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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
October 2018 Grand Jury

BY: _____
2019 JUL 18 PM 2:37
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES

FILED

UNITED STATES OF AMERICA,)	CR No. 16-390(B)-VAP
)	
Plaintiff,)	<u>S E C O N D</u>
)	<u>S U P E R S E D I N G</u>
v.)	<u>I N D I C T M E N T</u>
)	
JOSE LOZA,)	[18 U.S.C. § 1962(d): Racketeer
aka "Cartune,")	Influenced and Corrupt
"Pumpkin Head,")	Organizations Conspiracy;
"Pumpkin,")	18 U.S.C. §§ 1959(a)(1), (a)(3),
"P,")	(a)(5), (a)(6): Violent Crime in
"JC,")	Aid of Racketeering; 21 U.S.C.
"Gordy,")	§ 846: Conspiracy to Possess
"Joseph,")	with Intent to Distribute and
"Big Head,")	Distribute Controlled
"C,")	Substances; 21 U.S.C.
"Joey," and)	§§ 841(a)(1), (b)(1)(A):
"Toons," and)	Possession with Intent to
RONALD SOTELLO,)	Distribute Controlled
aka "Downer,")	Substances; 18 U.S.C.
)	§§ 924(c)(1)(A), (j)(1):
Defendants.)	Possess, Use, Carry, Brandish,
)	and/or Discharge a Firearm in
)	Furtherance of, and During and
)	in Relation to, a Crime of
)	Violence; 18 U.S.C.
)	§ 922(g)(1): Prohibited Person
)	in Possession of Firearm; 18
)	U.S.C. § 1956(h): Conspiracy to
)	Laundry Money; 18 U.S.C. § 2(a):
)	Aiding and Abetting; 18 U.S.C.
)	§§ 924(d), 963, 982(a)(1), 1963,
)	21 U.S.C. § 853, 26 U.S.C.
)	§ 5872, and 28 U.S.C. § 2461(c):
)	Criminal Forfeiture]

CAC: INMLR

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1 The Grand Jury charges:

2 GENERAL ALLEGATIONS

3 A. THE RACKETEERING ENTERPRISE

4 1. At times relevant to this Second Superseding
5 Indictment, defendants JOSE LOZA, also known as ("aka")
6 "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy,"
7 "Joseph," "Big Head," "C," "Joey," and "Toons" ("LOZA"); and
8 RONALD SOTELLO, aka "Downer" ("SOTELLO") (collectively, the
9 "defendants"); and co-conspirators David Gaitan, aka "Thumper"
10 and "Copperpot" ("Gaitan"); Leonardo Antolin, aka "Rowdy" and
11 "Rowdy Boy" ("Antolin"); Sylvia Olivas ("Olivas"); Christy
12 Arizmendi, aka "Christy Gonzalez" ("Arizmendi"); Frankie
13 Vasquez, aka "Kreeper," "Kreeps," and "Wicked" ("Vasquez");
14 Jesse Hernandez, Sr., aka "Lil Man," "Pony," and "Lil Hooligan"
15 ("Hernandez"); Andy Alvarez, aka "Night Owl" ("Alvarez"); Ian
16 Casillas, aka "Natural" and "Nat" ("Casillas"); Donald Goulet,
17 aka "Wacky" ("Goulet"); Alfredo Gonzalez, aka "Gunner" ("A.
18 Gonzalez"); Alexis Jaimez, aka "Lil Travieso" and "Lex" ("A.
19 Jaimez"); Brandon Espinoza, aka "Downer" ("Espinoza"); Peter
20 Orozco, aka "Chavo" ("Orozco"); Joseph Viramontes, aka "Bullet"
21 and "Jo Jo" ("Viramontes"); Raul Rubio, aka "Largo" and "Large"
22 ("Rubio"); Aaron Salinas ("A. Salinas"); Henry Mendoza, aka
23 "Spanky," "Spanks," and "Hank" ("Mendoza"); Rene Pantaleon, aka
24 "Conejo" and "Rabbit" ("Pantaleon"); Denise Contreras ("D.
25 Contreras"); Christian Bowers, aka "Gato," "Cat," and "Christian
26 Espinoza" ("Bowers"); Monica Rodriguez, aka "Smiley" and "Monica
27 Gonzalez" ("Rodriguez"); Jaime Villalba, aka "Puppet"
28 ("Villalba"); Steven Jaimez, aka "Flea" ("S. Jaimez"); Emanuel

1 Higuera, aka "Blanco" ("Higuera"); Edward Paniagua, aka "Oso"
2 and "Bear" ("Paniagua"); Rigoberto Contreras, aka "Rigo" ("R.
3 Contreras"); Steven De La Paz, aka "Smokes" and "Smokey" ("De La
4 Paz"); Derek Vandoren, aka "Ness," aka "Necio," "Derek Van
5 Doren," and "Lickalotpuss" ("Vandoren"); Anthony Morales, aka
6 "Cartoon," "Toons," and "Rest" ("Morales"); Fernando Holguin,
7 aka "Farmer" ("F. Holguin"); Enrique Holguin, aka "Boxer,"
8 "Rick," "Ricky," and "Slick" ("E. Holguin"); Frank Martinez, aka
9 "Stranger," "Frank Burrola," and "Frank Martinez Segovia"
10 ("Martinez"); Angelic Gaitan ("A. Gaitan"); Michael Jaimez, aka
11 "Travieso" and "Travi" ("M. Jaimez"); Michael Salinas, aka
12 "Smiley" ("M. Salinas"); Ricky Perez, aka "Wicked" and "Wicks"
13 ("Perez"); Luis Moreno, aka "Oser" ("Moreno"); Juan Nila, aka
14 "Topo" ("Nila"); Roy Gavaldon, Sr., aka "Spider Roy" ("Gavaldon,
15 Sr."); Daniel Gallardo, aka "Kraze" and "Craze" ("Gallardo");
16 Juan Pizano, aka "Drifter" ("Pizano"); Manuel Alatorre Martinez,
17 aka "Malo," "Manuel Alatorre," and "Manuel Martinez"
18 ("Alatorre"); Derik Gonzales, aka "Jo Jo," "Shaggy," and "Derik
19 Gonzalez" ("D. Gonzales"); Nicholas Jaimez, aka "Littles" and
20 "Lils" ("N. Jaimez"); Roy Gavaldon, Jr. ("Gavaldon, Jr.");
21 Christina Franco ("Franco"); Samuel Cabrera ("Cabrera"); Nicole
22 Murietta, aka "Happy" and "Pig" ("Murietta"); and Gabriel Felix
23 ("Felix"); and others known and unknown to the Grand Jury, were
24 members and associates of a criminal organization engaged in,
25 among other things, a conspiracy to traffic in narcotics,
26 narcotics trafficking, money laundering, identity theft, access
27 device fraud, and the commission of crimes of violence,
28 including conspiracy to commit murder, murder, attempted murder,

1 assault, extortion, and robbery. At relevant times, this
2 organization, hereinafter referred to as the Canta Ranas
3 Organization, operates in the Central District of California and
4 elsewhere. The Canta Ranas Organization, including its leaders,
5 members, and associates, constitutes an "enterprise," as defined
6 by Title 18, United States Code, Section 1961(4), that is, a
7 group of individuals associated in fact, although not a legal
8 entity, which is engaged in, and the activities of which affect,
9 interstate commerce. The enterprise constitutes an ongoing
10 organization whose members function as a continuing unit for a
11 common purpose of achieving the objectives of the enterprise.

12 B. BACKGROUND OF THE RACKETEERING ENTERPRISE

13 2. The Mexican Mafia, often referred to as "La EME"
14 (derived from the Spanish pronunciation of the letter "M"), is a
15 criminal organization that operates from within the California
16 state prison system, the federal prison system, the streets and
17 suburbs of large cities throughout Southern California, and
18 elsewhere. Members of the Mexican Mafia, commonly referred to
19 as a "Carnal," "Brother," "Big Homie," "Tio" (Spanish for
20 "uncle"), and/or "Padrino" (Spanish for "godfather"), typically
21 come from the ranks of local Southern California Hispanic street
22 gangs, including the Canta Ranas gang. By controlling the
23 criminal activities occurring within prison facilities,
24 providing protection for imprisoned members and associates of
25 Hispanic gangs, and imposing discipline, often in the form of
26 acts of violence, against both individuals and street gangs who
27 fail to adhere to its directives, the Mexican Mafia has risen to
28 the position where it now exercises control over Hispanic street

1 gangs operating throughout the State of California.
2 Specifically, its individual members control one or more
3 Hispanic street gangs, which serve as the power base through
4 which the Mexican Mafia members operate their individual
5 criminal enterprises.

6 3. Mexican Mafia member D.G. ("Mexican Mafia D.G."), who
7 is incarcerated in state prison, is the leader of the Canta
8 Ranas Organization and has run this criminal enterprise since
9 approximately the late 1980s. The Canta Ranas Organization's
10 core membership consists of members and associates of the Canta
11 Ranas street gang ("CR gang"), but its membership also extends
12 to communities throughout California, including Riverside,
13 Sacramento, and Stockton, that have gangs loyal to Mexican Mafia
14 D.G. Mexican Mafia D.G. runs the Canta Ranas Organization with
15 the assistance of intermediaries, who facilitate his receipt of
16 "rent" payments from the Canta Ranas Organization's members, and
17 communicate or assist in the communication of Mexican Mafia
18 D.G.'s directives to the Canta Ranas Organization.

19 4. The Canta Ranas Organization's street-based operations
20 are controlled principally by a senior member who is known as
21 the "keyholder" or "shotcaller." The shotcaller's authority is
22 derived from Mexican Mafia D.G., who appoints this individual.
23 The shotcaller is responsible for ensuring that the goals of the
24 Canta Ranas Organization are met, which include enforcing
25 Mexican Mafia D.G.'s directives, enforcing the Canta Ranas
26 Organization's code of conduct, and generating revenue through
27 the commission of crimes, including narcotics trafficking in
28 Canta Ranas Organization territory and taxing (i.e., extorting a

1 portion of illicit proceeds, typically drug proceeds) those who
2 engage in illegal conduct within Canta Ranas Organization
3 territory. Defendant LOZA, a Canta Ranas gang member, is the
4 current Canta Ranas Organization shotcaller. With the support
5 and sponsorship of Mexican Mafia D.G., defendant LOZA became a
6 Mexican Mafia member sometime in 2014 or 2015.

7 5. The Canta Ranas gang is a multi-generational criminal
8 street gang founded in Santa Fe Springs, California, in the late
9 1940's to early 1950's. In English, the name "Canta Ranas"
10 means "Singing Frogs" and the gang adopted Canta Ranas as its
11 name because the neighborhood in which it was founded was a
12 flood ranch that had frogs that would croak following heavy
13 rains, as if they were singing.

14 6. The Canta Ranas gang currently has approximately 140
15 active members, with three separate cliques: the Seekers,
16 Kingsmen, and Viejos. The territory claimed by the Kingsmen and
17 Viejos cliques of the Canta Ranas gang is as follows: Telegraph
18 Road to the South, the San Gabriel River Bed to the West,
19 Norwalk Boulevard to the East, and Los Nietos Road to the North.
20 The territory claimed by the Seekers clique is as follows:
21 Pioneer Boulevard to the East, Slauson Avenue to the South,
22 Washington Boulevard to the North and the San Gabriel River Bed
23 to the West. Each clique is loyal to Mexican Mafia D.G., and
24 part of, the Canta Ranas Organization.

25 7. The Canta Ranas Organization maintains control of its
26 territories by intimidating and threatening residents who live
27 in the communities, by controlling the illegal conduct occurring
28 within its territories, by attacking and threatening rival gang

1 members who encroach on Canta Ranas Organization territory, and
2 by the use of symbolism, such as "tagging," (e.g., gang
3 graffiti, such as "CR," "CRV," "CRV13," "CRVR," pictures of
4 frogs/musical notes), gang signs (e.g., curling the index finger
5 and thumb towards each other to form a "C," then curling the
6 middle finger downward past the thumb to form an "R," using the
7 call "ribbit"), and gang paraphernalia (e.g., clothing and hats
8 of the Colorado Rockies baseball team displaying CR, the San
9 Francisco Giants baseball team or San Francisco 49ers football
10 team displaying SF, tattoos containing the letters "CR," the
11 words "Canta Ranas," and/or images of frogs or musical notes).
12 CR gang members and associates also often "brand" their criminal
13 acts by, for example, shouting references to "CR" so that the
14 individual member or associate, and the broader organization,
15 receives credit for having committed the crime.

16 8. Canta Ranas Organization members and associates
17 typically are required to participate in criminal acts committed
18 on behalf of, and in furtherance of, the Canta Ranas
19 Organization. Such crimes include, but are not limited to,
20 murder, attempted murder, assault, robbery, kidnaping,
21 carjacking, extortion, witness intimidation, narcotics
22 trafficking, access device fraud, credit card fraud, and
23 identity theft. The commission of these crimes and/or the
24 participation in non-criminal Canta Ranas Organization-directed
25 activities, such as protecting the neighborhood, often is
26 referred to as "putting in work." Those members and associates
27 who "put in work" are able to maintain and increase their
28 standing within the Canta Ranas Organization. This is

1 particularly true when acts of violence are committed at the
2 direction, and on behalf, of the Canta Ranas Organization.

3 9. To support its criminal operations and bolster its
4 reputation for violence and intimidation, the Canta Ranas
5 Organization maintains a ready supply of firearms, including
6 handguns, shotguns, rifles, and assault weapons. Such weapons
7 are frequently stolen, altered, or unregistered to make it more
8 difficult to connect them to the individual who either used or
9 obtained the weapon. The Canta Ranas Organization also
10 regularly sells weapons for profit, using the proceeds from such
11 sales to purchase narcotics and additional firearms, which
12 ensures that it always has a ready supply of firearms at its
13 disposal.

14 10. The Canta Ranas Organization generates revenue
15 primarily by controlling the drug trafficking occurring within
16 its territory. Both members and approved drug dealers may
17 distribute drugs, primarily methamphetamine and heroin, within
18 Canta Ranas Organization territory with protection from rivals
19 and without other interference. In return, these individuals
20 pay to the Canta Ranas Organization a percentage of the drug
21 proceeds generated, known as a "tax." The Canta Ranas
22 Organization further taxes those who engage in other types of
23 illegal conduct within its territory. Those who refuse to pay
24 the Canta Ranas Organization-mandated tax are subject to
25 reprisals, including fines, robbery, kidnapping, and threatened
26 or actual violence.

27 11. The Canta Ranas Organization, through its members and
28 associates, takes steps to conceal and disguise its criminal

1 activities from law enforcement, including the proceeds
2 generated from its illegal conduct. For example, members and
3 associates of the Canta Ranas Organization regularly use coded
4 language to disguise the content of telephone communications
5 relating to illegal conduct and frequently convert narcotics
6 proceeds into money orders, which are used for numerous
7 purposes, including, but not limited to: (a) transferring funds
8 to Mexican Mafia D.G. and others known and unknown to the Grand
9 Jury; (b) using money orders to advance the enterprise's
10 financial interests; and (c) using money orders to conceal the
11 nature and origin of narcotics and extortion proceeds generated
12 by the enterprise.

13 12. Individuals who impede the Canta Ranas Organization's
14 efforts to generate revenue, including the collection of taxes
15 imposed on drug traffickers, or who otherwise disregard its
16 directives, are subject to discipline and/or retribution from
17 the Canta Ranas Organization, which can include monetary fines,
18 threats, and acts of violence.

19 C. PURPOSES OF THE ENTERPRISE

20 13. The purposes of the Canta Ranas Organization include,
21 but are not limited to, the following:

22 a. Enriching members and associates of the Canta
23 Ranas Organization, including Mexican Mafia D.G. (and at his
24 direction, others including his family members and associates),
25 through, among other things, the distribution of narcotics, the
26 collection of taxes from narcotics traffickers and others who
27 commit crimes in Canta Ranas Organization territory, and the
28 commission of financially-oriented crimes such as identity

1 theft, credit card fraud, burglary, and robbery.

2 b. Maintaining control and authority over the Canta
3 Ranas Organization's territory, often through threats,
4 intimidation, and the commission of acts of violence against
5 local residents and rival gangs.

6 c. Preserving, protecting, and expanding the power
7 of the Canta Ranas Organization through the use of intimidation,
8 violence, threats of violence, assaults, and murders.

9 d. Promoting and enhancing the reputations and
10 activities of the Canta Ranas Organization and its members and
11 associates.

12 D. THE MEANS AND METHODS OF THE ENTERPRISE

13 14. The means and methods by which the defendants and
14 other members and associates of the Canta Ranas Organization
15 conduct and participate in the conduct of the affairs of the
16 enterprise include:

17 a. Leaders of the Canta Ranas Organization
18 disseminate rules and orders to be followed by all participants
19 in the Canta Ranas Organization criminal enterprise.

20 b. Members and associates of the Canta Ranas
21 Organization commit, attempt to commit, and threaten to commit
22 acts of violence, including murders, assaults, and acts of
23 intimidation, directed against rival gang members and witnesses
24 in criminal cases, to protect and expand the scope of the
25 enterprise's criminal operations and to promote a climate of
26 fear and intimidation.

27 c. Members and associates of the Canta Ranas
28 Organization engage in narcotics trafficking, firearms

1 trafficking, robbery, identity theft, access device fraud, and
2 "tax" collection as a means to generate income.

3 d. Members and associates of the Canta Ranas
4 Organization pay "taxes" or "donations" to the Mexican Mafia to
5 ensure protection for its incarcerated members and associates,
6 and to obtain continued authorization to exercise exclusive
7 control over the Canta Ranas Orgnaization's territory and the
8 criminal conduct occurring therein.

9 e. Members and associates of the Canta Ranas
10 Organization attempt to conceal from law enforcement the
11 identity of its members and associates, the ways in which it
12 conducts its affairs, and the locations where its members and
13 associates discuss and conduct its affairs.

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COUNT ONE

[18 U.S.C. § 1962(d)]

[DEFENDANTS LOZA AND SOTELLO]

Paragraphs 1 through 14 of the General Allegations of this Second Superseding Indictment are re-alleged here.

A. OBJECT OF THE RICO CONSPIRACY

Beginning on a date unknown and continuing to on or about October 18, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants LOZA and SOTELLO, and co-conspirators Gaitan, Antolin, Olivas, Arizmendi, Vasquez, Hernandez, Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez, Espinoza, Orozco, Viramontes, Rubio, A. Salinas, Mendoza, Pantaleon, D. Contreras, Bowers, Rodriguez, Villalba, S. Jaimez, Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales, F. Holguin, E. Holguin, Martinez, A. Gaitan, M. Jaimez, M. Salinas, Perez, Moreno, Nila, Gavaldon, Sr., Gallardo, Pizano, Alatorre, D. Gonzales, N. Jaimez, Gavaldon, Jr., Franco, Cabrera, Murietta, and Felix, and others known and unknown to the Grand Jury, being persons employed by and associated with the Canta Ranas Organization, an enterprise which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts indictable under the following provisions of federal law:

1 1. Title 18, United States Code, Section 1956 (Money
2 Laundering);

3 2. Title 18, United States Code, Section 1028 (Identity
4 Theft);

5 3. Title 18, United States Code, Section 1029 (Access
6 Device Fraud);

7 and multiple acts involving:

8 4. the distribution of, possession with intent to
9 distribute, and conspiracy to distribute and/or possess with
10 intent to distribute, controlled substances, in violation of
11 Title 21, United State Code, Sections 841(a)(1) and 846;

12 5. robbery, in violation of California Penal Code
13 Sections 21a, 31, 182, 211, 212.5(a), 213, and 664;

14 6. murder, in violation of California Penal Code Sections
15 21a, 31, 182, 187, 189, 190, and 664; and

16 7. extortion, in violation of California Penal Code
17 Sections 21(a), 31, 182, 518, 519, 520, and 664.

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

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

23 The object of the conspiracy was to be accomplished in
24 substance as follows:

25 1. Mexican Mafia D.G., from within the California state
26 prison system, would pass messages to co-conspirators Olivas,
27 Rodriguez, and Arizmendi, and others known and unknown to the
28 Grand Jury, instructing Canta Ranas Organization leaders,

1 including defendant LOZA, to direct certain activities of the
2 Canta Ranas Organization, including activities involving the
3 distribution of controlled substances and the collection and
4 distribution of taxes collected from those engaged in illegal
5 activities, and to authorize and to direct acts of violence
6 committed by members and associates of the Canta Ranas
7 Organization.

8 2. Mexican Mafia D.G., from within the California state
9 prison system, would grant leadership authority over the Canta
10 Ranas Organization to defendant LOZA, and others known and
11 unknown to the Grand Jury.

12 3. Mexican Mafia D.G., assisted by defendant LOZA and co-
13 conspirator Gaitan, and others known and unknown to the Grand
14 Jury, would authorize Canta Ranas Organization members and
15 associates to extort and collect "taxes" from narcotics
16 traffickers and others in the areas controlled by the Canta
17 Ranas Organization.

18 4. Mexican Mafia D.G. and defendant LOZA and co-
19 conspirator Gaitan, and others known and unknown to the Grand
20 Jury, would direct Canta Ranas Organization members and
21 associates to commit crimes, including robberies, murders,
22 extortion, and narcotics trafficking, to promote and further the
23 activities of the Canta Ranas Organization.

24 5. Defendants LOZA and SOTELLO, and co-conspirators
25 Gaitan, Antolin, Vasquez, Hernandez, Alvarez, Casillas, Goulet,
26 A. Gonzalez, Viramontes, A. Salinas, Mendoza, Villalba, Higuera,
27 Paniagua, De La Paz, Morales, Martinez, A. Gaitan, Perez,
28 Moreno, Nila, Gallardo, Alatorre, D. Gonzales, Franco, and

1 Felix, and others known and unknown to the Grand Jury, would
2 obtain, possess, and/or store firearms, firearms accessories,
3 and ammunition for Canta Ranas Organization members and
4 associates, so that they could be used to commit crimes of
5 violence, to enforce the authority of the Canta Ranas
6 Organization, and/or to protect against rival gangs.

7 6. Defendant LOZA and co-conspirators Gaitan, Arizmendi,
8 Vasquez, Hernandez, Casillas, A. Salinas, Rubio, D. Contreras,
9 Martinez, A. Gaitan, Cabrera, and Murietta, and others known and
10 unknown to the Grand Jury, would provide controlled substances
11 to Canta Ranas Organization members and associates for further
12 distribution within Canta Ranas Organization territory.

13 7. Defendants LOZA and SOTELLO, and co-conspirators
14 Gaitan, Antolin, Arizmendi, Vasquez, Hernandez, Casillas,
15 Goulet, Rubio, A. Salinas, Mendoza, D. Contreras, Bowers,
16 Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales,
17 F. Holguin, E. Holguin, Martinez, A. Gaitan, Moreno, Nila,
18 Pizano, D. Gonzales, Cabrera, and Murietta, and others known and
19 unknown to the Grand Jury, would possess and distribute
20 controlled substances in the neighborhoods controlled by the
21 Canta Ranas Organization.

22 8. Co-conspirators Gaitan, A. Jaimez, Espinoza, A.
23 Salinas, S. Jaimez, M. Jaimez, M. Salinas, Perez, and Nila, and
24 others known and unknown to the Grand Jury, would smuggle or
25 otherwise cause controlled substances to be smuggled into the
26 incarceration system for distribution to Canta Ranas
27 Organization members and other inmates.

28 9. Mexican Mafia D.G., defendant LOZA, and co-

1 conspirators Gaitan, Antolin, Olivas, Arizmendi, Hernandez,
2 Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez, Bowers,
3 Rodriguez, R. Contreras, A. Gaitan, M. Jaimez, N. Jaimez,
4 Murietta, and Felix, and others known and unknown to the Grand
5 Jury, would collect "tax" payments from narcotics traffickers
6 and others in the neighborhoods controlled by the Canta Ranas
7 Organization, and co-conspirators E. Holguin, A. Salinas, M.
8 Jaimez, M. Salinas, and Perez, and others known and unknown to
9 the Grand Jury, would collect such payments within the
10 incarceration system, all on behalf of Mexican Mafia D.G.

11 10. Co-conspirators Gaitan, Olivas, Arizmendi, Vasquez,
12 Hernandez, Orozco, Rodriguez, F. Holguin, Martinez, Murietta,
13 and Felix, and others known and unknown to the Grand Jury, would
14 deliver payment of the collected taxes to Mexican Mafia D.G. as
15 tribute owed by the Canta Ranas Organization to Mexican Mafia
16 D.G. and to obtain and maintain the protection, favor, and
17 backing of Mexican Mafia D.G., including through the depositing
18 of money into Mexican Mafia D.G.'s prison account and the
19 mailing of money orders and cashier's checks to Mexican Mafia
20 D.G. at Pelican Bay State Prison.

21 11. Defendants LOZA and SOTELLO, and co-conspirators
22 Antolin, Vasquez, Goulet, A. Gonzalez, Viramontes, and Paniagua,
23 and others known and unknown to the Grand Jury, would use
24 firearms and dangerous weapons to commit robberies and assaults,
25 and to retaliate against, attempt to kill, and kill gang members
26 and others who obstructed the purposes of the Mexican Mafia, the
27 Canta Ranas Organization, as well as potential witnesses to
28 criminal activities committed by Canta Ranas Organization

1 members and residents in the neighborhoods controlled by the
2 Canta Ranas Organization, to enforce the authority of the Canta
3 Ranas Organization.

4 C. OVERT ACTS

5 In furtherance of the conspiracy, and to accomplish the
6 object of the conspiracy, defendants LOZA and SOTELLO, and co-
7 conspirators Gaitan, Antolin, Olivas, Arizmendi, Vasquez,
8 Hernandez, Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez,
9 Espinoza, Orozco, Viramontes, Rubio, A. Salinas, Mendoza,
10 Pantaleon, D. Contreras, Bowers, Rodriguez, Villalba, S. Jaimez,
11 Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales,
12 F. Holguin, E. Holguin, Martinez, A. Gaitan, M. Jaimez, M.
13 Salinas, Perez, Moreno, Nila, Gavaldon, Sr., Gallardo, Pizano,
14 Alatorre, D. Gonzales, N. Jaimez, Gavaldon, Jr., Franco,
15 Cabrera, Murietta, and Felix, and others known and unknown to
16 the Grand Jury, committed various overt acts, on or about the
17 following dates, within the Central District of California, and
18 elsewhere, including, but not limited to, the following:

19 1. On April 26, 2004, near Los Nietos Park in Canta Ranas
20 Organization territory, co-conspirator N. Jaimez, along with
21 other CR gang members, attempted to rob a group of high school
22 students.

23 2. Between October 26, 2004, and April 4, 2015, co-
24 conspirator Olivas deposited \$1,000 into Mexican Mafia D.G.'s j-
25 pay prison account at Pelican Bay State Prison ("Mexican Mafia
26 D.G.'s prison account").

27 3. On February 4, 2007, using coded language in written
28 correspondence, co-conspirator E. Holguin advised Mexican Mafia

1 D.G. that he had attempted to collect taxes on behalf of Mexican
2 Mafia D.G. inside a prison facility, informed Mexican Mafia D.G.
3 that he had been challenged by an inmate who wanted proof that
4 co-conspirator E. Holguin was authorized to do so, and sought
5 Mexican Mafia D.G.'s assistance in resolving this issue.

6 4. On May 4, 2007, co-conspirator F. Holguin sent a money
7 order in the amount of \$50 to Mexican Mafia D.G. at Pelican Bay
8 State Prison for deposit into Mexican Mafia D.G.'s prison
9 account.

10 5. On July 13, 2007, using coded language in an in-person
11 visit at the Los Angeles County Jail ("LACJ"), Mexican Mafia
12 D.G. instructed co-conspirator Olivas to tell an individual that
13 Mexican Mafia D.G. would not tolerate that individual's harsh
14 treatment of Canta Ranas Organization members and that Mexican
15 Mafia D.G. would come down hard on the individual if he (the
16 individual) did not respect Mexican Mafia D.G.'s wishes.

17 6. On October 21, 2007, co-conspirator E. Holguin sent
18 Mexican Mafia D.G. a card with frogs and spiders on it and
19 notified Mexican Mafia D.G. that co-conspirator E. Holguin was
20 currently incarcerated in Chino, California.

21 7. On October 10, 2008, co-conspirator Murietta deposited
22 \$30 into Mexican Mafia D.G.'s prison account.

23 8. Between May 4, 2009 and December 28, 2015, co-
24 conspirator Orozco deposited \$510 into Mexican Mafia D.G.'s
25 prison account.

26 9. On June 23, 2009, using coded language in written
27 correspondence, co-conspirator Rodriguez told Mexican Mafia D.G.
28 that defendant LOZA had caused an unidentified gang member to be

1 removed from the prison yard/facility due to the individual
2 being a problem.

3 10. On October 3, 2009, using coded language in an in-
4 person visit at Pelican Bay State Prison, co-conspirator
5 Rodriguez reported to Mexican Mafia D.G. about rival Los Nietos
6 gang members targeting her residence and told him that she had
7 defendant LOZA order a leader of the rival Los Nietos gang to
8 leave co-conspirator Rodriguez's residence alone.

9 11. On October 3, 2009, using coded language in an in-
10 person visit at Pelican Bay State Prison, co-conspirator
11 Rodriguez confirmed that she would relay to an individual
12 Mexican Mafia D.G.'s order that Mexican Mafia D.G. wanted the
13 individual's assurance that Los Nietos gang members would no
14 longer cause problems at co-conspirator Rodriguez's residence.

15 12. On October 3, 2009, using coded language in an in-
16 person visit at Pelican Bay State Prison, co-conspirator
17 Rodriguez told Mexican Mafia D.G. about problems she was having
18 with co-conspirator Murietta, including that co-conspirator
19 Murietta was indiscreetly carrying around written correspondence
20 from Mexican Mafia D.G. and using it to intimidate people.

21 13. On October 3, 2009, using coded language in an in-
22 person visit at Pelican Bay State Prison, co-conspirator
23 Rodriguez confirmed with Mexican Mafia D.G. that she, not co-
24 conspirator Murietta, had his support to conduct business on his
25 behalf and with his authorization.

26 14. On October 3, 2009, using coded language in an in-
27 person visit at Pelican Bay State Prison, Mexican Mafia D.G.
28 told co-conspirator Rodriguez that she had his authorization to

1 tell defendant LOZA and co-conspirator Murietta that Mexican
2 Mafia D.G. viewed co-conspirator Murietta as being in bad
3 standing.

4 15. On October 3, 2009, using coded language in an in-
5 person visit at Pelican Bay State Prison, Mexican Mafia D.G.
6 directed co-conspirator Rodriguez to relay to an unindicted co-
7 conspirator that the order to assist co-conspirator Rodriguez
8 with funds to visit Mexican Mafia D.G. came directly from
9 Mexican Mafia D.G. himself.

10 16. On January 15, 2010, co-conspirators A. Jaimez, S.
11 Jaimez, and Viramontes, and other unindicted co-conspirators,
12 threatened to tax residents who were hosting a private party in
13 Santa Fe Springs, California, and to shoot up the residence
14 because they (the residents) were in Canta Ranas Organization
15 territory.

16 17. On March 6, 2010, in Los Nietos Park within Canta
17 Ranas Organization territory, co-conspirators Espinoza and S.
18 Jaimez, and unindicted co-conspirators, harassed people.

19 18. On April 4, 2010, co-conspirator Rodriguez sent a \$60
20 money order to Pelican Bay State Prison for deposit into Mexican
21 Mafia D.G.'s prison account.

22 19. On April 22, 2010, co-conspirator Orozco sent a \$45
23 money order for deposit into Mexican Mafia D.G.'s prison account
24 and advised Mexican Mafia D.G. in an accompanying letter that a
25 lot of Canta Ranas Organization members did not have faith in an
26 unindicted co-conspirator's leadership.

27 20. On September 21, 2010, using coded language in written
28 correspondence, co-conspirator Orozco told Mexican Mafia D.G.

1 that another unidentified co-conspirator was collecting taxes
2 using Mexican Mafia D.G.'s name; co-conspirator Orozco also
3 enclosed a money order in the amount of \$45 for Mexican Mafia
4 D.G. with the correspondence.

5 21. On August 5, 2011, using coded language in a Facebook
6 conversation, co-conspirator A. Gonzalez threatened an
7 individual, possibly a rival gang member, telling him that he
8 (co-conspirator A. Gonzalez) was in possession of a 20 gauge
9 shotgun and a .38 caliber firearm.

10 22. On August 24, 2011, using coded language in a Facebook
11 conversation, co-conspirator A. Gonzalez and an unindicted co-
12 conspirator agreed to get together and assault Brown Brotherhood
13 gang members.

14 23. On August 25, 2011, using coded language in a Facebook
15 conversation, co-conspirator A. Gonzalez told an unindicted co-
16 conspirator that he had three firearms and that he was going to
17 assault a rival gang member.

18 24. On November 3, 2011, from Pelican Bay State Prison, an
19 unindicted co-conspirator sent written correspondence to co-
20 conspirator F. Holguin asking co-conspirator F. Holguin if, in
21 the future, he would pass a message to Mexican Mafia D.G.

22 25. Between November 14, 2011, and October 1, 2014, co-
23 conspirator Vasquez deposited \$5,600 into Mexican Mafia D.G.'s
24 prison account.

25 26. On November 24, 2011, using coded language in a
26 Facebook conversation, co-conspirator A. Gonzalez told an
27 individual that he possessed a .38 caliber firearm.

28 27. On April 11, 2012, at his residence, co-conspirator

1 Alatorre possessed two Winchester .9mm Ruger rounds and CR gang
2 paraphernalia.

3 28. On June 24, 2012, using coded language in a Facebook
4 conversation, co-conspirator Viramontes asked an unindicted co-
5 conspirator if the individual knew of any firearms for sale.

6 29. On June 29, 2012, using coded language in a Facebook
7 conversation, co-conspirator Viramontes told a gang member that
8 he would sell him a .32 caliber firearm for \$250.

9 30. On or before August 31, 2012, co-conspirator
10 Viramontes tagged "SFROGS 13 PSGUNNERS BALA FREE SWIFTY" at an
11 unknown location.

12 31. On September 9, 2012, using coded language in a series
13 of text messages, co-conspirator Gallardo asked co-conspirator
14 Viramontes if he was ready to "bang" (i.e., "gang bang,"
15 referring to illicit activities undertaken on behalf of a gang)
16 that evening; co-conspirator Viramontes responded to co-
17 conspirator Gallardo in the affirmative.

18 32. On or before September 18, 2012, at an unknown
19 location, co-conspirators Gallardo, Viramontes, and Moreno, and
20 an unindicted co-conspirator tagged "CANTA RANAS 13."

21 33. On September 18, 2012, using coded language in a
22 series of text messages, co-conspirator Gallardo asked co-
23 conspirator Viramontes whether he had any .38 caliber ammunition
24 that he could supply to co-conspirator Gallardo for the firearm
25 that co-conspirator Gallardo had just obtained from Arizona, to
26 which co-conspirator Viramontes replied that he did.

27 34. On September 21, 2012, in a vehicle he was driving,
28 co-conspirator F. Holguin possessed a mixture and substance

1 containing a detectable amount of heroin.

2 35. On October 7, 2012, using coded language in a recorded
3 jail conversation, co-conspirator Paniagua told an unindicted
4 co-conspirator that he was considering giving a firearm to this
5 individual after the individual was released from the LACJ.

6 36. On November 19, 2012, using coded language in a three-
7 way recorded jail conversation, co-conspirator Viramontes told
8 co-conspirator Paniagua and an unindicted co-conspirator that he
9 had committed a robbery at a liquor store with co-conspirator A.
10 Gonzalez which had been captured on videotape, and that co-
11 conspirator A. Gonzalez was facing twenty years imprisonment for
12 the crime.

13 37. On November 19, 2012, using coded language in a three-
14 way recorded jail conversation, co-conspirator Viramontes told
15 co-conspirator Paniagua and an unindicted co-conspirator, "Hell
16 ya we been shooting those fools up, fool," in response to the
17 unindicted co-conspirator stating that he had heard rival Los
18 Nietos gang members would be assaulting CR gang members housed
19 in the same LACJ jail dorm.

20 38. On November 21, 2012, using coded language in a
21 Facebook conversation, co-conspirator Viramontes told co-
22 conspirator Alatorre to be careful of retaliation because he
23 (co-conspirator Viramontes) had shot at rival gang members from
24 Norwalk two days prior.

25 39. On November 29, 2012, co-conspirator Antolin possessed
26 a Lorcin Model .22 caliber pistol, various .22 caliber
27 ammunition rounds, CR gang paraphernalia, and a digital scale.

28 40. On December 28, 2012, using coded language in a series

1 of text messages, co-conspirators Gallardo and Nila talked about
2 who would store co-conspirator D. Gonzales's shotgun, and about
3 how rival Los Nietos gang members had been shooting at co-
4 conspirator Nila's residence.

5 41. On January 3, 2013, co-conspirator Viramontes
6 possessed a loaded short-barreled shotgun, various Remington and
7 Buck shotgun shells, and various .223 ammunition rounds.

8 42. On January 4, 2013, using coded language in a series
9 of text messages, co-conspirator Antolin asked co-conspirator
10 Gallardo if he could purchase co-conspirator Gallardo's firearm,
11 to which co-conspirator Gallardo responded that it was not for
12 sale and that he needed it because he had been shot at by an
13 18th Street gang member.

14 43. On January 4, 2013, using coded language in a text
15 message, co-conspirator Nila told co-conspirator Gallardo that
16 he was in Canta Ranas Organization territory "gang banging."

17 44. On January 14, 2013, using coded language in a series
18 of text messages, co-conspirator Gallardo complained to co-
19 conspirator Gaitan that co-conspirator R. Contreras was making
20 explicit threats while collecting taxes on behalf of the Canta
21 Ranas Organization, and that he should not be so disrespectful.

22 45. On January 14, 2013, in a vehicle he was driving, co-
23 conspirator Gallardo possessed a loaded Johnson Arms and Cycle
24 Works .32 caliber chrome revolver.

25 46. On January 14, 2013, at his residence, co-conspirator
26 Gallardo possessed fifteen .38 caliber Smith & Wesson bullets,
27 nine .22 caliber bullets, seven live .32 caliber bullets (six
28 Smith & Wesson, and one hollow point CBC), one 7.6mm GRI bullet,

1 and CR gang paraphernalia.

2 47. On February 4, 2013, using coded language in written
3 correspondence, co-conspirator E. Holguin apprised Mexican Mafia
4 D.G. that co-conspirator F. Holguin was in custody in LACJ.

5 48. On February 21, 2013, using coded language in written
6 correspondence, co-conspirator F. Holguin told Mexican Mafia
7 D.G. that co-conspirator E. Holguin was supposed to inform
8 Mexican Mafia D.G. that co-conspirator F. Holguin was in custody
9 in LACJ and that he (co-conspirator F. Holguin) would send taxes
10 to Mexican Mafia D.G. in a week or two.

11 49. On February 21, 2013, using coded language in written
12 correspondence sent via a third party, co-conspirator F. Holguin
13 reported to Mexican Mafia D.G. that he was in custody at LACJ
14 and asked Mexican Mafia D.G. to tell co-conspirator Olivas that
15 co-conspirator F. Holguin was in jail.

16 50. On February 21, 2013, using coded language in written
17 correspondence sent via a third party, co-conspirator F. Holguin
18 told Mexican Mafia D.G. that he would attempt to send money to
19 Mexican Mafia D.G. in a week or two.

20 51. On April 3, 2013, co-conspirator Paniagua and others
21 went to assault co-conspirator S. Jaimez because co-conspirator
22 S. Jaimez was perceived as not complying with the authority of
23 the Canta Ranas Organization and, therefore, in violation of
24 Canta Ranas Organization rules.

25 52. On April 3, 2013, in a vehicle he was driving, co-
26 conspirator Alatorre possessed a loaded Llama .380 caliber semi-
27 automatic handgun and a loaded Phoenix Arms .22 caliber
28 semiautomatic handgun.

1 53. On April 10, 2013, using coded language in a telephone
2 conversation, co-conspirator Franco admitted that she engages in
3 fraud and that she was willing to purchase items for co-
4 conspirator Paniagua using fraudulent credit cards.

5 54. On April 27, 2013, co-conspirator Paniagua engaged in
6 a shoot-out with an individual, possibly a rival LTP gang
7 member, firing off approximately eleven shots.

8 55. On April 28, 2013, using coded language in a series of
9 text messages, co-conspirator Antolin arranged to sell narcotics
10 to a drug customer.

11 56. On April 28, 2013, co-conspirator Antolin possessed
12 approximately 2.1 grams of methamphetamine, drug paraphernalia,
13 and a fixed-blade knife.

14 57. On April 28, 2013, using coded language in a telephone
15 conversation, co-conspirator Franco told an individual that co-
16 conspirator Paniagua had been involved in a shooting the prior
17 night, that she believed it was a "set-up," and that as a
18 result, she went and retrieved a firearm that had been lent to
19 another person so that she could protect herself.

20 58. On April 28, 2013, using coded language in a telephone
21 conversation, co-conspirator Paniagua told an individual that he
22 had been in a gunfight in which he had returned eleven shots at
23 the person who was shooting at him.

