limited to, the following:

11 a. Maintaining MS-13's power, control, and authority over
12 its territory, often through threats, intimidation, and acts of
13 violence committed against local residents and rival gangs;

14 b. Violently retaliating against rival gang members or
15 perceived outsiders who challenged MS-13's authority;

16 c. Preserving, promoting, and protecting the power,
17 territory, and profits of MS-13 and its members and associates,
18 through threats of violence and actual acts of violence, including
19 robbery, extortion, assault, attempted murder, and murder;

20 d. Exposing and punishing MS-13 members and associates
21 who were perceived to have violated MS-13's and the Mexican Mafia's
22 codes of conduct; and

23 e. Profiting from robberies, burglaries, and the sales of
24 narcotics.

25 D. THE MEANS AND METHODS OF THE ENTERPRISE IN LOS ANGELES

26 19. The means and methods by which the defendants and their
27 associates conducted and participated in the conduct of the affairs
28 of MS-13 included the following:

1 a. Members and associates of the enterprise conspired to
2 commit, attempted to commit, and committed, acts of violence to
3 protect and expand the enterprise's criminal operation and to
4 initiate new members into the enterprise, including assault and
5 murder, directed against rival gang members, MS-13 members who
6 cooperated with law enforcement, or were perceived to have cooperated
7 with law enforcement, neighborhood residents, and visitors;

8 b. Members and associates of the enterprise acquired,
9 possessed, carried, and used deadly weapons, including firearms and
10 machetes, in the course of the criminal enterprise's criminal
11 activities;

12 c. Members and associates of the enterprise promoted a
13 climate of fear in the community through threats of harm and
14 violence;

15 d. Members and associates of the enterprise participated
16 in narcotics trafficking, including the purchase and sale of
17 controlled substances, extortion, firearms sales, robberies,
18 burglaries, and the operation and collection of rent from casitas to
19 generate income;

20 e. Members and associates of the enterprise frequently
21 engaged in the aforementioned criminal activity in the presence of
22 other MS-13 gang members and/or associates in order to enhance the
23 status within MS-13 of those affirmatively conducting criminal acts;

24 f. Members and associates of the enterprise used various
25 techniques to avoid law enforcement scrutiny of the enterprise's
26 criminal activities and to evade and frustrate law enforcement, such
27 as the use of coded language to discuss criminal activities, counter-

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1 surveillance techniques, the concealment of members who had recently
2 committed crimes, and regularly replacing cellular telephones; and

3 g. Members and associates of the enterprise communicated
4 with one another about committing acts of violence using social media
5 platforms and regularly posted photographs depicting MS-13 imagery.

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1 2. Multiple offenses involving trafficking in controlled
2 substances in violation of Title 21, United States Code, Sections
3 841(a)(1) and 846.

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

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

9 The object of the conspiracy was to be accomplished in substance
10 as follows:

11 1. Defendants GUZMAN, VELASQUEZ, and CHAVEZ, and others known
12 and unknown to the Grand Jury, were shot callers and leaders of MS-
13 13's Fulton clique. As the leaders of the clique, defendants GUZMAN,
14 VELASQUEZ, and CHAVEZ authorized murders of rival gang members and/or
15 enemies, known as "chavalas," and others who were perceived to have
16 wronged MS-13 in some way, such as cooperating with law enforcement.
17 Additionally, defendants GUZMAN, VELASQUEZ, and CHAVEZ oversaw the
18 day-to-day operations of the Fulton clique, including the collection
19 of rent.

20 2. Defendants CRUZ, GUZMAN, E. MORALES, GARCIA, BAQUIAX,
21 GOMEZ, ARTEAGA, CHAVEZ, REVELO, ALVARADO, R. MENDEZ, ORDONES, CORADO,
22 E. MENDEZ, FLORES, GONZALEZ, MARTINEZ, LINARES, RAMOS, and ROSALES
23 ARIAS and others known and unknown to the Grand Jury, committed acts
24 of violence, including murders and attempted murders, against
25 citizens of the community, rival gang members, and MS-13 members who
26 cooperated with law enforcement, or were perceived as cooperating
27 with law enforcement, to maintain and increase positions in MS-13,
28 and to promote and further the activities of MS-13.

1 3. Defendants GUZMAN, GARCIA, VELASQUEZ, CHAVEZ, and E.
2 MENDEZ, and Vides, and others known and unknown to the Grand Jury,
3 would possess and distribute controlled substances to other MS-13
4 members in other states, as well as within neighborhoods controlled
5 by MS-13.

6 4. Vides, and others known and unknown to the Grand Jury,
7 acted as a facilitator, advisor, supporter, and protector of Fulton
8 clique members, among other things, hiding them from law enforcement,
9 providing legal documents from the California Superior Court
10 electronic filing system, intimidating those he perceived to be
11 cooperating with law enforcement, communicating with Fulton clique
12 members immediately after they committed murders, and dispensing
13 advice related to the enterprise.

14 C. OVERT ACTS

15 In furtherance of the conspiracy, and to accomplish the object
16 of the conspiracy, on or about the following dates, defendants CRUZ,
17 GUZMAN, E. MORALES, GARCIA, BAQUIAX, GOMEZ, ARTEAGA, VELASQUEZ,
18 CHAVEZ, REVELO, ALVARADO, R. MENDEZ, ORDONES, CORADO, E. MENDEZ,
19 FLORES, GONZALEZ, MARTINEZ, LINARES, RAMOS, and ROSALES ARIAS, and
20 others known and unknown to the Grand Jury, committed various overt
21 acts within the Central District of California, and elsewhere,
22 including, but not limited to, the following:

23 Overt Act No. 1: On March 24, 2010, in Douglas County,
24 Nebraska, defendant VELASQUEZ transported \$1,226,220 in U.S. currency
25 that constituted drug proceeds in a white trailer attached to a red
26 1999 Freightliner semi-tractor.

27 Overt Act No. 2: On April 6, 2014, in the area of Kester
28 Avenue in Van Nuys, California, within MS-13 territory, defendant

1 VELASQUEZ and unindicted co-conspirators approached B.R., C.A, and
2 T.M., inquired where they were from, and informed them that they were
3 in Mara Salvatrucha territory.

4 Overt Act No. 3: On April 6, 2014, in the area of Kester
5 Avenue in Van Nuys, California, within MS-13 territory, defendant
6 VELASQUEZ ordered unindicted co-conspirators to, "shoot this fool!,"
7 and unindicted co-conspirators shot at B.R., C.A., and T.M., killing
8 B.R.

9 Overt Act No. 4: On August 9, 2015, at the Cali Viejo
10 Restaurant, within MS-13's Hollywood clique territory, defendants
11 ARTEAGA and FLORES gathered with unindicted co-conspirators who shot
12 a rival gang member.

13 Overt Act No. 5: On August 14, 2015, in the area of Vermont
14 Avenue and Francis Avenue in Los Angeles, California, within MS-13's
15 Francis clique territory, defendant BAQUIAX spray-painted gang
16 graffiti on the wall of a business.

17 Overt Act No. 6: On August 15, 2015, at the Little San
18 Salvador Nightclub and Restaurant, located at 901 N. Western Avenue,
19 Los Angeles, California, within MS-13's Hollywood clique territory
20 ("Little San Salvador"), unindicted co-conspirators and longtime MS-
21 13 members groomed defendants REVELO, GARCIA, ARTEAGA, and FLORES for
22 membership in MS-13 when the unindicted co-conspirators shot and
23 killed E.M. and stabbed H.M. and S.B.

24 Overt Act No. 7: On August 16, 2015, at Vanowen Street and
25 Whitsett Avenue, in North Hollywood, California, within MS-13's
26 Fulton clique territory, defendants REVELO, CHAVEZ, E. MORALES,
27 FLORES, and ARTEAGA, and unindicted co-conspirators challenged D.M.,
28

1 who they believed to be a rival gang member, by asking, "where you
2 fucking from!"

3 Overt Act No. 8: On August 16, 2015, defendant CHAVEZ stepped
4 in front of D.M.'s vehicle so that a co-conspirator could shoot D.M.

5 Overt Act No. 9: On September 27, 2015, in Los Angeles,
6 California, defendant VELASQUEZ, on behalf of the Fulton clique, and
7 dozens of unindicted co-conspirators attended an MS-13 general
8 leadership meeting.

9 Overt Act No. 10: On October 15, 2015, in the area of Whitsett
10 Avenue in North Hollywood, California, within MS-13's Fulton Clique
11 territory, defendants CRUZ, GARCIA, ARTEAGA, and FLORES associated
12 with one another in a known MS-13 area.

13 Overt Act No. 11: On November 10, 2015, defendants CRUZ,
14 ARTEAGA, REVELO, E. MENDEZ, and FLORES gathered in the area of the
15 Wash.

16 Overt Act No. 12: On November 10, 2015, in the area of the
17 Wash, defendant ARTEAGA, in the presence of defendants CRUZ, REVELO,
18 E. MENDEZ, and FLORES attempted to shoot a rival gang member in a
19 vehicle, but actually shot an innocent bystander.

20 Overt Act No. 13: On August 14, 2016, at Whitsett Park,
21 defendants GARCIA, FLORES, and ARTEAGA, and unindicted co-
22 conspirators, discussed whether an MS-13 member's son was cooperating
23 with law enforcement against MS-13 members and that an unindicted co-
24 conspirator disposed of the firearm used during the August 16, 2015
25 shooting of D.M.

26 Overt Act No. 14: On September 8, 2016, defendants GARCIA and
27 E. MENDEZ, and unindicted co-conspirators, were at the Wash and
28

1 possessed a .22 caliber handgun loaded with nine .22 live rounds, a
2 ten inch knife, and a can of blue spray paint.

3 Overt Act No. 15: On January 9, 2017, Vides posted a
4 photograph on Facebook of himself, defendants GUZMAN, GARCIA,
5 E. MENDEZ, and ARTEAGA, and unindicted co-conspirators at Whitsett
6 Park.

7 Overt Act No. 16: On January 11, 2017, via Facebook messenger,
8 Vides asked an unindicted co-conspirator whether she was from a rival
9 gang and said that he "don't jump in girls."

10 Overt Act No. 17: On January 15, 2017, Vides posted a
11 photograph on his Facebook page depicting himself and defendants
12 GUZMAN, CRUZ, GARCIA, E. MENDEZ, and ARTEAGA, and unindicted co-
13 conspirators, throwing MS-13 hand signs.

14 Overt Act No. 18: On January 18, 2017, using coded language,
15 via Facebook Messenger, defendant E. MENDEZ agreed to sell marijuana
16 to a drug customer.

17 Overt Act No. 19: On January 24, 2017, using coded language
18 via Facebook Messenger, defendants GUZMAN and E. MENDEZ discussed
19 that defendant E. MENDEZ had lost the clique's drug proceeds and a
20 scale.

21 Overt Act No. 20: On February 2, 2017, using coded language,
22 via Facebook messenger, an unindicted co-conspirator thanked Vides
23 and MS-13 for looking out for them, and Vides responded, "we're here
24 homie. You know that you are all my little brothers."

25 Overt Act No. 21: On February 8, 2017, in the area of
26 Coldwater Canyon Avenue and Vanowen Street in North Hollywood,
27 California, within MS-13's Fulton Clique territory, defendants CRUZ,
28 E. MORALES, E. MENDEZ, and ARTEAGA met in a known MS-13 stronghold.

1 Overt Act No. 22: On February 18, 2017, using coded language
2 via Facebook Messenger, defendant CHAVEZ requested notes about
3 narcotics sales from defendant E. MENDEZ, and they discussed how the
4 proceeds should be used for the Fulton clique.

5 Overt Act No. 23: On February 27, 2017, an unindicted co-
6 conspirator posted a photograph on Facebook of defendants GARCIA and
7 E. MENDEZ and an unindicted co-conspirator throwing MS-13 hand signs
8 with a sticker titled, "Big barrio eMes X3," for MS-13.

