

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 ) 18 CR 719  
 )  
 v. ) Violations: Title 18, United States Code,  
 ) Sections 922(g)(1) and 1959  
 LUIS CONTRERAS, )  
 )  
 a/k/a “Snoop” ) **SUPERSEDING INDICTMENT**  
 )

**COUNT ONE**

The SPECIAL JANUARY 2019 GRAND JURY charges:

At times material to this Indictment:

1. The defendant, and others known and unknown, were members and associates of the Latin Saints Street Gang, a criminal organization whose members and associates engaged in acts of violence, including acts involving murder, assault with a dangerous weapon, and assault resulting in serious bodily injury, and which operated in the Back of the Yards neighborhood of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Latin Saints, including its leadership, membership, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce. The Latin Saints enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. The purposes of the Latin Saints enterprise included, but were not limited to, the following:

a. Acquiring, preserving and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder, assault with a dangerous weapon, assault resulting in serious bodily injury, other acts of violence, and illegal trafficking in controlled substances;

b. Promoting and enhancing the enterprise and its members' and associates' activities, including by publicly claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members;

c. Increasing the status of the enterprise through the use of social media platforms; and

d. Keeping victims, rival gang members, and witnesses in fear of the enterprise and its leaders, members and associates through acts and threats of violence.

4. At all times relevant to this Indictment, the Latin Saints, through its leadership, membership and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

a. Acts involving murder, in violation of the laws of the State of Illinois; and

b. Offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

5. On or about February 18, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

LUIS CONTRERAS, a/k/a “Snoop,”

defendant herein, for the purpose of maintaining and increasing position in the Latin Saints, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Andre Franzell, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

## NOTICE OF SPECIAL FINDINGS

6. The defendant Luis Contreras:
  - a. was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
  - b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
  - c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));
  - d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
  - e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
  - f. in the commission of the offense, knowingly created a grave risk of death to 1 or more persons in addition to the victim (Title 18, United States Code, Section 3592(c)(5)); and

g. committed the offense after substantial planning and premeditation to cause the death of the victim (Title 18, United States Code, Section 3592(c)(9)).

## COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Paragraphs One through Four of Count One are incorporated here.
2. On or about February 18, 2018, at Chicago, in the Northern District of

Illinois, Eastern Division,

LUIS CONTRERAS, a/k/a “Snoop,”

defendant herein, for the purpose of maintaining and increasing position in the Latin Saints, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder an individual, namely, Josue Gurrola, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Section 5/8-4, 5/5-1, and 5/5-2);

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

**COUNT THREE**

The SPECIAL JANUARY 2019 GRAND JURY charges:

On or about February 18, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LUIS CONTRERAS, a/k/a “Snoop,”

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, ammunition, namely, four FIOCCHI .223 REM caliber cartridge cases, which ammunition had traveled in interstate and foreign commerce prior to defendant’s possession of the ammunition;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 23, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LUIS CONTRERAS, a/k/a “Snoop,”

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Del-Ton Inc. 5.56mm caliber semiautomatic rifle model DTI-15 bearing serial number B-49997, a Bushmaster Firearms International LLC model XM15-E2S, .223/5.56mm caliber semiautomatic firearm bearing serial number ARA019622, and a loaded Glock model 26 9mm pistol bearing serial number ZGT109, which firearm had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).



**FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in Counts Three and Four of this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to four Fioocchi .223 REM caliber cartridge cases; a loaded Del-Ton Inc. 5.56mm caliber semiautomatic rifle model DTI-15 bearing serial number B-49997; a Bushmaster Firearms International LLC model XM15-E2S; .223/5.56mm caliber semiautomatic firearm bearing serial number ARA019622; a loaded Glock model 26 9mm pistol bearing serial number ZGT109; and associated ammunition.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY