

FILED

2009 MAY 13 PM 2:51

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

BY \_\_\_\_\_

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2008 Grand Jury

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )

No. CR 09-00466

v. )

I N D I C T M E N T

JOSE ALFARO, )  
 aka "Shyboy," )  
EDWIN ARIAS, )  
 aka "Enano," )  
HUGO BOLANOS, )  
 aka "Crimen," )  
JUAN CENDEJAS, )  
 aka "Morro," )  
CARLOS CUENTAS, )  
 aka "Snoopy," )  
YANIRA ESCALANTE, )  
 aka "Flaca," )  
JUAN FUENTES, )  
 aka "Skinny," )  
BRIAN GIRON, )  
 aka "Creeper," )  
 aka "Grinch," )  
JOSE GONZALEZ, )  
 aka "Puppet," )  
PAUL CORTEZ JOVEL, )  
 aka "Little Man," )  
 aka "Oscar Chacon," )  
LUIS LAZO, )  
 aka "Chico," )  
OSCAR LINARES, )  
 aka "Huevo," )  
PEDRO LOPEZ, )  
 aka "Grumpy," )

[18 U.S.C. § 1962(d):  
Racketeer Influenced and  
Corrupt Organizations  
Conspiracy; 18 U.S.C.  
§ 1959(a)(1), (a)(3), (a)(5):  
Violent Crimes in Aid of  
Racketeering; 18 U.S.C.  
§§ 924(c)(1)(A)(iii), (j)(1):  
Use, Carry, Brandish, and  
Discharge a Firearm During a  
Crime of Violence Causing  
Death; 18 U.S.C. § 922(g)(1):  
Felon in Possession of a  
Firearm; 21 U.S.C. § 846:  
Conspiracy to Distribute,  
Possess with Intent to  
Distribute, and to Aid and  
Abet the Distribution of  
Controlled Substances]

EC: VOCS

1 JUAN MANCILLA, )  
aka "Gato," )  
2 JOSUE MARTINEZ, )  
aka "Negro," )  
3 KELVIN MELGAR, )  
aka "Pain," )  
4 FERNANDO MORALES, )  
aka "Clever," )  
5 EDWIN NAVAS, )  
aka "Pedernal," )  
6 RUBEN PINEDA, )  
aka "Salty," )  
7 DAVID RIVERA, )  
aka "Huero," )  
8 ERIC SALAZAR, )  
aka "Tears," )  
9 ALEX SANCHEZ, )  
aka "Rebelde," )  
10 GUILLERMO VASQUEZ-LANDAUER, )  
aka "Jute," and )  
11 MARVIN VASQUEZ, )  
aka "Catracho," )  
12 )  
Defendants. )  
13 )

---

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 The Grand Jury charges:

2 INTRODUCTORY ALLEGATIONS

3 A. THE RACKETEERING ENTERPRISE

4 At all times relevant to this Indictment:

5 1. Defendants JOSE ALFARO, also known as ("aka") "Shyboy"  
6 ("ALFARO"), EDWIN ARIAS, aka "Enano" ("ARIAS"), HUGO BOLANOS,  
7 aka "Crimen" ("BOLANOS"), JUAN CENDEJAS, aka "Morro"  
8 ("CENDEJAS"), CARLOS CUENTAS, aka "Snoopy" ("CUENTAS"), YANIRA  
9 ESCALANTE, aka "Flaca" ("ESCALANTE"), JUAN FUENTES, aka "Skinny"  
10 ("FUENTES"), BRIAN GIRON, aka "Creeper," aka "Grinch" ("GIRON"),  
11 JOSE GONZALEZ, aka "Puppet" ("GONZALEZ"), PAUL CORTEZ JOVEL, aka  
12 "Little Man," aka "Oscar Chacon" ("JOVEL"), LUIS LAZO, aka  
13 "Chico" ("LAZO"), OSCAR LINARES, aka "Huevo" ("LINARES"), PEDRO  
14 LOPEZ, aka "Grumpy" ("LOPEZ"), JUAN MANCILLA, aka "Gato"  
15 ("MANCILLA"), JOSUE MARTINEZ, aka "Negro" ("MARTINEZ"), KELVIN  
16 MELGAR, aka "Pain" ("MELGAR"), FERNANDO MORALES, aka "Clever"  
17 ("MORALES"), EDWIN NAVAS, aka "Pedernal" ("NAVAS"), RUBEN  
18 PINEDA, aka "Salty" ("PINEDA"), DAVID RIVERA, aka "Huero"  
19 ("RIVERA"), ERIC SALAZAR, aka "Tears" ("SALAZAR"), ALEX SANCHEZ,  
20 aka "Rebelde" ("SANCHEZ"), GUILLERMO VASQUEZ-LANDAVER, aka  
21 "Jute" ("VASQUEZ-LANDAVER"), and MARVIN VASQUEZ, aka "Catracho"  
22 ("VASQUEZ"), and others known and unknown to the Grand Jury,  
23 were members and associates of Mara Salvatrucha, otherwise known  
24 as MS-13 (hereinafter referred to as "MS-13"), a criminal  
25 organization whose members and associates engaged in numerous  
26 acts of violence and other crimes, including murder, conspiracy  
27 to commit murder, narcotics trafficking, extortion, robbery,  
28 assault, obstruction of justice, and witness tampering.

1           2.    MS-13, including its leadership, membership, and  
2 associates, constitutes an "enterprise," as defined in Title 18,  
3 United States Code, Section 1961(4), that is, a group of  
4 individuals associated in fact, although not a legal entity,  
5 which is engaged in, and the activities of which affect,  
6 interstate and foreign commerce.

7           3.    MS-13 operates in the Central District of California,  
8 and elsewhere within and outside of the United States, and  
9 constitutes an ongoing organization whose members function as a  
10 continuing unit for a common purpose of achieving the objectives  
11 of the enterprise.

12           4.    Defendants ALFARO, ARIAS, BOLANOS, CENDEJAS, CUENTAS,  
13 ESCALANTE, FUENTES, GIRON, GONZALEZ, JOVEL, LAZO, LOPEZ,  
14 LINARES, MANCILLA, MARTINEZ, MELGAR, MORALES, NAVAS, PINEDA,  
15 RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAUER, and VASQUEZ, and  
16 others known and unknown to the Grand Jury, participated in the  
17 operation, organization, and leadership of MS-13.

18    B.    GENERAL BACKGROUND

19           At all times relevant to this Indictment:

20           5.    MS-13 was formed in Los Angeles, California, in the  
21 mid-1980s by immigrants fleeing the civil war in El Salvador.  
22 The term "Mara" originally referred to a vicious South American  
23 ant that attacks in swarms, but evolved over time into a general  
24 Spanish slang term for "gang." The term "Salvatrucha" combines  
25 two phrases. "Salva" refers both to the nation of El Salvador  
26 and to the gang's self-perceived role as the savior of the El  
27 Salvadoran people in Los Angeles. The term "trucha," meaning  
28 "look out," or "heads up," was adopted by MS-13 from other

1 Hispanic gangs in Los Angeles, whose members often shouted  
2 "trucha" as a way to alert each other to the presence of the  
3 police. The number "13," which stands for the letter "M," the  
4 13th letter of the alphabet, was added to the gang's name in the  
5 mid-1990s, when MS-13 became associated with the Mexican Mafia.  
6 The Mexican Mafia, commonly referred to as "la EME" (which  
7 translates in English as "the M"), is a criminal organization  
8 that operates within the prison system and exercises control  
9 over the Hispanic street gangs of Southern California.

10 6. Over the years, as members of MS-13 were deported to  
11 El Salvador or traveled to other locations in the United States  
12 and abroad, MS-13 spread. MS-13 operates as a national and  
13 international criminal organization, with tens of thousands of  
14 members regularly conducting gang activities in at least ten  
15 states and Washington, D.C., and with thousands more in Central  
16 America and Mexico. MS-13 is considered one of the largest and  
17 most violent gangs in the world.

18 7. MS-13 operates through subsets known as "cliques,"  
19 which are usually named for a street within a clique's territory  
20 or for the neighborhood in which the clique operates. Each  
21 clique has one or more leaders, commonly referred to as "shot  
22 callers," who are responsible for, among other things, managing  
23 the narcotics operation in the clique's territory, collecting  
24 extortion payments, directing the day-to-day management of the  
25 clique, enforcing MS-13's rules, and resolving intra-clique  
26 disputes. Shot callers are also responsible for meeting with  
27 other clique leaders in order to achieve their common criminal  
28 purposes and to resolve disputes between cliques.

1           8.     In Los Angeles, many, though not all, MS-13 cliques  
2 operate within an area bounded by Sunset Boulevard to the north,  
3 Alvarado Street to the east, Olympic Boulevard to the south, and  
4 Gower Street to the west. MS-13 also maintains cliques in other  
5 parts of Los Angeles County.

6           9.     A clique adds new members through an initiation ritual  
7 known as being "jumped in," during which several existing gang  
8 members beat up a prospective member for thirteen seconds. Once  
9 "jumped in," a gang member is expected to participate fully in  
10 MS-13's criminal activity.

11          10.    MS-13 enforces its rules and promotes discipline among  
12 its members and associates by imposing monetary fines and by  
13 threatening and committing acts of violence against those  
14 members and associates of the organization who violate the rules  
15 of or pose a threat to the enterprise. MS-13 members also  
16 engage in acts of violence against innocent citizens in the  
17 gang's territory and against rival gang members who venture into  
18 its territory. Participation in violent acts directed by the  
19 gang leadership or in the presence of other gang members  
20 particularly increases the respect accorded that member and  
21 results in that member maintaining or increasing his position in  
22 MS-13. In addition, violent acts committed by MS-13 members  
23 enhance the gang's overall reputation for violence in the  
24 community, resulting in the intimidation of citizens in MS-13  
25 territory and the reinforcement of the gang's control of those  
26 areas of Los Angeles in which it operates. MS-13 members are  
27 aided in their criminal endeavors by other trusted individuals,  
28 referred to herein as "associates," who participate in the

1 various activities of the cliques and its members.

2 11. Members of MS-13 frequently, though not always,  
3 signified their membership in the gang with tattoos reading  
4 "Mara Salvatrucha," "MS," "MS-13," or other variations of the  
5 gang's name. MS-13 members frequently refer to one another by  
6 gang monikers, or nicknames, and often do not know fellow gang  
7 members' legal names.

8 12. Narcotics sales provide the bulk of MS-13's profits.  
9 In each clique's territory, the narcotics are supplied by a  
10 "mayorista," or wholesaler, and are usually, but not always,  
11 sold on the street by "traqueteros," sellers who are often not  
12 members of MS-13 but who are allowed to sell narcotics within  
13 the clique's territory on the condition that they buy the drugs  
14 they sell exclusively from the clique's mayorista and pay weekly  
15 "rent" to the clique. Non-member associates of MS-13, often  
16 referred to as "workers," are sometimes used to distribute drugs  
17 to the traqueteros and collect rent from them. Clique members  
18 provide protection to the traqueteros from robbers and  
19 competitors. Traqueteros who violate this arrangement are  
20 subject to reprisals, including threatened and actual acts of  
21 violence.