9 Overt Act No. 24: On March 6, 2017, defendants VELASQUEZ and
10 GUZMAN had telephonic contact approximately eight times.

11 Overt Act No. 25: On March 6, 2017, defendants GUZMAN, GARCIA,
12 BAQUIAX, and E. MENDEZ, and unindicted co-conspirators, went to The
13 Wash for the purpose of assaulting and abducting J.S., an alleged
14 rival gang member who was believed to have crossed out MS-13
15 graffiti.

16 Overt Act No. 26: On March 6, 2017, using coded language, via
17 Facebook messenger, defendant E. MENDEZ invited defendant E. MORALES
18 to participate in the murder of J.S.

19 Overt Act No. 27: On March 6, 2017, using coded language,
20 defendant E. MORALES told defendant E. MENDEZ that he would
21 participate in the murder of J.S.

22 Overt Act No. 28: On March 6, 2017, defendants GUZMAN, GARCIA,
23 BAQUIAX, and E. MENDEZ, and unindicted co-conspirators, choked J.S.

24 Overt Act No. 29: On March 6, 2017, defendants GUZMAN, GARCIA,
25 BAQUIAX, and E. MENDEZ placed J.S. in an unindicted co-conspirator's
26 vehicle, and drove to the Angeles National Forest, located in an
27 unincorporated area of Los Angeles County ("Angeles National
28 Forest").

1 Overt Act No. 30: On March 6, 2017, in the Angeles National
2 Forest, defendants GUZMAN, E. MORALES, GARCIA, BAQUIAX, and E.
3 MENDEZ, and unindicted co-conspirators, attacked J.S. with a machete,
4 killing and dismembering J.S.

5 Overt Act No. 31: On March 6, 2017, in the Angeles National
6 Forest, defendant GUZMAN carved out J.S.'s heart.

7 Overt Act No. 32: On March 6, 2017, in the Angeles National
8 Forest, defendants GUZMAN, E. MORALES, GARCIA, BAQUIAX, and E. MENDEZ
9 threw J.S.'s body parts into a canyon.

10 Overt Act No. 33: On March 6, 2017, defendant VELASQUEZ was in
11 telephonic contact with defendants GUZMAN and E. MENDEZ after they
12 participated in the murder of J.S.

13 Overt Act No. 34: On March 6, 2017, in Van Nuys, California,
14 defendants GUZMAN, E. MORALES, GARCIA, VELASQUEZ, CHAVEZ, and E.
15 MENDEZ, and unindicted co-conspirators, met at an abandoned church
16 occupied by defendant VELASQUEZ to discuss the murder of J.S.

17 Overt Act No. 35: On March 6, 2017, in Van Nuys, California,
18 defendant GUZMAN showed defendant VELASQUEZ photographs of J.S.'s
19 body that were taken by defendant E. MENDEZ to prove and verify that
20 defendants GUZMAN, E. MORALES, GARCIA, BAQUIAX, and E. MENDEZ, and
21 unindicted co-conspirators killed J.S.

22 Overt Act No. 36: On March 11, 2017, using coded language, via
23 Facebook Messenger, an unindicted co-conspirator and defendant E.
24 MENDEZ discussed which new moniker the unindicted co-conspirator
25 should take after the unindicted co-conspirator's participation in
26 the murder of J.S.

27 Overt Act No. 37: On March 13, 2017, defendant E. MENDEZ told
28 defendant REVELO to go to Whitsett Park for a meeting.

1 Overt Act No. 38: On March 14, 2017, using coded language, via
2 Facebook Messenger, defendants CHAVEZ and E. MENDEZ discussed which
3 new moniker defendant E. MENDEZ should take now that defendant E.
4 MENDEZ participated in J.S.'s murder, and defendant CHAVEZ suggested
5 "Predator."

6 Overt Act No. 39: On March 17, 2017, defendants GUZMAN and
7 BAQUIAX were at a destroyer in MS-13's Francis clique territory.

8 Overt Act No. 40: On March 22, 2017, using coded language, via
9 Facebook Voice, defendant GUZMAN asked defendant E. MENDEZ to pick up
10 two ounces of narcotics.

11 Overt Act No. 41: On March 26, 2017, using coded language, via
12 Facebook Messenger, defendant GUZMAN told defendant E. MORALES that
13 defendant VELASQUEZ wanted to see them at the upcoming MS-13 meeting.

14 Overt Act No. 42: On March 31, 2017, defendant REVELO and an
15 unindicted co-conspirator, who was an MS-13 member, gathered at The
16 Wash dressed in MS-13 attire.

17 Overt Act No. 43: On April 2, 2017, at South Gate Park in
18 South Gate, California, defendant GOMEZ brandished a knife at two
19 South Gate Police Department Public Safety Officers.

20 Overt Act No. 44: On April 4, 2017, using coded language, via
21 Facebook Messenger, defendants ALVARADO and E. MENDEZ discussed
22 ammunition.

23 Overt Act No. 45: On April 9, 2017, in the area of Vanowen
24 Street and Hazeltine Avenue in Van Nuys, California, within MS-13's
25 Fulton clique territory, defendants E. MENDEZ, GONZALEZ, and LINARES
26 met with another known MS-13 member.

1 Overt Act No. 46: On April 11, 2017, using coded language, via
2 Facebook Voice Message, defendants GUZMAN and GONZALEZ discussed
3 defending MS-13's territory.

4 Overt Act No. 47: On or before April 13, 2017, defendant
5 ALVARADO created a Facebook page with the photograph of a female
6 juvenile unindicted co-conspirator for the purpose of making
7 surreptitious contact with victim G.B.

8 Overt Act No. 48: On April 13, 2017, unindicted co-
9 conspirators contacted G.B. via Facebook, with the purpose of luring
10 G.B. to an isolated location for the purpose of murdering G.B.

11 Overt Act No. 49: On April 14, 2017, using coded language via
12 text message, defendant VELASQUEZ discussed selling narcotics to a
13 shot caller of Maryland's Fulton clique.

14 Overt Act No. 50: On April 14, 2017, using coded language via
15 text message, defendant VELASQUEZ directed the Maryland MS-13 Fulton
16 clique shot caller to contact Vides regarding the narcotics sales.

17 Overt Act No. 51: On April 14, 2017, using coded language via
18 text message, defendant VELASQUEZ recommended to the Maryland shot
19 caller that defendants GUZMAN and VELASQUEZ, and Vides, and the
20 Maryland MS-13 Fulton clique shot caller discuss the upcoming
21 narcotics sales.

22 Overt Act No. 52: On April 17, 2017, via Facebook, Vides
23 posted a photograph of himself, throwing an MS-13 hand sign, with
24 defendant GUZMAN.

25 Overt Act No. 53: On April 19, 2017, via Facebook messenger,
26 defendants CRUZ, GUZMAN, GARCIA, CHAVEZ, ARTEAGA, FLORES, and
27 GONZALEZ participated in a group chat wherein defendant CHAVEZ
28 denounced the United States Government for trying to eliminate MS-13

1 in the United States and threatened to go to war with local law
2 enforcement.

3 Overt Act No. 54: On April 19, 2017, defendant ALVARADO
4 searched Facebook for G.B., who defendants GUZMAN, ALVARADO, R.
5 MENDEZ, ORDONES, and E. MENDEZ planned to murder.

6 Overt Act No. 55: On April 20, 2017, defendant ALVARADO
7 searched Facebook for G.B., who defendants GUZMAN, ALVARADO, R.
8 MENDEZ, ORDONES, and E. MENDEZ planned to murder.

9 Overt Act No. 56: On April 20, 2017, defendants ALVARADO and
10 ORDONES, and unindicted co-conspirators, drove G.B. to the Angeles
11 National Forest, where defendants GUZMAN, R. MENDEZ, and E. MENDEZ
12 were waiting, for the purposes of murdering G.B. because MS-13
13 believed that G.B. was an informant.

14 Overt Act No. 57: On April 20, 2017, in the Angeles National
15 Forest, defendant GUZMAN struck G.B. in the back of the head with a
16 pistol, knocking G.B. to the ground.

17 Overt Act No. 58: On April 20, 2017, in the Angeles National
18 Forest, defendants GUZMAN, ALVARADO, R. MENDEZ, and E. MENDEZ
19 repeatedly struck G.B. with a machete, killing him.

20 Overt Act No. 59: On April 20, 2017, in the Angeles National
21 Forest, defendant ALVARADO and an unindicted co-conspirator removed
22 G.B.'s clothing, including two "Santa Muerte" pendants G.B. was
23 wearing, and the each kept one of the pendants.

24 Overt Act No. 60: On April 20, 2017, defendant VELASQUEZ had
25 telephonic contact with defendant GUZMAN five times after defendant
26 GUZMAN participated in the murder of G.B.

27 Overt Act No. 61: On April 23, 2017, Vides' Facebook profile
28 photograph was of Vides, posing at the Big Tujunga Canyon dam

1 outlook, in the Angeles National Forest, approximately one mile from
2 where victims J.S. and G.B. were murdered.

3 Overt Act No. 62: On April 29, 2017, defendant VELASQUEZ
4 received a \$900 wire transfer from a member of Maryland's Fulton
5 clique as payment for half a pound of marijuana.

6 Overt Act No. 63: On May 7, 2017, in the area of Vanowen
7 Street and Nagle Avenue in Van Nuys, California, within MS-13's
8 Fulton Clique territory, defendants GUZMAN, E. MORALES, and FLORES
9 gathered in an area painted with MS-13 graffiti.

10 Overt Act No. 64: On May 29, 2017, in the area of Francis
11 Avenue and S. Hoover Street in Los Angeles, California, within MS-13
12 territory, defendants GUZMAN, BAQUIAX, and E. MENDEZ gathered within
13 MS-13's Francis Clique's territory.

14 Overt Act No. 65: On May 31, 2017, defendant GARCIA received a
15 \$1,000 wire transfer from a member of Maryland's Fulton clique as
16 payment for narcotics.

17 Overt Act No. 66: On June 4, 2017, at a destroyer located
18 within MS-13 territory, defendant CHAVEZ repeatedly hit E.H. in the
19 chest while yelling, "La Mara!"

20 Overt Act No. 67: On June 4, 2017, defendants GARCIA, CHAVEZ,
21 and REVELO, and unindicted co-conspirators, drove E.H. to the Angeles
22 National Forest.

23 Overt Act No. 68: On June 4, 2017, defendant CHAVEZ repeatedly
24 struck E.H. with a machete, and defendants GARCIA, REVELO, and
25 LINARES struck E.H. with a knife, killing him.

26 Overt Act No. 69: On June 5, 2017, using coded language, via
27 Facebook Messenger, defendant GARCIA told an unindicted co-

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1 conspirator that it was "cool" that the unindicted co-conspirator
2 participated in a violent crime.

3 Overt Act No. 70: On June 14, 2017, defendant GARCIA posted to
4 his Facebook page a photograph of himself throwing MS-13 gang signs.

5 Overt Act No. 71: On June 18, 2017, defendant GARCIA received
6 a \$500 wire transfer from a member of Maryland's Fulton clique as
7 payment for narcotics.

8 Overt Act No. 72: On June 27, 2017, via Facebook, Vides posted
9 a photograph of himself and defendants GUZMAN, E. MORALES, GARCIA,
10 ARTEAGA, FLORES, E. MENDEZ, and unindicted co-conspirators throwing
11 MS-13 hand signs.

12 Overt Act No. 73: On July 1, 2017, defendant REVELO and
13 ARTEAGA, and Vides, and unindicted co-conspirators, gathered in the
14 area of The Wash.

15 Overt Act No. 74: On July 3, 2017, using coded language, via
16 Facebook Messenger, defendant GUZMAN told defendant E. MENDEZ that
17 defendant GUZMAN had narcotics that defendant E. MENDEZ could sell.