24 59. On April 28, 2013, using coded language in a telephone
25 conversation, an unindicted co-conspirator asked co-conspirator
26 Paniagua if he had heroin for sale, to which co-conspirator
27 Paniagua stated that he did.

28 60. On May 1, 2013, in Canta Ranas Organization territory,

1 co-conspirator Paniagua possessed a loaded .380 caliber handgun,
2 a loaded .22 caliber handgun, and a loaded .9mm handgun, and
3 additional rounds of ammunition, including at least one 8mm
4 Smith & Wesson hollow point round.

5 61. On May 3, 2013, using coded language in a telephone
6 conversation, co-conspirator Felix told co-conspirator Gaitan
7 that co-conspirator R. Contreras had dropped off \$270 on a Green
8 Dot card and asked if co-conspirator Gaitan wanted to go
9 retrieve it.

10 62. On May 5, 2013, using coded language in a telephone
11 conversation, co-conspirators Gaitan and Casillas talked about
12 the taxes which co-conspirator Casillas owed to co-conspirator
13 Gaitan, and the fact that the taxes could be used for co-
14 conspirator Gaitan to purchase more narcotics from a source of
15 supply.

16 63. On May 7, 2013, using coded language in a telephone
17 conversation, co-conspirators Gaitan and S. Jaimez agreed to
18 give co-conspirator M. Jaimez \$200 to purchase heroin which co-
19 conspirator M. Jaimez would then have smuggled into prison for
20 distribution.

21 64. On May 7, 2013, using coded language in a series of
22 text messages, co-conspirators Gaitan and Antolin discussed the
23 bullet capacity of a Smith and Wesson firearm.

24 65. On May 8, 2013, using coded language in a telephone
25 conversation, co-conspirator M. Salinas told co-conspirator
26 Gaitan that an inmate located at the same prison as co-
27 conspirator M. Salinas wanted to contact defendant LOZA
28 regarding conducting narcotics sales on behalf of Mexican Mafia

1 D.G., to which co-conspirator Gaitan agreed to facilitate the
2 communication with defendant LOZA.

3 66. On May 8, 2013, using coded language in a telephone
4 conversation, co-conspirator Gaitan told co-conspirator M.
5 Salinas that he would continue to look for heroin suppliers and
6 co-conspirator M. Salinas requested that co-conspirator Gaitan
7 apprise co-conspirator A. Salinas if co-conspirator Gaitan found
8 one.

9 67. On May 8, 2013, using coded language in a series of
10 text messages, co-conspirator A. Jaimez informed co-conspirator
11 Gaitan that he (co-conspirator A. Jaimez) would deliver \$100 in
12 tax payments to co-conspirator Gaitan's mailbox.

13 68. On May 10, 2013, using coded language in a telephone
14 conversation, co-conspirator Moreno told co-conspirator Gaitan
15 that he had the money to purchase a .22 caliber firearm.

16 69. On May 10, 2013, using coded language in a telephone
17 conversation, defendant SOTELLO ordered half-an-ounce of
18 methamphetamine from co-conspirator Gaitan.

19 70. On May 10, 2013, defendant SOTELLO went to co-
20 conspirator Gaitan's residence to pick up half-an-ounce of
21 methamphetamine.

22 71. On May 10, 2013, using coded language in a telephone
23 conversation, co-conspirator Moreno advised co-conspirator
24 Gaitan that he was prepared to purchase a 7.62mm firearm for
25 \$300.

26 72. On May 10, 2013, using coded language in a telephone
27 conversation, co-conspirator Gaitan informed defendant SOTELLO
28 that co-conspirator Moreno was ready to purchase two firearms

1 which defendant SOTELLO was selling, and defendant SOTELLO
2 stated that he would be ready to complete the sale that evening.

3 73. On May 10, 2013, using coded language in a telephone
4 conversation, defendant LOZA instructed co-conspirator Gaitan to
5 speak with co-conspirator Casillas because co-conspirator
6 Casillas was late in delivering tax payments.

7 74. On May 10, 2013, using coded language in a telephone
8 conversation, co-conspirator M. Salinas told co-conspirator
9 Gaitan that his (co-conspirator M. Salinas's) girlfriend would
10 bring heroin into the prison that weekend and that co-
11 conspirator M. Salinas would have the money from the heroin
12 sales sent to co-conspirator A. Salinas, who, in turn, would get
13 the money to co-conspirator Gaitan so that it could be paid to
14 Mexican Mafia D.G.

15 75. On May 10, 2013, using coded language in a telephone
16 conversation, co-conspirator M. Salinas told co-conspirator
17 Gaitan that his heroin supplier was a MS-13 street gang member
18 who would supply him with ounce and quarter pound amounts at a
19 time.

20 76. On May 10, 2013, using coded language in a telephone
21 conversation, co-conspirator M. Salinas told co-conspirator
22 Gaitan that he had two ounces of heroin, that co-conspirator A.
23 Salinas would be picking up additional heroin, and that co-
24 conspirator Gaitan should tell co-conspirator M. Jaimez that if
25 he needed an ounce of heroin, co-conspirator M. Salinas would be
26 able to supply it on credit for \$600 per ounce.

27 77. On May 11, 2013, using coded language in a series of
28 text messages, co-conspirator De La Paz told co-conspirator

1 Gaitan that an individual was willing to sell a .45 caliber
2 firearm for \$500 and a 9 millimeter firearm for \$400 or exchange
3 bottles of codeine for the firearms.

4 78. On May 11, 2013, using coded language in a telephone
5 conversation, co-conspirator Casillas told co-conspirator Gaitan
6 that he had \$400 in tax payments to deliver to co-conspirator
7 Gaitan.

8 79. On May 11, 2013, using coded language in a telephone
9 conversation, co-conspirators Pizano and Gaitan agreed to meet
10 to discuss pricing for methamphetamine, cocaine, and marijuana.

11 80. On May 11, 2013, using coded language in a telephone
12 conversation, co-conspirator Gaitan told co-conspirator Pizano
13 that he (co-conspirator Pizano) owed \$60 in tax payments.

14 81. On May 11, 2013, using coded language in a telephone
15 conversation, co-conspirator Gavaldon, Sr. told co-conspirator
16 Gaitan that an individual needed to stop using Mexican Mafia
17 D.G.'s name to collect taxes in a prison yard.

18 82. On May 11, 2013, using coded language in a telephone
19 conversation, co-conspirator Gavaldon, Sr. asked co-conspirator
20 Gaitan to wire \$100 to his prison account.

21 83. On May 11, 2013, using coded language in a telephone
22 conversation, co-conspirator R. Contreras asked co-conspirator
23 Gaitan if he had any methamphetamine.

24 84. On May 12, 2013, using coded language in a telephone
25 conversation, co-conspirators Gaitan and R. Contreras arranged
26 to meet at an unknown location to conduct a methamphetamine
27 purchase.

28 85. On May 12, 2013, using coded language in a telephone

1 conversation, co-conspirator Gaitan told co-conspirator M.
2 Jaimez that co-conspirator M. Salinas would be selling heroin in
3 the prison yard and that some of the proceeds would be paid to
4 Mexican Mafia D.G.

5 86. On May 12, 2013, using coded language in a telephone
6 conversation, co-conspirator Gaitan relayed to co-conspirator M.
7 Jaimez that co-conspirators Gaitan and S. Jaimez would give \$200
8 to co-conspirator M. Jaimez to help pay for narcotics which co-
9 conspirator M. Jaimez was trying to get smuggled into the prison
10 in which he (co-conspirator M. Jaimez) was an inmate.

11 87. On May 12, 2013, using coded language in a telephone
12 conversation, co-conspirator Casillas told co-conspirator Gaitan
13 that he (co-conspirator Casillas) would be picking up another
14 \$40 or \$50 in tax payments, and would drop off the money to co-
15 conspirator Gaitan the following day.

16 88. On May 13, 2013, using coded language in a series of
17 text messages, co-conspirator A. Jaimez told co-conspirator
18 Gaitan to confront co-conspirator D. Contreras because she was
19 telling certain individuals that they did not need to pay taxes
20 on narcotics sales because of her affiliation with the Canta
21 Ranas Organization.

22 89. On May 13, 2013, using coded language in a telephone
23 conversation, co-conspirator Casillas told co-conspirator Gaitan
24 about an individual who possessed two Glock firearms for sale
25 for \$500 each, and that he had a good portion of the taxes which
26 he owed co-conspirator Gaitan.

27 90. On May 13, 2013, using coded language in a telephone
28 conversation, co-conspirator Gavaldon, Sr. told co-conspirator

1 Gaitan to give \$100 to co-conspirator Olivas, who would then
2 transmit it to co-conspirator Gavaldon, Sr.

3 91. On May 13, 2013, using coded language in a telephone
4 conversation, co-conspirators Pizano and Gaitan arranged to meet
5 to discuss narcotics prices.

6 92. On May 13, 2013, using coded language in a series of
7 text messages, co-conspirators Pizano and Gaitan negotiated a
8 sale price of \$3,000 for half a pound of methamphetamine, during
9 which co-conspirator Pizano represented that his supplier had
10 better quality methamphetamine than co-conspirator Gaitan had
11 been selling.

12 93. On May 13, 2013, using coded language in a series of
13 text messages, co-conspirator Pizano told co-conspirator Gaitan
14 that a supplier he knew would sell co-conspirator Gaitan a
15 quarter pound of methamphetamine for \$1,700 as a test to see if
16 co-conspirator Gaitan's customers liked it, and that if they
17 did, the supplier would sell co-conspirator Gaitan half a pound
18 of methamphetamine; co-conspirator Pizano asked co-conspirator
19 Gaitan to let him know when he was ready to move forward.

20 94. On May 13, 2013, using coded language in a telephone
21 conversation, co-conspirator Gaitan received a message sent by
22 co-conspirator M. Jaimez stating that he (co-conspirator M.
23 Jaimez) needed \$200 to be put on a Green Dot card to help pay
24 for narcotics, and asking for co-conspirators M. Salinas and A.
25 Salinas's telephone numbers because co-conspirator M. Jaimez was
26 planning to smuggle heroin into the prison that weekend and
27 would need to communicate with them to make arrangements for
28 obtaining the heroin.

1 95. On May 13, 2013, using coded language in a telephone
2 conversation, co-conspirator Gavaldon, Jr. agreed to relay to
3 co-conspirator Olivas that defendant LOZA and co-conspirator
4 Gaitan intended to visit her at her residence so that she could
5 meet co-conspirator Gaitan; co-conspirators Gaitan and Gavaldon,
6 Jr. then talked about depositing money on co-conspirator
7 Gavaldon, Sr.'s prison account.

8 96. On May 14, 2013, using coded language in a telephone
9 conversation, co-conspirator Alvarez asked co-conspirator Gaitan
10 to provide him with an address to send tax payments destined for
11 Mexican Mafia D.G.

12 97. On May 14, 2013, using coded language in a telephone
13 conversation, co-conspirator R. Contreras asked co-conspirator
14 Gaitan to accompany him to a meeting with an individual to
15 discuss that person's payment of taxes.

16 98. On May 14, 2013, using coded language in a telephone
17 conversation, co-conspirator De La Paz told co-conspirator
18 Gaitan that he had sold most of the methamphetamine provided to
19 him by co-conspirator Gaitan, and that he would bring the
20 proceeds to co-conspirator Gaitan later that evening.

21 99. On May 14, 2013, using coded language in a telephone
22 conversation, co-conspirator R. Contreras told co-conspirator
23 Gaitan that an individual was at home and ready to talk to co-
24 conspirators R. Contreras and Gaitan about her payment of taxes;
25 both agreed to meet near a McDonald's restaurant.

26 100. On May 14, 2013, using coded language in a telephone
27 conversation, co-conspirator Gaitan spoke with an unindicted co-
28 conspirator who asked for co-conspirator M. Salinas's telephone

1 number on behalf of co-conspirator M. Jaimez, and also asked co-
2 conspirator Gaitan to text him (the unindicted co-conspirator)
3 the Green Dot number once \$200 was put onto a Green Dot Card.

4 101. On May 14, 2013, co-conspirators Gaitan and R.
5 Contreras met with an individual to discuss the payment of
6 taxes.

7 102. On May 14, 2013, in a text message, co-conspirator
8 Gaitan sent co-conspirator A. Salinas's telephone number to co-
9 conspirator M. Jaimez so that co-conspirator M. Jaimez could
10 contact co-conspirator A. Salinas for heroin.

11 103. On May 14, 2013, using coded language in a telephone
12 conversation, co-conspirator Gaitan told co-conspirator R.
13 Contreras to let him know when an individual needed more
14 methamphetamine and that the individual was already aware of the
15 pricing.

16 104. On May 14, 2013, and May 15, 2013, using coded
17 language in a series of telephone conversations, co-conspirator
18 Gaitan and an unindicted co-conspirator arranged to meet at a
19 CVS Pharmacy in Whittier, California, so that the unindicted co-
20 conspirator could purchase methamphetamine which would be
21 smuggled into the LACJ, and ultimately to co-conspirator
22 Paniagua.

23 105. On May 15, 2013, co-conspirator Franco drove an
24 unindicted co-conspirator to a CVS in Whittier, California, so
25 that the individual could obtain methamphetamine from co-
26 conspirator Gaitan and then smuggle it into the LACJ for
27 delivery to co-conspirator Paniagua, an inmate at LACJ.

28 106. On May 15, 2013, in a text message, co-conspirator

1 Gaitan sent co-conspirator M. Jaimez the number of a Green Dot
2 card onto which \$200 had been put.

3 107. On May 15, 2013, using coded language in a telephone
4 conversation, co-conspirator M. Jaimez told co-conspirator
5 Gaitan that he had informed the inmate who controlled the prison
6 yard and that he (co-conspirator M. Jaimez) would be selling
7 narcotics in the prison yard on behalf of Mexican Mafia D.G.

8 108. On May 15, 2013, using coded language in a telephone
9 conversation, co-conspirator Gaitan told co-conspirator M.
10 Jaimez that co-conspirator Alvarez was collecting taxes from
11 street gangs in the Sacramento, California, area, on behalf of
12 Mexican Mafia D.G., and asked co-conspirator M. Jaimez to find
13 inmates who could assist with this task.

14 109. On May 15, 2013, using coded language in a telephone
15 conversation, co-conspirator Gaitan told co-conspirator M.
16 Jaimez that co-conspirator M. Salinas had a source of supply who
17 could sell an ounce of heroin for \$600 and that co-conspirator
18 A. Salinas would be picking up the heroin, to which co-
19 conspirator M. Jaimez responded that he would call co-
20 conspirator A. Salinas to touch base with him.

21 110. On May 15, 2013, using coded language in a telephone
22 conversation, co-conspirator M. Jaimez asked co-conspirator
23 Gaitan to tell Mexican Mafia D.G. that he (co-conspirator M.
24 Jaimez) would kill for Mexican Mafia D.G. if he was in the same
25 prison yard as an inmate whom Mexican Mafia D.G. wanted to be
26 killed.

27 111. On May 15, 2013, using coded language in a text
28 message, co-conspirator Gavaldon, Jr. sent co-conspirator

1 Gavaldon, Sr.'s information to co-conspirator Gaitan so that co-
2 conspirator Gaitan could send money to co-conspirator Gavaldon,
3 Sr.

4 112. On May 16, 2013, using coded language in a telephone
5 conversation, co-conspirator M. Salinas told co-conspirator
6 Gaitan that he would send taxes generated from narcotics sales
7 in his prison yard to defendant LOZA and co-conspirator Gaitan;
8 co-conspirator Gaitan told co-conspirator M. Salinas that
9 defendant LOZA would give the proceeds to Mexican Mafia D.G.

10 113. On May 16, 2013, using coded language in a telephone
11 conversation, co-conspirator Gaitan told co-conspirator M.
12 Jaimez that co-conspirator M. Salinas would provide 22 grams of
13 heroin to co-conspirator M. Jaimez for \$600.

14 114. On May 16, 2013, using coded language in a series of
15 text messages, co-conspirator Gaitan instructed co-conspirator
16 Alvarez to send tax payments that he had collected to co-
17 conspirator Felix's residence.

18 115. On May 16, 2013, using coded language in a telephone
19 conversation, defendant SOTELLO told co-conspirator Gaitan that
20 he had shot at an individual, that he had given the firearm to
21 his brother-in-law, and that he would retrieve the firearm and
22 give it to co-conspirator Gaitan so that members of the Canta
23 Ranas Organization could protect themselves from rival Los
24 Nietos gang members.

25 116. On May 16, 2013, using coded language in a telephone
26 conversation, co-conspirator Moreno agreed to purchase two
27 firearms for himself and co-conspirator D. Gonzales from co-
28 conspirator Gaitan's firearms supplier.

1 117. On May 16, 2013, using coded language in a telephone
2 conversation, co-conspirator Alvarez told co-conspirator Gaitan
3 that at co-conspirator Gaitan's direction, he (co-conspirator
4 Alvarez) would arrange to collect taxes from a gang in the
5 Sacramento, California, area.

6 118. On May 17, 2013, using coded language in a telephone
7 conversation, co-conspirator M. Jaimez told co-conspirator
8 Gaitan that he (co-conspirator M. Jaimez) had identified inmates
9 who would assist co-conspirator Alvarez with collecting taxes
10 from gangs in the Sacramento, California, area.

11 119. On May 17, 2013, using coded language in a series of
12 text messages, co-conspirator Gaitan told co-conspirator Alvarez
13 that co-conspirator M. Jaimez had made arrangements for members
14 of the 47th Street gang in Sacramento, California, to assist co-
15 conspirator Alvarez with collecting taxes, to which co-
16 conspirator Alvarez responded that he was already collecting
17 taxes from that gang.

18 120. On May 17, 2013, using coded language in a telephone
19 conversation, co-conspirator Alvarez told co-conspirator Gaitan
20 that an unindicted co-conspirator owed a \$400 drug debt to
21 Mexican Mafia D.G. and another Mexican Mafia member.

22 121. On May 17, 2013, using coded language in a telephone
23 conversation, co-conspirator Higuera told co-conspirator Gaitan
24 that he had money to pay for methamphetamine and that co-
25 conspirator Gaitan should bring the methamphetamine to him.

26 122. On May 17, 2013, using coded language in a telephone
27 conversation, co-conspirator M. Jaimez told co-conspirator
28 Gaitan that his cellmate was going to select the individual from

1 his own gang (the 47th Street criminal gang) who would provide
2 co-conspirator Alvarez with tax payments from that gang.

3 123. On May 17, 2013, using coded language in a series of
4 text messages, co-conspirator Alvarez told co-conspirator Gaitan
5 that although he (co-conspirator Alvarez) was in control of
6 collecting taxes in the Sacramento, California, area, he would
7 facilitate a call between co-conspirator Gaitan and
8 representatives of the 47th Street during which they could
9 discuss the amount of taxes the gang would be expected to pay
10 co-conspirator Alvarez.

11 124. On May 18, 2013, using coded language in a telephone
12 conversation, co-conspirator Casillas told co-conspirator Gaitan
13 that he (co-conspirator Casillas) was still collecting taxes and
14 would give the money to co-conspirator Gaitan as scheduled on
15 the following day; co-conspirator Casillas further told co-
16 conspirator Gaitan that he had encountered an individual, who
17 was not supposed to be around in Canta Ranas Organization
18 territory, but he had not assaulted this individual because he
19 had been told that the individual was hands-off.

20 125. On May 18, 2013, using coded language in a telephone
21 conversation, defendant LOZA instructed co-conspirator M.
22 Salinas to tell an inmate at co-conspirator M. Salinas's prison
23 that he (the inmate) needs to stop saying he was working for
24 Mexican Mafia D.G. and that defendant LOZA was the person who
25 could provide the requisite authority and order the individual
26 to be punished for falsely claiming such authority.

27 126. On May 19, 2013, using coded language in a telephone
28 conversation, co-conspirator A. Gonzalez told co-conspirator

1 Gaitan that he had the taxes and the ability to obtain firearms
2 for the gang.

3 127. On May 20, 2013, using coded language in a telephone
4 conversation, co-conspirator M. Salinas told co-conspirator
5 Gaitan that he would be selling narcotics in the prison yard
6 during that weekend and would send some of the sale proceeds to
7 co-conspirator Gaitan on behalf of co-conspirator M. Jaimez and
8 himself.

9 128. On May 20, 2013, using coded language in a telephone
10 conversation, co-conspirators Gaitan and Orozco discussed a
11 former Canta Ranas Organization member who was in bad standing
12 because he and his family had given information to law
13 enforcement; both further talked about how co-conspirator Orozco
14 had conducted a Canta Ranas Organization meeting with Brown
15 Brotherhood gang members during which he had advised them that
16 this individual was in bad standing, and how co-conspirator A.
17 Gonzalez and others had beaten up this former Canta Ranas
18 Organization member in front of his residence.