22 13. Profits are also generated from robberies, routine  
23 extortions of legitimate and illegitimate food vendors, and  
24 other business owners operating within MS-13 territory, as well  
25 as from additional miscellaneous crimes committed by MS-13  
26 members. Members are expected to contribute a portion of the  
27 proceeds of their crimes towards the gang. In addition to  
28 generating profits, these crimes of intimidation also further

1 the enterprise by establishing and maintaining MS-13's control  
2 over its territory by instilling fear in the populace.

3 14. In Los Angeles, each clique contributes a portion of  
4 its profits towards a tax paid by MS-13 to the Mexican Mafia.  
5 Like all gangs associated with the Mexican Mafia, MS-13 is  
6 required to pay a specified sum of money on a regular basis to a  
7 member of the Mexican Mafia. Members of the Mexican Mafia are  
8 commonly referred to as "big homies," "tios" (Spanish for  
9 "uncles"), "carnals" (Spanish slang for "brothers"), and/or  
10 "señors" (a Spanish title of respect for a man). In return for  
11 the tax payments, the Mexican Mafia provides protection to all  
12 MS-13 members incarcerated in county, state, and federal prisons  
13 and jails in California. Failure to pay the tax will result in  
14 a "green light" being placed on MS-13, that is, a general order  
15 from the Mexican Mafia to assault or kill any incarcerated MS-13  
16 member in any facility controlled by the Mexican Mafia. Also in  
17 return for these tax payments, the Mexican Mafia ensures that no  
18 other gang operates in MS-13's territory or otherwise interferes  
19 with the criminal activities of MS-13.

20 15. Since the mid-1990s, when MS-13 became associated with  
21 the Mexican Mafia, a single powerful MS-13 member in Los Angeles  
22 has been appointed to act as MS-13's representative to the  
23 Mexican Mafia ("the EME representative"). The EME  
24 representative works as a "soldier" for the Mexican Mafia and is  
25 responsible for, among other things, ensuring that MS-13 pays  
26 its tax; setting policies to manage and discipline MS-13 members  
27 and associates; organizing and conducting meetings among MS-13  
28 shot callers on a regular basis; resolving disputes between MS-



1 13 cliques and members; organizing MS-13 cliques to generate  
2 money through, among other things, narcotics trafficking; and  
3 providing support to, and requesting assistance from, MS-13  
4 leaders in El Salvador.

5 16. In addition to the tax paid to the Mexican Mafia, MS-  
6 13 utilizes the profits obtained through its illegal activities  
7 by sending money to MS-13 members in prison in El Salvador,  
8 purchasing weapons and narcotics, paying attorney's fees for  
9 gang members who have been charged with committing crimes,  
10 contributing to funeral costs for gang members who have been  
11 killed, and putting money on the prison accounts of MS-13  
12 members incarcerated in the United States.

13 C. THE PARTIES

14 At all times relevant to this Indictment:

15 17. Defendants ALFARO, ARIAS, CUENTAS, LOPEZ, and MELGAR  
16 were shot callers of the Hollywood clique of MS-13, and  
17 defendants GIRON, MORALES, and SALAZAR were members of the  
18 Hollywood clique of MS-13.

19 18. Defendant BOLANOS was a shot caller of the Adams  
20 clique of MS-13.

21 19. Defendant GONZALEZ was a shot caller of the Leeward  
22 clique of MS-13.

23 20. Defendant JOVEL was a shot caller of the Parkview  
24 clique of MS-13.

25 21. Defendants LAZO and LINARES were shot callers of the  
26 Western clique of MS-13.

27 22. Defendant VASQUEZ-LANDAVER was a member of the Francis  
28 clique of MS-13.

1           23. Defendant MANCILLA was a shot caller of the Southside  
2 clique of MS-13.

3           24. Defendants CENDEJAS, FUENTES, PINEDA, and SANCHEZ were  
4 shot callers of the Normandie clique of MS-13.

5           25. Defendant ESCALANTE was an associate of MS-13 who  
6 acted as a go-between for shot callers of MS-13 and between MS-  
7 13 members on the street and those in prison.

8           26. Defendants MARTINEZ, NAVAS, RIVERA, and VASQUEZ were  
9 associates of MS-13.

10 D.   PURPOSES OF THE ENTERPRISE

11           27. The purposes of the enterprise include, but are not  
12 limited to, the following:

13           a.    Enriching the members and associates of the  
14 enterprise through, among other things, the sale and  
15 distribution of narcotics and the collection of rent from  
16 narcotics traffickers and legitimate and illegitimate business  
17 persons operating within its territory;

18           b.    Preserving and protecting the power, territory,  
19 and profits of the enterprise, its members and associates,  
20 through threats of violence and actual acts of violence,  
21 including assault, robbery, and murder;

22           c.    Promoting and enhancing the enterprise and the  
23 activities of its members and associates;

24           d.    Providing assistance and protection to other  
25 members of the enterprise, including by intimidating and  
26 murdering potential witnesses against members of the enterprise.

27 E.   MEANS AND METHODS OF THE ENTERPRISE

28           28. Among the means and methods by which the defendants

1 and other members and associates of the enterprise conduct and  
2 participate in the conduct of the affairs of the enterprise are  
3 the following:

4 a. Members and associates of the enterprise conspire  
5 to commit, commit, and attempt to commit acts of violence,  
6 including murder, to protect and expand the enterprise's  
7 criminal operations;

8 b. Members and associates of the enterprise acquire,  
9 possess, carry, and use deadly weapons, including firearms, in  
10 the course of the enterprise's criminal activities;

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

14 d. Members and associates of the enterprise  
15 participate in narcotics trafficking, including the purchase and  
16 sale of crack cocaine, powder cocaine, crystal methamphetamine,  
17 and marijuana;

18 e. Members and associates of the enterprise use  
19 various techniques to avoid law enforcement scrutiny of the  
20 enterprise's criminal activities and to evade and frustrate law  
21 enforcement, such as the use of coded language to discuss  
22 criminal activities and other counter-surveillance techniques;

23 f. Members and associates of the enterprise  
24 frustrate investigations of their criminal conduct by, among  
25 other things, attempting to destroy evidence and intimidating  
26 witnesses through threats of violence and actual violence,  
27 including assault and murder.

28



1 A. THE PATTERN OF RACKETEERING ACTIVITY

2 31. The pattern of racketeering activity, as defined in  
3 Title 18, United States Code, Sections 1961(1) and 1961(5),  
4 consisted of the following acts:

5 Racketeering Act One:

6 Conspiracy to Possess with Intent to Distribute,  
7 Distribute, and Aid and Abet the Distribution of Narcotics,  
8 and to Commit Extortion

9 32. The defendants named below committed the following  
10 acts, any one of which constitutes the commission of  
11 Racketeering Act One:

12 a. Beginning on a date unknown to the Grand Jury,  
13 but certainly by in or about 1995, and continuing until in or  
14 about May 2009, in Los Angeles County, within the Central  
15 District of California, and elsewhere, defendants ALFARO, ARIAS,  
16 BOLANOS, CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ,  
17 JOVEL, LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR,  
18 MORALES, NAVAS, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-  
19 LANDAVER, and VASQUEZ, and others known and unknown to the Grand  
20 Jury, conspired and agreed with each other to knowingly and  
21 intentionally commit the following offenses:

22 1. To possess with intent to distribute, and  
23 distribute, and aid and abet the distribution of a controlled  
24 substance, namely, at least 50 grams of a mixture or substance  
25 containing a detectable amount of cocaine base in the form of  
26 crack cocaine, in violation of Title 21, United States Code,  
27 Sections 841(a)(1), 841(b)(1)(A)(iii), and 846.

28 2. To possess with intent to distribute, and

1 distribute, and aid and abet the distribution of a controlled  
2 substance, namely, at least 1000 kilograms of a mixture or  
3 substance containing a detectable amount of marijuana, in  
4 violation of Title 21, United States Code, Sections 841(a)(1),  
5 841(b)(1)(A)(vii), and 846.

6           3. To possess with the intent to distribute,  
7 and distribute, and aid and abet the distribution of a  
8 controlled substance, namely, at least 500 grams of a mixture or  
9 substance containing a detectable amount of methamphetamine, in  
10 violation of Title 21, United States Code, Sections 841(a)(1),  
11 841(b)(1)(A)(viii), and 846.

12           4. To possess with intent to distribute, and  
13 distribute, and aid and abet the distribution of a controlled  
14 substance, namely, at least five kilograms of a mixture or  
15 substance containing a detectable amount of cocaine, in  
16 violation of Title 21, United States Code, Sections 841(a)(1),  
17 841(b)(1)(A)(ii), and 846.

18           b. Beginning on a date unknown to the Grand Jury,  
19 but certainly by in or about 1995, and continuing until in or  
20 about May 2009, in Los Angeles County, within the Central  
21 District of California, and elsewhere, defendants ALFARO, ARIAS,  
22 BOLANOS, CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ,  
23 JOVEL, LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR,  
24 MORALES, NAVAS, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-  
25 LANDAVER, and VASQUEZ, and others known and unknown to the Grand  
26 Jury, conspired and agreed with each other to commit extortion,  
27 in that defendants conspired to obtain money and other property  
28 from traqueteros operating in MS-13 territory by the wrongful

1 use of force and fear, in violation of California Penal Code  
2 Sections 182, 518, 519, and 520.

3 **Racketeering Act Two:**

4 **Conspiracy to Commit Extortion**

5 33. Beginning on a date unknown to the Grand Jury, but  
6 certainly by in or about 1995, and continuing until in or about  
7 May 2009, in Los Angeles County, within the Central District of  
8 California, and elsewhere, defendants ALFARO, ARIAS, BOLANOS,  
9 CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ, JOVEL,  
10 LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR, MORALES,  
11 NAVAS, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAVER, and  
12 VASQUEZ, and others known and unknown to the Grand Jury,  
13 knowingly conspired and agreed with each other to commit  
14 extortion, in that defendants conspired to obtain money and  
15 other property from persons other than those named in Paragraph  
16 32(b), namely, all legitimate and semi-legitimate business  
17 persons operating in MS-13 territory, by the wrongful use of  
18 force and fear, in violation of California Penal Code Sections  
19 182, 518, 519, and 520.

20 **Racketeering Act Three:**

21 **Robbery of G.B.**

22 34. On or about January 7, 2001, in Los Angeles County,  
23 within the Central District of California, defendant LAZO, and  
24 others known and unknown to the Grand Jury, feloniously took  
25 personal property in the possession of another from his person  
26 and immediate presence, and against his will, by means of force  
27 and fear, namely, LAZO and others known and unknown to the Grand  
28 Jury struck victim G.B. and ripped a gold necklace from G.B.'s

1 neck in the vicinity of Occidental Boulevard and Hoover Street  
2 in Los Angeles, California, in violation of California Penal  
3 Code Section 211.