18 Overt Act No. 75: On July 5, 2017, on Goodland Avenue just
19 south of Vanowen Street, in North Hollywood, California, defendants
20 GUZMAN and E. MENDEZ possessed a Raven Arms .25 caliber semi-
21 automatic pistol and baggies containing cocaine inside a vehicle.

22 Overt Act No. 76: On July 14, 2017, using coded language, via
23 Facebook Messenger, defendant E. MORALES told defendant E. MENDEZ
24 that the Fulton clique neighborhood was free of law enforcement and
25 rival gang members, after defendant E. MORALES had been patrolling
26 the area.

27 Overt Act No. 77: On July 14, 2017, in the area of Vanowen
28 Street and Balboa Boulevard in Van Nuys, California, within MS-13

1 territory, defendant GARCIA, with defendant REVELO as the passenger,
2 drove the stolen van used during the June 4, 2017 murder of E.H.

3 Overt Act No. 78: On July 19, 2017, defendants GARCIA and
4 ARTEAGA and Vides posed for a photograph throwing MS-13 hand signs at
5 the Big Tujunga Dam overlook, located within the Angeles National
6 Forest, approximately one mile from the Too Late Helipad where J.S.,
7 G.B., and E.H. were murdered.

8 Overt Act No. 79: On July 20, 2017, via Facebook, defendant
9 CHAVEZ posted a photograph of defendants GARCIA and E. MENDEZ wherein
10 defendant GARCIA is throwing an MS-13 hand sign.

11 Overt Act No. 80: On July 25, 2017, using coded language, via
12 Facebook Messenger, defendant GUZMAN told an unindicted co-
13 conspirator to delete photographs because it was not good for law
14 enforcement to be able to identify them as MS-13 members.

15 Overt Act No. 81: On July 26, 2017, defendant GARCIA posted to
16 his Facebook page a photograph of himself throwing an MS-13 hand
17 sign.

18 Overt Act No. 82: On July 30, 2017, using coded language, via
19 Facebook Messenger, Vides told defendant GUZMAN about an MS-13 member
20 who was attacked by three rival gang members, and that the next day,
21 an unindicted co-conspirator was going to bring a firearm so MS-13
22 could retaliate.

23 Overt Act No. 83: On August 6, 2017, an unindicted co-
24 conspirator posted to Facebook a photograph of defendants GUZMAN, E.
25 MORALES, GARCIA, REVELO, and FLORES, and unindicted co-conspirators,
26 throwing MS-13 hand signs, with defendant E. MORALES wielding a large
27 knife.

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1 Overt Act No. 84: On August 7, 2017, using coded language, via
2 Facebook Messenger, defendant GUZMAN discussed narcotics distribution
3 with an unindicted co-conspirator.

4 Overt Act No. 85: On August 9, 2017, defendant GARCIA and
5 Vides posed for a photograph, throwing MS-13 hand signs, at the Big
6 Tujunga Canyon dam outlook, in the Angeles National Forest,
7 approximately one mile from where victims J.S., G.B. were murdered.

8 Overt Act No. 86: On August 14, 2017, in the area of Whitsett
9 Park, defendants REVELO and FLORES, and other unindicted co-
10 conspirators, threw MS-13 hand signs at the occupants of a vehicle,
11 who fired shots at defendant REVELO.

12 Overt Act No. 87: On August 15, 2017, defendants GUZMAN and
13 GARCIA, and an unindicted co-conspirator, painted MS-13 graffiti
14 while in the Wash.

15 Overt Act No. 88: On August 20, 2017, using coded language,
16 via Facebook Messenger, defendant GARCIA posted a photograph of a
17 semiautomatic rifle in response to an unindicted co-conspirator
18 informing defendant GARCIA of a person's whereabouts.

19 Overt Act No. 89: On August 27, 2017, using coded language,
20 via Facebook Messenger, defendant GUZMAN told an unindicted co-
21 conspirator to bring the unindicted co-conspirator's machete to
22 Whitsett Park.

23 Overt Act No. 90: On September 1, 2017, defendant ALVARADO
24 posed for a photograph in Whitsett Park of himself throwing MS-13
25 hand signs.

26 Overt Act No. 91: On September 5, 2017, Vides posted
27 photographs on his Facebook page of numerous MS-13 members, including
28 defendants GUZMAN, E. MORALES, GARCIA, ARTEAGA, CHAVEZ, E. MENDEZ,

1 and FLORES, and other unindicted co-conspirators, throwing MS-13 gang
2 signs, and thanked them for "coming over."

3 Overt Act No. 92: On September 7, 2017, Vides posted a montage
4 of photographs of numerous MS-13 members posing with one another and
5 throwing MS-13 hand signs.

6 Overt Act No. 93: On September 7, 2017, defendant ALVARADO
7 possessed a handwritten set of MS-13's rules.

8 Overt Act No. 94: On September 8, 2017, defendants GONZALEZ
9 and LINARES approached victim B.C., yelled, "MS!" and inquired
10 whether B.C. was from a rival gang, Blythe Street, and B.C. said he
11 did not "gang bang."

12 Overt Act No. 95: On September 8, 2017, defendants GONZALEZ
13 and LINARES stabbed B.C. in the back and abdomen.

14 Overt Act No. 96: On September 10, 2017, defendant ALVARADO
15 posed for photographs of himself wearing murder victim G.B.'s Santa
16 Muerte pendant.

17 Overt Act No. 97: On September 14, 2017, via Facebook voice,
18 defendant GUZMAN and Vides discussed relocating defendants GONZALEZ
19 and LINARES, who had just stabbed B.C., to avoid law enforcement.

20 Overt Act No. 98: On September 18, 2017, using coded language,
21 via Facebook messenger, Vides discussed hiding defendants GONZALEZ
22 and LINARES, who had just stabbed B.C., in defendant VELASQUEZ's
23 trailer, to avoid law enforcement.

24 Overt Act No. 99: On September 18, 2017, using coded language,
25 via Facebook voice, Vides told defendant GUZMAN that selling
26 "crystal" is "where the money is."

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1 Overt Act No. 100: On September 24, 2017, Vides posted to
2 Facebook a photograph of himself and defendants REVELO and GARCIA
3 throwing MS-13 hand signs.

4 Overt Act No. 101: On October 3, 2017, via Facebook, Vides
5 posted that he was with defendants GUZMAN, REVELO, GONZALEZ, and
6 LINARES.

7 Overt Act No. 102: On October 11, 2017, defendant ALVARADO
8 searched Facebook for B.A., who was to be murdered by defendants
9 ALVARADO, R. MENDEZ, and CORADO.

10 Overt Act No. 103: On October 19, 2017, defendant ALVARADO
11 searched Facebook for B.A., who was to be murdered by defendants
12 ALVARADO, R. MENDEZ, and CORADO.

13 Overt Act No. 104: On October 21, 2017, defendants REVELO, E.
14 MENDEZ, FLORES, and GONZALEZ possessed an Amadeo Rossi .38 caliber
15 special revolver, a machete, and marijuana near Erwin Park in Los
16 Angeles.

17 Overt Act No. 105: On October 28, 2017, defendant ALVARADO
18 searched Facebook for B.A., who was to be murdered by defendants
19 ALVARADO, R. MENDEZ, and CORADO.

20 Overt Act No. 106: On October 30, 2017, unindicted co-
21 conspirators lured B.A. to Lake Balboa Park in Los Angeles.

22 Overt Act No. 107: On October 30, 2017, defendant ALVARADO and
23 unindicted co-conspirators transported B.A. to the Angeles National
24 Forest.

25 Overt Act No. 108: On October 30, 2017, in the Angeles National
26 Forest, defendants ALVARADO, R. MENDEZ, and CORADO, and unindicted
27 co-conspirators killed B.A. and threw B.A.'s body into a canyon.

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1 Overt Act No. 109: On November 3, 2017, defendants REVELO, E.
2 MORALES, and RAMOS were stopped in a vehicle in the area of Rayen
3 Street and Sepulveda Boulevard in North Hills, California.

4 Overt Act No. 110: On November 5, 2017, via Facebook, Vides
5 posted that he was with defendants E. MORALES, GARCIA, REVELO, and E.
6 MENDEZ.

7 Overt Act No. 111: On November 5, 2017, defendant GARCIA and
8 Vides posed for photographs throwing MS-13 hand signs.

9 Overt Act No. 112: On November 5, 2017, Vides posed at the Big
10 Tujunga Canyon dam outlook, in the Angeles National Forest,
11 approximately one mile from where J.S. and G.B. were murdered.

12 Overt Act No. 113: On November 28, 2017, defendant GARCIA
13 received a \$950 wire transfer from a member of Maryland's Fulton
14 clique as payment for narcotics.

15 Overt Act No. 114: On December 2, 2017, defendants GUZMAN and
16 GARCIA posed for a photograph in which they were both throwing MS-13
17 gang signs.

18 Overt Act No. 115: On December 3, 2017, Vides posted a
19 photograph to his Facebook page of himself and defendants E. MORALES,
20 GARCIA, ARTEAGA, E. MENDEZ, and FLORES, and unindicted co-
21 conspirators dressed in MS-13 attire.

22 Overt Act No. 116: On December 10, 2017, defendants REVELO and
23 E. MORALES, and an unindicted co-conspirator met at Whitsett Park.

24 Overt Act No. 117: On January 1, 2018, defendants REVELO and
25 RAMOS and an unindicted co-conspirator were dressed in MS-13 attire
26 at The Wash.

27 Overt Act No. 118: On January 2, 2018, defendant ALVARADO
28 possessed a list of Fulton clique members, including defendants

1 GARCIA, ALVARADO, R MENDEZ, and LINARES, with the amounts of clique
2 dues each member had paid.

3 Overt Act No. 119: On January 28, 2018, defendant GARCIA posed
4 for photographs while throwing an MS-13 hand sign and wielding a
5 machete.

6 Overt Act No. 120: On January 28, 2018, defendant GARCIA and
7 Vides posed for photographs while GARCIA threw an MS-13 hand sign.

8 Overt Act No. 121: On February 8, 2018, defendant ALVARADO
9 possessed a cellular telephone that contained approximately 49 videos
10 and audio recordings about MS-13.

11 Overt Act No. 122: On February 8, 2018, via Facebook, defendant
12 CHAVEZ posted a photograph of himself posing with defendant LINARES
13 in what appears to be the Angeles National Forest.

14 Overt Act No. 123: On February 11, 2018, defendants REVELO and
15 E. MORALES, and an unindicted co-conspirator gathered in the Wash.

16 Overt Act No. 124: On February 24, 2018, defendants REVELO and
17 RAMOS and an unindicted co-conspirator gathered in the area of the
18 Wash.

19 Overt Act No. 125: On February 25, 2018, Vides posted a
20 photograph of himself and his MS-13 tattoos to Facebook.

21 Overt Act No. 126: On March 1, 2018, in Panorama City, within
22 MS-13 territory, defendants REVELO and RAMOS drove in a vehicle with
23 no license plates.

24 Overt Act No. 127: On March 5, 2018, via Instagram, defendant
25 GOMEZ posted a video of himself and defendant CRUZ throwing MS-13
26 hand signs in The Wash.

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1 Overt Act No. 128: On March 8, 2018, via Instagram, defendant
2 CRUZ posted a photograph of himself in front of the Fulton Avenue
3 street sign and another street sign with MS-13 graffiti.

4 Overt Act No. 129: On March 18, 2018, via Instagram, defendant
5 CRUZ identified himself as a member of the Fulton clique of MS-13.

6 Overt Act No. 130: On March 20, 2018, via Instagram, defendant
7 CRUZ posted a video of himself and defendant CHAVEZ throwing MS-13
8 hand signs.

9 Overt Act No. 131: On March 20, 2018, defendant GARCIA
10 brandished a knife while standing in the area of Vanowen Street and
11 Fulton Avenue, within MS-13's Fulton clique territory, in front of
12 MS-13 graffiti, "MS XIII FLS."