19 129. On May 20, 2013, using coded language in a telephone
20 conversation, co-conspirator Orozco told co-conspirator Gaitan
21 to instruct younger Canta Ranas Organization members to stop
22 posting gang-related information on Facebook due to law
23 enforcement's monitoring of that activity.

24 130. On May 21, 2013, using coded language in a series of
25 text messages, co-conspirator S. Jaimez reported to co-
26 conspirator Gaitan that he had \$100 for co-conspirator M.
27 Jaimez, as discussed previously.

28 131. On May 21, 2013, using coded language in a telephone

1 conversation, co-conspirator Gaitan told co-conspirator Antolin
2 that he (co-conspirator Antolin) and other Canta Ranas
3 Organization members owed taxes; co-conspirators Gaitan and
4 Antolin also discussed potential firearms to buy and sell; co-
5 conspirator Antolin moreover referred to co-conspirator Nila's
6 cousin who had recently been shot because he was a "snitch."

7 132. On May 22, 2013, using coded language in a telephone
8 conversation, co-conspirator Casillas told co-conspirator Gaitan
9 that co-conspirator Casillas had \$200 in tax payments and that
10 he (co-conspirator Casillas) would have the full amount owed
11 after he sold the drugs within his possession; co-conspirator
12 Gaitan instructed co-conspirator Casillas to collect taxes from
13 co-conspirators Antolin and Pizano, to which co-conspirator
14 Casillas agreed and stated that he would assault them if they
15 opposed paying the tax.

16 133. On May 23, 2013, using coded language in a telephone
17 conversation, co-conspirator Felix told co-conspirator Gaitan
18 that he was willing to send money to co-conspirator Gavaldon,
19 Sr. in prison, and to use his name and address when doing so.

20 134. On May 23, 2013, using coded language in a telephone
21 conversation, co-conspirator Gavaldon, Jr. agreed to send co-
22 conspirator Gavaldon, Sr.'s information to co-conspirator Gaitan
23 so that co-conspirator Gaitan could transmit \$100 in taxes to
24 co-conspirator Gavaldon, Sr.

25 135. On May 23, 2013, using coded language in a text
26 message, co-conspirator Gavaldon, Jr. provided co-conspirator
27 Gavaldon, Sr.'s name and inmate registration number to co-
28 conspirator Gaitan as previously agreed.

1 136. On May 23, 2013, co-conspirator Gaitan drove co-
2 conspirator Felix to a Western Union located in Whittier,
3 California, where co-conspirator Felix wired \$100 in tax
4 proceeds into co-conspirator Gavaldon, Sr.'s prison account.

5 137. On May 23, 2013, using coded language in a telephone
6 conversation, co-conspirators Gaitan and Casillas talked about
7 co-conspirator Casillas's efforts to collect taxes from co-
8 conspirators Antolin and Pizano.

9 138. On May 23, 2013, using coded language in a telephone
10 conversation, co-conspirator Gaitan told co-conspirator Pizano
11 that he (co-conspirator Pizano) would need to pay double the
12 taxes he owed because he was late on the payments, to which co-
13 conspirator Pizano responded that he would pay co-conspirator
14 Gaitan the remaining \$30 by no later than the following day.

15 139. On May 23, 2013, defendant LOZA went to co-conspirator
16 Olivas's residence to give co-conspirator Olivas tax proceeds to
17 help pay for co-conspirator Olivas's trip to Pelican Bay State
18 Prison so that she could meet with, and receive orders from,
19 Mexican Mafia D.G.

20 140. On May 25, 2013, using coded language in a telephone
21 conversation, co-conspirator Casillas informed co-conspirator
22 Gaitan that he had three grams of methamphetamine to sell before
23 he would have the full amount of taxes owed to co-conspirator
24 Gaitan, who, in turn, said he would use this money to purchase
25 additional narcotics.

26 141. On May 25, 2013, using coded language in a telephone
27 conversation, co-conspirators Gaitan and Casillas discussed that
28 co-conspirator Goulet had been "jumped into" the CR gang by co-

1 conspirator Morales, that co-conspirator Goulet had to be hit on
2 the head with a firearm to get him off another individual with
3 whom co-conspirator Goulet had been fighting, and that co-
4 conspirator Goulet was willing to collect taxes on behalf of the
5 Canta Ranas Organization.

6 142. On May 25, 2013, using coded language in a telephone
7 conversation, co-conspirator S. Jaimez told co-conspirator
8 Gaitan that he would give co-conspirator Gaitan \$100 later that
9 day for co-conspirator M. Jaimez, as discussed previously.

10 143. On May 25, 2013, using coded language in a series of
11 text messages, co-conspirator Antolin asked co-conspirator
12 Gaitan about the availability of firearms.

13 144. On May 26, 2013, using coded language in a telephone
14 conversation, co-conspirator Gaitan asked co-conspirator De La
15 Paz to pay for the methamphetamine which co-conspirator Gaitan
16 had "fronted," to which co-conspirator De La Paz responded that
17 he had not sold all of it yet and was waiting for co-
18 conspirators Nila and Viramontes to pay him for the
19 methamphetamine that he had distributed to them.

20 145. On May 26, 2013, using coded language in a series of
21 text messages, co-conspirator R. Contreras told co-conspirator
22 Gaitan that an individual needed more methamphetamine.

23 146. On May 26, 2013, using coded language in a telephone
24 conversation, co-conspirator De La Paz asked co-conspirator
25 Gaitan for permission to ask co-conspirator R. Contreras to pay
26 the \$20 he owed so that co-conspirator De La Paz could use that
27 money to help pay his drug debt to co-conspirator Gaitan; co-
28 conspirator Gaitan told co-conspirator De La Paz that he (co-

1 conspirator De La Paz) could try to get the money from co-
2 conspirator R. Contreras but that if he was not able to do so,
3 co-conspirator Gaitan would get the money from co-conspirator R.
4 Contreras himself.

5 147. On May 26, 2013, using coded language in a telephone
6 conversation, co-conspirator Gaitan confirmed to co-conspirator
7 De La Paz that he ordered unidentified co-conspirators to
8 collect taxes, but that he had not instructed them to collect
9 from co-conspirator De La Paz yet because he sent them to
10 individuals for collection only when necessary.

11 148. On May 27, 2013, using coded language in a telephone
12 conversation, co-conspirators Gaitan and Casillas talked about
13 co-conspirator Casillas collecting late tax payments from Canta
14 Ranas Organization members and assaulting them for being late on
15 such payments.

16 149. On May 27, 2013, using coded language in a telephone
17 conversation, co-conspirator Bowers asked co-conspirator Gaitan
18 for narcotics to sell.

19 150. On May 27, 2013, using coded language in a series of
20 text messages, co-conspirator Vandoren asked co-conspirator
21 Gaitan for methamphetamine, to which co-conspirator Gaitan
22 responded that he may have some the following day.

23 151. On May 29, 2013, using coded language in a telephone
24 conversation, co-conspirators Gaitan and Casillas talked about
25 the quality of the narcotics being sold by the Canta Ranas
26 Organization, and also the taxes co-conspirator Casillas was
27 collecting pursuant to co-conspirator Gaitan's instructions.

28 152. On May 29, 2013, using coded language in a telephone

1 conversation, co-conspirator Gaitan told co-conspirator Vandoren
2 that he would distribute methamphetamine to co-conspirator
3 Vandoren via co-conspirator Casillas at a cost of between \$500
4 to \$550 per ounce, with the price tied to how long it would take
5 for co-conspirator Vandoren to sell the methamphetamine.

6 153. On May 30, 2013, using coded language in a text
7 message, co-conspirator Moreno asked co-conspirator Gaitan if
8 co-conspirator Gaitan had an "eight ball" (approximately 3.5
9 grams of methamphetamine) for sale.

10 154. On May 31, 2013, using coded language in a telephone
11 conversation, co-conspirator Antolin, after advising co-
12 conspirator Gaitan that he and co-conspirator Vandoren had tax
13 payments for co-conspirator Gaitan, discussed with co-
14 conspirator Gaitan whether co-conspirator Gaitan would use the
15 \$160 in tax payments provided by co-conspirator Nila to purchase
16 a firearm.

17 155. On June 1, 2013, using coded language in a telephone
18 conversation, co-conspirator Mendoza asked co-conspirator Gaitan
19 if he had methamphetamine, to which co-conspirator Gaitan
20 responded that he would have some to distribute the following
21 day.

22 156. On June 2, 2013, using coded language in a telephone
23 conversation, co-conspirator M. Jaimez told co-conspirator
24 Gaitan that he had begun selling narcotics in the prison yard,
25 and that he would send co-conspirator Gaitan tax payments to
26 give to Mexican Mafia D.G. on his behalf.

27 157. On June 2, 2013, in a parking lot in Pico Rivera,
28 California, co-conspirator Vasquez distributed one-half pound of

1 methamphetamine to co-conspirator Gaitan.

2 158. On June 2, 2013, co-conspirator Gaitan brought one-
3 half pound of methamphetamine to co-conspirator D. Contreras so
4 that she could repackage it for sale.

5 159. On June 2, 2013, using coded language in a telephone
6 conversation, co-conspirator D. Contreras told co-conspirator
7 Gaitan that she was in the process of repackaging the
8 methamphetamine.

9 160. On June 2, 2013, using coded language in a telephone
10 conversation, co-conspirator D. Contreras told co-conspirator
11 Gaitan that co-conspirator A. Gaitan had called and had arranged
12 to pick up the methamphetamine after visiting a store.

13 161. On June 2, 2013, using coded language in a telephone
14 conversation, co-conspirator Gaitan asked co-conspirator A.
15 Gaitan why it was taking co-conspirator A. Gaitan so long to get
16 methamphetamine from co-conspirator D. Contreras's residence, to
17 which co-conspirator A. Gaitan responded that she was running
18 late because she had to stop by a store to get something to hide
19 the methamphetamine in before she could pick it up.

20 162. On June 2, 2013, co-conspirator D. Contreras
21 distributed approximately one-half pound of methamphetamine to
22 co-conspirator A. Gaitan.

23 163. On June 2, 2013, using coded language in a Facebook
24 conversation, co-conspirator Felix sent co-conspirator R.
25 Contreras a threatening message, instructing co-conspirator R.
26 Contreras to contact co-conspirator Gaitan because he (co-
27 conspirator R. Contreras) had not paid the \$150 monthly tax.

28 164. On June 2, 2013, using coded language in a telephone

1 conversation, co-conspirator Gaitan instructed co-conspirator
2 Mendoza to go to his (co-conspirator Gaitan's) residence in
3 forty-five minutes to pick up methamphetamine.

4 165. On June 2, 2013, co-conspirator Mendoza went to co-
5 conspirator Gaitan's residence and picked up approximately 16.2
6 grams of methamphetamine from co-conspirator Gaitan.

7 166. On June 2, 2013, co-conspirator Mendoza possessed a
8 9mm semi-automatic Glock pistol with a magazine containing 18
9 rounds of ammunition, including five hollow point bullets, and
10 two baggies containing a total of approximately 16.2 grams of
11 methamphetamine.

12 167. On June 3, 2013, using coded language in a telephone
13 conversation, co-conspirator D. Contreras ordered half-an-ounce
14 of methamphetamine from co-conspirator Gaitan.

15 168. On June 3, 2013, using coded language in a telephone
16 conversation, co-conspirator Casillas told co-conspirator Gaitan
17 that he (co-conspirator Casillas) still had two eight-balls
18 (approximately 3.5 grams of methamphetamine each) left to sell.

19 169. On June 4, 2013, using coded language in a telephone
20 conversation, co-conspirator Antolin told co-conspirator Gaitan
21 that he had been incarcerated for five days for possessing the
22 kitchen knife which he always carried, after which the two
23 discussed the taxes owed by an unidentified individual, with co-
24 conspirator Gaitan telling co-conspirator Antolin that it would
25 be the normal \$550 minus whatever co-conspirator Antolin owed.

26 170. On June 5, 2013, using coded language in a text
27 message, co-conspirator Morales told co-conspirator Gaitan that
28 he had spoken with defendant LOZA, and that defendant LOZA

1 wanted his drug debt to be paid in cash, not by the provision of
2 goods to defendant LOZA and co-conspirator Gaitan.

3 171. On June 6, 2013, using coded language in a telephone
4 conversation, co-conspirator Gaitan advised co-conspirator
5 Orozco that he had spoken with a Brown Brotherhood gang member
6 and had told the individual that it was okay if he did not buy
7 methamphetamine from co-conspirator Gaitan, but that he had to
8 pay \$100 in taxes to the Canta Ranas Organization the first of
9 every month for the right to sell narcotics in its territory,
10 which co-conspirator Orozco noted was a fair arrangement.

11 172. On June 5, 2013, using coded language in a text
12 message, co-conspirator Morales told co-conspirator Gaitan that
13 he would be working hard to obtain money to pay off his drug
14 debt.

15 173. On June 8, 2013, in Whittier, California, co-
16 conspirator Espinoza punched an individual whom he believed to
17 be a member of a rival gang and who had yelled, "Fuck CR," and
18 co-conspirator Villalba thereafter further assaulted the
19 individual while the individual was lying unconscious on the
20 ground.

21 174. On June 8, 2013, using coded language in a series of
22 text messages, co-conspirator Gaitan asked if co-conspirator
23 Morales could give him money for methamphetamine which he (co-
24 conspirator Morales) had previously obtained because he (co-
25 conspirator Gaitan) needed to pay co-conspirator Vasquez for
26 methamphetamine which co-conspirator Vasquez had "fronted" to
27 co-conspirator Gaitan.

28 175. On June 9, 2013, using coded language in a telephone

1 conversation, co-conspirator Antolin informed co-conspirator
2 Gaitan that he (co-conspirator Antolin) had collected \$160 in
3 tax payments which were to be given to co-conspirator Gaitan.

4 176. On June 10, 2013, using coded language in a series of
5 text messages, co-conspirator Vandoren asked co-conspirator
6 Gaitan if he had methamphetamine for co-conspirator Vandoren to
7 sell because co-conspirator Vandoren only had \$70.

8 177. On June 11, 2013, using coded language in a series of
9 text messages, co-conspirator A. Gaitan told co-conspirator
10 Gaitan that the money that co-conspirator D. Contreras had
11 provided for narcotics was at their residence and inside a box
12 containing a scale.

13 178. On June 11, 2013, using coded language in a telephone
14 conversation, defendant LOZA told co-conspirator Gaitan to hold
15 onto narcotics proceeds for co-conspirator Gavaldon, Jr., who
16 would then transmit them to co-conspirator Olivas.

17 179. On June 11, 2013, at the direction of defendant LOZA,
18 co-conspirator Gaitan possessed tax payments dropped off by co-
19 conspirator Moreno and another individual.

20 180. On June 12, 2013, using coded language in a telephone
21 conversation, co-conspirators Gaitan and Casillas discussed the
22 actual weight of the ounce of methamphetamine which co-
23 conspirator Casillas had picked up from co-conspirator Gaitan,
24 as co-conspirator Casillas believed it was short of an ounce.

25 181. On June 12, 2013, using coded language in a telephone
26 conversation, co-conspirator Villalba told co-conspirator Gaitan
27 that he intended to purchase two 30-round rifle magazines for
28 co-conspirator Gaitan, to which co-conspirator Gaitan responded

1 that "one could never have too many" and further stated that he
2 wanted to shoot his "AR."

3 182. On June 13, 2013, using coded language in a series of
4 text messages, co-conspirator Gaitan asked co-conspirator
5 Villalba if he could purchase four 30-round magazines because
6 co-conspirator Gaitan was going to give two of the magazines to
7 another individual, to which co-conspirator Villalba responded
8 that he would be picking the four magazines up the following
9 day.

10 183. On June 13, 2013, using coded language in a telephone
11 conversation, co-conspirator Vandoren told co-conspirator Gaitan
12 that he was coming over to co-conspirator Gaitan's residence to
13 pick up methamphetamine.

14 184. On June 13, 2013, using coded language in a telephone
15 conversation, co-conspirator A. Jaimez told co-conspirator
16 Gaitan that he (co-conspirator A. Jaimez) needed a firearm
17 because he was always running into rival Los Nietos gang
18 members, and that he had sent a text message to co-conspirator
19 De La Paz, asking him if he could borrow co-conspirator De La
20 Paz's firearm.

21 185. On June 13, 2013, co-conspirator Gaitan distributed
22 approximately 26.4 grams of methamphetamine to co-conspirator
23 Vandoren.

24 186. On June 14, 2013, using coded language in a text
25 message, co-conspirator Gaitan sent co-conspirator A. Gaitan
26 banking information for co-conspirator Villalba's wife so that
27 co-conspirator A. Gaitan could electronically send her money to
28 pay for 30-round rifle magazines which co-conspirator Villalba

1 was buying on co-conspirator Gaitan's behalf.

2 187. On June 14, 2013, using coded language in a telephone
3 conversation, co-conspirators Gaitan and Gavaldon, Jr. agreed to
4 meet the following day so that co-conspirator Gaitan could give
5 co-conspirator Gavaldon, Jr. money to give co-conspirator
6 Olivas.

7 188. On June 14, 2013, using coded language in a telephone
8 conversation, co-conspirator Villalba told co-conspirator Gaitan
9 that he had purchased eight 30-round magazines; co-conspirator
10 Gaitan stated that he wanted to shoot his firearm and that he
11 also wanted to take the "AR" and "the Calico."

12 189. On June 14, 2013, using coded language in a telephone
13 conversation, co-conspirator Gaitan asked co-conspirator
14 Gavaldon, Jr. to attend the Canta Ranas Organization meeting set
15 for the following day, explaining that it was important for more
16 senior members like co-conspirator Gavaldon, Jr. to be there to
17 set the younger ones straight, to which co-conspirator Gavaldon,
18 Jr. responded that he would let co-conspirator Gaitan know if he
19 could attend the meeting.

20 190. On June 14, 2013, using coded language in a series of
21 text messages, co-conspirator Felix asked co-conspirator Gaitan
22 if he could purchase methamphetamine from co-conspirator Gaitan.

23 191. On June 15, 2013, using coded language in a telephone
24 conversation, defendant SOTELLO ordered methamphetamine from co-
25 conspirator Gaitan.

26 192. On June 15, 2013, defendant SOTELLO drove to co-
27 conspirator Gaitan's residence to pick up methamphetamine.

28

1 193. On June 17, 2013, using coded language in a text
2 message, co-conspirator Vandoren, who had been stopped by law
3 enforcement after picking up drugs at co-conspirator Gaitan's
4 residence, warned co-conspirator Gaitan that law enforcement was
5 conducting surveillance of co-conspirator Gaitan's residence.

6 194. On June 17, 2013, using coded language in a telephone
7 conversation, co-conspirator Vandoren told co-conspirator Gaitan
8 that he was at the tow yard and that he would find out if law
9 enforcement had found the methamphetamine that he had stored in
10 the vehicle.

11 195. On June 18, 2013, using coded language in a telephone
12 conversation, co-conspirator Espinoza told co-conspirator Gaitan
13 about a recent altercation he had with rival Las Tres Palmas
14 gang members.

15 196. On June 18, 2013, using coded language in a telephone
16 conversation, co-conspirator Espinoza told co-conspirator Gaitan
17 that he would attend the meeting arranged by defendant LOZA and
18 co-conspirator Gaitan, and that he would assault any members of
19 the Canta Ranas Organization whom co-conspirator Gaitan believed
20 to be in need of discipline.

21 197. On June 19, 2013, using coded language in a telephone
22 conversation, co-conspirator Felix told co-conspirator Gaitan
23 that co-conspirator Felix would deliver to co-conspirator Gaitan
24 any tax payments mailed by co-conspirator Alvarez.

25 198. On June 19, 2013, using coded language in a telephone
26 conversation, defendant SOTELLO asked co-conspirator Gaitan to
27 bring to his residence between half-an-ounce to an ounce of
28 methamphetamine, to which co-conspirator Gaitan agreed.

1 199. On June 19, 2013, co-conspirator Gaitan distributed
2 approximately 14 grams of methamphetamine to defendant SOTELLO.

3 200. On June 19, 2013, using coded language in a telephone
4 conversation, co-conspirator Gaitan asked co-conspirator Felix
5 to get co-conspirator Gaitan's firearms magazines out of co-
6 conspirator Felix's garage because co-conspirator Gaitan was
7 going to the shooting range.

8 201. On June 19, 2013, using coded language in a telephone
9 conversation, co-conspirator Felix told co-conspirator Gaitan
10 that he would leave keys with co-conspirator Gaitan so that
11 defendant LOZA and co-conspirator Gaitan could hold a Canta
12 Ranas Organization meeting at his residence while he and his
13 mother were out.

14 202. On June 20, 2013, using coded language in a telephone
15 conversation with co-conspirator Gaitan, co-conspirator S.
16 Jaimez agreed to attend a Canta Ranas Organization meeting and
17 to let other CR gang members know about the meeting.

18 203. On June 20, 2013, co-conspirator Goulet and an
19 unindicted co-conspirator drove to Riverside, California, to
20 collect taxes from the Casa Blanca gang on behalf of Mexican
21 Mafia D.G.

22 204. On June 20, 2013, using coded language in a telephone
23 conversation, co-conspirator Gaitan told co-conspirator A.
24 Gonzalez that co-conspirator Goulet was collecting taxes from
25 the Casa Blanca gang in Riverside, California.

26 205. On June 20, 2013, using coded language in a telephone
27 conversation, co-conspirator Gaitan instructed co-conspirator A.
28

1 Gonzalez to order other CR gang members to assault an individual
2 who owed money to co-conspirator Gaitan upon encountering him.

3 206. On June 20, 2013, co-conspirator Gaitan told co-
4 conspirator A. Gonzalez that he (co-conspirator A. Gonzalez)
5 needed to attend a Canta Ranas Organization meeting the upcoming
6 Saturday.

7 207. On June 20, 2013, using coded language in a telephone
8 conversation, co-conspirator A. Gonzalez told co-conspirator
9 Gaitan that he and an unindicted co-conspirator attempted to
10 collect taxes from another unindicted co-conspirator.

11 208. On June 20, 2013, using coded language in a text
12 message, co-conspirator Villalba asked co-conspirator Gaitan
13 whether he (co-conspirator Gaitan) wanted to buy 240 rounds of
14 7.62 mm ammunition from a third-party supplier.

15 209. On June 20, 2013, using coded language in a telephone
16 conversation, co-conspirator Gaitan told co-conspirator Alvarez
17 that he (co-conspirator Gaitan) had received the tax payments
18 which co-conspirator Alvarez had mailed.

19 210. On June 21, 2013, using coded language in a text
20 message, co-conspirator Gaitan warned defendant SOTELLO to be
21 careful of rival Whittier Varrio Locos gang members who were in
22 Canta Ranas Organization territory.

23 211. On June 21, 2013, using coded language in a telephone
24 conversation, co-conspirator Gaitan told defendant SOTELLO that
25 co-conspirator Moreno had been shot by rival Whittier Varrio
26 Locos gang members, to which defendant SOTELLO responded that he
27 would tell co-conspirator Gaitan where three Whittier Varrio
28 Locos street gang members were when he returned home, and noted

1 that those three individuals only had a .22 caliber firearm.

2 212. On June 21, 2013, using coded language in a telephone
3 conversation, co-conspirator Felix told co-conspirator Gaitan
4 that co-conspirator Alvarez had mailed \$300 to co-conspirator
5 Felix's residence.

6 213. On June 21, 2013, using coded language in a telephone
7 conversation, co-conspirator Gaitan told co-conspirator Villalba
8 that he had a lot of 7.62 mm ammunition and was not interested
9 in purchasing more unless co-conspirator Villalba was able to
10 secure a really favorable deal.

11 214. On June 21, 2013, using coded language in a telephone
12 conversation, co-conspirator Felix attempted to persuade co-
13 conspirator Gaitan not to hold a Canta Ranas Organization
14 meeting at co-conspirator Felix's residence because co-
15 conspirator Felix was storing co-conspirator Gaitan's firearms
16 and receiving taxes at his residence, and did not want to
17 attract law enforcement's attention to the residence.

18 215. On June 22, 2013, using coded language in a telephone
19 conversation, co-conspirator Felix told co-conspirator Gaitan to
20 come to his residence so that co-conspirator Gaitan could see
21 the layout of co-conspirator Felix's backyard for the purpose of
22 holding a Canta Ranas Organization meeting.

23 216. On June 22, 2013, co-conspirator Gaitan went to co-
24 conspirator Felix's residence in Whittier, California, to see if
25 the layout was appropriate for a Canta Ranas Organization
26 meeting defendant LOZA and co-conspirator Gaitan were conducting
27 later that day.

28

1 217. On June 22, 2013, using coded language in a telephone
2 conversation with co-conspirator Gaitan, co-conspirator S.
3 Jaimez agreed to call co-conspirator Pizano to confirm his
4 attendance at the Canta Ranas Organization meeting.

5 218. On June 22, 2013, using coded language in a telephone
6 conversation, co-conspirator Gaitan told co-conspirator
7 Rodriguez to have co-conspirator Nila call him regarding the
8 Canta Ranas Organization meeting.

9 219. On June 22, 2013, using coded language in a telephone
10 conversation, defendant LOZA asked co-conspirator Rodriguez
11 about the whereabouts of her son, co-conspirator Nila, because
12 co-conspirator Nila needed to attend the Canta Ranas
13 Organization meeting where people were going to speak "bad"
14 about him, so he could "explain himself."

15 220. On June 22, 2013, using coded language in a telephone
16 conversation, co-conspirator Nila told defendant LOZA that he
17 and co-conspirator Rodriguez were en route to the Canta Ranas
18 Organization meeting.

19 221. On June 22, 2013, using coded language in a telephone
20 conversation, co-conspirator Rodriguez asked co-conspirator Nila
21 if he was ready to be picked up from the Canta Ranas
22 Organization meeting, and co-conspirator Nila said he was.

23 222. On June 22, 2013, in Whittier, California, defendant
24 LOZA and co-conspirator Gaitan held a Canta Ranas Organization
25 meeting, during which defendant LOZA ordered younger and
26 subordinate gang members to assault other members who were in
27 bad standing.

28 223. On June 22, 2013, in response to co-conspirator

1 Gaitan's text message identifying its location, co-conspirator
2 A. Jaimez attended the Canta Ranas Organization meeting in
3 Whittier, California, which was arranged by defendant LOZA and
4 co-conspirator Gaitan.

5 224. On June 22, 2013, in Whittier, California, co-
6 conspirator Espinoza attended the Canta Ranas Organization
7 meeting that was arranged by defendant LOZA and co-conspirator
8 Gaitan.

9 225. On June 22, 2013, co-conspirator S. Jaimez attended
10 the Canta Ranas Organization meeting in Whittier, California,
11 which was arranged by co-conspirator Gaitan and defendant LOZA.

12 226. On June 22, 2013, using coded language in a telephone
13 conversation, co-conspirator Gaitan told co-conspirator A.
14 Gaitan that co-conspirators A. Gonzalez, Antolin, and Viramontes
15 had not attended the Canta Ranas Organization meeting that day
16 and would be beaten for skipping the meeting.

17 227. On June 22, 2013, using coded language in a series of
18 text messages, co-conspirator Gaitan told co-conspirator
19 Villalba that he would get magazines for co-conspirator
20 Villalba's Glock pistol after co-conspirator Villalba identified
21 for him the model of the Glock in his (co-conspirator
22 Villalba's) possession.

23 228. On June 22, 2013, using coded language in an in-person
24 visit at Pelican Bay State Prison, co-conspirator Olivas
25 confirmed to Mexican Mafia D.G. that defendant LOZA had provided
26 her with \$200 to help pay for her trip to see Mexican Mafia D.G.

27 229. On June 22, 2013, using coded language in a telephone
28 conversation, co-conspirator Alatorre agreed to meet with co-

1 conspirator Gaitan to pay taxes he owed.

2 230. On June 23, 2013, using coded language in an in-person
3 visit at Pelican Bay State Prison, Mexican Mafia D.G. instructed
4 co-conspirator Olivas (along with defendant LOZA, who was not
5 present) to relay the message to an individual that the person
6 did not have permission to collect taxes from street gangs or to
7 conduct any criminal activities under Mexican Mafia D.G.'s
8 authority/name, to which co-conspirator Olivas agreed.

9 231. On June 23, 2013, using coded language in an in-person
10 visit at Pelican Bay State Prison, Mexican Mafia D.G. instructed
11 co-conspirator Olivas to tell defendant LOZA not to give co-
12 conspirator Gavaldon, Sr. any money collected by the Canta Ranas
13 Organization, to which co-conspirator Olivas agreed.

14 232. On June 24, 2013, using coded language in a telephone
15 conversation, co-conspirator Alatorre told co-conspirator Gaitan
16 that he would come to co-conspirator Gaitan's house to pay him
17 \$100 in taxes.

18 233. On June 24, 2013, using coded language in a telephone
19 conversation, co-conspirator Bowers told co-conspirator Gaitan
20 that he (co-conspirator Bowers) had assaulted an individual when
21 he collected taxes from the individual because the person had
22 disrespected the neighborhood; co-conspirator Gaitan told co-
23 conspirator Bowers to give him the money.

24 234. On June 24, 2013, using coded language in a telephone
25 conversation, defendant LOZA told co-conspirator Gaitan that he
26 went to co-conspirator Mendoza's mother's residence to collect
27 payment for the methamphetamine which had been seized from co-
28 conspirator Mendoza by law enforcement.

1 235. On June 24, 2013, using coded language in a telephone
2 conversation, co-conspirator N. Jaimez told co-conspirator
3 Gaitan that he would help collect taxes from co-conspirator
4 Pizano.

5 236. On June 24, 2013, using coded language in a telephone
6 conversation, co-conspirator Gaitan provided co-conspirator N.
7 Jaimez with co-conspirator Goulet's telephone number and asked
8 him to help co-conspirator Goulet collect taxes from the Casa
9 Blanca street gang in Riverside, California, which co-
10 conspirator N. Jaimez agreed to do.

11 237. On June 24, 2013, using coded language in a telephone
12 conversation, co-conspirator Bowers told co-conspirator Gaitan
13 that he (co-conspirator Bowers) had paid a debt to the Brown
14 Brotherhood street gang on behalf of co-conspirator R.
15 Contreras, and that when co-conspirator Bowers went to collect
16 the money back from co-conspirator R. Contreras, co-conspirator
17 Bowers had assaulted co-conspirator R. Contreras for not paying
18 him back.

19 238. On June 26, 2013, using coded language in a telephone
20 conversation, co-conspirators Gaitan and S. Jaimez talked about
21 co-conspirator A. Jaimez going to Riverside, California, to help
22 co-conspirator Goulet collect taxes from the Casa Blanca gang.

23 239. On June 26, 2013, co-conspirator A. Jaimez went to
24 Riverside, California, to meet with co-conspirator Goulet to
25 discuss the collection of taxes from the Casa Blanca gang.

26 240. On June 26, 2013, using coded language in a series of
27 text messages, co-conspirators Gaitan and Moreno agreed to meet
28 in order for co-conspirator Moreno to purchase approximately 3.5

1 grams of methamphetamine from co-conspirator Gaitan.

2 241. On June 27, 2013, using coded language in a telephone
3 conversation, co-conspirator A. Jaimez confirmed with co-
4 conspirator Gaitan that he (co-conspirator A. Jaimez) had met
5 with co-conspirator Goulet in Riverside, California, regarding
6 the collection of taxes from the Casa Blanca gang.

7 242. On June 27, 2013, using coded language in a telephone
8 conversation, co-conspirator A. Jaimez agreed to help co-
9 conspirator Gaitan collect taxes from Canta Ranas Organization
10 members and to beat them up if they were unable or unwilling to
11 pay.

12 243. On June 27, 2013, using coded language in a telephone
13 conversation, co-conspirator Higuera asked co-conspirator Gaitan
14 to sell him half-an-ounce of methamphetamine for \$250, which he
15 reminded co-conspirator Gaitan had been the price paid in a
16 prior transaction.

17 244. On June 27, 2013, using coded language in a series of
18 text messages, co-conspirator Gaitan asked co-conspirator
19 Antolin for help in collecting \$210 in outstanding tax payments
20 owed by an individual.

21 245. On June 29, 2013, using coded language in a series of
22 text messages, co-conspirator Moreno asked co-conspirator Gaitan
23 for 3.5 grams of methamphetamine.

24 246. On June 29, 2013, co-conspirator Moreno went to co-
25 conspirator Gaitan's residence to pick up methamphetamine.

26 247. On June 29, 2013, co-conspirator Gaitan distributed
27 approximately 3.5 grams of methamphetamine to co-conspirator
28 Moreno.

1 248. On June 29, 2013, using coded language in a telephone
2 conversation, co-conspirator A. Jaimez told co-conspirator
3 Gaitan that he wanted to assault co-conspirators Viramontes and
4 A. Gonzalez for their transgressions against the Canta Ranas
5 Organization, which included not paying their share of taxes.

6 249. On June 29, 2013, using coded language in a telephone
7 conversation, co-conspirator Goulet advised co-conspirator
8 Gaitan that he would pay the money he owed co-conspirator Gaitan
9 as soon as he completed two additional drug sales.

10 250. On June 29, 2013, using coded language in a telephone
11 conversation, co-conspirator Goulet told co-conspirator Gaitan
12 that he had \$140 to give to co-conspirator Gaitan, and that
13 another individual owed him (co-conspirator Goulet) \$200, to
14 which co-conspirator Gaitan responded that co-conspirator Goulet
15 owed about \$1,855; co-conspirator Goulet then told co-
16 conspirator Gaitan that he had five grams of methamphetamine to
17 sell.

18 251. On June 29, 2013, using coded language in a telephone
19 conversation, co-conspirator Goulet confirmed to co-conspirator
20 Gaitan that he was going to meet with a Casa Blanca gang member
21 to discuss collecting taxes from that gang, and asked co-
22 conspirator Gaitan if he should bring a firearm when doing so.

23 252. On June 29, 2013, using coded language in a telephone
24 conversation, defendant LOZA called co-conspirator Vandoren's
25 brother in an attempt to locate co-conspirator Vandoren to
26 collect payment for the methamphetamine law enforcement had
27 seized from co-conspirator Vandoren.

28 253. On June 30, 2013, using coded language in a telephone

1 conversation, defendant LOZA called an unindicted co-conspirator
2 to get an update on efforts to collect the taxes owed by co-
3 conspirators Mendoza and Morales.

4 254. On June 30, 2013, using coded language in a telephone
5 conversation, defendant LOZA called co-conspirator Vandoren and
6 instructed him to pay the money co-conspirator Vandoren owed for
7 the methamphetamine seized by law enforcement.

8 255. On June 30, 2013, using coded language in a telephone
9 conversation, co-conspirator Vandoren told defendant LOZA that
10 he had fled to Maine because he believed law enforcement was
11 onto defendant LOZA and co-conspirator Gaitan, as co-conspirator
12 Vandoren had been pulled over only ten minutes after obtaining
13 methamphetamine from co-conspirator Gaitan.

14 256. On June 30, 2013, using coded language in a telephone
15 conversation, co-conspirator Vandoren told defendant LOZA that
16 he would send defendant LOZA the money he owed for the
17 methamphetamine seized by law enforcement from money he earned
18 working on a fishing boat.

19 257. On June 30, 2013, using coded language in a recorded
20 voicemail, co-conspirator Bowers told co-conspirator Gaitan that
21 half of the \$120 in taxes which he (co-conspirator Bowers) had
22 given to co-conspirator Gaitan was from a particular drug
23 dealer.

24 258. On June 30, 2013, using coded language in a telephone
25 conversation, co-conspirator Goulet informed co-conspirator
26 Gaitan that he had met with the Casa Blanca gang member who had
27 gotten him "into the hood" and had told the individual that co-
28 conspirator Goulet was collecting taxes on behalf of Mexican

1 Mafia D.G., to which co-conspirator Gaitan reiterated that co-
2 conspirator Goulet had to make sure that the Casa Blanca gang
3 understood that the collections were on behalf of Mexican Mafia
4 D.G.

5 259. On June 30, 2013, using coded language in a telephone
6 conversation, co-conspirator Higuera told co-conspirator Gaitan
7 that he (co-conspirator Higuera) had a 17-round 9mm magazine
8 which he wanted to give to co-conspirator Gaitan so that it
9 could then be given to another unindicted co-conspirator.

10 260. On June 30, 2013, using coded language in a telephone
11 conversation, co-conspirator Gaitan told co-conspirator Higuera
12 to put co-conspirator Higuera's and co-conspirator Goulet's tax
13 payments in his (co-conspirator Gaitan's) mailbox and that he
14 would give co-conspirator Higuera more methamphetamine if he
15 returned home in time.

16 261. On June 30, 2013, using coded language in a text
17 message, defendant LOZA instructed an individual to tell co-
18 conspirator Vandoren to stop hiding and to pay the money he owed
19 for the methamphetamine seized by law enforcement.

20 262. On July 1, 2013, using coded language in a text
21 message, co-conspirator Goulet told co-conspirator Gaitan that
22 he was meeting with a Casa Blanca gang member to discuss the
23 taxing of that gang.

24 263. On July 1, 2013, using coded language in a telephone
25 conversation, defendant LOZA and co-conspirator Mendoza
26 discussed how defendant LOZA had been to co-conspirator
27 Mendoza's residence seven days in a row in an attempt to talk to
28 co-conspirator Mendoza about the money he owed due to law

1 enforcement seizing methamphetamine from co-conspirator Mendoza,
2 with co-conspirator Mendoza explaining that he was staying away
3 from his residence due to his perception that law enforcement
4 was targeting the house because he was always getting pulled
5 over by law enforcement after leaving it.

6 264. On July 1, 2013, using coded language in a telephone
7 conversation, co-conspirators Gaitan and Casillas talked about
8 the collection of taxes from two drug dealers operating in Canta
9 Ranas Organization territory, and the need for co-conspirator
10 Casillas to deliver the money to co-conspirator Gaitan; co-
11 conspirators Gaitan and Casillas also talked about re-supplying
12 both dealers and about whether they could sell a whole ounce of
13 methamphetamine in time.

14 265. On July 1, 2013, using coded language in a telephone
15 conversation, co-conspirator A. Gaitan told co-conspirator
16 Gaitan that she needed to bring methamphetamine to co-
17 conspirator D. Contreras.

18 266. On July 2, 2013, using coded language in a series of
19 text messages, co-conspirator D. Contreras told co-conspirator
20 Gaitan that she had provided a drug dealer with methamphetamine
21 and that the individual might need more methamphetamine.

22 267. On July 2, 2013, using coded language in a telephone
23 conversation, co-conspirator Goulet told co-conspirator Gaitan
24 that he had fixed a firearm, which co-conspirator Gaitan agreed
25 to accept and apply to co-conspirator Goulet's "tab" of what he
26 owed co-conspirator Gaitan.

27 268. On July 2, 2013, at a location within Canta Ranas
28 Organization territory, co-conspirator Morales met with

1 defendant LOZA and co-conspirator Casillas to discuss CR-related
2 issues.

3 269. On July 3, 2013, using coded language in a text
4 message, co-conspirator Morales reported to defendant LOZA that
5 rival Las Tres Palmas gang members had assaulted unidentified CR
6 gang members within Canta Ranas Organization territory.

7 270. On July 3, 2013, using coded language in a telephone
8 conversation, co-conspirator Gaitan told co-conspirator Nila
9 that he had found an individual who would sell a Glock 19 pistol
10 to co-conspirator Nila in exchange for co-conspirator Nila's
11 shotgun and \$350.

12 271. On July 4, 2013, using coded language in a telephone
13 conversation, co-conspirator D. Contreras told co-conspirator
14 Gaitan that she would pay him for methamphetamine, asked for an
15 additional half-an-ounce to an ounce of methamphetamine, and
16 discussed with co-conspirator Gaitan her drug customers'
17 comments about the quality of co-conspirator Gaitan's
18 methamphetamine.

19 272. On July 4, 2013, using coded language in a telephone
20 conversation, co-conspirator Goulet told co-conspirator Gaitan
21 that he had approximately \$420 to pay co-conspirator Gaitan for
22 additional methamphetamine.

23 273. On July 4, 2013, using coded language in a telephone
24 conversation, co-conspirators Gaitan and Goulet talked about a
25 firearm that co-conspirator Gaitan needed co-conspirator Goulet
26 to fix for him, and also about co-conspirator Goulet getting
27 magazines for a Glock 36 and a .40 caliber Smith & Wesson
28 firearm.

1 274. On July 4, 2013, using coded language in a telephone
2 conversation, defendant LOZA asked an unindicted co-conspirator
3 for an update on his efforts to collect taxes from the Casa
4 Blanca gang in Riverside, California.

5 275. On July 4, 2013, using coded language in a text
6 message, co-conspirator Higuera relayed to co-conspirator Gaitan
7 that co-conspirator Goulet had money for co-conspirator Gaitan,
8 and that co-conspirator Goulet wanted more methamphetamine.

9 276. On July 5, 2013, using coded language in a series of
10 text messages, co-conspirator Moreno told co-conspirator Gaitan
11 that he needed more methamphetamine and that he would go to co-
12 conspirator Gaitan's residence to pick it up.

13 277. On July 5, 2013, co-conspirator Goulet possessed a .38
14 caliber stainless steel revolver, multiple rounds of ammunition,
15 and drug paraphernalia.

16 278. On July 5, 2013, using coded language in a telephone
17 conversation, co-conspirator Higuera told co-conspirator Gaitan
18 that he had heard that law enforcement was in the process of
19 executing a search warrant at his residence, that he was worried
20 because there was methamphetamine and a firearm in the house,
21 and that he could be linked to the residence because it was his
22 parole address of record; co-conspirator Higuera stated that he
23 had tried to contact co-conspirator Goulet, who lived there with
24 him, but had not heard back.

25 279. On July 5, 2013, using coded language in a telephone
26 conversation, co-conspirator Gaitan instructed co-conspirator A.
27 Gaitan to give co-conspirator D. Contreras an ounce of
28 methamphetamine.

1 280. On July 5, 2013, using coded language in a telephone
2 conversation, co-conspirator A. Gaitan told co-conspirator
3 Gaitan that she had retrieved a firearm and money for narcotics
4 from their mailbox.

5 281. On July 6, 2013, using coded language in a telephone
6 conversation, co-conspirator Alvarez asked co-conspirator Gaitan
7 if co-conspirator Gaitan was selling the firearm that co-
8 conspirator Alvarez had provided, to which co-conspirator Gaitan
9 responded that they had tried, but had been unable, to sell it
10 to generate money to purchase more firearms; co-conspirator
11 Alvarez asked if the Canta Ranas Organization was still looking
12 for more firearms, to which co-conspirator Gaitan responded in
13 the affirmative; co-conspirator Gaitan told co-conspirator
14 Alvarez that CR was using the firearm co-conspirator Alvarez had
15 provided.

16 282. On July 6, 2013, using coded language in a telephone
17 conversation, defendant LOZA instructed co-conspirator Alvarez
18 to bring him a better firearm the next time he came to the
19 Whittier, California area.

20 283. On July 6, 2013, using coded language in a telephone
21 conversation, defendant LOZA instructed co-conspirator Alvarez
22 to provide him with the telephone number of a drug dealer,
23 because that individual and another person owed \$3,000.

24 284. On July 7, 2013, using coded language in a telephone
25 conversation, co-conspirator Higuera told co-conspirator Gaitan
26 that his methamphetamine sales would go smoother now that he was
27 staying in Whittier, California, instead of Riverside,
28 California.

1 285. On July 7, 2013, co-conspirator Felix called co-
2 conspirator Gaitan and then gave the telephone to co-conspirator
3 R. Contreras so that co-conspirator R. Contreras could order
4 methamphetamine from, and also arrange for the payment of taxes
5 to, co-conspirator Gaitan.

6 286. On July 7, 2013, using coded language in a telephone
7 conversation, co-conspirator R. Contreras asked co-conspirator
8 Gaitan for more methamphetamine so that co-conspirator R.
9 Contreras could start selling methamphetamine again.

10 287. On July 7, 2013, using coded language in a series of
11 text messages, co-conspirator Gaitan told co-conspirator Orozco
12 that he wanted to obtain flash bang grenades to help the Canta
13 Ranas Organization collect taxes; co-conspirator Orozco stated
14 that co-conspirator Gaitan could buy some flash bang grenades
15 from his brother and provided his brother's telephone number to
16 co-conspirator Gaitan.

17 288. On July 8, 2013, using coded language in a telephone
18 conversation, co-conspirator Gaitan instructed co-conspirator A.
19 Gaitan to collect money for narcotics from co-conspirator De La
20 Paz, who was at their residence.

21 289. On July 8, 2013, using coded language in a series of
22 text messages, co-conspirator Felix sent co-conspirator Gaitan
23 personal identifying information belonging to co-conspirator
24 Goulet and another individual for the purpose of committing
25 fraud which would generate proceeds for the Canta Ranas
26 Organization.

27 290. On July 9, 2013, using coded language in a telephone
28 conversation, co-conspirator Higuera told co-conspirator Gaitan

1 that he and an unindicted co-conspirator had buried firearms and
2 ammunition at a residence in Whittier, California, because they
3 feared that law enforcement would be serving a search warrant
4 there.

5 291. On July 9, 2013, using coded language in a telephone
6 conversation, co-conspirator Higuera told co-conspirator Gaitan
7 that he had approximately a quarter-ounce of methamphetamine in
8 his possession.

9 292. On July 9, 2013, using coded language in a series of
10 text messages, co-conspirator Gavaldon, Jr. asked co-conspirator
11 Gaitan for assistance in finding someone who would assault an
12 inmate in the Riverside County Jail, and provided the inmate's
13 identifying information.

14 293. On July 9, 2013, using coded language in a text
15 message, co-conspirator Nila asked co-conspirator Gaitan if he
16 knew of any firearms for sale.

17 294. On July 10, 2013, using coded language in a text
18 message, co-conspirator Nila asked co-conspirator Gaitan if the
19 .38 caliber and .40 caliber firearms were still for sale, and
20 co-conspirator Gaitan told co-conspirator Nila that they were
21 both no longer available.

22 295. On July 10, 2013, using coded language in a telephone
23 conversation, co-conspirators Gaitan and Higuera discussed the
24 \$250 co-conspirator Higuera owed co-conspirator Gaitan for
25 narcotics co-conspirator Gaitan had "fronted" to co-conspirator
26 Higuera; co-conspirator Higuera asked for an additional half-
27 ounce of methamphetamine, and co-conspirator Gaitan said he
28 would see if he could obtain more methamphetamine.

1 296. On July 10, 2013, using coded language in a telephone
2 conversation, co-conspirators Gaitan and Higuera talked about
3 co-conspirator Higuera putting an unindicted co-conspirator in
4 contact with Casa Blanca gang members so that the unindicted co-
5 conspirator could collect taxes from the gang while co-
6 conspirator Goulet was in custody.

7 297. On July 10, 2013, using coded language in a telephone
8 conversation, co-conspirator D. Contreras told co-conspirator
9 Gaitan that she would pay him the following day for the
10 methamphetamine co-conspirator Gaitan had distributed to her.

11 298. On July 11, 2013, using coded language in a telephone
12 conversation, co-conspirator Higuera told co-conspirator Gaitan
13 that he had \$300 to give to co-conspirator Gaitan for another
14 half-ounce of methamphetamine, and that he was going to use the
15 profit from the sales of that methamphetamine to help pay co-
16 conspirator Goulet's debt (arising from law enforcement's
17 seizure of narcotics that were in co-conspirator Goulet's
18 possession).

19 299. On July 11, 2013, using coded language in a telephone
20 conversation, co-conspirator A. Gaitan told co-conspirator
21 Gaitan that he needed to get more methamphetamine because co-
22 conspirator Gaitan should not keep his drug customers waiting.

23 300. On July 11, 2013, using coded language in a telephone
24 conversation, co-conspirator D. Contreras asked co-conspirator
25 Gaitan when co-conspirator Gaitan would have more
26 methamphetamine.

27 301. On July 11, 2013, using coded language in a telephone
28 conversation, co-conspirator Gaitan told co-conspirator D.

1 Contreras to check with co-conspirator A. Gaitan later in the
2 evening to see if co-conspirator Gaitan had obtained additional
3 methamphetamine.

4 302. On July 11, 2013, using coded language in a series of
5 text messages, co-conspirator Gaitan asked co-conspirator
6 Vasquez to bring one-half pound of methamphetamine to co-
7 conspirator Gaitan's residence, to which co-conspirator Vasquez
8 agreed.

9 303. On July 11, 2013, using coded language in a series of
10 text messages, co-conspirator Higuera relayed to co-conspirator
11 Gaitan that there may be a situation with an unidentified
12 individual at co-conspirator Higuera's sister's house, and that
13 co-conspirator Goulet wants Canta Ranas Organization members to
14 be on standby, with firearms, in case the individual shows up at
15 the house.

16 304. On July 11, 2013, using coded language in a telephone
17 conversation, co-conspirator Bowers asked co-conspirator Gaitan
18 for methamphetamine to sell.

19 305. On July 11, 2013, using coded language in a telephone
20 conversation, co-conspirator Gaitan told an unindicted co-
21 conspirator that co-conspirator A. Gaitan would tell the
22 individual via text message to come to their residence and get
23 methamphetamine if there was any available.

24 306. On July 11, 2013, co-conspirator Vasquez transported
25 narcotics for distribution to co-conspirator Gaitan.

26 307. On July 11, 2013, co-conspirators Vasquez and
27 Pantaleon conspired to murder an individual who, unbeknownst to
28 them, was an undercover law enforcement officer.

1 308. On July 11, 2013, using coded language in a telephone
2 conversation, co-conspirator Pizano asked an unindicted co-
3 conspirator to tell defendant LOZA that he would make his tax
4 payment by the end of the day.

5 309. On July 12, 2013, using coded language in a telephone
6 conversation, co-conspirator A. Gaitan asked co-conspirator
7 Gaitan if he needed her to meet with co-conspirator Vasquez to
8 obtain additional methamphetamine.

9 310. On July 12, 2013, using coded language in a telephone
10 call, co-conspirator Gaitan told co-conspirator A. Gaitan that
11 co-conspirator Vasquez would bring them more methamphetamine
12 later in the day.

13 311. On July 12, 2013, using coded language in a series of
14 text messages, co-conspirator A. Gaitan told co-conspirator
15 Gaitan that he was going to lose business if he did not obtain
16 more methamphetamine, and offered to get it from co-conspirator
17 Vasquez.

18 312. On July 12, 2013, using coded language in a series of
19 text messages, co-conspirator Vasquez informed co-conspirator
20 Gaitan that he would deliver methamphetamine to co-conspirator
21 Gaitan that day.

22 313. On July 12, 2013, using coded language in a series of
23 text messages, co-conspirator Gaitan instructed co-conspirator
24 Vasquez to give a half pound of methamphetamine to co-
25 conspirator A. Gaitan, who would, in turn, provide payment to
26 co-conspirator Vasquez.

27 314. On July 12, 2013, using coded language in a series of
28 text messages, co-conspirator Gaitan told co-conspirator Higuera

1 that he had was preparing co-conspirator Higuera's share of
2 methamphetamine.

3 315. On July 13, 2013, using coded language in a telephone
4 conversation, co-conspirator Bowers asked co-conspirator Gaitan
5 for methamphetamine to sell.

6 316. On July 13, 2013, using coded language in a telephone
7 conversation, co-conspirator Espinoza told co-conspirator Gaitan
8 that he had assaulted co-conspirator A. Gonzalez, per co-
9 conspirator Gaitan's instructions.

10 317. On July 13, 2013, using coded language in a series of
11 telephone conversations, co-conspirator Higuera, after advising
12 co-conspirator Gaitan that rival Whittier 13 gang members were
13 targeting his residence, asked co-conspirator Gaitan if he could
14 borrow a firearm, to which co-conspirator Gaitan responded by
15 directing co-conspirator Higuera to go to co-conspirator
16 Gaitan's residence to pick up a firearm.

17 318. On July 13, 2013, at his residence, co-conspirator
18 Gaitan gave co-conspirator Higuera a firearm so that co-
19 conspirator Higuera could protect himself from rival Whittier 13
20 gang members.

21 319. On July 13, 2013, using coded language in a telephone
22 conversation, co-conspirator Alvarez told co-conspirator Gaitan
23 that he would mail more tax payments to co-conspirator Felix's
24 residence the following week.

25 320. On July 13, 2013, defendant LOZA and co-conspirators
26 Gaitan and Vasquez met at co-conspirator Gaitan's residence,
27 where co-conspirator Vasquez told the others that he had shot at
28 a vehicle which had been following him.

1 321. On July 14, 2013, using coded language in a telephone
2 conversation, co-conspirator Vasquez directed defendant LOZA to
3 go to his residence, because he was facing a "life and death"
4 situation that was related to the shooting he had told defendant
5 LOZA about the day before.

6 322. On July 14, 2013, defendant LOZA and co-conspirator
7 Vasquez met at co-conspirator Vasquez's residence to discuss the
8 shooting involving co-conspirator Vasquez.

9 323. On July 14, 2013, using coded language in a telephone
10 conversation, co-conspirator Gaitan instructed co-conspirator D.
11 Contreras to get rid of narcotics and drug paraphernalia in her
12 possession.

13 324. On July 15, 2013, co-conspirator Villalba possessed a
14 Palmetto State Armory AR-15 .223 caliber semi-automatic rifle
15 with four high-capacity 30-round magazines and two 10-round
16 magazines, a Ruger .22 caliber semi-automatic rifle with two
17 magazines, a Plainfield Machining 30 caliber semi-automatic
18 rifle with two magazines, a Norinco 7.62x39 semi-automatic rifle
19 with one high-capacity 50-round magazine, a Smith & Wesson 12-
20 gauge pump action shotgun, an American Gun Company double-barrel
21 12-gauge breach loader shotgun, a Ruger 9mm semi-automatic
22 pistol with three 10-round magazines, a Phoenix Arms .25 caliber
23 semi-automatic pistol with one magazine, a Glock .45 caliber
24 semi-automatic pistol with two magazines, a Smith & Wesson .357
25 caliber six shot revolver with an obliterated serial number, 250
26 rounds of Lellier & Bellot .25 caliber ammunition, 149 rounds of
27 UMC 9mm ammunition, 110 rounds of Centerfire 7.62x39mm
28 ammunition, 100 rounds of PMC .25 caliber ammunition, fifty

1 rounds of Blazer .25 caliber ammunition, forty-two rounds of
2 Federal .223 caliber ammunition, forty rounds of Wolf 7.62x39mm
3 ammunition, twenty-two rounds of Lake City Army .30 caliber
4 ammunition, one 12-gauge shotgun round, one pistol holster, one
5 plastic rifle stock, four plastic hand guards belonging to an
6 AR-15 rifle, two plastic collapsible AR-15 rifle stocks, and one
7 plastic AR-15 rifle grip handle.

8 325. On July 15, 2013, using coded language in a telephone
9 conversation, co-conspirator Villalba told co-conspirator Gaitan
10 that law enforcement had executed a search warrant at his
11 residence, during which they had seized all of the firearms and
12 ammunition from his safe, and that he was nervous because he
13 could not afford to incur any more felony convictions.

14 326. On July 16, 2013, using coded language in a telephone
15 conversation, co-conspirator Villalba told co-conspirator Gaitan
16 that he believed an informant had given information to the
17 police.

18 327. On July 23, 2013, using coded language in a telephone
19 conversation, co-conspirator Orozco warned co-conspirator Gaitan
20 that an unidentified male from the rival Whittier Varrio Locos
21 gang was trying to collect taxes from a Brown Brotherhood gang
22 member, and relayed that he (co-conspirator Orozco) had given
23 the order to members of the Brown Brotherhood gang not to pay
24 any money to the unidentified male.

25 328. On July 24, 2013, using coded language in a telephone
26 conversation, co-conspirator R. Contreras told Gaitan that he
27 was ready to pay his outstanding drug debt, and co-conspirator
28 Gaitan told co-conspirator R. Contreras that he would put him

1 (co-conspirator R. Contreras) in touch with an unidentified co-
2 conspirator to obtain more methamphetamine.

3 329. On July 24, 2013, using coded language in a telephone
4 conversation, co-conspirator Orozco told defendant LOZA that
5 they should shoot an unidentified male on sight for trying to
6 collect taxes in Canta Ranas Organization territory.

7 330. On July 24, 2013, using coded language in a telephone
8 conversation, co-conspirator Gaitan told co-conspirator R.
9 Contreras to go to a Del Taco restaurant to meet with an
10 unidentified co-conspirator to purchase methamphetamine.

11 331. On July 24, 2013, using coded language in a series of
12 text messages, co-conspirator Alvarez confirmed to co-
13 conspirator Gaitan that he had sent tax payments to co-
14 conspirator Gaitan which were intended for defendant LOZA.

15 332. On July 31 2013, using coded language in a telephone
16 conversation, co-conspirator M. Salinas told co-conspirator
17 Gaitan that he could help organize and keep younger CR gang
18 members in line with the goals of the gang, but needed a
19 cellular telephone to do so.

20 333. On August 1, 2013, using coded language in a telephone
21 conversation, co-conspirator Gaitan instructed co-conspirator
22 Espinoza to collect a \$100 drug debt owed by co-conspirator
23 Bowers.

24 334. On August 3, 2013, using coded language in a telephone
25 conversation, co-conspirator Gaitan asked defendant LOZA if co-
26 conspirator M. Salinas and other unindicted co-conspirators were
27 authorized to assault an individual in prison, to which
28 defendant LOZA confirmed that they were.

1 335. On August 7, 2013, using coded language in a telephone
2 conversation, co-conspirator Gaitan and co-conspirator Felix
3 talked about the .22 firearm co-conspirator Antolin had, with
4 co-conspirator Felix asking why co-conspirator Antolin would
5 have the firearm in his possession if he knew that there had
6 been a law enforcement "raid" the day prior; co-conspirator
7 Gaitan and co-conspirator Felix also talked about a recent
8 indictment involving the La Familia Cartel, the Mexican Mafia,
9 and the Florencia-13 criminal street gang.

10 336. On August 7, 2013, using coded language in a text
11 message, co-conspirator Morales told defendant LOZA that he had
12 money to pay off a drug debt, and asked defendant LOZA for more
13 methamphetamine.

14 337. On August 10, 2013, at Quiet Canyon in Montebello,
15 California, co-conspirator Espinoza and defendant SOTELLO
16 conspired to murder a member of the Mongols outlaw motorcycle
17 gang.

18 338. On August 10, 2013, defendant SOTELLO stabbed a
19 Mongols member who was assaulting co-conspirator Espinoza.

20 339. On August 12, 2013, using coded language in a series
21 of text messages, co-conspirator Higuera asked co-conspirator
22 Gaitan to help him obtain half-an-ounce of methamphetamine on
23 credit.

24 340. On August 14, 2013, using coded language in a
25 telephone conversation, co-conspirator Goulet told co-
26 conspirator Gaitan that he had fixed co-conspirator Gaitan's
27 firearm and had fired it multiple times to make sure that it was
28 working; co-conspirator Goulet stated that now that his debt was

1 paid, he was trying to save money to purchase a firearm to be
2 collectively used by the Canta Ranas Organization, and that he
3 would engrave the firearm with the name of a member of the gang
4 who had died during an encounter with law enforcement.

5 341. On August 14, 2013, using coded language in a
6 telephone conversation, co-conspirator Goulet told co-
7 conspirator Gaitan that co-conspirator Bowers had traveled with
8 him and others to collect taxes from the Casa Blanca gang.

9 342. On August 15, 2013, co-conspirator Antolin possessed a
10 .25 caliber semi-automatic pistol, five .25 caliber brass
11 bullets, a digital scale, drug paraphernalia, and CR gang
12 paraphernalia.

13 343. On August 17, 2013, using coded language in a series
14 of text messages, co-conspirator S. Jaimez asked co-conspirator
15 Gaitan if he had a .40 caliber firearm because co-conspirator S.
16 Jaimez had a customer who wanted to purchase one, to which co-
17 conspirator Gaitan responded that he did not have that gun
18 anymore.

19 344. On August 18, 2013, co-conspirator Casillas possessed
20 a loaded Smith and Wesson semi-automatic pistol and a magazine
21 with six .40 caliber ammunition rounds.

22 345. On August 20, 2013, at a convenience store in Canta
23 Ranas Organization territory, co-conspirator Bowers, while
24 stealing items from the store, told the store owner that he was
25 collecting "gangster taxes" on behalf of the Canta Ranas
26 Organization.

27 346. On August 30, 2013, using coded language in a
28 telephone conversation, co-conspirator Casillas and an

1 individual talked about co-conspirator Casillas borrowing a
2 credit card embosser for the purpose of committing access device
3 fraud.

4 347. On September 2, 2013, using coded language in a
5 telephone conversation, co-conspirator Casillas and two other
6 individuals talked about co-conspirator Casillas obtaining and
7 mailing fraudulent credit cards and/or credit card numbers.

8 348. On September 2, 2013, using coded language in a
9 telephone conversation, co-conspirator Casillas told defendant
10 LOZA that he had just been assaulted by rival Los Tres Palmas
11 gang members, and that the Canta Ranas Organization should
12 retaliate.

13 349. On September 11, 2013, using coded language in a
14 telephone conversation, co-conspirator Casillas discussed
15 kidnaping an individual who had taken money from the Canta Ranas
16 Organization, and noted that defendant LOZA and co-conspirator
17 Gaitan wanted to "get at her."

18 350. On September 11, 2013, using coded language in a
19 telephone conversation, defendant LOZA and co-conspirator
20 Casillas talked about co-conspirator Casillas selling narcotics
21 and owing taxes to defendant LOZA, who was collecting on behalf
22 of Mexican Mafia D.G.

23 351. On September 21, 2013, co-conspirator Casillas
24 possessed a stolen California Identification Card and marijuana.

25 352. On September 25, 2013, in Whittier, California, co-
26 conspirator Murietta possessed approximately 3.6 grams of
27 methamphetamine and a digital scale.