4 **Racketeering Act Four:**

5 **Conspiracy to Murder and Murder of Jose Ayala, aka "Loco"**

6 35. The defendant named below committed the following acts  
7 involving murder, either one of which constitutes the commission  
8 of Racketeering Act Four:

9 a. Conspiracy to Murder Jose Ayala, aka "Loco"

10 In or about March 2001, in Los Angeles County, within the  
11 Central District of California, defendant LAZO, and others known  
12 and unknown to the Grand Jury, unlawfully and knowingly  
13 combined, conspired, confederated, and agreed together and with  
14 each other to kill with malice aforethought Jose Ayala, aka  
15 "Loco," and a conspirator committed an overt act in furtherance  
16 of the conspiracy, in violation of California Penal Code  
17 Sections 182 and 187.

18 b. Murder of Jose Ayala, aka "Loco"

19 On or about March 17, 2001, in Los Angeles County, within  
20 the Central District of California, defendant LAZO, and others  
21 known and unknown to the Grand Jury, unlawfully, willfully,  
22 deliberately, and knowingly killed with premeditation and malice  
23 aforethought, and aided, abetted, advised, encouraged, and  
24 otherwise willfully participated in the killing with malice  
25 aforethought of Jose Ayala, aka "Loco," in violation of  
26 California Penal Code Sections 31, 187, and 189.



1           **Racketeering Act Five:**

2           **Witness Intimidation of G.A.**

3           36. On or about April 4, 2001, in Los Angeles County,  
4 within the Central District of California, defendant RIVERA, and  
5 others known and unknown to the Grand Jury, knowingly  
6 intimidated and threatened to use physical force against victim  
7 G.A., by pointing a handgun at G.A.'s forehead and threatening  
8 to kill G.A., with the intent to influence, delay, and prevent  
9 G.A.'s testimony in the prosecution of the murder of Reny Lara,  
10 aka "Triste," in violation of Title 18, United States Code,  
11 Section 1512(a)(2).

12           **Racketeering Act Six:**

13           **Conspiracy to Murder G.G. and A.G.**

14           37. From in or about May 2001, through in or about October  
15 2002, in Los Angeles County, within the Central District of  
16 California, defendants MANCILLA and ARIAS, and others known and  
17 unknown to the Grand Jury, unlawfully and knowingly combined,  
18 conspired, confederated, and agreed together and with each other  
19 to kill with malice aforethought victims G.G. and A.G., and a  
20 conspirator committed an overt act in furtherance of the  
21 conspiracy, in violation of California Penal Code Sections 182  
22 and 187.

23           **Racketeering Act Seven:**

24           **Conspiracy to Murder and Murder of Aileen Alvarez, aka**  
25           **"Nena"**

26           38. The defendant named below committed the following acts  
27 involving murder, either one of which constitutes the commission  
28 of Racketeering Act Seven:

1 a. Conspiracy to Murder Aileen Alvarez, aka "Nena"

2 From in or about January 2002 through in or about August  
3 2002, in Los Angeles County, within the Central District of  
4 California, defendant ARIAS, and others known and unknown to the  
5 Grand Jury, unlawfully and knowingly combined, conspired,  
6 confederated, and agreed together and with each other to kill  
7 with malice aforethought Aileen Alvarez, aka "Nena," and a  
8 conspirator committed an overt act in furtherance of the  
9 conspiracy, in violation of California Penal Code Sections 182  
10 and 187.

11 b. Murder of Aileen Alvarez, aka "Nena"

12 On or about August 19, 2002, in Los Angeles County, within  
13 the Central District of California, defendant ARIAS, and others  
14 known and unknown to the Grand Jury, unlawfully, willfully,  
15 deliberately, and knowingly killed with premeditation and malice  
16 aforethought, and aided, abetted, advised, encouraged, and  
17 otherwise willfully participated in the killing with malice  
18 aforethought of Aileen Alvarez, aka "Nena," in violation of  
19 California Penal Code Sections 31, 187, and 189.

20 **Racketeering Act Eight:**

21 **Conspiracy to Murder Erick Flores, aka "Moreno" and Ileana**  
22 **Lara, aka "Mousey," and Murder of Erick Flores, aka**  
23 **"Moreno"**

24 39. The defendants named below committed the following  
25 acts involving murder, either one of which constitutes the  
26 commission of Racketeering Act Eight:

1 a. Conspiracy to Murder Erick Flores, aka "Moreno,"  
2 and Ileana Lara, aka "Mousey"

3 From in or about the fall of 2002 through on or about  
4 January 22, 2003, in Los Angeles County, within the Central  
5 District of California, defendants MARTINEZ, VASQUEZ-LANDAVER,  
6 and VASQUEZ, and others known and unknown to the Grand Jury,  
7 unlawfully and knowingly combined, conspired, confederated, and  
8 agreed together and with each other to kill with malice  
9 aforethought Erick Flores, aka "Moreno," and Ileana Lara, aka  
10 "Mousey," and a conspirator committed an overt act in  
11 furtherance of the conspiracy, in violation of California Penal  
12 Code Sections 182 and 187.

13 b. Murder of Erick Flores, aka "Moreno"

14 On or about January 22, 2003, in Los Angeles County, within  
15 the Central District of California, defendants MARTINEZ,  
16 VASQUEZ-LANDAVER, and VASQUEZ, and others known and unknown to  
17 the Grand Jury, unlawfully, willfully, deliberately, and  
18 knowingly killed with premeditation and malice aforethought, and  
19 aided, abetted, advised, encouraged, and otherwise willfully  
20 participated in the killing with malice aforethought of Erick  
21 Flores, aka "Moreno," in violation of California Penal Code  
22 Sections 31, 187, and 189.

23 **Racketeering Act Nine:**

24 **Murder of Ileana Lara, aka "Mousey"**

25 40. On or about January 22, 2003, in Los Angeles County,  
26 within the Central District of California, defendants MARTINEZ,  
27 VASQUEZ-LANDAVER, and VASQUEZ, and others known and unknown to  
28 the Grand Jury, unlawfully, willfully, deliberately, and

1 knowingly killed with premeditation and malice aforethought, and  
2 aided, abetted, advised, encouraged, and otherwise willfully  
3 participated in the killing with malice aforethought of Ileana  
4 Lara, aka "Mousey," in violation of California Penal Code  
5 Sections 31, 187, and 189.

6 **Racketeering Act Ten:**

7 **Attempted Robbery of Vanessa Jewelry Store**

8 41. On or about March 10, 2003, in Los Angeles County,  
9 within the Central District of California, defendant VASQUEZ-  
10 LANDAVER, and others known and unknown to the Grand Jury,  
11 obstructed, delayed, and affected commerce and the movement of  
12 articles and commodities in commerce, and attempted and  
13 conspired so to do, in that VASQUEZ-LANDAVER and others known  
14 and unknown unlawfully attempted to take and obtain at gunpoint  
15 personal property consisting of jewelry from victim J.R.,  
16 against J.R.'s will by means of actual and threatened force,  
17 violence, and fear of injury, immediate and future, to J.R.'s  
18 person and property, at the Vanessa Jewelry Store, located on  
19 West 3rd Street in Los Angeles, California, in violation of  
20 California Penal Code Section 211.

21 **Racketeering Act Eleven:**

22 **Robbery of A.H.**

23 42. On or about May 16, 2003, in Los Angeles County,  
24 within the Central District of California, defendant CUENTAS,  
25 and others known and unknown to the Grand Jury, feloniously took  
26 personal property in the possession of another from his person  
27 and immediate presence, and against his will, by means of force  
28 and fear, namely, CUENTAS and others known and unknown robbed

1 victim A.H. of cash and his cellphone at gunpoint in the  
2 vicinity of Western Avenue and Santa Monica Boulevard, in Los  
3 Angeles, California, in violation of California Penal Code  
4 Section 211.

5 **Racketeering Act Twelve:**

6 **Conspiracy to Murder and Murder of Tomas Caballero**

7 43. The defendants named below committed the following  
8 acts involving murder, either one of which constitutes the  
9 commission of Racketeering Act Twelve:

10 a. Conspiracy to Murder Tomas Caballero

11 In or about September 2003, in Los Angeles County, within  
12 the Central District of California, defendants BOLANOS and  
13 NAVAS, and others known and unknown to the Grand Jury,  
14 unlawfully and knowingly combined, conspired, confederated, and  
15 agreed together and with each other to kill with malice  
16 aforethought Tomas Caballero, and a conspirator committed an  
17 overt act in furtherance of the conspiracy, in violation of  
18 California Penal Code Sections 182 and 187.

19 b. Murder of Tomas Caballero

20 On or about September 1, 2003, in Los Angeles County,  
21 within the Central District of California, defendants BOLANOS  
22 and NAVAS, and others known and unknown to the Grand Jury,  
23 unlawfully, willfully, deliberately, and knowingly killed with  
24 premeditation and malice aforethought, and aided, abetted,  
25 advised, encouraged, and otherwise willfully participated in the  
26 killing with malice aforethought of Tomas Caballero, in  
27 violation of California Penal Code Sections 31, 187, and 189.

28

1           **Racketeering Act Thirteen:**

2           **Robbery of C.B.**

3           44. On or about January 16, 2005, in Los Angeles County,  
4 within the Central District of California, defendant SALAZAR,  
5 and others known and unknown to the Grand Jury, feloniously took  
6 personal property in the possession of another from his person  
7 and immediate presence, and against his will, by means of force  
8 and fear, namely, defendant SALAZAR and others known and unknown  
9 robbed victim C.B. of cash and a necklace at knifepoint in the  
10 vicinity of St. Andrews Place and Santa Monica Boulevard, in Los  
11 Angeles, California, in violation of California Penal Code  
12 Section 211.

13           **Racketeering Act Fourteen:**

14           **Murder of Lionel Guajardo**

15           45. On or about March 13, 2006, in Los Angeles County,  
16 within the Central District of California, defendant LOPEZ, and  
17 others known and unknown to the Grand Jury, unlawfully,  
18 willfully, deliberately, and knowingly killed with premeditation  
19 and malice aforethought, and aided, abetted, advised,  
20 encouraged, and otherwise willfully participated in the killing  
21 with malice aforethought of Lionel Guajardo, in violation of  
22 California Penal Code Sections 31, 187, and 189.