13 Overt Act No. 132: On March 25, 2018, via Instagram, defendant
14 CRUZ posted a photograph of himself throwing an MS-13 hand sign in
15 front of MS-13 Fulton clique graffiti.

16 Overt Act No. 133: On March 25, 2018, defendants CRUZ, E.
17 MORALES, ARTEAGA, REVELO, and RAMOS, and unindicted co-conspirators,
18 gathered at Whitsett Park.

19 Overt Act No. 134: On April 7, 2018, defendants CRUZ, E.
20 MORALES, GOMEZ, FLORES, and ARTEAGA brought J.H.C., who they believed
21 to have passed information to a rival gang, to the Angeles National
22 Forest.

23 Overt Act No. 135: On April 7, 2018, in the Angeles National
24 Forest, defendants CRUZ, E. MORALES, GOMEZ, FLORES, and ARTEAGA used
25 multiple knives to stab victim J.H.C. to death.

26 Overt Act No. 136: On April 8, 2018, in the area of Lindley
27 Avenue and Valerio Street in Los Angeles, California, defendants CRUZ
28

1 and GOMEZ traveled together in a red Nissan that contained three
2 bloody knives, two of which had J.H.C.'s blood on them.

3 Overt Act No. 137: On April 18, 2018, via Instagram, defendant
4 CRUZ posted a photograph of himself throwing an MS-13 hand sign at
5 the Wash.

6 Overt Act No. 138: On April 30, 2018, via Instagram, defendant
7 FLORES posted that he was 100% Salvatrucha and bleeds blue, the color
8 associated with MS-13.

9 Overt Act No. 139: On May 3, 2018, via Instagram, defendant
10 CRUZ posted a photograph of himself and defendant CHAVEZ posing with
11 firearms, and the photograph contained a custom sticker reading,
12 "Nochx D Casxria," Spanish for, "hunting night."

13 Overt Act No. 140: On May 19, 2018, defendant CORADO posed for
14 a photograph throwing a MS-13 hand sign in the Malibu area.

15 Overt Act No. 141: On May 24, 2018, in the area of Coldwater
16 Canyon Boulevard and Sherman Way in Los Angeles California, within
17 MS-13's Fulton clique territory, defendants CRUZ and GOMEZ challenged
18 J.P. by asking J.P. multiple times, "where are you from?"

19 Overt Act No. 142: On June 6, 2018, defendants REVELO and RAMOS
20 gathered in Lafayette Park, which was controlled by MS-13.

21 Overt Act No. 143: On June 12, 2018, using coded language, via
22 Facebook messenger, defendant CHAVEZ told an unindicted co-
23 conspirator that he was in Maryland to evaluate MS-13 in Maryland,
24 where MS-13 Fulton clique members often sent narcotics to other MS-13
25 members.

26 Overt Act No. 144: On June 21, 2018, defendants GUZMAN,
27 GONZALEZ, and LINARES fled to Heber City, Utah to avoid detection by
28 law enforcement.

1 Overt Act No. 145: On June 24, 2018 defendant CORADO took a
2 photograph of defendant REVELO and RAMOS, which depicted defendant
3 REVELO throwing an MS-13 hand sign.

4 Overt Act No. 146: On July 1, 2018, in the area of Balboa
5 Boulevard and Amestoy Avenue in Lake Balboa, within MS-13's Fulton
6 clique territory, defendants VELASQUEZ and CHAVEZ traveled in a
7 vehicle containing a .223 round, a .45 round, and three 9mm rounds of
8 ammunition.

9 Overt Act No. 147: On July 5, 2018, in Panorama City,
10 California, defendant GOMEZ possessed a loaded, Shinn, 20 gauge,
11 sawed-off shotgun.

12 Overt Act No. 148: On July 5, 2018, at Fulton Avenue and
13 Sherman Way in Los Angeles, within MS-13 territory, defendant RAMOS
14 told K.G., "this is Mara, where you from?" and shattered G.M.'s car
15 window with a knife.

16 Overt Act No. 149: On July 10, 2018, defendant CORADO took a
17 photograph of a black Beretta pistol.

18 Overt Act No. 150: On July 12, 2018, using coded language, via
19 Facebook messenger, defendant CHAVEZ told an unindicted co-
20 conspirator that MS-13 members in El Salvador want to speak with the
21 unindicted co-conspirator and defendant VELASQUEZ.

22 Overt Act No. 151: On July 13, 2018, defendant CHAVEZ posted to
23 Facebook a photograph of defendants CHAVEZ, GUZMAN, GARCIA, GONZALEZ,
24 and LINARES, and other unindicted co-conspirators.

25 Overt Act No. 152: On July 21, 2018, in the Malibu Hills of Los
26 Angeles County, defendants GOMEZ, REVELO, CORADO, and ROSALES ARIAS,
27 and unindicted co-conspirators, shot and killed R.C.

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1 Overt Act No. 153: On July 29, 2018, defendants CHAVEZ and
2 REVELO met with several unindicted co-conspirators at Whitsett Park
3 for approximately 30 minutes.

4 Overt Act No. 154: On August 14, 2018, defendant CORADO took a
5 photograph of a chrome and black Smith & Wesson pistol.

6 Overt Act No. 155: On August 29, 2018, via Facebook, defendant
7 CHAVEZ sent defendant CRUZ a photograph of defendant CHAVEZ holding a
8 firearm.

9 Overt Act No. 156: On August 30, 2018, at the San Fernando
10 Courthouse in San Fernando, California, Vides and two unindicted co-
11 conspirators met at a hearing involving defendants E. MORALES,
12 BAQUIAX, and an unindicted co-conspirator. At the meeting, one of
13 the unindicted co-conspirators standing next to Vides announced that
14 he believed someone was cooperating with law enforcement.

15 Overt Act No. 157: On August 31, 2018, defendant CORADO took a
16 photograph of a Heckler & Koch model VP70Z, 9mm caliber pistol,
17 bearing serial number 77955.

18 Overt Act No. 158: On September 3, 2018, in the area of Pacific
19 Coast Highway and Coastline Drive in Malibu, California, defendants
20 REVELO, CORADO, and ARTEAGA, and an unindicted co-conspirator were in
21 a vehicle and possessed a machete and a Heckler & Koch model VP70Z,
22 9mm caliber pistol, bearing serial number 77955, loaded with a high
23 capacity magazine containing 17 live rounds.

24 Overt Act No. 159: On September 6, 2018, in The Wash, defendant
25 ARTEAGA possessed a machete.

26 Overt Act No. 160: On September 23, 2018, defendants CRUZ,
27 ARTEAGA, GONZALEZ, LINARES, and RAMOS, and unindicted co-conspirators
28 gathered in Whitsett Park.

1 Overt Act No. 161: On October 4, 2018, in the area of Fulton
2 Avenue and Vanowen Street in North Hollywood, California, defendant
3 LINARES drove a stolen vehicle he had obtained in exchange for
4 crystal methamphetamine.

5 Overt Act No. 162: On October 12, 2018, via Facebook, defendant
6 CHAVEZ shared a video of defendant RAMOS acting as a lookout while an
7 unindicted co-conspirator wrote MS-13 Fulton Locos graffiti in the
8 area of Whitsett Park.

9 Overt Act No. 163: On October 17, 2018, using coded language,
10 via Facebook messenger, defendant CHAVEZ informed an unindicted co-
11 conspirator that MS-13 in Los Angeles, including Fulton Mara
12 Salvatrucha, ran its own program in response to the unindicted co-
13 conspirator stating that the unindicted co-conspirator wanted one
14 united MS-13 program, including Maryland, Washington, and Los
15 Angeles.

16 Overt Act No. 164: On October 19, 2018, an unindicted co-
17 conspirator posted a photograph on Facebook of defendants GUZMAN,
18 GARCIA, and ARTEAGA, and unindicted co-conspirators throwing MS-13
19 hand signs.

20 Overt Act No. 165: On October 19, 2018, via Facebook Messenger,
21 defendant CHAVEZ posted photographs of a rifle that he discussed
22 purchasing.

23 Overt Act No. 166: On October 21, 2018, via Facebook messenger,
24 CHAVEZ informed an unindicted co-conspirator that he knew the
25 unindicted co-conspirator's clique leader, that defendant VELASQUEZ
26 is defendant CHAVEZ's clique leader, and that organizing as one
27 program required permission.

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1 Overt Act No. 167: On October 30, 2018, in the area of 29th
2 Street and Griffith Street in Los Angeles, California, defendant R.
3 MENDEZ drove a black Mitsubishi Montero in which defendant GOMEZ and
4 an unindicted co-conspirator were passengers.

5 Overt Act No. 168: On November 15, 2018, at 11th Street and
6 Central Avenue in Los Angeles, California, defendants GOMEZ and
7 ROSALES ARIAS were in a black 2011 Toyota Corolla, registered to
8 defendant CORADO, which was used during the October 30, 2017 murder
9 of B.A.

10 Overt Act No. 169: On or November 30, 2018, via Facebook
11 messenger, defendant MARTINEZ sent a photograph of defendants ARTEAGA
12 and CHAVEZ throwing MS-13 hand signs while in a destroyer to
13 defendant CHAVEZ.

14 Overt Act No. 170: On December 2, 2018, at a 7-11 convenience
15 store located at 10133 San Fernando Road in Los Angeles, California,
16 defendants CHAVEZ, and MARTINEZ, and unindicted co-conspirators
17 attacked A.G., a rival gang member, with fists and a knife.

18 Overt Act No. 171: On December 2, 2018, after the attack on
19 A.G., defendant CHAVEZ threw an MS-13 gang.

20 Overt Act No. 172: On December 4, 2018, at a 7-11 convenience
21 store located within MS-13 territory, defendant RAMOS participated in
22 the stabbing of N.M.A., a rival gang member.

23 Overt Act No. 173: On December 12, 2018, via Facebook,
24 defendant RAMOS posted a video of himself and defendant REVELO
25 throwing MS-13 hand signs.

26 Overt Act No. 174: On December 14, 2018, defendants ARTEAGA,
27 REVELO, CHAVEZ, and MARTINEZ, and an unindicted co-conspirator
28 appeared in videos throwing MS-13 hand signs.

1 Overt Act No. 175: On December 15, 2018, defendants CHAVEZ,
2 REVELO, GONZALEZ, and MARTINEZ posed for a photograph at the Wash
3 throwing MS-13 hand signs.

4 Overt Act No. 176: On December 17, 2018, defendant LINARES
5 posed for a photograph throwing MS-13 hand signs in front of a fence
6 painted with "MS" at Whitsett Park.

7 Overt Act No. 177: On December 21, 2018, defendant MARTINEZ
8 took a video wherein defendant MARTINEZ challenged someone by saying
9 "where are you from?" After the person responded, defendant MARTINEZ
10 said, "this is Mara!"

11 Overt Act No. 178: On December 23, 2018, defendants MARTINEZ
12 and LINARES posed for a photograph throwing MS-13 hand signs.

13 Overt Act No. 179: On January 3, 2019, using coded language,
14 via Facebook Messenger, defendant GONZALEZ discussed purchasing .38
15 caliber ammunition with an unindicted co-conspirator.

16 Overt Act No. 180: On January 4, 2019, defendant MARTINEZ
17 narrated video footage of MS-13 Fulton Locos Salvatruchas graffiti
18 and claimed that "big time Mara Salvatrucha Fulton Locotes"
19 controlled Los Angeles.

20 Overt Act No. 181: On January 11, 2019, via Facebook, defendant
21 MARTINEZ posted a photograph of himself and defendant GONZALEZ posing
22 at Whitsett Park in front of graffiti stating, "MS-13" and "FLS,"
23 which stood for Fulton Locos Salvatruchos.

24 Overt Act No. 182: On January 12, 2019, via Facebook, defendant
25 CHAVEZ sent a photograph of a distribution amount of marijuana.

26 Overt Act No. 183: On January 12, 2019, via Facebook, defendant
27 CHAVEZ sent a photograph of himself throwing MS-13 hand signs in
28 front of graffiti reading, "Mara Salvatrucha."

1 Overt Act No. 184: On January 12, 2019, via Facebook, defendant
2 GONZALEZ posted a video of defendant MARTINEZ spray-painting MS-13
3 Fulton clique graffiti wherein defendants CHAVEZ, REVELO, ARTEAGA,
4 and MARTINEZ viewed the video via Facebook.

5 Overt Act No. 185: On January 14, 2019, using coded language,
6 via Facebook Messenger, defendant CHAVEZ told defendant GONZALEZ,
7 "let's go take out the trash" in Whitsett Park, meaning to murder
8 rival gang members located in Whitsett Park, and told defendant
9 GONZALEZ to be careful.

10 Overt Act No. 186: On January 14, 2019, at Whitsett Park,
11 defendants GONZALEZ and MARTINEZ and an unindicted co-conspirator
12 confronted B.H. and the unindicted co-conspirator shot and killed
13 B.H.

14 Overt Act No. 187: On January 14, 2019, using coded language,
15 via Facebook, defendant GONZALEZ said, in coded language, that MS-13
16 committed a murder, and posted the typographical characters for MS-
17 13.

18 Overt Act No. 188: On January 15, 2019, defendants GONZALEZ and
19 MARTINEZ and unindicted co-conspirators appeared in a video throwing
20 MS-13 hand signs while driving by MS-13, Fulton Locos Salvatruchas
21 graffiti.

22 Overt Act No. 189: On January 22, 2019, via Facebook, defendant
23 MARTINEZ posted a photograph of himself, defendant GONZALEZ, and
24 three unindicted co-conspirators throwing MS-13 hand signs in Santa
25 Monica, California.

26 Overt Act No. 190: On January 24, 2019, via Facebook messenger,
27 defendant MARTINEZ and an unindicted co-conspirator discussed tagging
28 graffiti and crossing out a rival gang's graffiti.

1 Overt Act No. 191: On January 27, 2019, using coded language,
2 via Facebook voice, defendant MARTINEZ and an unindicted co-
3 conspirator discussed committing a crime together.

4 Overt Act No. 192: On January 28, 2019, in the Malibu Hills of
5 Los Angeles County, defendants GONZALEZ and MARTINEZ traveled in a
6 vehicle with two unindicted co-conspirators and possessed a loaded
7 gun, two baseball bats, two knives, ski masks, two beanies with "MS"
8 embroidered on them, and handcuffs.

9 Overt Act No. 193: On January 31, 2019, via Facebook, defendant
10 CHAVEZ shared a photograph of an LAPD Crime Alert for the January 14,
11 2019 murder of B.H.

12 Overt Act No. 194: On February 13, 2019, using coded language,
13 via Facebook messenger, defendant CHAVEZ engaged in a conversation
14 with an unindicted co-conspirator about purchasing a firearm.

15 Overt Act No. 195: On February 13, 2019, an unindicted co-
16 conspirator posted a photograph on Facebook of defendant LINARES
17 throwing an MS-13 hand sign in front of a Salvadoran flag, bearing
18 "FLS," for Fulton Locos Salvatruchas.

19 Overt Act No. 196: On February 28, 2019, via Facebook,
20 defendant CHAVEZ sent defendant ARTEAGA photographs depicting
21 defendants GUZMAN, E. MORALES, GARCIA, ARTEAGA, CHAVEZ, E. MENDEZ,
22 and LINARES, and Vides, and unindicted co-conspirators, throwing MS-
23 13 hand signs, and defendant GARCIA is wielding a machete.

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1 D. NOTICE OF SPECIAL SENTENCING ALLEGATIONS

2 The Grand Jury further alleges that:

3 1. On or about March 6, 2017, in Los Angeles County, within
4 the Central District of California, defendants GUZMAN, E. MORALES,
5 GARCIA, and BAQUIAX, and others known and unknown to the Grand Jury,
6 willfully, deliberately, and with premeditation, unlawfully killed
7 with malice aforethought J.S., in violation of California Penal Code
8 Sections 31, 187, 189, and 190.

9 2. On or about April 20, 2017, in Los Angeles County, within
10 the Central District of California, defendants GUZMAN, ALVARADO, R.
11 MENDEZ, and ORDONES, and others known and unknown, willfully,
12 deliberately, and with premeditation, unlawfully killed with malice
13 aforethought G.B., in violation of California Penal Code Sections 31,
14 187, 189, and 190.

15 3. On or about October 30, 2017, in Los Angeles County, within
16 the Central District of California, defendants ALVARADO, R. MENDEZ,
17 and CORADO, and others known and unknown, willfully, deliberately,
18 and with premeditation, unlawfully killed with malice aforethought
19 B.A., in violation of California Penal Code Sections 31, 187, 189,
20 and 190.

21 4. On or about April 7, 2018, in Los Angeles County, within
22 the Central District of California, defendants CRUZ, E. MORALES,
23 GOMEZ, ARTEAGA, and FLORES, and others known and unknown, willfully,
24 deliberately, and with premeditation, unlawfully killed with malice
25 aforethought J.H.C., in violation of California Penal Code Sections
26 31, 187, 189, and 190.

27 5. On or about July 21, 2018, in Los Angeles County, within
28 the Central District of California, defendants GOMEZ, REVELO, CORADO,

1 and ROSALES ARIAS, and others known and unknown, willfully,
2 deliberately, and with premeditation, unlawfully killed with malice
3 aforethought R.C., in violation of California Penal Code Sections 31,
4 187, 189, and 190.

5 6. On or about January 14, 2019, in Los Angeles County, within
6 the Central District of California, defendants GONZALEZ and MARTINEZ,
7 and others known and unknown, willfully, deliberately, and with
8 premeditation, unlawfully killed with malice aforethought B.H., in
9 violation of California Penal Code Sections 31, 187, 189, and 190.

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COUNT TWO

[18 U.S.C. §§ 1111, 7(3), 2(a)]

[DEFENDANTS GUZMAN, E. MORALES, GARCIA, and BAQUIAX]

On or about March 6, 2017, in Los Angeles County, within the Central District of California, in the Angeles National Forest, a place within the special maritime and territorial jurisdiction of the United States, defendants ANGEL AMADEO GUZMAN, aka "Splinter" and "Desastre," EVER JOEL MORALES, aka "Bandita," "Catracho," "Conejo," and "Angel Malvado," FERNANDO GARCIA PARADA, aka "Chaos," "Caprichoso," and "Penny," and JOSE BAQUIAX ALVAREZ, aka "Alacran," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully killed J.S.

COUNT THREE

[18 U.S.C. §§ 1111, 7(3), 2(a)]

[DEFENDANTS GUZMAN, ALVARADO, R. MENDEZ, and ORDONES]

On or about April 20, 2017, in Los Angeles County, within the Central District of California, in the Angeles National Forest, a place within the special maritime and territorial jurisdiction of the United States, defendants ANGEL AMADEO GUZMAN, aka "Splinter" and "Desastre," GERARDO ALVARADO, aka "Tato," ROBERTO CARLOS MENDEZ CRUZ, aka "Desquiciado," and BRYAN ALBERTO ORDONES, and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully killed G.B.

COUNT FOUR

[18 U.S.C. §§ 1111, 7(3), 2(a)]

[DEFENDANTS ALVARADO, R. MENDEZ, and CORADO]

On or about October 30, 2017, in Los Angeles County, within the Central District of California, in the Angeles National Forest, a place within the special maritime and territorial jurisdiction of the United States, defendants GERARDO ALVARADO, aka "Tato," ROBERTO CARLOS MENDEZ CRUZ, aka "Desquiciado," and ROBERTO ALEJANDRO CORADO ORTIZ, aka "Infernal," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully killed B.A.

COUNT FIVE

[18 U.S.C. §§ 1111, 7(3), 2(a)]

[DEFENDANTS CRUZ, E. MORALES, GOMEZ, ARTEAGA, and FLORES]

On or about April 7, 2018, in Los Angeles County, within the Central District of California, in the Angeles National Forest, a place within the special maritime and territorial jurisdiction of the United States, defendants GERMAN ARNULFO CRUZ HERNANDEZ, aka "Arnol" and "Malandro," EVER JOEL MORALES, aka "Bandita," "Catracho," "Conejo," and "Angel Malvado," KEVIN VILLALTA GOMEZ, aka "Mentiroso," KEVIN ARTEAGA, aka "Street Boy" and "Lucifer," and JOSUE BALMORE FLORES CASTRO, aka "Swagger" and "Lil Malvado," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully killed J.H.C.

COUNT SIX

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS GUZMAN, E. MORALES, GARCIA, and BAQUIAX]

1. Paragraphs 1 through 19 of the General Allegations are re-alleged and incorporated here.

2. At times relevant to this Second Superseding Indictment, MS-13, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, in violation of California Penal Code Sections 21a, 31, 182, 187, 189, 190, and 664, and offenses involving trafficking in controlled substances, in violation of Title 21, United States Code, Sections 846 and 841.

3. On or about March 6, 2017, in Los Angeles County, within the Central District of California, for the purpose of gaining entrance to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants ANGEL AMADEO GUZMAN, aka "Splinter" and "Desastre," EVER JOEL MORALES, aka "Bandita," "Catracho," "Conejo," and "Angel Malvado," FERNANDO GARCIA PARADA, aka "Chaos," "Caprichoso," and "Penny," and JOSE BAQUIAX ALVAREZ, aka "Alacran," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered J.S., in violation of California Penal Code Sections 31, 187, 189, and 190.

COUNT SEVEN

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS GUZMAN, ALVARADO, R. MENDEZ, and ORDONES]

1. Paragraphs 1 through 19 of the General Allegations and paragraph 2 of Count Six of this Second Superseding Indictment are re-alleged and incorporated here.

2. On or about April 20, 2017, in Los Angeles County, within the Central District of California, for the purpose of gaining entrance to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants ANGEL AMADEO GUZMAN, aka "Splinter" and "Desastre," GERARDO ALVARADO, aka "Tato," ROBERTO CARLOS MENDEZ CRUZ, aka "Desquiciado," and BRYAN ALBERTO ORDONES, and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered G.B., in violation of California Penal Code Sections 31, 187, 189, and 190.

COUNT EIGHT

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS ALVARADO, R. MENDEZ, and CORADO]

1. Paragraphs 1 through 19 of the General Allegations and paragraph 2 of Count Six of this Second Superseding Indictment are re-alleged and incorporated here.

2. On or about October 30, 2017, in Los Angeles County, within the Central District of California, for the purpose of gaining entrance to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants GERARDO ALVARADO, aka "Tato," ROBERTO CARLOS MENDEZ CRUZ, aka "Desquiciado," and ROBERTO ALEJANDRO CORADO ORTIZ, aka "Infernal," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered B.A., in violation of California Penal Code Sections 31, 187, 189, and 190.

COUNT NINE

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS CRUZ, E. MORALES, GOMEZ, ARTEAGA, and FLORES]

1. Paragraphs 1 through 19 of the General Allegations and paragraph 2 of Count Six of this Second Superseding Indictment are re-alleged and incorporated here.

2. On or about April 7, 2018, in Los Angeles County, within the Central District of California, for the purpose of gaining entry to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants GERMAN ARNULFO CRUZ HERNANDEZ, aka "Arnol" and "Malandro," EVER JOEL MORALES, aka "Bandita," "Catracho," "Conejo," and "Angel Malvado," KEVIN VILLALTA GOMEZ, aka "Mentiroso," KEVIN ARTEAGA, aka "Street Boy" and "Lucifer," and JOSUE FLORES CASTRO, aka "Swagger" and "Lil Malvado," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered J.H.C., in violation of California Penal Code Sections 31, 187, 189, and 190.

COUNT TEN

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS GOMEZ, REVELO, CORADO, and ROSALES ARIAS]

1. Paragraphs 1 through 19 of the General Allegations and paragraph 2 of Count Six of this Second Superseding Indictment are re-alleged and incorporated here.