23           **Racketeering Act Fifteen:**

24           **Conspiracy to Murder Walter Lacinos, aka "Cameron"**

25           46. From in or about January 2006 through in or about May  
26 2006, in Los Angeles County, within the Central District of  
27 California, and elsewhere, defendants CENDEJAS, FUENTES, PINEDA,  
28 and SANCHEZ, and others known and unknown to the Grand Jury,

1 unlawfully and knowingly combined, conspired, confederated, and  
2 agreed together and with each other to kill with malice  
3 aforethought, Walter Lacinos, aka "Cameron," and a conspirator  
4 committed an overt act in furtherance of the conspiracy, in  
5 violation of California Penal Code Sections 182 and 187.

6 **Racketeering Act Sixteen:**

7 **Robbery of M.R.**

8 47. On or about September 26, 2006, in Los Angeles County,  
9 within the Central District of California, defendant FUENTES,  
10 and others known and unknown to the Grand Jury, feloniously took  
11 personal property in the possession of another from his person  
12 and immediate presence, and against his will, by means of force  
13 and fear, namely, FUENTES and others known and unknown robbed  
14 M.R. of approximately \$6,000 at gunpoint in a parking lot in the  
15 vicinity of Olympic Boulevard and South Hope Street, in Los  
16 Angeles, California, in violation of California Penal Code  
17 Section 211.

18 **Racketeering Act Seventeen:**

19 **Conspiracy to Murder and Murder of Jorge Bernal, aka**  
20 **"Travieso"**

21 48. The defendants named below committed the following  
22 acts involving murder, either one of which constitutes the  
23 commission of Racketeering Act Seventeen:

24 a. Conspiracy to Murder Jorge Bernal, aka "Travieso"

25 In or about October 2006, in Los Angeles County, within the  
26 Central District of California, defendants GIRON and JOVEL, and  
27 others known and unknown to the Grand Jury, unlawfully and  
28 knowingly combined, conspired, confederated, and agreed together

1 and with each other to kill with malice aforethought Jorge  
2 Bernal, aka "Travieso," and a conspirator committed an overt act  
3 in furtherance of the conspiracy, in violation of California  
4 Penal Code Sections 182 and 187.

5 b. Murder of Jorge Bernal, aka "Travieso"

6 On or about October 28, 2006, in Los Angeles County, within  
7 the Central District of California, defendants GIRON and JOVEL,  
8 and others known and unknown to the Grand Jury, unlawfully,  
9 willfully, deliberately, and knowingly killed with premeditation  
10 and malice aforethought, and aided, abetted, advised,  
11 encouraged, and otherwise willfully participated in the killing  
12 with malice aforethought of Jorge Bernal, aka "Travieso," in  
13 violation of California Penal Code Sections 31, 187, and 189.

14 **Racketeering Act Eighteen:**

15 **Conspiracy to Murder Detective Frank Flores**

16 49. From on or about December 21, 2006, through in or  
17 about January 2007, in Los Angeles County, within the Central  
18 District of California, defendants CUENTAS, LOPEZ, MELGAR,  
19 MORALES, and SALAZAR, and others known and unknown to the Grand  
20 Jury, unlawfully and knowingly combined, conspired,  
21 confederated, and agreed together and with each other to kill  
22 with malice aforethought Los Angeles Police Department Detective  
23 Frank Flores, and a conspirator committed an overt act in  
24 furtherance of the conspiracy, in violation of California Penal  
25 Code Sections 182 and 187.

26 B. OVERT ACTS

27 50. In furtherance of the conspiracy, and to accomplish  
28 the objects of the conspiracy, defendants ALFARO, ARIAS,



1 BOLANOS, CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ,  
2 JOVEL, LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR,  
3 MORALES, NAVAS, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-  
4 LANDAVER, and VASQUEZ, and others known and unknown to the Grand  
5 Jury, committed various overt acts, on or about the following  
6 times and dates, within the Central District of California, and  
7 elsewhere, including, but not limited to, the following:

8 (1) On or about August 8, 1995, defendant MELGAR  
9 and approximately five other members of MS-13 assaulted and  
10 attempted to rob a man in the vicinity of 5136 Marathon Street  
11 in Los Angeles.

12 (2) On or about January 7, 1995, defendant CENDEJAS  
13 sold crack cocaine to an undercover police officer in the  
14 vicinity of 11th Street and Mariposa Avenue in Los Angeles.

15 (3) On or about October 28, 1995, defendant PINEDA  
16 attempted to dispose of a loaded 9 mm handgun while being chased  
17 by police in the vicinity of 8th Street and Mariposa Avenue in  
18 Los Angeles.

19 (4) On or about March 14, 1996, defendant CENDEJAS  
20 possessed three loaded handguns in an apartment located at 861  
21 S. Fedora Street in Los Angeles.

22 (5) On or about November 11, 1997, defendant RIVERA  
23 sold crack cocaine in the vicinity of 531 S. Rampart Boulevard  
24 in Los Angeles.

25 (6) On or about April 20, 1998, defendant PINEDA sold  
26 \$2,400 worth of crack cocaine to an LAPD confidential informant  
27 in the vicinity of Geneva Street and Westmoreland Avenue in Los  
28 Angeles.

1 (7) On or about June 18, 1998, defendant RIVERA  
2 attempted to dispose of a film canister containing approximately  
3 40 rocks of crack cocaine when stopped by police officers in the  
4 vicinity of 345 S. Rampart Boulevard in Los Angeles.

5 (8) On or about November 17, 1998, defendant CUENTAS  
6 resisted arrest and threatened police officers in the vicinity  
7 of 5522 W. Sierra Vista Avenue in Los Angeles.

8 (9) On or about March 2, 1999, defendant RIVERA  
9 trespassed for the purpose of selling narcotics at 434 S.  
10 Rampart Boulevard in Los Angeles.

11 (10) On or about May 3, 1999, defendant RIVERA sold  
12 crack cocaine in the vicinity of 400 S. Rampart Boulevard in Los  
13 Angeles.

14 (11) On or about August 23, 2000, defendant LAZO and two  
15 other MS-13 members possessed 15 rocks of crack cocaine in their  
16 car.

17 (12) On or about December 27, 2000, defendant LAZO spray  
18 painted MS-13 graffiti on a store in the vicinity of 8th Street  
19 and Normandie Avenue in Los Angeles.

20 (13) On or about January 7, 2001, defendant LAZO and  
21 other MS-13 members assaulted G.B. and ripped a gold chain from  
22 G.B.'s throat in the vicinity of Occidental Boulevard and Hoover  
23 Street in Los Angeles.

24 (14) On or about January 24, 2001, defendant ALFARO  
25 possessed cocaine in the vicinity of 1006 Mariposa Avenue while  
26 in the company of approximately seven other MS-13 members.

27 (15) On or about April 9, 2001, defendant RIVERA  
28 threatened at gunpoint to kill G.A. if she testified about her

1 knowledge of the murder of Reny Lara, aka "Triste."

2 (16) On or about March 17, 2001, defendant LAZO, and  
3 other members of MS-13, shot and killed Jose Ayala, aka "Loco,"  
4 in a van on Santa Inez Street in Los Angeles.

5 (17) On or about March 17, 2001, defendant LAZO and  
6 other MS-13 members burned the van in which Jose Ayala, aka  
7 "Loco," was killed in an attempt to destroy evidence of his  
8 murder.

9 (18) On or about May 26, 2001, defendants ALFARO and  
10 CUENTAS trespassed at 1006 N. Mariposa Avenue in Los Angeles in  
11 the company of approximately 40 other members of MS-13.

12 (19) On or about June 21, 2001, defendant LAZO resisted  
13 arrest, struck a police officer, and attempted to flee on foot  
14 in the vicinity of Lexington and Van Ness Avenues in Los  
15 Angeles.

16 (20) On or about August 16, 2001, defendant BOLANOS  
17 escaped from Quezaltepeque prison in San Salvador, El Salvador.

18 (21) On or about November 30, 2001, defendant FUENTES  
19 picked up another MS-13 member who had been observed by police  
20 selling crack cocaine in the vicinity of 6th Street and  
21 Normandie Avenue in Los Angeles.

22 (22) On or about November 30, 2001, defendant FUENTES  
23 possessed crack cocaine in his vehicle in the vicinity of 6th  
24 Street and Normandie Avenue in Los Angeles.

25 (23) On or about December 22, 2001, defendant CUENTAS  
26 assaulted a citizen in the vicinity of Santa Monica Boulevard  
27 and Western Avenue in Los Angeles.

28 (24) On or about January 10, 2002, defendant CUENTAS and

1 other MS-13 members loitered, intimidated customers, and  
2 prevented customers from entering a Subway sandwich shop located  
3 at 1075 N. Western Avenue in Los Angeles.

4 (25) In or about March 2002, defendants ARIAS and  
5 MANCILLA, and other members of MS-13, met at the El Cafetal  
6 restaurant on Santa Monica Boulevard in Los Angeles to conspire  
7 to kill G.A. and A.G. because they believed G.A. and A.G. had  
8 cooperated with the police in a homicide investigation against  
9 MS-13 member Will Rivas, aka "Little Satanas."

10 (26) On or about March 7, 2002, defendant LINARES  
11 loitered with other MS-13 members for the purpose of selling  
12 crack cocaine and marijuana at 511 S. Rampart Boulevard in Los  
13 Angeles.

14 (27) On or about March 16, 2002, defendant FUENTES and  
15 another MS-13 member beat a citizen for refusing to join MS-13.

16 (28) On or about March 27, 2002, defendant FUENTES and  
17 another MS-13 member threatened two citizens at gunpoint at 3318  
18 W. 8th Street in Los Angeles.

19 (29) On or about April 4, 2002, defendant FUENTES  
20 possessed in his vehicle a loaded stolen 9 mm handgun.

21 (30) On or about May 11, 2002, defendants ALFARO and  
22 CUENTAS, and other MS-13 members, congregated at the  
23 intersection of Santa Monica Boulevard and Western Avenue in Los  
24 Angeles in violation of a gang injunction against MS-13.

25 (31) On or about July 4, 2002, defendant ALFARO and two  
26 other MS-13 members associated with one another and blocked the  
27 free passage of pedestrians at a shopping center located at 1075  
28 N. Western Avenue in Los Angeles, in violation of a gang

1 injunction against MS-13.

2 (32) On or about July 20, 2002, defendant CUENTAS and  
3 other MS-13 members wrote MS-13 graffiti on a telephone booth  
4 and utility box near the intersection of Santa Monica Boulevard  
5 and Western Avenue in Los Angeles.

6 (33) On or about August 2, 2002, defendant FUENTES  
7 offered to sell crack cocaine to an undercover police officer in  
8 the vicinity of 8th Street and Normandie Avenue in Los Angeles.

9 (34) On or about August 19, 2002, defendant ARIAS and  
10 other members of MS-13 shot and killed Aileen Alvarez, aka  
11 "Nena," and dumped her body on Wilshire Boulevard in Los  
12 Angeles.

13 (35) On or about September 23, 2002, defendant ALFARO  
14 negotiated the terms of a crack cocaine sale during a recorded  
15 phone conversation with a confidential informant working on  
16 behalf of the Federal Bureau of Investigation ("FBI").

17 (36) On or about September 26, 2002, defendant ALFARO  
18 sold approximately 27 grams of cocaine to an FBI confidential  
19 informant in the vicinity of Wilton Place and Santa Monica  
20 Boulevard in Los Angeles.

21 (37) On or about October 1, 2002, defendant ALFARO  
22 negotiated the terms of a crack cocaine sale during a recorded  
23 phone conversation with an FBI confidential informant.

24 (38) On or about October 2, 2002, defendant ALFARO sold  
25 approximately 14.4 grams of cocaine to an FBI confidential  
26 informant in the vicinity of Wilton Place and Santa Monica  
27 Boulevard in Los Angeles.

28 (39) On or about October 7, 2002, defendant ALFARO sold

1 approximately 7.1 grams of cocaine base in the form of crack  
2 cocaine to an FBI confidential informant in the vicinity of  
3 Wilton Place and Santa Monica Boulevard in Los Angeles.

4 (40) On or about October 11, 2002, defendant ALFARO sold  
5 approximately 12.3 grams of cocaine and approximately 3.7 grams  
6 of cocaine base in the form of crack cocaine to an FBI  
7 confidential informant in the vicinity of a Burger King  
8 restaurant located at the corner of Western Avenue and Santa  
9 Monica Boulevard in Los Angeles.

10 (41) On or about October 24, 2002, defendant ALFARO sold  
11 approximately 15.1 grams of cocaine and approximately 8.7 grams  
12 of cocaine base in the form of crack cocaine to an FBI  
13 confidential informant in the vicinity of a Burger King  
14 restaurant located at the corner of Western Avenue and Santa  
15 Monica Boulevard in Los Angeles.

16 (42) On or about October 28, 2002, defendant CENDEJAS  
17 discharged a stolen .40 caliber handgun in the vicinity of 501  
18 S. Rampart Boulevard in Los Angeles.

19 (43) On or about December 10, 2002, defendant CUENTAS  
20 possessed a .38 caliber handgun and a .380 caliber handgun in  
21 his residence located on Sierra Vista Avenue in Los Angeles.

22 (44) In or about December 2002, defendants MARTINEZ,  
23 VASQUEZ-LANDAVER, and VASQUEZ, and other MS-13 members,  
24 conspired to kill Erick Flores, aka "Moreno," and Ileana Lara,  
25 aka "Mousey," for violating MS-13 rules regarding the operation  
26 of the gang's narcotics business.

27 (45) On or about January 22, 2003, defendants MARTINEZ,  
28 VASQUEZ-LANDAVER, and VASQUEZ, and another MS-13 member, shot

1 and killed Erick Flores, aka "Moreno," and Ileana Lara, aka  
2 "Mousey," inside a parked car near the intersection of 54th  
3 Street and McKinley Avenue in Los Angeles.

4 (46) On or about February 13, 2003, defendant VASQUEZ-  
5 LANDAVER and another MS-13 member possessed a .45 caliber  
6 handgun in a vehicle in the vicinity of 6th Street and Rampart  
7 Boulevard in Los Angeles.

8 (47) On or about March 10, 2003, defendant VASQUEZ-  
9 LANDAVER and two other MS-13 members attempted to rob at  
10 gunpoint employees of a jewelry store located at 3715 W. 3rd  
11 Street in Los Angeles.

12 (48) On or about May 18, 2003, defendant CUENTAS and two  
13 other MS-13 members robbed A.H. at gunpoint and stole his cash  
14 and cellphone in the vicinity of St. Andrews Place and Santa  
15 Monica Boulevard in Los Angeles.

16 (49) On or about May 20, 2003, defendant ALFARO sold  
17 approximately 12.8 grams of cocaine to an FBI confidential  
18 informant in the vicinity of 1021 S. Park View Street in Los  
19 Angeles.

20 (50) On or about July 3, 2003, defendant ESCALANTE  
21 facilitated a three-way call to a shot caller of MS-13.

22 (51) On or about July 18, 2003, defendant CUENTAS  
23 possessed a .357 caliber revolver, bullets, pepper spray,  
24 handcuffs, and a videotape titled "L.A. Mara Salvatrucha" in his  
25 residence located on Sierra Vista Avenue in Los Angeles.

26 (52) On or about August 15, 2003, defendant BOLANOS  
27 offered to sell crack cocaine and marijuana to an undercover  
28 police officer in the vicinity of 501 S. Rampart Boulevard in

1 Los Angeles.

2 (53) On or about August 31, 2003, defendants BOLANOS and  
3 NAVAS, and another MS-13 member, conspired to kill Tomas  
4 Caballero.

5 (54) On or about August 31, 2003, defendants BOLANOS and  
6 NAVAS, and another MS-13 member, attempted to kill Tomas  
7 Caballero by giving him an overdose of drugs.

8 (55) On or about September 1, 2003, defendants BOLANOS  
9 and NAVAS, and another MS-13 member, shot and killed Tomas  
10 Caballero inside BOLANOS's car, and they dumped his body in the  
11 vicinity of the Bridewell Street off-ramp of the 110 freeway in  
12 Los Angeles.

13 (56) On or about October 27, 2003, defendant NAVAS  
14 possessed in his car approximately five kilograms of cocaine  
15 that he was attempting to transport to the East Coast from  
16 California.

17 (57) On or about November 5, 2003, defendant SALAZAR  
18 threatened a plainclothes police officer and possessed on his  
19 person a knife, a screwdriver that had been sharpened into a  
20 shank, a toy gun, and marijuana in the vicinity of Wilton Place  
21 and Virginia Avenue in Los Angeles.

22 (58) On or about November 10, 2003, defendant SALAZAR  
23 and another MS-13 member robbed merchandise from the Santa  
24 Monica Market located on Santa Monica Boulevard in Los Angeles.

25 (59) On or about November 24 and 25, 2003, defendant  
26 BOLANOS discussed a narcotics transaction and MS-13 business in  
27 a series of phone calls with another member of MS-13.

28 (60) On or about November 25, 2003, defendant ESCALANTE



1 warned a member of MS-13 not to come to her residence because  
2 the police were there.

3 (61) On or about December 3, 2003, defendant ESCALANTE  
4 had a phone conversation with a shotcaller of MS-13 during which  
5 she told the shotcaller that she had lied to Los Angeles Police  
6 Department detectives about her relationship with him and  
7 another member of MS-13.

8 (62) On or about December 11, 2003, defendant SALAZAR  
9 and another MS-13 member sold crack cocaine in the vicinity of  
10 822 S. Carondelet Street in Los Angeles.

11 (63) On or about December 12, 2003, a member of the  
12 Mexican Mafia sent a letter from Tehachapi State Prison to  
13 defendant ESCALANTE in Los Angeles to be delivered to a  
14 shotcaller of MS-13.

15 (64) On or about December 20, 2003, defendant MELGAR  
16 possessed in his vehicle approximately 40 rocks of crack cocaine  
17 in the vicinity of 441 S. Rampart Boulevard in Los Angeles.

18 (65) On or about March 20, 2004, defendant MANCILLA  
19 participated in a meeting of approximately twenty MS-13 members  
20 in Orcas Park in Los Angeles.

21 (66) On or about March 30, 2004, defendant MANCILLA sold  
22 approximately 54.5 grams of methamphetamine to an FBI  
23 confidential informant in the parking lot of a grocery store on  
24 Long Beach Boulevard in Lynwood, California.

25 (67) On or about April 12, 2004, defendant GONZALEZ and  
26 two other MS-13 members beat a man and stole his ring in the  
27 parking lot of a nightclub on Hollywood Boulevard in Los  
28 Angeles.

1 (68) On or about April 21, 2004, defendant GONZALEZ sold  
2 approximately 51 grams of methamphetamine to an FBI confidential  
3 informant in the vicinity of 112 S. Occidental Boulevard in Los  
4 Angeles.

5 (69) On or about April 26, 2004, defendant ARIAS shot at  
6 the occupants of a vehicle in the vicinity of Grape Street and  
7 Firestone Boulevard in Los Angeles.

8 (70) On or about May 3, 2004, defendant MANCILLA  
9 sold approximately 113.3 grams of methamphetamine to an FBI  
10 confidential informant at a liquor store near the intersection  
11 of El Segundo Boulevard and Santa Fe Avenue in Lynwood,  
12 California.

13 (71) On or about May 5, 2004, defendant GONZALEZ sold  
14 approximately 100.8 grams of methamphetamine to an FBI  
15 confidential informant in the vicinity of 78th Street and  
16 Figueroa Avenue in Los Angeles.

17 (72) On or about May 11, 2004, defendant BOLANOS  
18 possessed in his vehicle a large brick of marijuana in the  
19 vicinity of 1100 Ardmore Street in Los Angeles.

20 (73) On or about May 11, 2004, defendant BOLANOS  
21 possessed methamphetamine, a gram scale, \$652 in cash, and a gun  
22 magazine in his residence on Ardmore Street in Los Angeles.

23 (74) On or about June 3, 2004, defendant GONZALEZ sold  
24 approximately 134.3 grams of methamphetamine to an FBI  
25 confidential informant in the vicinity of 76th Street and  
26 Broadway Avenue in Los Angeles.

27 (75) On or about June 16, 2004, defendant ALFARO sold  
28 approximately 42.4 grams of cocaine base in the form of crack

1 cocaine to an FBI confidential informant in an apartment located  
2 at 4649 Beverly Boulevard in Los Angeles.

3 (76) On or about June 17, 2004, defendant GONZALEZ sold  
4 approximately 52.1 grams of methamphetamine to an FBI  
5 confidential informant in the vicinity of 76th Street and  
6 Broadway Avenue in Los Angeles.

7 (77) On or about June 21, 2004, defendant ALFARO sold  
8 approximately 19.4 grams of cocaine base in the form of crack  
9 cocaine to an FBI confidential informant in an apartment located  
10 on Beverly Boulevard in Los Angeles.

11 (78) On or about June 24, 2004, defendant ALFARO sold  
12 approximately 43.8 grams of cocaine base in the form of crack  
13 cocaine to an FBI confidential informant in an apartment located  
14 on Beverly Boulevard in Los Angeles.

15 (79) On or about August 1, 2004, defendant GIRON  
16 possessed on his person a double-edged razor blade for carving  
17 grafitti, while associating with other MS-13 members in the  
18 vicinity of Pico Boulevard and Hauser Street in Los Angeles.

19 (80) On or about August 28, 2004, defendant CENDEJAS  
20 acted as a lookout for other MS-13 members who were selling  
21 crack cocaine in the vicinity of 8th Street and Wilton Place in  
22 Los Angeles.

23 (81) On or about October 11, 2004, defendant MANCILLA  
24 sold approximately 194.8 grams of methamphetamine to an FBI  
25 confidential informant in the parking lot of a store located on  
26 Playa Street in Culver City, California.

27 (82) On or about January 3, 2005, defendant MANCILLA and  
28 two other MS-13 members attempted to hide three loaded handguns

1 from the police by hiding them in and around MANCILLA's  
2 residence and vehicle.

3 (83) On or about January 16, 2005, defendant SALAZAR and  
4 another MS-13 member robbed C.B. of cash and a necklace at  
5 knifepoint in the vicinity of St. Andrews Place and Santa Monica  
6 Boulevard in Los Angeles.

7 (84) On or about February 18, 2005, defendant FUENTES  
8 and another MS-13 member associated with each other in the  
9 vicinity of 8th Street and Vermont Avenue in violation of a gang  
10 injunction against MS-13.

11 (85) On or about May 24, 2005, defendant MORALES  
12 possessed a knife in the vicinity of Virginia Street and Wilton  
13 Place in Los Angeles.

14 (86) On or about May 24, 2005, defendant MORALES painted  
15 MS-13 graffiti on Melrose Avenue in Los Angeles.

16 (87) On or about September 7, 2005, defendant ALFARO  
17 possessed crack cocaine, methamphetamine, heroin, and narcotics  
18 paraphernalia, including a false bottom can, a digital scale,  
19 and rolls of cash, in his residence on Beverly Boulevard in Los  
20 Angeles.

21 (88) On or about September 7, 2005, defendant MANCILLA  
22 possessed phone numbers of other MS-13 members, letters from  
23 other MS-13 members, and an article about the arrest of fourteen  
24 MS-13 members in El Salvador in his residence on Nava Street in  
25 Norwalk, California.

26 (89) On or about January 25, 2006, defendant FUENTES  
27 agreed by telephone to sell approximately one ounce of  
28 methamphetamine to an FBI confidential informant.

1 (90) On or about January 26, 2006, defendant FUENTES  
2 delivered approximately 14.3 grams of methamphetamine to an FBI  
3 confidential informant.

4 (91) On or about January 27, 2006, defendant LOPEZ asked  
5 an FBI confidential informant to drive him to collect an  
6 extortion payment in Culver City on behalf of defendant MELGAR.

7 (92) On or about January 31, 2006, defendant LOPEZ spoke  
8 by telephone with an FBI confidential informant and agreed to  
9 sell three handguns to the informant.

10 (93) On or about February 4, 2006, defendant LOPEZ sold  
11 approximately one-fourth of an ounce of methamphetamine out of  
12 the driveway of a residence on Sierra Vista Avenue in Los  
13 Angeles.

14 (94) On or about February 7, 2006, defendant LOPEZ met  
15 with an FBI confidential informant and discussed selling guns  
16 and methamphetamine to the informant.

17 (95) On or about February 26, 2006, defendants CUENTAS  
18 and LOPEZ discussed putting money on the inmate account of an  
19 incarcerated MS-13 member.

20 (96) On or about March 1, 2006, defendant FUENTES agreed  
21 by telephone to sell approximately two ounces of methamphetamine  
22 to an FBI confidential informant.

23 (97) On or about March 1, 2006, defendant LOPEZ and  
24 other MS-13 members assaulted victims S.S. and W.P. in the  
25 vicinity of N. Mariposa Avenue in Los Angeles.

26 (98) On or about March 2, 2006, defendant FUENTES  
27 directed another MS-13 member to deliver approximately 12.9  
28 grams of methamphetamine to an FBI confidential informant at a

1 residence on Sierra Vista Avenue in Los Angeles.

2 (99) On or about March 13, 2006, defendant LOPEZ and  
3 other MS-13 members shot and killed Lionel Guajardo in the  
4 vicinity of Kingsley Avenue in Los Angeles.

5 (100) On or about March 23, 2006, defendant CUENTAS told  
6 an FBI informant that members of the Hollywood clique of MS-13  
7 were planning a meeting to discuss clique leadership in the wake  
8 of defendant LOPEZ's arrest.

9 (101) On or about March 28, 2006, defendant MORALES sold  
10 a .380 caliber handgun to an FBI confidential informant for \$400  
11 at a residence on Sierra Vista Avenue in Los Angeles.

12 (102) On or about April 4, 2006, defendant CUENTAS sold  
13 a MAK-90 assault rifle to an FBI confidential informant at a  
14 residence on Sierra Vista Avenue in Los Angeles.

15 (103) On or about April 12, 2006, defendants CENDEJAS  
16 and FUENTES sold approximately eighteen grams of cocaine base in  
17 the form of crack cocaine to an FBI confidential informant in  
18 the vicinity of a liquor store located at the corner of 8th  
19 Street and Catalina Street in Los Angeles.

20 (104) On or about April 18, 2006, defendant FUENTES  
21 agreed by phone to sell approximately one ounce of  
22 methamphetamine to an FBI confidential informant.

23 (105) On or about April 18, 2006, defendant FUENTES  
24 delivered approximately 7.9 grams of methamphetamine to an FBI  
25 confidential informant in the vicinity of Catalina Street and  
26 James M. Woods Boulevard in Los Angeles.

27 (106) On or about April 25, 2006, defendant FUENTES  
28 agreed by phone to sell approximately two ounces of

1 methamphetamine to an FBI confidential informant.

2 (107) On or about April 25, 2006, defendant FUENTES  
3 delivered approximately 15.5 grams of methamphetamine to an FBI  
4 confidential informant in the parking lot of a Burger King  
5 restaurant located at the corner of Vermont Avenue and  
6 Washington Boulevard in Los Angeles.

7 (108) On or about May 6 and 7, 2006, defendants  
8 CENDEJAS, FUENTES, PINEDA, and SANCHEZ had a series of phone  
9 conversations with each other and with other members of MS-13,  
10 during which they conspired to kill Walter Lacinos, aka  
11 "Cameron."

12 (109) On or about May 15, 2006, an MS-13 member shot and  
13 killed Walter Lacinos, aka "Cameron," in La Libertad, El  
14 Salvador.

15 (110) On or about May 16, 2006, defendant MELGAR  
16 collected \$1,150 from an FBI confidential informant near the  
17 corner of Melrose Avenue and Vermont Avenue in Los Angeles.

18 (111) On or about May 17, 2006, defendant MELGAR and  
19 another MS-13 member delivered approximately 20 grams of  
20 methamphetamine to an FBI confidential informant near the corner  
21 of Western Avenue and Fernwood Avenue in Los Angeles.

22 (112) On or about May 18, 2006, defendant PINEDA  
23 conducted countersurveillance in the vicinity of Mariposa Avenue  
24 and Olympic Boulevard in Los Angeles in an attempt to identify  
25 police officers who were surveilling a narcotics transaction  
26 being conducted by another MS-13 member.

27 (113) On or about May 23, 2006, defendant CUENTAS put  
28 money obtained from the sale of narcotics on the inmate account

1 of defendant LOPEZ.

2 (114) On or about May 25, 2006, defendant FUENTES  
3 delivered approximately four grams of methamphetamine to an FBI  
4 confidential informant in the parking lot of a grocery store  
5 located at the corner of Vermont and Vernon Avenues in Los  
6 Angeles.

7 (115) On or about May 26, 2006, defendant CENDEJAS had a  
8 series of phone conversations during which he arranged for  
9 another MS-13 member to deliver approximately 39.5 grams of  
10 cocaine base in the form of crack cocaine to an FBI informant in  
11 the vicinity of James M. Woods Boulevard and Kenmore Avenue in  
12 Los Angeles.

13 (116) On or about June 8, 2006, defendant MELGAR and  
14 another MS-13 member collected \$1,725 for narcotics from an FBI  
15 confidential informant at a residence located on Sierra Vista  
16 Avenue in Los Angeles.

17 (117) On or about June 8, 2006, defendant MELGAR and  
18 another MS-13 member delivered approximately 42.1 grams of  
19 methamphetamine to an FBI confidential informant at the corner  
20 of Melrose and Vermont Avenues in Los Angeles.

21 (118) On or about June 11, 2006, defendant MORALES  
22 collected extortion payments from food vendors in the vicinity  
23 of Western Avenue and Santa Monica Boulevard in Los Angeles  
24 while armed with a 9 mm handgun.

25 (119) On or about July 9, 2006, defendants CUENTAS,  
26 MORALES, and SALAZAR, and other MS-13 members, met at the  
27 residence of an FBI confidential informant and discussed the  
28 crisis facing MS-13 members in Central America and the need to



1 generate money for the gang.

2 (120) On or about July 10, 2006, defendant JOVEL sold a  
3 .380 caliber handgun to an FBI confidential informant for \$330  
4 in the vicinity of Harvard and Irolo Streets in Los Angeles.

5 (121) On or about July 31, 2006, defendant MELGAR  
6 received money from defendant CUENTAS to send to another MS-13  
7 member in prison in El Salvador.

8 (122) On or about August 1, 2006, defendant JOVEL and  
9 another MS-13 member provided an FBI confidential informant with  
10 \$4,000 in cash to purchase approximately 114.4 grams of  
11 methamphetamine and instructed the informant to sell the  
12 methamphetamine on the street and return the profits to JOVEL.

13 (123) On or about August 2, 2006, defendant GIRON  
14 offered to sell an FBI confidential informant an assault rifle  
15 for \$150.

16 (124) On or about August 8, 2006, defendant GIRON sold a  
17 .22 caliber assault rifle to an FBI confidential informant for  
18 \$150 at a residence on Sierra Vista Avenue in Los Angeles.

19 (125) On or about August 13, 2006, defendant GIRON and  
20 other MS-13 members brought four firearms, including a MAK-11  
21 assault rifle, to a residence on Sierra Vista Avenue in Los  
22 Angeles.

23 (126) On or about August 20, 2006, defendant ESCALANTE  
24 went to a residence on Sierra Vista Avenue in Los Angeles to  
25 collect a drug debt from defendant CUENTAS that was owed to  
26 defendant MELGAR for an ounce of methamphetamine.

27 (127) On or about August 29, 2006, defendant MELGAR  
28 collected \$2,400 from an FBI confidential informant at a

1 residence on Sierra Vista Avenue in Los Angeles.

2 (128) On or about August 29, 2006, defendants MELGAR and  
3 MORALES delivered approximately 61.5 grams of methamphetamine to  
4 an FBI confidential informant at a residence located on Sierra  
5 Vista Avenue in Los Angeles.

6 (129) On or about September 14, 2006, defendant FUENTES  
7 delivered approximately 2.9 grams of methamphetamine to an FBI  
8 confidential informant in the parking lot of a Burger King  
9 restaurant located at the intersection of Vermont Avenue and  
10 Washington Boulevard in Los Angeles.

11 (130) On or about September 26, 2006, defendant FUENTES  
12 and another MS-13 member robbed M.R. at gunpoint of  
13 approximately \$6,000 in a parking lot M.R. managed on W. Olympic  
14 Boulevard in Los Angeles.

15 (131) On or about October 5, 2006, defendants GIRON and  
16 CUENTAS tried to convince an FBI confidential informant to  
17 intimidate witnesses who planned to testify against members of  
18 the Hollywood clique of MS-13.

19 (132) On or about October 20, 2006, defendant FUENTES  
20 possessed \$12,000 in cash, photos of MS-13 members, and letters  
21 from MS-13 members at his residence on W. 49th Street in Los  
22 Angeles.

23 (133) On or about October 28, 2006, defendants GIRON,  
24 and JOVEL, and other MS-13 members, shot and killed Jorge  
25 Bernal, aka "Travieso," a member of the Toonerville gang, in the  
26 vicinity of Chevy Chase Park in Glendale, California.

27 (134) On or about November 11, 2006, defendant MELGAR  
28 told an FBI confidential informant that he was going to drive to

1 Santa Ana, California, to pick up methamphetamine for defendant  
2 SALAZAR to sell.

3 (135) On or about November 17, 2006, defendant MORALES  
4 hid a gun that had been used by other MS-13 members to kill  
5 Alvaro Rivas in the vicinity of 1026 Ridgewood Place in Los  
6 Angeles.

7 (136) On or about November 30, 2006, defendant MORALES  
8 sold a .38 caliber handgun to an FBI confidential informant for  
9 \$350.

10 (137) On or about December 12, 2006, defendants MELGAR  
11 and MORALES sold approximately 56.5 grams of methamphetamine to  
12 an FBI confidential informant at a residence located at 5511  
13 Sierra Vista Avenue in Los Angeles.

14 (138) On or about December 21, 2006, defendants LOPEZ  
15 and MELGAR had a phone conversation with each other and with  
16 other MS-13 members during which LOPEZ, MELGAR, and others  
17 discussed a plot to kill LAPD Detective Frank Flores.

18 (139) On or about December 23, 2006, defendants LOPEZ  
19 and MELGAR had a phone conversation during which they discussed  
20 a plot to kill LAPD Detective Frank Flores.

21 (140) In or about late December 2006, defendants CUENTAS  
22 and MELGAR ordered another MS-13 member to follow through with  
23 defendant LOPEZ's orders to kill LAPD Detective Frank Flores.

24 (141) In or about late December 2006, defendants MORALES  
25 and SALAZAR showed another MS-13 member a handgun that the MS-13  
26 member was ordered to use to kill LAPD Detective Frank Flores.

27 (142) On or about January 11, 2007, defendant SALAZAR  
28 possessed four bags of methamphetamine and a bag of marijuana in

1 his car in the vicinity of Vine Street and De Longpre Avenue in  
2 Los Angeles.

3 (143) On or about January 20, 2007, defendant MELGAR  
4 agreed to sell an FBI confidential informant approximately four  
5 ounces of methamphetamine on January 24, 2007, in exchange for  
6 \$2,200.

7 (144) On or about January 24, 2007, defendant MELGAR  
8 told an FBI confidential informant that the methamphetamine he  
9 had agreed to sell the informant would arrive in 15-20 minutes  
10 and that the delivery would include an extra package for  
11 defendant MORALES.

12 (145) On or about January 24, 2007, a co-conspirator  
13 working for defendant MELGAR delivered approximately 50.5 grams  
14 of methamphetamine to an FBI confidential informant at a  
15 residence located on Sierra Vista Avenue in Los Angeles.

16 (146) On or about February 2, 2007, defendant ESCALANTE  
17 went to a residence located on Sierra Vista Avenue in Los  
18 Angeles to collect a drug debt on behalf of defendant MELGAR.

19 (147) On or about February 15, 2007, defendant JOVEL  
20 sold approximately 55.3 grams of methamphetamine to an FBI  
21 confidential informant in the vicinity of 5511 Sierra Vista  
22 Avenue in Los Angeles.

23 (148) On or about March 20, 2007, defendant JOVEL sold  
24 approximately 111.9 grams of methamphetamine to an FBI  
25 confidential informant in the parking lot of a McDonald's  
26 restaurant located at the corner of Vermont and Melrose Avenues  
27 in Los Angeles.

28 (149) On or about April 4, 2007, defendant CUENTAS sold

1 approximately 13.7 grams of cocaine to an FBI confidential  
2 informant.

3 (150) On or about May 8, 2007, defendants MORALES and  
4 GIRON associated with each other in the vicinity of Romaine  
5 Street and Western Avenue in Los Angeles, in violation of a gang  
6 injunction against MS-13.

7 (151) On or about May 17, 2007, defendant JOVEL sold  
8 approximately 83.6 grams of methamphetamine to an FBI  
9 confidential informant in the vicinity of Vermont and McKinley  
10 Avenues in Los Angeles.

11 (152) On or about May 24, 2007, defendant JOVEL sold  
12 approximately 53.6 grams of methamphetamine and approximately  
13 27.5 grams of cocaine base in the form of crack cocaine to an  
14 FBI confidential informant in the vicinity of 1208 East 46th  
15 Street in Los Angeles.

16 (153) On or about June 8, 2007, defendant JOVEL sold  
17 approximately 83.9 grams of cocaine base in the form of crack  
18 cocaine to an FBI confidential informant in the vicinity of  
19 Clinton Street and Normandie Avenue in Los Angeles.

20 (154) On or about June 20, 2007, defendants MORALES and  
21 SALAZAR associated with each other in the vicinity of Western  
22 Avenue and Santa Monica Boulevard in Los Angeles, in violation  
23 of a gang injunction against MS-13.

24 (155) On or about June 20, 2007, defendant JOVEL and  
25 another MS-13 member sold approximately 55.1 grams of  
26 methamphetamine to an FBI confidential informant in the vicinity  
27 of 2748 Council Street in Los Angeles.

28 (156) In or about July 2007, defendants MORALES and

1 SALAZAR, and another member of MS-13, threatened a fruit vendor  
2 at gunpoint if the vendor did not pay rent in the vicinity of  
3 St. Andrews Place and Santa Monica Boulevard in Los Angeles.

4 (157) On or about July 10, 2007, defendant CUENTAS sold  
5 approximately 45 grams of cocaine base in the form of crack  
6 cocaine to an FBI confidential informant on Sierra Vista Avenue  
7 in Los Angeles.

8 (158) On or about November 15, 2007, defendant JOVEL  
9 threw methamphetamine and crack cocaine out of a window in an  
10 attempt to dispose of evidence during the execution of a search  
11 warrant at his residence on Alpine Street in Los Angeles.

12 All in violation of Title 18, United States Code, Section  
13 1962(d).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COUNT TWO

[18 U.S.C. § 1959(a)(1)]

51. At all times relevant to this Indictment, MS-13, as more fully described in Paragraphs One through Twenty-Eight of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, 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 was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

52. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, extortion, and robbery in violation of state law; narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846, and acts indictable under Section 1512 (witness intimidation) in violation of Title 18, United States Code.

53. On or about March 17, 2001, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendant LAZO, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and

1 otherwise participated in the killing with malice aforethought  
2 of Jose Ayala, aka "Loco," in violation of California Penal Code  
3 Sections 31 and 187, all in violation of Title 18, United States  
4 Code, Section 1959(a)(1).

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



COUNT THREE

[18 U.S.C. § 1959(a)(1)]

54. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

55. On or about August 19, 2002, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendant ARIAS, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and otherwise participated in the killing with malice aforethought of Aileen Alvarez, aka "Nena," in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT FOUR

[18 U.S.C. § 1959(a)(1)]

56. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

57. On or about January 22, 2003, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants MARTINEZ, VASQUEZ-LANDAVER, and VASQUEZ, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and otherwise participated in the killing with malice aforethought of Erick Flores, aka "Moreno," in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT FIVE

[18 U.S.C. § 1959(a)(1)]

58. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

59. On or about January 22, 2003, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants MARTINEZ, VASQUEZ-LANDAVER, and VASQUEZ, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and otherwise participated in the killing with malice aforethought of Ileana Lara, aka "Mousey," in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT SIX

[18 U.S.C. §§ 1959(a)(3)]

60. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

61. On or about January 16, 2005, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendant SALAZAR, and others known and unknown to the Grand Jury, committed an assault upon the person of another with a deadly weapon or instrument other than a firearm and by any means of force likely to produce great bodily injury, namely, SALAZAR and others known and unknown to the Grand Jury robbed victim C.B. of cash and a necklace at knifepoint in the vicinity of St. Andrews Place and Santa Monica Boulevard in Los Angeles, California, in violation of California Penal Code Section 245(a)(1), in violation of Title 18, United States Code, Sections 1959(a)(3).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COUNT SEVEN

[18 U.S.C. § 1959(a)(1)]

62. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

63. On or about March 13, 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendant LOPEZ, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and otherwise participated in the killing with malice aforethought of Lionel Guajardo, in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT EIGHT

[18 U.S.C. §§ 924(c)(1)(A)(iii), (j)(1)]

64. On or about March 13, 2006, in Los Angeles County, within the Central District of California, defendant PEDRO LOPEZ, aka "Grumpy" ("LOPEZ"), and others known and unknown to the Grand Jury, knowingly used and discharged a firearm, namely, a .380 caliber Lorcin pistol, Model L380, bearing serial number 389008, during and in relation to, and in furtherance of, a crime of violence, namely, the violent crime in aid of racketeering (the murder of Lionel Guajardo), in violation of Title 18, United States Code, Section 1959(a)(1), as charged in Count Seven of this Indictment.

In the commission of this offense, and through the use and discharge of the firearm, defendant LOPEZ, and others known and unknown to the Grand Jury, caused the death of Lionel Guajardo, and his death constituted a murder, as defined in Title 18, United States Code, Section 1111(a), namely, a willful, deliberate, and premeditated killing with malice aforethought.

COUNT NINE

[18 U.S.C. § 1959(a)(5)]

65. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

66. From in or about January 2006, through in or about May 2006, in Los Angeles County, within the Central District of California, and elsewhere, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants CENDEJAS, FUENTES, PINEDA, and SANCHEZ, and others known and unknown to the Grand Jury, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to kill with malice aforethought Walter Lacinis, aka "Cameron," and a conspirator committed an overt act in furtherance of the conspiracy, in violation of California Penal Code Sections 182 and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TEN

[18 U.S.C. §§ 1959(a)(3)]

67. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

68. On or about September 26, 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendant FUENTES, and others known and unknown to the Grand Jury, committed an assault upon the person of another with a deadly weapon or instrument other than a firearm and by any means of force likely to produce great bodily injury, namely, FUENTES and others known and unknown robbed M.R. of approximately \$6,000 at gunpoint in a parking lot in the vicinity of Olympic Boulevard and South Hope Street in Los Angeles, California, in violation of California Penal Code Section 245(a)(1), in violation of Title 18, United States Code, Sections 1959(a)(3).



COUNT ELEVEN

[18 U.S.C. § 1959(a)(5)]

69. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

70. In or about October 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants GIRON and JOVEL, and others known and unknown to the Grand Jury, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to kill with malice aforethought Jorge Bernal, aka "Travieso," and a conspirator committed an overt act in furtherance of the conspiracy, in violation of California Penal Code Sections 182 and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWELVE

[18 U.S.C. § 1959(a)(1)]

71. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

72. On or about October 28, 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants GIRON and JOVEL, and others known and unknown to the Grand Jury, unlawfully and with malice aforethought, aided, abetted, advised, encouraged, and otherwise participated in the killing with malice aforethought of Jorge Bernal, aka "Travieso," in violation of California Penal Code Sections 31 and 187, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT THIRTEEN

[18 U.S.C. §§ 924(c)(1)(A)(iii), (j)(1)]

73. On or about October 28, 2006, in Los Angeles County, within the Central District of California, defendants BRIAN GIRON, aka "Creeper," aka "Grinch" ("GIRON") and PAUL CORTEZ JOVEL, aka "Little Man," aka "Oscar Chacon" ("JOVEL"), and others known and unknown to the Grand Jury, knowingly used and discharged a firearm, namely, a .45 caliber Colt pistol, bearing serial number 261317C, during and in relation to, and in furtherance of, a crime of violence, namely, the violent crime in aid of racketeering (the murder of Jorge Bernal), in violation of Title 18, United States Code, Section 1959(a)(1), as charged in Count Twelve of this Indictment.

In the commission of this offense, and through the use and discharge of the firearm, defendants GIRON and JOVEL, and others known and unknown to the Grand Jury, caused the death of Jorge Bernal, and his death constituted a murder, as defined in Title 18, United States Code, Section 1111(a), namely, a willful, deliberate, and premeditated killing with malice aforethought.

COUNT FOURTEEN

[18 U.S.C. § 922(g)(1)]

74. On or about October 28, 2006, in Los Angeles County, within the Central District of California, defendant PAUL CORTEZ JOVEL, aka "Little Man," aka "Oscar Chacon" ("JOVEL"), knowingly possessed a firearm, namely, a .45 caliber Colt pistol, bearing serial number 261317C, in and affecting interstate and foreign commerce.

Such possession occurred after defendant JOVEL had been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Transportation and Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352, in the Los Angeles Superior Court, Case Number XCNBA06340701, on or about August 20, 1992.

COUNT FIFTEEN

[18 U.S.C. § 1959(a)(5)]

75. Paragraphs 51 and 52 of Count Two are hereby realleged and incorporated by reference as though fully set forth herein.

76. From on or about December 21, 2006, through in or about January 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing their position in MS-13, an enterprise engaged in racketeering activity, defendants CUENTAS, MELGAR, MORALES, and SALAZAR, and others known and unknown to the Grand Jury, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to kill with malice aforethought Los Angeles Police Department Detective Frank Flores, and a conspirator committed an overt act in furtherance of the conspiracy, in violation of California Penal Code Sections 182 and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

1 COUNT SIXTEEN

2 [21 U.S.C. § 846]

3 77. Paragraphs One through Twenty-Eight of the  
4 Introductory Allegations are hereby realleged and incorporated  
5 by reference as though fully set forth herein.

6 A. OBJECTS OF THE CONSPIRACY

7 78. Beginning on a date unknown to the Grand Jury, but  
8 certainly by in or about 1995, and continuing until in or about  
9 May 2009, in Los Angeles County, within the Central District of  
10 California, and elsewhere, defendants ALFARO, ARIAS, BOLANOS,  
11 CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ, JOVEL,  
12 LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR, MORALES,  
13 NAVAS, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAVER, and  
14 VASQUEZ, and others known and unknown to the Grand Jury,  
15 conspired and agreed with each other to knowingly and  
16 intentionally commit the following offenses:

17 a. To possess with intent to distribute, and  
18 distribute, and aid and abet the distribution of a controlled  
19 substance, namely, at least 50 grams of a mixture and substance  
20 containing a detectable amount of cocaine base in the form of  
21 crack cocaine, in violation of Title 21, United States Code,  
22 Sections 841(a)(1), 841(b)(1)(A)(iii), and 846.

23 b. To possess with intent to distribute, and  
24 distribute, and aid and abet the distribution of a controlled  
25 substance, namely, at least 1000 kilograms of a mixture and  
26 substance containing a detectable amount of marijuana, in  
27 violation of Title 21, United States Code, Sections 841(a)(1),  
28 841(b)(1)(A)(vii), and 846.

1 c. To possess with intent to distribute, and  
2 distribute, and aid and abet the distribution of a controlled  
3 substance, namely, at least 500 grams of a mixture and substance  
4 containing a detectable amount of methamphetamine, in violation  
5 of Title 21, United States Code, Sections 841(a)(1),  
6 841(b)(1)(A)(viii), and 846.

7 d. To possess with intent to distribute, and  
8 distribute, and aid and abet the distribution of a controlled  
9 substance, namely, at least five kilograms of a mixture and  
10 substance containing a detectable amount of cocaine, in  
11 violation of Title 21, United States Code, Sections 841(a)(1),  
12 841(b)(1)(A)(ii), and 846.

13 B. MEANS OF THE CONSPIRACY

14 79. The objects of the conspiracy were to be accomplished  
15 in substance as follows:

16 a. Defendants ALFARO, BOLANOS, CENDEJAS, CUENTAS,  
17 FUENTES, GONZALEZ, JOVEL, LOPEZ, MANCILLA, MELGAR, PINEDA,  
18 SANCHEZ, and VASQUEZ, and others known and unknown to the Grand  
19 Jury, would install drug wholesalers, or mayoristas, and street  
20 dealers, or traqueteros, to sell narcotics in MS-13's territory.

21 b. Defendants ALFARO, ARIAS, BOLANOS, CENDEJAS,  
22 CUENTAS, FUENTES, GIRON, GONZALEZ, JOVEL, LAZO, LOPEZ, LINARES,  
23 MANCILLA, MARTINEZ, MELGAR, MORALES, PINEDA, RIVERA, SALAZAR,  
24 SANCHEZ, VASQUEZ-LANDAVER, and VASQUEZ, and others known and  
25 unknown to the Grand Jury, would inform the traqueteros that  
26 they were required to pay rent to MS-13 and to buy their supply  
27 of narcotics from MS-13's preferred mayorista in order to  
28 conduct their narcotics trafficking activities free of

1 interference from MS-13.

2 c. Defendants ALFARO, ARIAS, BOLANOS, CENDEJAS,  
3 CUENTAS, FUENTES, GIRON, GONZALEZ, JOVEL, LAZO, LOPEZ, LINARES,  
4 MANCILLA, MARTINEZ, MELGAR, MORALES, PINEDA, RIVERA, SALAZAR,  
5 SANCHEZ, VASQUEZ-LANDAVER, and VASQUEZ, and others known and  
6 unknown to the Grand Jury, would require the traqueteros to pay  
7 rent to MS-13 in order to receive protection from MS-13 and the  
8 Mexican Mafia, and would be threatened with retribution by MS-13  
9 if they failed to do so.

10 d. At regular intervals, defendants ALFARO, ARIAS,  
11 BOLANOS, CENDEJAS, CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ,  
12 JOVEL, LAZO, LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR,  
13 MORALES, PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAVER, and  
14 VASQUEZ, and others known and unknown to the Grand Jury, would  
15 collect rent from the traqueteros, and would cause a portion of  
16 the rent collected from the narcotics traffickers to be  
17 distributed to the shot callers and other members of MS-13, as  
18 well as to members and associates of the Mexican Mafia.

19 e. Through the collection of rent, defendants  
20 ALFARO, ARIAS, BOLANOS, CENDEJAS, CUENTAS, ESCALANTE, FUENTES,  
21 GIRON, GONZALEZ, JOVEL, LAZO, LOPEZ, LINARES, MANCILLA,  
22 MARTINEZ, MELGAR, MORALES, NAVAS, PINEDA, RIVERA, SALAZAR,  
23 SANCHEZ, VASQUEZ-LANDAVER, and VASQUEZ, controlled significant  
24 amounts of narcotics trafficking and encouraged the narcotics  
25 trafficking activities of individuals operating in MS-13  
26 territory and who paid rent to MS-13.

27 f. Defendants ALFARO, ARIAS, BOLANOS, CENDEJAS,  
28 CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ, JOVEL, LAZO,



1 LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR, MORALES, NAVAS,  
2 PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAVER, and VASQUEZ,  
3 and others known and unknown to the Grand Jury, would possess  
4 with intent to distribute and distribute narcotic controlled  
5 substances, including cocaine, cocaine base, methamphetamine,  
6 and marijuana.

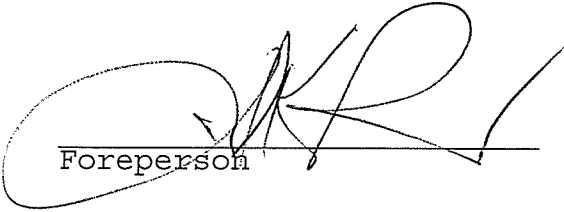
7 g. Defendants ALFARO, ARIAS, BOLANOS, CENDEJAS,  
8 CUENTAS, ESCALANTE, FUENTES, GIRON, GONZALEZ, JOVEL, LAZO,  
9 LOPEZ, LINARES, MANCILLA, MARTINEZ, MELGAR, MORALES, NAVAS,  
10 PINEDA, RIVERA, SALAZAR, SANCHEZ, VASQUEZ-LANDAVER, and VASQUEZ,  
11 and others known and unknown to the Grand Jury, would arrange  
12 for others to distribute narcotic controlled substances,  
13 including cocaine, cocaine base, methamphetamine, and marijuana.

14 //  
15 //  
16 //  
17 //  
18 //  
19 //  
20 //  
21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28

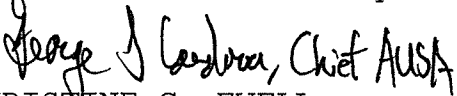
1 C. OVERT ACTS

2 80. Paragraph 50 of Count One of this Indictment is hereby  
3 realleged as if fully set forth herein.

4 A TRUE BILL

5  
6   
7 \_\_\_\_\_  
8 Foreperson

9 THOMAS P. O'BRIEN  
10 United States Attorney

11   
12 CHRISTINE C. EWELL  
13 Assistant United States Attorney  
14 Chief, Criminal Division

15 ROBERT E. DUGDALE  
16 Assistant United States Attorney  
17 Chief, Violent & Organized Crime Section

18 ELIZABETH R. YANG  
19 Assistant United States Attorney  
20 Deputy Chief, Violent & Organized Crime Section

21 ELIZABETH CARPENTER  
22 Assistant United States Attorney  
23 Violent & Organized Crime Section