2. On or about July 21, 2018, in Los Angeles County, within the Central District of California, for the purpose of gaining entry to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants KEVIN VILLALTA GOMEZ, aka "Mentiroso," YEFRI ALEXANDER REVELO, aka "Silent," ROBERTO ALEJANDRO CORADO ORTIZ, aka "Infernal," and ERICK EDUARDO ROSALES ARIAS, aka "Gix," aka "Extrano," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered R.C., in violation of California Penal Code Sections 31, 187, 189, and 190.

COUNT ELEVEN

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANTS GONZALEZ and MARTINEZ]

1. Paragraphs 1 through 19 of the General Allegations and paragraph 2 of Count Six of this Second Superseding Indictment are re-alleged and incorporated here.

2. On or about January 14, 2019, in Los Angeles County, within the Central District of California, for the purpose of gaining entry to and maintaining and increasing position in MS-13 Los Angeles, an enterprise engaged in racketeering activity, defendants LUIS ARTURO GONZALEZ, aka "Guanako," and EDWIN MARTINEZ, aka "Desorden" and "El Omicidio," and others known and unknown to the Grand Jury, each aiding and abetting the others, willfully, deliberately, and with premeditation and malice aforethought, unlawfully murdered B.H., in violation of California Penal Code Sections 31, 187, 189, and 190.

1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 1963]

3 [DEFENDANTS CRUZ, GUZMAN, E. MORALES, GARCIA, BAQUIAX, GOMEZ,
4 ARTEAGA, VELASQUEZ, CHAVEZ, REVELO, ALVARADO, R. MENDEZ, ORDONES,
5 CORADO, E. MENDEZ, FLORES, GONZALEZ, MARTINEZ, LINARES, RAMOS and
6 ROSALES ARIAS]

7 1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice
8 is hereby given that the United States of America will seek
9 forfeiture as part of any sentence, pursuant to Title 18, United
10 States Code, Section 1963, and Title 28, United States Code, Section
11 2461(c), in the event of any defendant's conviction of the offense
12 set forth in Count One of this Second Superseding Indictment.

13 2. Any defendant so convicted shall forfeit to the United
14 States of America the following:

15 (a) Any interest the convicted defendant has acquired or
16 maintained in violation of 18 U.S.C. § 1962;

17 (b) Any interest in, security of, claim against, or
18 property or contractual right of any kind affording a source or
19 influence over, any enterprise which the convicted defendant has
20 established, operated, controlled, conducted, or participated in the
21 conduct of, as a result of the offense;

22 (c) Any property constituting, or derived from, any
23 proceeds which the person obtained, directly or indirectly, from
24 racketeering activity in violation of 18 U.S.C. § 1962; and

25 (d) To the extent such property is not available for
26 forfeiture, a sum of money equal to the total value of the property
27 described in subparagraphs (a), (b), and (c).

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1 3. Pursuant to Title 18, United States Code, Section 1963(m),
2 any defendant so convicted shall forfeit substitute property, up to
3 the total value of the property described in the preceding paragraph
4 if, as the result of any act or omission of said defendant, the
5 property described in the preceding paragraph, or any portion thereof
6 (a) cannot be located upon the exercise of due diligence; (b) has
7 been transferred, sold to or deposited with a third party; (c) has
8 been placed beyond the jurisdiction of the court; (d) has been
9 substantially diminished in value; or (e) has been commingled with
10 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 [DEFENDANTS GUZMAN, E. MORALES, GARCIA, BAQUIAX, ALVARADO, R. MENDEZ,
4 ORDONES, CORADO, CRUZ, GOMEZ, ARTEAGA, and FLORES]

5 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
6 Procedure, notice is hereby given that the United States of America
7 will seek forfeiture as part of any sentence, pursuant to Title 18,
8 United States Code, Section 981(a)(1)(C) and Title 28, United States
9 Code, Section 2461(c), in the event of any defendant's conviction of
10 the offenses set forth in any of Counts Two through Five of this
11 Second Superseding Indictment.

12 2. Any defendant so convicted shall forfeit to the United
13 States of America the following:

14 a. all right, title, and interest in any and all
15 property, real or personal, constituting, or derived from, any
16 proceeds traceable to any of the offenses; and

17 b. To the extent such property is not available for
18 forfeiture, a sum of money equal to the total value of the property
19 described in subparagraph (a).

20 3. Pursuant to Title 21, United States Code, Section 853(p),
21 as incorporated by Title 28, United States Code, Section 2461(c), the
22 convicted defendant shall forfeit substitute property, up to the
23 value of the property described in the preceding paragraph if, as the
24 result of any act or omission of said defendant, the property
25 described in the preceding paragraph or any portion thereof (a)
26 cannot be located upon the exercise of due diligence; (b) has been
27 transferred, sold to, or deposited with a third party; (c) has been
28 placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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1 NOTICE OF SPECIAL FINDINGS

2 [DEFENDANTS CRUZ, GUZMAN, E. MORALES, GARCIA, BAQUIAX, GOMEZ,
3 ARTEAGA, REVELO, ALVARADO, R. MENDEZ, ORDONES, CORADO, FLORES,
4 GONZALEZ, MARTINEZ, and ROSALES ARIAS]

5 The allegations of Counts Two through Eleven of this Second
6 Superseding Indictment are re-alleged and incorporated here.

7 As to Counts Two and Six, defendant ANGEL AMADEO GUZMAN, aka
8 "Splinter" and "Desastre":

9 1. Was 18 years of age or older at the time of the offense (18
10 U.S.C. § 3591(a));

11 2. Intentionally killed J.S. (18 U.S.C. § 3591(a)(2)(A));

12 3. Intentionally inflicted serious bodily injury that resulted
13 in the death of J.S. (18 U.S.C. § 3591(a)(2)(B));

14 4. Intentionally participated in an act, contemplating that
15 the life of a person would be taken or intending that lethal force
16 would be used in connection with a person, other than a participant
17 of the offense, and J.S. died as a direct result of the act (18
18 U.S.C. § 3591(a)(2)(C));

19 5. Intentionally and specifically engaged in an act of
20 violence, knowing that the act created a grave risk of death to a
21 person, other than a participant of the offense, such that
22 participation in the act constituted a reckless disregard for human
23 life and J.S. died as a direct result of the act (18 U.S.C.
24 § 3591(a)(2)(D));

25 6. Committed the offense in an especially heinous, cruel, or
26 depraved manner in that it involved torture or serious physical abuse
27 to the victim (18 U.S.C. § 3592(c)(6)); and
28

1 7. Committed the offense after substantial planning and
2 premeditation to cause the death of the person (18 U.S.C.
3 § 3592(c) (9) .

4 As to Counts Two and Six, defendant EVER JOEL MORALES, aka
5 "Bandita," "Catracho," "Conejo," and "Angel Malvado":

6 8. Was 18 years of age or older at the time of the offense (18
7 U.S.C. § 3591(a));

8 9. Intentionally killed J.S. (18 U.S.C. § 3591(a) (2) (A));

9 10. Intentionally inflicted serious bodily injury that resulted
10 in the death of J.S. (18 U.S.C. § 3591(a) (2) (B));

11 11. Intentionally participated in an act, contemplating that
12 the life of a person would be taken or intending that lethal force
13 would be used in connection with a person, other than a participant
14 of the offense, and J.S. died as a direct result of the act (18
15 U.S.C. § 3591(a) (2) (C));

16 12. Intentionally and specifically engaged in an act of
17 violence, knowing that the act created a grave risk of death to a
18 person, other than a participant of the offense, such that
19 participation in the act constituted a reckless disregard for human
20 life and J.S. died as a direct result of the act (18 U.S.C.
21 § 3591(a) (2) (D));

22 13. Committed the offense in an especially heinous, cruel, or
23 depraved manner in that it involved torture or serious physical abuse
24 to the victim (18 U.S.C. § 3592(c) (6)); and

25 14. Committed the offense after substantial planning and
26 premeditation to cause the death of the person (18 U.S.C.
27 § 3592(c) (9) .

28

1 As to Counts Two and Six, defendant FERNANDO GARCIA PARADA, aka
2 "Chaos," "Caprichoso," and "Penny":

3 15. Was 18 years of age or older at the time of the offense (18
4 U.S.C. § 3591(a));

5 16. Intentionally killed J.S. (18 U.S.C. § 3591(a)(2)(A));

6 17. Intentionally inflicted serious bodily injury that resulted
7 in the death of J.S. (18 U.S.C. § 3591(a)(2)(B));

8 18. Intentionally participated in an act, contemplating that
9 the life of a person would be taken or intending that lethal force
10 would be used in connection with a person, other than a participant
11 of the offense, and J.S. died as a direct result of the act (18
12 U.S.C. § 3591(a)(2)(C));

13 19. Intentionally and specifically engaged in an act of
14 violence, knowing that the act created a grave risk of death to a
15 person, other than a participant of the offense, such that
16 participation in the act constituted a reckless disregard for human
17 life and J.S. died as a direct result of the act (18 U.S.C.
18 § 3591(a)(2)(D));

19 20. Committed the offense in an especially heinous, cruel, or
20 depraved manner in that it involved torture or serious physical abuse
21 to the victim (18 U.S.C. § 3592(c)(6)); and

22 21. Committed the offense after substantial planning and
23 premeditation to cause the death of the person (18 U.S.C.
24 § 3592(c)(9)).

25 As to Counts Two and Six, defendant JOSE BAQUIAX ALVAREZ, aka
26 "Alacran":

27 22. Was 18 years of age or older at the time of the offense (18
28 U.S.C. § 3591(a));

1 23. Intentionally killed J.S. (18 U.S.C. § 3591(a)(2)(A));

2 24. Intentionally inflicted serious bodily injury that resulted
3 in the death of J.S. (18 U.S.C. § 3591(a)(2)(B));

4 25. Intentionally participated in an act, contemplating that
5 the life of a person would be taken or intending that lethal force
6 would be used in connection with a person, other than a participant
7 of the offense, and J.S. died as a direct result of the act (18
8 U.S.C. § 3591(a)(2)(C));

9 26. Intentionally and specifically engaged in an act of
10 violence, knowing that the act created a grave risk of death to a
11 person, other than a participant of the offense, such that
12 participation in the act constituted a reckless disregard for human
13 life and J.S. died as a direct result of the act (18 U.S.C.
14 § 3591(a)(2)(D));

15 27. Committed the offense in an especially heinous, cruel, or
16 depraved manner in that it involved torture or serious physical abuse
17 to the victim (18 U.S.C. § 3592(c)(6)); and

18 28. Committed the offense after substantial planning and
19 premeditation to cause the death of the person (18 U.S.C.
20 § 3592(c)(9)).

21 As to Counts Three and Seven, defendant ANGEL AMADEO GUZMAN, aka
22 "Splinter," aka "Desastre":

23 29. Was 18 years of age or older at the time of the offense (18
24 U.S.C. § 3591(a));

25 30. Intentionally killed G.B. (18 U.S.C. § 3591(a)(2)(A));

26 31. Intentionally inflicted serious bodily injury that resulted
27 in the death of G.B. (18 U.S.C. § 3591(a)(2)(B));

28

1 32. Intentionally participated in an act, contemplating that
2 the life of a person would be taken or intending that lethal force
3 would be used in connection with a person, other than a participant
4 of the offense, and G.B. died as a direct result of the act (18
5 U.S.C. § 3591(a) (2) (C));

6 33. Intentionally and specifically engaged in an act of
7 violence, knowing that the act created a grave risk of death to a
8 person, other than a participant of the offense, such that
9 participation in the act constituted a reckless disregard for human
10 life and G.B. died as a direct result of the act (18 U.S.C.
11 § 3591(a) (2) (D));

12 34. Committed the offense in an especially heinous, cruel, or
13 depraved manner in that it involved torture or serious physical abuse
14 to the victim (18 U.S.C. § 3592(c) (6)); and

15 35. Committed the offense after substantial planning and
16 premeditation to cause the death of the person (18 U.S.C.
17 § 3592(c) (9)).

18 As to Counts Three and Seven, defendant GERARDO ALVARADO, aka
19 "Tato":

20 36. Was 18 years of age or older at the time of the offense (18
21 U.S.C. § 3591(a));

22 37. Intentionally killed G.B. (18 U.S.C. § 3591(a) (2) (A));

23 38. Intentionally inflicted serious bodily injury that resulted
24 in the death of G.B. (18 U.S.C. § 3591(a) (2) (B));

25 39. Intentionally participated in an act, contemplating that
26 the life of a person would be taken or intending that lethal force
27 would be used in connection with a person, other than a participant
28

1 of the offense, and G.B. died as a direct result of the act (18
2 U.S.C. § 3591(a)(2)(C));

3 40. Intentionally and specifically engaged in an act of
4 violence, knowing that the act created a grave risk of death to a
5 person, other than a participant of the offense, such that
6 participation in the act constituted a reckless disregard for human
7 life and G.B. died as a direct result of the act (18 U.S.C.
8 § 3591(a)(2)(D));

9 41. Committed the offense in an especially heinous, cruel, or
10 depraved manner in that it involved torture or serious physical abuse
11 to the victim (18 U.S.C. § 3592(c)(6)); and

12 42. Committed the offense after substantial planning and
13 premeditation to cause the death of the person (18 U.S.C.
14 § 3592(c)(9)).

15 As to Counts Three and Seven, defendant ROBERTO CARLOS MENDEZ
16 CRUZ, aka "Desquiciado":

17 43. Was 18 years of age or older at the time of the offense (18
18 U.S.C. § 3591(a));

19 44. Intentionally killed G.B. (18 U.S.C. § 3591(a)(2)(A));

20 45. Intentionally inflicted serious bodily injury that resulted
21 in the death of G.B. (18 U.S.C. § 3591(a)(2)(B));

22 46. Intentionally participated in an act, contemplating that
23 the life of a person would be taken or intending that lethal force
24 would be used in connection with a person, other than a participant
25 of the offense, and G.B. died as a direct result of the act (18
26 U.S.C. § 3591(a)(2)(C));

27 47. Intentionally and specifically engaged in an act of
28 violence, knowing that the act created a grave risk of death to a

1 person, other than a participant of the offense, such that
2 participation in the act constituted a reckless disregard for human
3 life and G.B. died as a direct result of the act (18 U.S.C.
4 § 3591(a) (2) (D));

5 48. Committed the offense in an especially heinous, cruel, or
6 depraved manner in that it involved torture or serious physical abuse
7 to the victim (18 U.S.C. § 3592(c) (6)); and

8 49. Committed the offense after substantial planning and
9 premeditation to cause the death of the person (18 U.S.C.
10 § 3592(c) (9)).

11 As to Counts Three and Seven, defendant BRYAN ALBERTO ORDONES:

12 50. Was 18 years of age or older at the time of the offense (18
13 U.S.C. § 3591(a));

14 51. Intentionally killed G.B. (18 U.S.C. § 3591(a) (2) (A));

15 52. Intentionally inflicted serious bodily injury that resulted
16 in the death of G.B. (18 U.S.C. § 3591(a) (2) (B));

17 53. Intentionally participated in an act, contemplating that
18 the life of a person would be taken or intending that lethal force
19 would be used in connection with a person, other than a participant
20 of the offense, and G.B. died as a direct result of the act (18
21 U.S.C. § 3591(a) (2) (C));

22 54. Intentionally and specifically engaged in an act of
23 violence, knowing that the act created a grave risk of death to a
24 person, other than a participant of the offense, such that
25 participation in the act constituted a reckless disregard for human
26 life and G.B. died as a direct result of the act (18 U.S.C.
27 § 3591(a) (2) (D));

28

1 55. Committed the offense in an especially heinous, cruel, or
2 depraved manner in that it involved torture or serious physical abuse
3 to the victim (18 U.S.C. § 3592(c)(6)); and

4 56. Committed the offense after substantial planning and
5 premeditation to cause the death of the person (18 U.S.C.
6 § 3592(c)(9)).

7 As to Counts Four and Eight, defendant GERARDO ALVARADO, aka
8 "Tato":

9 57. Was 18 years of age or older at the time of the offense (18
10 U.S.C. § 3591(a));

11 58. Intentionally killed B.A. (18 U.S.C. § 3591(a)(2)(A));

12 59. Intentionally inflicted serious bodily injury that resulted
13 in the death of B.A. (18 U.S.C. § 3591(a)(2)(B));

14 60. Intentionally participated in an act, contemplating that
15 the life of a person would be taken or intending that lethal force
16 would be used in connection with a person, other than a participant
17 of the offense, and B.A. died as a direct result of the act (18
18 U.S.C. § 3591(a)(2)(C));

19 61. Intentionally and specifically engaged in an act of
20 violence, knowing that the act created a grave risk of death to a
21 person, other than a participant of the offense, such that
22 participation in the act constituted a reckless disregard for human
23 life and B.A. died as a direct result of the act (18 U.S.C.
24 § 3591(a)(2)(D));

25 62. Committed the offense in an especially heinous, cruel, or
26 depraved manner in that it involved torture or serious physical abuse
27 to the victim (18 U.S.C. § 3592(c)(6)); and

28

1 63. Committed the offense after substantial planning and
2 premeditation to cause the death of the person (18 U.S.C.
3 § 3592(c)(9)).

4 As to Counts Four and Eight, defendant ROBERTO CARLOS MENDEZ
5 CRUZ, aka "Desquiciado":

6 64. Was 18 years of age or older at the time of the offense (18
7 U.S.C. § 3591(a));

8 65. Intentionally killed B.A. (18 U.S.C. § 3591(a)(2)(A));

9 66. Intentionally inflicted serious bodily injury that resulted
10 in the death of B.A. (18 U.S.C. § 3591(a)(2)(B));

11 67. Intentionally participated in an act, contemplating that
12 the life of a person would be taken or intending that lethal force
13 would be used in connection with a person, other than a participant
14 of the offense, and B.A. died as a direct result of the act (18
15 U.S.C. § 3591(a)(2)(C));

16 68. Intentionally and specifically engaged in an act of
17 violence, knowing that the act created a grave risk of death to a
18 person, other than a participant of the offense, such that
19 participation in the act constituted a reckless disregard for human
20 life and B.A. died as a direct result of the act (18 U.S.C.
21 § 3591(a)(2)(D));

22 69. Committed the offense in an especially heinous, cruel, or
23 depraved manner in that it involved torture or serious physical abuse
24 to the victim (18 U.S.C. § 3592(c)(6)); and

25 70. Committed the offense after substantial planning and
26 premeditation to cause the death of the person (18 U.S.C.
27 § 3592(c)(9)).

28

1 As to Counts Four and Eight, defendant ROBERTO ALEJANDRO CORADO
2 ORTIZ, aka "Infernal":

3 71. Was 18 years of age or older at the time of the offense (18
4 U.S.C. § 3591(a));

5 72. Intentionally killed B.A. (18 U.S.C. § 3591(a)(2)(A));

6 73. Intentionally inflicted serious bodily injury that resulted
7 in the death of B.A. (18 U.S.C. § 3591(a)(2)(B));

8 74. Intentionally participated in an act, contemplating that
9 the life of a person would be taken or intending that lethal force
10 would be used in connection with a person, other than a participant
11 of the offense, and B.A. died as a direct result of the act (18
12 U.S.C. § 3591(a)(2)(C));

13 75. Intentionally and specifically engaged in an act of
14 violence, knowing that the act created a grave risk of death to a
15 person, other than a participant of the offense, such that
16 participation in the act constituted a reckless disregard for human
17 life and B.A. died as a direct result of the act (18 U.S.C.
18 § 3591(a)(2)(D));

19 76. Committed the offense in an especially heinous, cruel, or
20 depraved manner in that it involved torture or serious physical abuse
21 to the victim (18 U.S.C. § 3592(c)(6)); and

22 77. Committed the offense after substantial planning and
23 premeditation to cause the death of the person (18 U.S.C.
24 § 3592(c)(9)).

25 As to Counts Five and Nine, defendant GERMAN ARNULFO CRUZ
26 HERNANDEZ, aka "Arnol," aka "Malandro":

27 78. Was 18 years of age or older at the time of the offense (18
28 U.S.C. § 3591(a));

1 79. Intentionally killed J.H.C. (18 U.S.C. § 3591(a)(2)(A));

2 80. Intentionally inflicted serious bodily injury that resulted
3 in the death of J.H.C. (18 U.S.C. § 3591(a)(2)(B));

4 81. Intentionally participated in an act, contemplating that
5 the life of a person would be taken or intending that lethal force
6 would be used in connection with a person, other than a participant
7 of the offense, and J.H.C. died as a direct result of the act (18
8 U.S.C. § 3591(a)(2)(C));

9 82. Intentionally and specifically engaged in an act of
10 violence, knowing that the act created a grave risk of death to a
11 person, other than a participant of the offense, such that
12 participation in the act constituted a reckless disregard for human
13 life and J.H.C. died as a direct result of the act (18 U.S.C.
14 § 3591(a)(2)(D));

15 83. Committed the offense in an especially heinous, cruel, or
16 depraved manner in that it involved torture or serious physical abuse
17 to the victim (18 U.S.C. § 3592(c)(6)); and

18 84. Committed the offense after substantial planning and
19 premeditation to cause the death of the person (18 U.S.C.
20 § 3592(c)(9)).

21 As to Counts Five and Nine, defendant EVER JOEL MORALES, aka
22 "Bandita," aka "Catracho," aka "Conejo," aka "Angel Malvado":

23 85. Was 18 years of age or older at the time of the offense (18
24 U.S.C. § 3591(a));

25 86. Intentionally killed J.H.C. (18 U.S.C. § 3591(a)(2)(A));

26 87. Intentionally inflicted serious bodily injury that resulted
27 in the death of J.H.C. (18 U.S.C. § 3591(a)(2)(B));

28

1 88. Intentionally participated in an act, contemplating that
2 the life of a person would be taken or intending that lethal force
3 would be used in connection with a person, other than a participant
4 of the offense, and J.H.C. died as a direct result of the act (18
5 U.S.C. § 3591(a) (2) (C));

6 89. Intentionally and specifically engaged in an act of
7 violence, knowing that the act created a grave risk of death to a
8 person, other than a participant of the offense, such that
9 participation in the act constituted a reckless disregard for human
10 life and J.H.C. died as a direct result of the act (18 U.S.C.
11 § 3591(a) (2) (D));

12 90. Committed the offense in an especially heinous, cruel, or
13 depraved manner in that it involved torture or serious physical abuse
14 to the victim (18 U.S.C. § 3592(c) (6)); and

15 91. Committed the offense after substantial planning and
16 premeditation to cause the death of the person (18 U.S.C.
17 § 3592(c) (9)).

18 As to Counts Five and Nine, defendant KEVIN VILLALTA GOMEZ, aka
19 "Mentiroso":

20 92. Was 18 years of age or older at the time of the offense (18
21 U.S.C. § 3591(a));

22 93. Intentionally killed J.H.C. (18 U.S.C. § 3591(a) (2) (A));

23 94. Intentionally inflicted serious bodily injury that resulted
24 in the death of J.H.C. (18 U.S.C. § 3591(a) (2) (B));

25 95. Intentionally participated in an act, contemplating that
26 the life of a person would be taken or intending that lethal force
27 would be used in connection with a person, other than a participant
28

1 of the offense, and J.H.C. died as a direct result of the act (18
2 U.S.C. § 3591(a)(2)(C));

3 96. Intentionally and specifically engaged in an act of
4 violence, knowing that the act created a grave risk of death to a
5 person, other than a participant of the offense, such that
6 participation in the act constituted a reckless disregard for human
7 life and J.H.C. died as a direct result of the act (18 U.S.C.
8 § 3591(a)(2)(D));

9 97. Committed the offense in an especially heinous, cruel, or
10 depraved manner in that it involved torture or serious physical abuse
11 to the victim (18 U.S.C. § 3592(c)(6)); and

12 98. Committed the offense after substantial planning and
13 premeditation to cause the death of the person (18 U.S.C.
14 § 3592(c)(9)).

15 As to Counts Five and Nine, defendant KEVIN ARTEAGA, aka "Street
16 Boy," aka "Lucifer":

17 99. Was 18 years of age or older at the time of the offense (18
18 U.S.C. § 3591(a));

19 100. Intentionally killed J.H.C. (18 U.S.C. § 3591(a)(2)(A));

20 101. Intentionally inflicted serious bodily injury that resulted
21 in the death of J.H.C. (18 U.S.C. § 3591(a)(2)(B));

22 102. Intentionally participated in an act, contemplating that
23 the life of a person would be taken or intending that lethal force
24 would be used in connection with a person, other than a participant
25 of the offense, and J.H.C. died as a direct result of the act (18
26 U.S.C. § 3591(a)(2)(C));

27 103. Intentionally and specifically engaged in an act of
28 violence, knowing that the act created a grave risk of death to a

1 person, other than a participant of the offense, such that
2 participation in the act constituted a reckless disregard for human
3 life and J.H.C. died as a direct result of the act (18 U.S.C.
4 § 3591(a)(2)(D));

5 104. Committed the offense in an especially heinous, cruel, or
6 depraved manner in that it involved torture or serious physical abuse
7 to the victim (18 U.S.C. § 3592(c)(6)); and

8 105. Committed the offense after substantial planning and
9 premeditation to cause the death of the person (18 U.S.C.
10 § 3592(c)(9)).

11 As to Counts Five and Nine, defendant JOSUE FLORES CASTRO, aka
12 "Swagger," aka "Lil Malvado":

13 106. Was 18 years of age or older at the time of the offense (18
14 U.S.C. § 3591(a));

15 107. Intentionally killed J.H.C. (18 U.S.C. § 3591(a)(2)(A));

16 108. Intentionally inflicted serious bodily injury that resulted
17 in the death of J.H.C. (18 U.S.C. § 3591(a)(2)(B));

18 109. Intentionally participated in an act, contemplating that
19 the life of a person would be taken or intending that lethal force
20 would be used in connection with a person, other than a participant
21 of the offense, and J.H.C. died as a direct result of the act (18
22 U.S.C. § 3591(a)(2)(C));

23 110. Intentionally and specifically engaged in an act of
24 violence, knowing that the act created a grave risk of death to a
25 person, other than a participant of the offense, such that
26 participation in the act constituted a reckless disregard for human
27 life and J.H.C. died as a direct result of the act (18 U.S.C.
28 § 3591(a)(2)(D));

1 111. Committed the offense in an especially heinous, cruel, or
2 depraved manner in that it involved torture or serious physical abuse
3 to the victim (18 U.S.C. § 3592(c)(6)); and

4 112. Committed the offense after substantial planning and
5 premeditation to cause the death of the person (18 U.S.C.
6 § 3592(c)(9)).

7 As to Count Ten, defendant KEVIN VILLALTA GOMEZ, aka
8 "Mentiroso":

9 113. Was 18 years of age or older at the time of the offense (18
10 U.S.C. § 3591(a));

11 114. Intentionally killed R.C. (18 U.S.C. § 3591(a)(2)(A));

12 115. Intentionally inflicted serious bodily injury that resulted
13 in the death of R.C. (18 U.S.C. § 3591(a)(2)(B));

14 116. Intentionally participated in an act, contemplating that
15 the life of a person would be taken or intending that lethal force
16 would be used in connection with a person, other than a participant
17 of the offense, and R.C. died as a direct result of the act (18
18 U.S.C. § 3591(a)(2)(C));

19 117. Intentionally and specifically engaged in an act of
20 violence, knowing that the act created a grave risk of death to a
21 person, other than a participant of the offense, such that
22 participation in the act constituted a reckless disregard for human
23 life and R.C. died as a direct result of the act (18 U.S.C.
24 § 3591(a)(2)(D));

25 118. Committed the offense in an especially heinous, cruel, or
26 depraved manner in that it involved torture or serious physical abuse
27 to the victim (18 U.S.C. § 3592(c)(6)); and

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1 119. Committed the offense after substantial planning and
2 premeditation to cause the death of the person (18 U.S.C.
3 § 3592(c)(9)).

4 As to Count Ten, defendant YEFRI ALEXANDER REVELO, aka "Silent":

5 120. Was 18 years of age or older at the time of the offense (18
6 U.S.C. § 3591(a));

7 121. Intentionally killed R.C. (18 U.S.C. § 3591(a)(2)(A));

8 122. Intentionally inflicted serious bodily injury that resulted
9 in the death of R.C. (18 U.S.C. § 3591(a)(2)(B));

10 123. Intentionally participated in an act, contemplating that
11 the life of a person would be taken or intending that lethal force
12 would be used in connection with a person, other than a participant
13 of the offense, and R.C. died as a direct result of the act (18
14 U.S.C. § 3591(a)(2)(C));

15 124. Intentionally and specifically engaged in an act of
16 violence, knowing that the act created a grave risk of death to a
17 person, other than a participant of the offense, such that
18 participation in the act constituted a reckless disregard for human
19 life and R.C. died as a direct result of the act (18 U.S.C.
20 § 3591(a)(2)(D));

21 125. Committed the offense in an especially heinous, cruel, or
22 depraved manner in that it involved torture or serious physical abuse
23 to the victim (18 U.S.C. § 3592(c)(6)); and

24 126. Committed the offense after substantial planning and
25 premeditation to cause the death of the person (18 U.S.C.
26 § 3592(c)(9)).

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1 As to Count Ten, defendant ROBERTO ALEJANDRO CORADO ORTIZ, aka
2 "Infernal":

3 127. Was 18 years of age or older at the time of the offense (18
4 U.S.C. § 3591(a));

5 128. Intentionally killed R.C. (18 U.S.C. § 3591(a)(2)(A));

6 129. Intentionally inflicted serious bodily injury that resulted
7 in the death of R.C. (18 U.S.C. § 3591(a)(2)(B));

8 130. Intentionally participated in an act, contemplating that
9 the life of a person would be taken or intending that lethal force
10 would be used in connection with a person, other than a participant
11 of the offense, and R.C. died as a direct result of the act (18
12 U.S.C. § 3591(a)(2)(C));

13 131. Intentionally and specifically engaged in an act of
14 violence, knowing that the act created a grave risk of death to a
15 person, other than a participant of the offense, such that
16 participation in the act constituted a reckless disregard for human
17 life and R.C. died as a direct result of the act (18 U.S.C.
18 § 3591(a)(2)(D));

19 132. Committed the offense in an especially heinous, cruel, or
20 depraved manner in that it involved torture or serious physical abuse
21 to the victim (18 U.S.C. § 3592(c)(6)); and

22 133. Committed the offense after substantial planning and
23 premeditation to cause the death of the person (18 U.S.C.
24 § 3592(c)(9)).

25 As to Count Ten, defendant ERICK EDUARDO ROSALES ARIAS, aka
26 "Gix," aka "Extrano":

27 134. Was 18 years of age or older at the time of the offense (18
28 U.S.C. § 3591(a));

1 135. Intentionally killed R.C. (18 U.S.C. § 3591(a)(2)(A));

2 136. Intentionally inflicted serious bodily injury that resulted
3 in the death of R.C. (18 U.S.C. § 3591(a)(2)(B));

4 137. Intentionally participated in an act, contemplating that
5 the life of a person would be taken or intending that lethal force
6 would be used in connection with a person, other than a participant
7 of the offense, and R.C. died as a direct result of the act (18
8 U.S.C. § 3591(a)(2)(C));

9 138. Intentionally and specifically engaged in an act of
10 violence, knowing that the act created a grave risk of death to a
11 person, other than a participant of the offense, such that
12 participation in the act constituted a reckless disregard for human
13 life and R.C. died as a direct result of the act (18 U.S.C.
14 § 3591(a)(2)(D));

15 139. Committed the offense in an especially heinous, cruel, or
16 depraved manner in that it involved torture or serious physical abuse
17 to the victim (18 U.S.C. § 3592(c)(6)); and

18 140. Committed the offense after substantial planning and
19 premeditation to cause the death of the person (18 U.S.C.
20 § 3592(c)(9)).

21 As to Count Eleven, defendant LUIS ARTURO GONZALEZ, aka
22 "Guanako":

23 141. Was 18 years of age or older at the time of the offense (18
24 U.S.C. § 3591(a));

25 142. Intentionally killed B.H. (18 U.S.C. § 3591(a)(2)(A));

26 143. Intentionally inflicted serious bodily injury that resulted
27 in the death of B.H. (18 U.S.C. § 3591(a)(2)(B));

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1 144. Intentionally participated in an act, contemplating that
2 the life of a person would be taken or intending that lethal force
3 would be used in connection with a person, other than a participant
4 of the offense, and B.H. died as a direct result of the act (18
5 U.S.C. § 3591(a) (2) (C));

6 145. Intentionally and specifically engaged in an act of
7 violence, knowing that the act created a grave risk of death to a
8 person, other than a participant of the offense, such that
9 participation in the act constituted a reckless disregard for human
10 life and B.H. died as a direct result of the act (18 U.S.C.
11 § 3591(a) (2) (D));

12 146. Committed the offense in an especially heinous, cruel, or
13 depraved manner in that it involved torture or serious physical abuse
14 to the victim (18 U.S.C. § 3592(c) (6)); and

15 147. Committed the offense after substantial planning and
16 premeditation to cause the death of the person (18 U.S.C.
17 § 3592(c) (9)).

18 As to Count Eleven, defendant EDWIN MARTINEZ, aka "Desorden" aka
19 "El Omisidio":

20 148. Was 18 years of age or older at the time of the offense (18
21 U.S.C. § 3591(a));

22 149. Intentionally killed B.H. (18 U.S.C. § 3591(a) (2) (A));

23 150. Intentionally inflicted serious bodily injury that resulted
24 in the death of B.H. (18 U.S.C. § 3591(a) (2) (B));

25 151. Intentionally participated in an act, contemplating that
26 the life of a person would be taken or intending that lethal force
27 would be used in connection with a person, other than a participant
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1 of the offense, and B.H. died as a direct result of the act (18
2 U.S.C. § 3591(a)(2)(C));

3 152. Intentionally and specifically engaged in an act of
4 violence, knowing that the act created a grave risk of death to a
5 person, other than a participant of the offense, such that
6 participation in the act constituted a reckless disregard for human
7 life and B.H. died as a direct result of the act (18 U.S.C.
8 § 3591(a)(2)(D));

9 153. Committed the offense in an especially heinous, cruel, or
10 depraved manner in that it involved torture or serious physical abuse
11 to the victim (18 U.S.C. § 3592(c)(6)); and

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1 154. Committed the offense after substantial planning and
2 premeditation to cause the death of the person or commit an act of
3 terrorism (18 U.S.C. § 3592(c)(9)).

4 A TRUE BILL

5
6 151
7 Foreperson

8 NICOLA T. HANNA
9 United States Attorney

10 *Brandon Fox*

11 BRANDON D. FOX
12 Assistant United States Attorney
13 Chief, Criminal Division

14 JUSTIN R. RHOADES
15 Assistant United States Attorney
16 Chief, Violent and Organized
17 Crime Section

18 JOANNA M. CURTIS
19 Assistant United States Attorney
20 Violent and Organized Crime
21 Section

22 ERIC W. SIDDALL
23 CARMELIA MEJIA
24 Special Assistant United States
25 Attorneys
26 Violent and Organized Crime
27 Section
28