28

1 353. On October 8, 2013, in Whittier, California, co-
2 conspirator Goulet and an unidentified co-conspirator entered
3 the residence of victims D.T. and C.T., tied up the victims at
4 gunpoint, and stole computers and other items.

5 354. On October 9, 2013, in a stolen vehicle in Riverside,
6 California, co-conspirator Goulet possessed a Glock 9mm handgun,
7 fifteen rounds of 9mm ammunition, and property from victims D.T.
8 and C.T.

9 355. On October 26, 2013, using coded language in written
10 correspondence, co-conspirator E. Holguin, while in custody,
11 asked an unindicted co-conspirator to send a Facebook message to
12 another individual with the contact information for co-
13 conspirator E. Holguin's narcotics supplier, and to let that
14 individual know the "hookup" is coming from "Boxer from CR."

15 356. On November 5, 2013, co-conspirator A. Gonzalez
16 ordered victim L.G. at gunpoint to drive A. Gonzalez to co-
17 conspirator Antolin's residence located in Whittier, California.

18 357. On November 5, 2013, co-conspirator Morales ordered
19 co-conspirator A. Gonzalez to return a vehicle which co-
20 conspirator A. Gonzalez had carjacked.

21 358. On November 9, 2013, in Victorville, California, co-
22 conspirator Pantaleon beat unconscious an unidentified male who
23 said, "Fuck South Central," and then fled the scene, while
24 throwing away a knife he had in his possession.

25 359. On November 11, 2013, using coded language in a
26 telephone conversation, co-conspirator Pantaleon told an
27 individual that unidentified African-Americans needed to be
28 assaulted or killed due to them robbing a Mexican woman in

1 Whittier, California.

2 360. On November 15, 2013, co-conspirator Vasquez, who had
3 been advised that co-conspirator Pantaleon had been pulled over
4 by law enforcement, went to co-conspirator Pantaleon's residence
5 to discuss the incident.

6 361. On November 23, 2013, using coded language in written
7 correspondence, co-conspirator E. Holguin, while in custody,
8 directed co-conspirator F. Holguin to talk to an un-indicted co-
9 conspirator about taxes she was required to pay to co-
10 conspirator E. Holguin, and asked co-conspirator F. Holguin to
11 help another unindicted co-conspirator obtain the name and
12 number of co-conspirator E. Holguin's narcotics supplier,
13 thereby facilitating the Canta Ranas Organization's narcotics
14 sales.

15 362. On November 30, 2013, using coded language in a
16 telephone conversation, co-conspirator Vasquez, after being
17 advised of the location in Torrance, California, where five
18 members of a rival street gang had been spotted, stated that he
19 would proceed immediately to that location.

20 363. On November 30, 2013, using coded language in a
21 telephone conversation, co-conspirator Vasquez told the
22 unindicted co-conspirator that the Torrance police were nearby
23 and that he (co-conspirator Vasquez) had a firearm in the
24 vehicle with him.

25 364. On December 8, 2013, using coded language in written
26 correspondence, co-conspirator Olivas relayed to Mexican Mafia
27 D.G. that, consistent with his instructions to her, she had
28 ordered an individual to stop using Mexican Mafia D.G.'s

1 name/authority to collect taxes from gang members or other
2 unidentified individuals.

3 365. On December 9, 2013, using coded language in a text
4 message, co-conspirator Alvarez discussed the potential sale of
5 his .380 caliber gun with co-conspirator Nila.

6 366. On December 11, 2013, at his residence, co-conspirator
7 Alvarez possessed a loaded Smith & Wesson .40 caliber semi-
8 automatic handgun, a loaded Davis Industries .380 caliber semi-
9 automatic handgun, a loaded Ruger Police Service Six .357 magnum
10 revolver, a speed loader for a revolver, a loaded Smith & Wesson
11 .40 caliber magazine, a loaded AK-47 7.62x39 caliber magazine,
12 two magazines for a .380 semiautomatic handgun, one of which was
13 loaded, five boxes of ammunition, and two ledgers documenting
14 the amount of taxes various street gangs owed and/or had paid to
15 the Mexican Mafia.

16 367. On January 14, 2014, in Whittier, California, co-
17 conspirator Higuera possessed approximately 5.9 grams of
18 methamphetamine and a digital scale.

19 368. On January 24, 2014, in Canta Ranas Organization
20 territory, co-conspirator Morales was shot at by rival Las Tres
21 Palmas gang members.

22 369. On February 4, 2014, using coded language in written
23 correspondence, co-conspirator Perez told co-conspirator
24 Rodriguez that Canta Ranas Organization members needed to
25 assault rival Los Nietos gang members as retaliation for Los
26 Nietos gang members shooting at the residence of co-conspirator
27 Rodriguez.

28 370. On February 13, 2014, at co-conspirator Felix's

1 residence in Whittier, California, co-conspirator Gaitan and co-
2 conspirator Felix possessed a Glock 9mm Luger caliber semi-
3 automatic pistol loaded with 10 hollow point rounds of
4 ammunition, a Ruger .22 long rifle caliber semi-automatic
5 pistol, a disassembled Lorcin L-22 .22 caliber long rifle
6 semiautomatic pistol, two handgun magazines, two assault rifle
7 magazines, and 196 rounds of .22 caliber ammunition.

8 371. On March 5, 2014, defendant SOTELLO possessed a loaded
9 Smith & Wesson Airweight .38 caliber revolver.

10 372. On March 17, 2014, using coded language in a telephone
11 conversation, co-conspirator Gavaldon, Sr. told co-conspirator
12 Olivas that he was not receiving money from Canta Ranas
13 Organization members and asked that she apprise Mexican Mafia
14 D.G. of this fact the next time she went to Pelican State
15 Prison, to which co-conspirator Olivas agreed.

16 373. On March 27, 2014, at her residence, co-conspirator D.
17 Contreras possessed approximately 2.15 grams of methamphetamine,
18 a digital scale, and \$4,265 in cash.

19 374. On March 28, 2014, using coded language in a telephone
20 conversation, co-conspirator Gavaldon, Sr. told co-conspirator
21 Olivas that Mexican Mafia D.G. needed to know that defendant
22 LOZA was being greedy and not following Mexican Mafia D.G.'s
23 orders; co-conspirator Olivas stated that she would convey this
24 information to Mexican Mafia D.G.

25 375. On April 9, 2014, using coded language in a telephone
26 conversation, co-conspirator Gavaldon, Sr. reiterated to co-
27 conspirator Olivas that he still was not receiving money even
28 though his brother, Mexican Mafia D.G., was a Mexican Mafia

1 member.

2 376. On April 26, 2014, and April 27, 2014, using coded
3 language during in-person visits at Pelican Bay State Prison,
4 co-conspirator Olivas told Mexican Mafia D.G. about co-
5 conspirator Gavaldon, Sr. not receiving money from the Canta
6 Ranas Organization while in prison, and about it not being
7 right, to which Mexican Mafia D.G. agreed.

8 377. On April 28, 2014, using coded language in a telephone
9 conversation, co-conspirator Olivas told co-conspirator
10 Gavaldon, Sr. that she had visited Mexican Mafia D.G., and had
11 relayed to him that co-conspirator Gavaldon, Sr. was not
12 receiving money, and that consistent with Mexican Mafia D.G.'s
13 instructions and to ensure that co-conspirator Gavaldon, Sr.
14 would receive money from the Canta Ranas Organization, co-
15 conspirator Olivas was going to meet with defendant LOZA to
16 discuss the issue.

17 378. On April 28, 2014, using coded language in a telephone
18 conversation, co-conspirator Gavaldon, Sr. told co-conspirator
19 Olivas that he hoped defendant LOZA and other Canta Ranas
20 Organization members would not act stupid and go against Mexican
21 Mafia D.G.'s orders.

22 379. On May 2, 2014, using coded language in a telephone
23 conversation, co-conspirator Olivas updated co-conspirator
24 Gavaldon, Sr. that she would be speaking with defendant LOZA
25 that Sunday regarding co-conspirator Gavaldon, Sr.'s desire to
26 receive money from the Canta Ranas Organization.

27 380. On May 4, 2014, using Western Union, co-conspirator
28 Olivas wire transferred \$50 that had been given to her by

1 defendant LOZA to co-conspirator Gavaldon, Sr.'s prison account.

2 381. On May 4, 2014, using coded language in a telephone
3 conversation, co-conspirator Gavaldon, Sr. confirmed to co-
4 conspirator Olivas that he had received the money she had sent
5 him, and co-conspirator Olivas told co-conspirator Gavaldon, Sr.
6 that defendant LOZA would try to send co-conspirator Gavaldon,
7 Sr. money every other month.

8 382. On June 2, 2014, in written correspondence to an
9 individual, co-conspirator Gavaldon, Sr. reiterated his
10 allegiance to the Mexican Mafia and to Mexican Mafia D.G.,
11 stating that he would always be aligned with it.

12 383. On June 25, 2014, in a vehicle in which he was a
13 passenger, co-conspirator D. Gonzales possessed a loaded Omega
14 Burgo model NR 103 .22 short caliber revolver and approximately
15 .83 grams of methamphetamine.

16 384. On June 27, 2014, at his residence, co-conspirator D.
17 Gonzales possessed a loaded Browning model Buck Mark .22 Long
18 Rifle caliber handgun, four rounds of .22 caliber "Super X"
19 ammunition, one round of 9mm hollow point ammunition, a digital
20 scale, drug paraphernalia, and CR gang paraphernalia.

21 385. On July 30, 2014, co-conspirator Viramontes possessed
22 a loaded Smith & Wesson Model 36 revolver.

23 386. On August 13, 2014, using coded language in written
24 correspondence, co-conspirator Gavaldon, Sr. told an unindicted
25 co-conspirator that Mexican Mafia D.G. had sent a message to the
26 Canta Ranas Organization ordering it to pay money to co-
27 conspirator Gavaldon, Sr., and that he was now receiving the
28 money.

1 387. On August 13, 2014, using coded language in a
2 telephone conversation, co-conspirator Hernandez told an
3 unindicted co-conspirator that he had spoken with other
4 unindicted co-conspirators and that their main objective was to
5 help Mexican Mafia D.G. and defendant LOZA run the Canta Ranas
6 Organization.

7 388. On August 15, 2014, using coded language in a
8 telephone conversation, co-conspirator Hernandez instructed an
9 unindicted co-conspirator to inform an unidentified individual
10 that if he did not pay the taxes owed by a certain date, then
11 the amount owed would double.

12 389. On August 20, 2014, using coded language in a
13 telephone conversation, co-conspirator Hernandez asked an
14 unindicted co-conspirator to relay to Mexican Mafia D.G. that he
15 was in close contact with a Mexican Mafia member in the LACJ.

16 390. On September 4, 2014, co-conspirator F. Holguin
17 possessed approximately 4.1 grams of a mixture and substance
18 containing a detectable amount of heroin.

19 391. On October 20, 2014, co-conspirator Rodriguez
20 deposited \$100 into Mexican Mafia D.G.'s prison account.

21 392. On November 21, 2014, using coded language in an in-
22 person meeting, co-conspirator Olivas told an unindicted co-
23 conspirator not to pay taxes to a certain individual, and to
24 stay away from co-conspirator Hernandez because he was in bad
25 standing with Mexican Mafia D.G.

26 393. On January 3, 2015, on his Facebook account, co-
27 conspirator De La Paz listed his cellular telephone number and,
28 using coded language, posted that he was selling methamphetamine

1 at a Motel 6 in Canta Ranas Organization territory.

2 394. On January 5, 2015, using coded language on his
3 Facebook account, co-conspirator De La Paz posted that he was
4 selling methamphetamine out of a Motel 6 in Canta Ranas
5 Organization territory.

6 395. On January 9, 2015, while at the Hollywood Roosevelt
7 Hotel in Los Angeles, California, co-conspirator De La Paz
8 posted on his Facebook account, "Chillin like a villain drug
9 dealing."

10 396. On February 4, 2015, using coded language in a
11 telephone conversation, co-conspirator Hernandez told an
12 individual to tell co-conspirator Martinez that if he (co-
13 conspirator Martinez) did not pay the drug debt he owed co-
14 conspirator Hernandez by a certain date, he (co-conspirator
15 Hernandez) would send someone to co-conspirator Martinez's house
16 to collect the payment.

17 397. On February 4, 2015, using coded language in a
18 telephone conversation, co-conspirator Hernandez complained to
19 an individual about co-conspirator Martinez's failure to pay the
20 drug debt, to which the individual responded that co-conspirator
21 Martinez had received other instructions from Mexican Mafia D.G.
22 regarding co-conspirator Martinez's payments to co-conspirator
23 Hernandez.

24 398. On February 12, 2015, using coded language on his
25 Facebook account, co-conspirator De La Paz posted that he was
26 selling methamphetamine with co-conspirator Rubio at an
27 unidentified motel.

28 399. On February 13, 2015, in a vehicle in which he was a

1 passenger, co-conspirator Rubio possessed approximately 53.7
2 grams of methamphetamine.

3 400. Between February 20, 2015 and July 25, 2015, co-
4 conspirator Arizmendi deposited \$485 into Mexican Mafia D.G.'s
5 prison account.

6 401. On March 6, 2015, using coded language on his Facebook
7 account, co-conspirator De La Paz posted that he was selling
8 methamphetamine at a Motel 6 in Los Angeles, California.

9 402. On March 12, 2015, on his Facebook account, co-
10 conspirator De La Paz listed his cellular telephone number and,
11 using coded language, posted that he was selling
12 methamphetamine.

13 403. On March 13, 2015, using coded language in a telephone
14 conversation, co-conspirator Hernandez told an individual that
15 he should not worry about a female who had threatened to call
16 the police on this individual, as co-conspirator Hernandez would
17 take care of her.

18 404. On March 16, 2015, using coded language in a telephone
19 conversation, co-conspirator Hernandez asked an individual if
20 the female was still causing him trouble, to which the
21 individual replied no.

22 405. On April 19, 2015, using coded language in a telephone
23 conversation, co-conspirator Rubio told co-conspirator Cabrera
24 not to call co-conspirator Murietta anymore, noted that he (co-
25 conspirator Rubio) had told others to cut co-conspirator
26 Murietta off until she had turned things around, confirmed that
27 defendant LOZA was a Mexican Mafia member as well as a good
28 friend and businessman who oversaw the area, and directed co-

1 conspirator Cabrera to apprise co-conspirator Rubio if anyone
2 infringed upon co-conspirator Cabrera's territory, as co-
3 conspirator Rubio would address it since everyone listened to
4 him and the Canta Ranas Organization.

5 406. On April 19, 2015, using coded language in a telephone
6 conversation, co-conspirator Rubio instructed co-conspirator De
7 La Paz to purchase methamphetamine from co-conspirator Cabrera,
8 and not to go anywhere else with co-conspirator Rubio's money.

9 407. On April 19, 2015, using coded language in a telephone
10 conversation, co-conspirator Rubio informed co-conspirator
11 Cabrera that he would "co-sign" the drug debt which co-
12 conspirator De La Paz owed co-conspirator Cabrera, explaining
13 that co-conspirator De La Paz would pay co-conspirator Rubio
14 back because co-conspirator De La Paz knew not to cross co-
15 conspirator Rubio.

16 408. On April 23, 2015, using coded language in a telephone
17 conversation, co-conspirator Rubio instructed co-conspirator De
18 La Paz to get two ounces of methamphetamine from co-conspirator
19 Cabrera and to give a firearm to an unindicted co-conspirator.

20 409. On April 24, 2015, using coded language in a telephone
21 conversation, co-conspirator De La Paz told co-conspirator Rubio
22 that an individual owed him money and that if he (co-conspirator
23 De La Paz) did not make the effort to collect the money, it
24 would make CR look weak; co-conspirator De La Paz told co-
25 conspirator Rubio that to show he (co-conspirator De La Paz) was
26 serious about the cause, co-conspirator De La Paz would get a
27 firearm to threaten this individual.

28 410. On April 25, 2015, using coded language in a telephone

1 conversation, co-conspirator Rubio instructed co-conspirator De
2 La Paz to get an ounce of methamphetamine from co-conspirator
3 Cabrera.

4 411. On April 25, 2015, using coded language in a telephone
5 conversation, co-conspirator De La Paz told co-conspirator Rubio
6 that he was about to make a methamphetamine delivery, to which
7 co-conspirator Rubio responded by directing co-conspirator De La
8 Paz to get two ounces of methamphetamine from co-conspirator
9 Cabrera.

10 412. On April 26, 2015, using coded language on his
11 Facebook account, co-conspirator De La Paz posted that he was
12 selling methamphetamine out of the Double Tree Hotel in Norwalk,
13 California.

14 413. On April 26, 2015, using coded language in a telephone
15 conversation, co-conspirator De La Paz told co-conspirator Rubio
16 that he needed more methamphetamine and that he had missed out
17 on \$200 worth of methamphetamine sales because co-conspirator
18 Cabrera was not answering his phone.

19 414. On April 26, 2015, using coded language in a telephone
20 conversation, co-conspirator Rubio, while in custody, instructed
21 co-conspirator De La Paz to obtain co-conspirator Rubio's
22 contacts from a cellular telephone so that co-conspirator De La
23 Paz could reach out to those contacts to sell methamphetamine.

24 415. On April 26, 2015, using coded language in a telephone
25 conversation, co-conspirator De La Paz told co-conspirator Rubio
26 that he had obtained methamphetamine from a supplier named
27 "Youngster," to which co-conspirator Rubio ordered co-
28 conspirator De La Paz to purchase an additional two ounces of

1 methamphetamine from co-conspirator Cabrera.

2 416. On April 27, 2015, using coded language in a telephone
3 conversation, co-conspirator Rubio told co-conspirator De La Paz
4 that he wanted an unindicted co-conspirator assaulted because he
5 was not providing a list of drug customers to co-conspirator De
6 La Paz, as co-conspirator Rubio had requested, and co-
7 conspirator De La Paz informed co-conspirator Rubio that co-
8 conspirator Cabrera had given him one ounce of methamphetamine
9 and would be giving another ounce to him.

10 417. On April 28, 2015, using coded language in a telephone
11 conversation, co-conspirator Rubio instructed co-conspirator De
12 La Paz to bring a firearm and other CR gang members when De La
13 Paz went to assault a rival gang member.

14 418. On April 29, 2015, using coded language in a telephone
15 conversation, co-conspirator De La Paz informed co-conspirator
16 Rubio that co-conspirator Cabrera had given him one ounce of
17 methamphetamine and an unindicted co-conspirator had given him ,
18 ten grams of methamphetamine.

19 419. On April 30, 2015, co-conspirator Perez possessed a
20 loaded International Armament model M68 .38 caliber revolver.

21 420. On May 2, 2015, using coded language in a telephone
22 conversation, co-conspirator Rubio told co-conspirator Cabrera
23 that he had found him a new drug customer, and asked co-
24 conspirator Cabrera if he had heard back from co-conspirator De
25 La Paz, to whom he (co-conspirator Rubio) had given ten extra
26 grams of methamphetamine, and when co-conspirator Cabrera stated
27 that he had not, co-conspirator Rubio told co-conspirator
28 Cabrera that he would send co-conspirator Hernandez to deal with

1 co-conspirator De La Paz.

2 421. On May 3, 2015, using coded language in a telephone
3 conversation, co-conspirator Cabrera, at co-conspirator Rubio's
4 instruction, conducted a three-way call in which co-conspirator
5 Rubio brokered a methamphetamine deal between co-conspirator
6 Cabrera and a third-party.

7 422. On May 6, 2015, using coded language in a telephone
8 conversation, co-conspirator Cabrera told co-conspirator Rubio
9 that co-conspirator De La Paz owed co-conspirator Cabrera a \$400
10 drug debt and would not return co-conspirator Cabrera's text
11 messages; co-conspirator Rubio instructed co-conspirator Cabrera
12 to tell co-conspirator De La Paz that co-conspirator Rubio was
13 upset, and told co-conspirator Cabrera that he needed to call
14 defendant LOZA about co-conspirator De La Paz.

15 423. On May 24, 2015, using coded language in a telephone
16 conversation, co-conspirator Rubio told co-conspirator Cabrera
17 that co-conspirator Murietta would help co-conspirator Rubio pay
18 his drug debt to co-conspirator Cabrera.

19 424. On June 6, 2015, using coded language in a text
20 message, co-conspirator Murietta told an unindicted co-
21 conspirator that she had \$500 in tax payments which she was
22 going to give to defendant LOZA.

23 425. On June 8, 2015, in Whittier, California, and in a
24 vehicle in which he was a passenger, co-conspirator De La Paz
25 possessed approximately 5.4 grams of methamphetamine.

26 426. On June 10, 2015, using coded language in a series of
27 text messages, co-conspirator Murietta agreed to sell a total of
28 seven grams of methamphetamine.

1 427. On June 15, 2015, using coded language in a series of
2 text messages, co-conspirator Murietta agreed to supply
3 methamphetamine to a third party.

4 428. On June 18, 2015, using coded language in a series of
5 text messages, co-conspirator Cabrera arranged to purchase one
6 pound of methamphetamine for \$3,350 and to sell it for \$3,700.

7 429. On June 18, 2015, using coded language in a series of
8 text messages, co-conspirator Cabrera arranged to purchase two
9 ounces of methamphetamine from an unindicted co-conspirator for
10 \$500.

11 430. On June 19, 2015, using coded language in a series of
12 text messages, co-conspirator Cabrera arranged to purchase one
13 ounce of methamphetamine.

14 431. On June 23, 2015, at his residence, co-conspirator
15 Cabrera possessed approximately 1.28 grams of methamphetamine, a
16 ballistic vest, two digital scales, drug paraphernalia, a credit
17 card skimmer, credit card profiles, numerous blank credit cards,
18 a Social Security card in the name of another person,
19 identification cards in the name of two other persons, and 61
20 gift cards.

21 432. On June 24, 2015, at his residence, co-conspirator
22 Martinez possessed approximately 519 grams of methamphetamine,
23 approximately 39.1 grams of a mixture and substance containing a
24 detectable amount of heroin, a digital scale, a Bersa model 85
25 .38 caliber handgun, a Springfield Model XD .45 caliber handgun,
26 313 rounds of Super X .22 caliber long rifle ammunition, 20
27 rounds of .45 caliber ammunition, and two postal money order
28 receipts which reflected a total of \$400 in payments to Mexican

1 Mafia D.G.

2 433. On June 25, 2015, co-conspirator Hernandez possessed
3 approximately 12 grams of methamphetamine, a digital scale, a
4 Phoenix Arms Model Raven .25 caliber handgun with one round of
5 .25 caliber ammunition in the chamber, eight rounds of 9mm
6 ammunition, and two postal money order receipts which reflected
7 payments to Mexican Mafia D.G.

8 434. On July 11, 2015, using coded language in a telephone
9 call, co-conspirator Murietta told co-conspirator Rubio that she
10 would cover co-conspirator Hernandez's tax payment for the month
11 by paying defendant LOZA \$400.

12 435. On July 17, 2015, using coded language in a series of
13 text messages, co-conspirator Murietta asked an individual for a
14 credit card number and expiration date to commit fraud.

15 436. On July 24, 2015, using coded language in a telephone
16 conversation, co-conspirator Murietta told co-conspirator Rubio
17 that she was at a store with an unindicted co-conspirator who
18 was committing access device fraud.

19 437. Between July 24, 2015, and November 9, 2015, co-
20 conspirator Arizmendi deposited \$285 into Mexican Mafia D.G.'s
21 prison account.

22 438. On July 25, 2015, co-conspirator Murietta drove co-
23 conspirator De La Paz and an unindicted co-conspirator to stores
24 in La Crescenta, California, for the purpose of committing
25 access device fraud.

26 439. On August 4, 2015, using coded language in a telephone
27 conversation, co-conspirator Arizmendi acknowledged on a
28 telephone call that gang members and drug dealers stop by her

1 residence to drop off taxes owed to the Canta Ranas
2 Organization.

3 440. On August 16, 2015, using coded language in a
4 telephone conversation, defendant LOZA informed another Mexican
5 Mafia member that, with Mexican Mafia D.G.'s backing, defendant
6 LOZA had gained admission into the Mexican Mafia.

7 441. On August 29, 2015, and August 30, 2015, co-
8 conspirator Arizmendi visited Mexican Mafia D.G. at Pelican Bay
9 State Prison to discuss Canta Ranas Organization-related
10 matters.

11 442. On August 30, 2015, in Norwalk, California, co-
12 conspirator A. Jaimez and two other unindicted co-conspirators
13 assaulted victim L.H., while yelling "Canta Ranas," causing
14 severe bodily injury to victim L.H.

15 443. On September 5, 2015, and September 6, 2015, co-
16 conspirator Arizmendi visited Mexican Mafia D.G. at Pelican Bay
17 State Prison to discuss Canta Ranas Organization-related
18 matters.

19 444. On October 24, 2015, using coded language in a
20 recorded telephone conversation from jail, co-conspirator Perez
21 asked co-conspirator A. Salinas if another individual was
22 working for defendant LOZA, told co-conspirator A. Salinas that
23 he (co-conspirator Perez) did not want that individual to claim
24 membership in the CR gang, and said that he (co-conspirator
25 Perez) had advised others that he was going to assault that
26 individual.

27 445. On October 24, 2015, using coded language in a
28 recorded telephone conversation, co-conspirators S. Jaimez and

1 Perez discussed that co-conspirator Rubio was selling narcotics
2 and co-conspirator Perez, who was incarcerated, told co-
3 conspirator S. Jaimez to instruct co-conspirator Rubio to send
4 him (co-conspirator Perez) some "frog skins" (referring to drug
5 proceeds).

6 446. On October 24, 2015, using coded language in a
7 recorded telephone conversation from jail, co-conspirator Perez
8 informed co-conspirator Espinoza that he had threatened to
9 assault a member of another gang, who was in jail on charges of
10 stabbing a CR gang member, because of rumors that the rival gang
11 member was claiming that the CR gang member was a snitch.

12 447. On October 27, 2015, using coded language in a
13 telephone conversation, co-conspirator Arizmendi stated that
14 defendant LOZA wanted her to visit Mexican Mafia D.G. at Pelican
15 Bay State Prison to apprise him that some gang members in the
16 street were disregarding defendant LOZA'S authority as both a
17 shotcaller of CR and as an EME member.

18 448. On October 29, 2015, using coded language in a
19 recorded telephone conversation from jail, co-conspirator Perez
20 asked an unindicted co-conspirator if any CR gang members were
21 on probation and willing to go back to jail because co-
22 conspirator Perez was trying to identify someone to smuggle
23 narcotics into the jail facility.

24 449. On October 29, 2015, using coded language in a
25 recorded telephone conversation from jail, co-conspirator Perez
26 told co-conspirator Espinoza that he would have another
27 individual assaulted if that individual did not stop claiming
28 membership in the CR gang.

1 450. On October 29, 2015, using coded language in a
2 recorded telephone conversation from jail, co-conspirators
3 Espinoza and Perez discussed a plan by which co-conspirator N.
4 Jaimez would smuggle narcotics into co-conspirator Perez's jail
5 facility, and for which co-conspirator N. Jaimez would be paid
6 between \$500 and \$1,000 to do it.

7 451. On October 29, 2015, using coded language in a text
8 message, co-conspirator S. Jaimez and an unindicted co-
9 conspirator discussed how co-conspirator M. Jaimez's cell phone
10 had been taken away by prison officials, and that co-conspirator
11 M. Jaimez wanted defendant LOZA and others to know that the
12 phone had been confiscated and that any calls from the phone
13 likely were from prison officials calling the contacts in his
14 phone.

15 452. On October 30, 2015, using coded language in a
16 recorded telephone conversation from jail, co-conspirators Perez
17 and N. Jaimez discussed how co-conspirator N. Jaimez's lack of
18 outstanding warrants precluded him from being able to smuggle
19 narcotics into co-conspirator Perez's jail facility and how co-
20 conspirator N. Jaimez had to find someone who had outstanding
21 arrest warrants who could smuggle narcotics into the jail
22 facility.

23 453. On November 1, 2015, in Canta Ranas Organization
24 territory, co-conspirator A. Salinas possessed a loaded Bersa
25 .380 caliber semi-automatic firearm.

26 454. On November 4, 2015, using coded language in a
27 telephone conversation, co-conspirator Arizmendi told an
28 unindicted co-conspirator that she had gained respect and

1 opportunities due to her affiliation with, and visits to,
2 Mexican Mafia D.G.

3 455. On November 4, 2015, at his residence, co-conspirator
4 A. Salinas possessed a digital scale, three Green Dot MoneyPaks,
5 a pay/owe sheet documenting half-ounce to one-ounce sales of
6 heroin and methamphetamine, and CR gang paraphernalia.

7 456. On November 11, 2015, using coded language in a
8 recorded telephone conversation from jail, co-conspirator Perez
9 told co-conspirator A. Jaimez that he (co-conspirator Perez) had
10 directed co-conspirator A. Salinas, who was incarcerated in a
11 different jail facility, to collect a \$100 debt from a member of
12 the Eastside Longos gang, and acknowledged that co-conspirator
13 A. Salinas would have to use force or threats of force to
14 collect the debt.

15 457. On November 11, 2015, using coded language in a
16 recorded telephone conversation, co-conspirator A. Jaimez agreed
17 to send co-conspirator Perez a card containing concealed
18 narcotics.

19 458. On November 14, 2015, using coded language in a
20 telephone conversation, co-conspirator Espinoza told co-
21 conspirator Perez that he (co-conspirator Espinoza) was
22 collecting money for Mexican Mafia D.G.

23 459. November 21, 2015, using coded language in a recorded
24 telephone conversation from jail, co-conspirator Perez told co-
25 conspirator Espinoza that, if co-conspirator A. Jaimez smuggled
26 narcotics into the jail facility, they would all make a lot of
27 money and co-conspirator Perez would make sure that co-
28 conspirator A. Jaimez received payment.

1 460. On November 21, 2015, and November 22, 2015, co-
2 conspirator Arizmendi visited Mexican Mafia D.G. at Pelican Bay
3 State Prison to discuss Canta Ranas Organization-related
4 matters.

5 461. On December 2, 2015, on her Facebook account, co-
6 conspirator Arizmendi posted a photograph of herself posing with
7 Mexican Mafia D.G. at Pelican Bay State Prison.

8 462. On December 20, 2015, using coded language in a
9 telephone conversation facilitated by another individual, co-
10 conspirator M. Salinas told co-conspirator A. Salinas that there
11 was money on co-conspirator A. Salinas's PayPal card that had
12 been lost, that the money consisted of taxes owed by co-
13 conspirator M. Salinas to defendant LOZA, and that defendant
14 LOZA had told co-conspirator M. Salinas to contact co-
15 conspirator A. Salinas to have co-conspirator A. Salinas take
16 responsibility and pay defendant LOZA the money.

17 463. On January 8, 2016, using coded language in a recorded
18 telephone conversation, co-conspirator A. Jaimez told co-
19 conspirator Perez that he and co-conspirator Nila unsuccessfully
20 had attempted to send co-conspirator Perez a card containing
21 concealed narcotics.

22 464. On January 16, 2016, using coded language in a
23 telephone conversation, co-conspirator A. Salinas asked an
24 individual to use his Facebook account to send co-conspirator
25 Arizmendi a Facebook message response apprising her that co-
26 conspirator A. Salinas would be calling her later in the week.

27 465. On January 17, 2016, using coded language in a
28 telephone conversation, co-conspirator Arizmendi told an

1 unindicted co-conspirator that she was not liked by a gang from
2 Pico Rivera because she collected taxes from its members.

3 466. On January 27, 2016, using coded language in a
4 telephone conversation, co-conspirator Arizmendi explained to
5 Mexican Mafia D.G. that she had been unable to visit him and
6 would let him know when she would visit him again.

7 467. On February 6, 2016, using coded language in a
8 telephone conversation, co-conspirator Arizmendi stated that she
9 was always in possession of a firearm.

10 468. On February 15, 2016, using coded language in a text
11 message, co-conspirator S. Jaimez told an unindicted co-
12 conspirator that he and co-conspirator Espinoza had assaulted a
13 third party, about which defendant LOZA had found out, that
14 defendant LOZA wanted to talk to co-conspirator M. Jaimez, and
15 that co-conspirator M. Jaimez would have to answer to, and
16 likely be disciplined by, Mexican Mafia D.G. about the incident
17 because co-conspirator M. Jaimez did not have authority over CRO
18 members and enterprise affairs that Mexican Mafia D.G. or
19 defendant LOZA possessed.

20 469. On February 24, 2016, using coded language in a
21 telephone conversation, co-conspirator Arizmendi told Mexican
22 Mafia D.G. that she and defendant LOZA had not been getting
23 along, that during these periods of discord, defendant LOZA did
24 not provide her with money on a consistent basis, and that
25 defendant LOZA had gone to visit co-conspirator Olivas that day.

26 470. On March 5, 2016, using coded language in a telephone
27 conversation, co-conspirator Arizmendi negotiated the purchase
28 of two ounces of methamphetamine for \$500 from a third party in

1 East Los Angeles.

2 471. On March 6, 2016, using coded language in a telephone
3 conversation, Mexican Mafia D.G. asked co-conspirator Arizmendi
4 to find out if co-conspirator Olivas had instructed defendant
5 LOZA to send Mexican Mafia D.G. \$200 every month.

6 472. On March 8, 2016, using coded language in a text
7 message, co-conspirator Espinoza told co-conspirator S. Jaimez
8 that he was getting a "CR" tattoo on the back of his head as
9 well as "Viejo" (CR clique), and "Southeast" (referring to
10 Southeast Los Angeles County) tattoos.

11 473. On March 19, 2016, and March 20, 2016, co-conspirator
12 Arizmendi visited Mexican Mafia D.G. at Pelican Bay State Prison
13 to discuss Canta Ranas Organization-related matters.

14 474. On March 21, 2016, using coded language in a text
15 message, co-conspirator S. Jaimez asked an individual if he was
16 available to give co-conspirator S. Jaimez a tattoo of a frog on
17 his head.

18 475. On April 7, 2016, using coded language in a text
19 message, co-conspirator Orozco complained to defendant LOZA that
20 Pelican Bay State Prison officials were holding and reviewing
21 the mail of Mexican Mafia D.G.

22 476. Between April 10, 2016, and April 14, 2016, using
23 coded language in a series of messages on Facebook, co-
24 conspirator Gavaldon, Jr. asked co-conspirator Arizmendi for
25 methamphetamine and also informed her that he had heard from co-
26 conspirator Olivas, who confirmed that Mexican Mafia D.G. did
27 not want any taxes to be paid to co-conspirator Gavaldon, Sr.

28 477. On April 19, 2016, in the parking lot of a restaurant

1 in Bassett, California, defendant LOZA and co-conspirator
2 Antolin murdered victim D.G.

3 478. On April 19, 2016, in the parking lot of a restaurant
4 in Bassett, California, defendant LOZA and co-conspirator
5 Antolin attempted to murder victim A.G.

6 479. On April 19, 2016, in a parking lot of a restaurant in
7 Bassett, California, defendant LOZA and co-conspirator Antolin
8 shot victim L.L. six times in her lower abdomen.

9 480. On April 21, 2016, using coded language in a Facebook
10 conversation, co-conspirator Arizmendi told an individual who
11 wanted to meet with defendant LOZA that she was with him, sent
12 the individual a "burn number," and instructed the individual to
13 send PayPal numbers to her on that number for the purpose of
14 laundering illicit proceeds.

15 481. On April 22, 2016, using coded language in a series of
16 text messages, co-conspirator S. Jaimez and an unidentified co-
17 conspirator discussed previously shooting at another
18 individual's vehicle, and co-conspirator S. Jaimez said that, if
19 he saw the vehicle again, he would shoot at the vehicle while
20 the individual was inside.

21 482. On April 24, 2016, using coded language in a telephone
22 conversation, co-conspirator Olivas relayed to Mexican Mafia
23 D.G. that defendant LOZA recently had suffered an injury to the
24 leg.

25 483. On April 29, 2016, using coded language in a series of
26 text messages, defendant LOZA and an individual discussed
27 putting in a new interior and "good" body work in a vehicle
28 (likely referring to defendant LOZA's Dodge Charger).

1 484. On May 1, 2016, using coded language in a Facebook
2 conversation, co-conspirator Arizmendi complained to an
3 individual that she had been "hiding out for now 12 days" and
4 instructed the individual to text or call her at a phone number
5 she provided because she did not "trust" Facebook.

6 485. On May 10, 2016, using coded language in a Facebook
7 conversation, co-conspirator Arizmendi told an individual that
8 co-conspirator Antolin could do whatever he wanted in response
9 to the individual's complaints about being taxed by co-
10 conspirator Antolin and having her "shit" taken; co-conspirator
11 Arizmendi told the individual that she and defendant LOZA wanted
12 to meet with her (the individual).

13 486. On May 11, 2016, using coded language in a Facebook
14 conversation, co-conspirator Arizmendi informed an unindicted
15 co-conspirator that defendant LOZA wanted to know if the
16 individual was available to conduct criminal activities on
17 behalf of defendant LOZA.

18 487. On May 13, 2016, using coded language in a Facebook
19 conversation, co-conspirator Olivas relayed to co-conspirator
20 Arizmendi that Mexican Mafia D.G. asked about how defendant LOZA
21 was doing, and that he was sending his "love and hellos" to
22 defendant LOZA and co-conspirator Arizmendi.

23 488. On May 19, 2016, using coded language in a Facebook
24 conversation, co-conspirator Arizmendi told an unindicted co-
25 conspirator that everything related to Canta Ranas Organization
26 business had to be "run by" defendant LOZA or co-conspirator
27 Antolin, and that they would need to "check out" an individual
28 before he was allowed to be "jumped into" CR.

1 489. On May 19, 2016, in a series of text messages, co-
2 conspirator Olivas told defendant LOZA that "you made me smile
3 real big," in response to defendant LOZA sending her a
4 photograph of a new spider tattoo on his back.

5 490. On May 23, 2016, using coded language in a Facebook
6 conversation with an unindicated co-conspirator, co-conspirator
7 Arizmendi agreed to accept payment for 3.5 grams of
8 methamphetamine she had previously fronted and further agreed to
9 front another 3.5 grams of methamphetamine to that individual.

10 491. On May 23, 2016, using coded language in a Facebook
11 conversation, co-conspirator Arizmendi told an individual that
12 she could provide methamphetamine and asked the individual to
13 resend his address to her.

14 492. On May 23, 2016, in a vehicle driven by defendant
15 LOZA, defendant LOZA, co-conspirators Antolin and Arizmendi, and
16 an unindicted co-conspirator possessed a Beretta 92FS, 9mm semi-
17 automatic handgun, with the serial number obliterated.

18 493. On May 23, 2016, at his brother's residence, defendant
19 LOZA and his brother possessed approximately 430 grams of
20 methamphetamine.

21 494. On May 23, 2016, at his residence, defendant LOZA
22 possessed a 9mm Glock pistol, CR gang paraphernalia, and Mexican
23 Mafia paraphernalia.

24 495. On May 23, 2016, at her residence, co-conspirator
25 Arizmendi possessed approximately 44 grams of methamphetamine,
26 CR gang paraphernalia, and written correspondence from Mexican
27 Mafia D.G.

28 496. On May 25, 2016, using coded language in a series of

1 text messages, co-conspirator S. Jaimez agreed to help an
2 unidentified co-conspirator exchange a .357 caliber firearm for
3 another firearm.

4 497. On June 14, 2016, at his residence, co-conspirator
5 Rubio possessed approximately 26 rounds of ammunition of various
6 calibers.

7 498. On June 14, 2016, at his residence, co-conspirator
8 Paniagua possessed approximately 96 rounds of ammunition of
9 various calibers.

10 499. On June 14, 2016, at their residence, co-conspirators
11 D. Gaitan and A. Gaitan possessed a Jennings 9mm semi-automatic
12 handgun, a Glock .40 caliber semi-automatic handgun, a PA-15
13 Palmetto carbine rifle, a bullet proof vest, and CR gang
14 paraphernalia.

15 500. On December 8, 2016, co-conspirator Mendoza possessed
16 a IMEZ model IJ70-18AH, 9mm Makarov caliber semi-automatic
17 pistol loaded with eight rounds of ammunition.

18 501. On June 5, 2017, in federal court, co-conspirator
19 Gavaldon, Sr., transmitted a secret note, or "kite," to co-
20 conspirator Gallardo, which was intended for defendant LOZA and
21 in which co-conspirator Gavaldon, Sr. complained about his bad
22 standing with Mexican Mafia D.G., defendant LOZA, and other CR
23 members, and attempted to explain the reasons for him (co-
24 conspirator Gavaldon, Sr.) speaking badly about defendant LOZA
25 previously.

26 502. On June 5, 2017, in federal court, co-conspirator
27 Gavaldon, Sr. possessed an additional secret note, or "kite,"
28 which referred to an individual believed to be cooperating with

1 law enforcement.

2 503. On August 15, 2017, co-conspirator E. Holguin and
3 another individual assaulted an inmate who, because of his
4 protective custody status as a gang "drop out," was perceived by
5 co-conspirator E. Holguin as being "no good."

6 504. On August 19, 2017, using coded language in a recorded
7 telephone conversation from jail, co-conspirator E. Holguin told
8 an individual that he had been put "in the hole" after he and
9 his cellmate encountered an inmate who was not "supposed to be
10 near us" because that inmate was in protective custody and was
11 "no good."

12 505. On August 21, 2017, using coded language in a recorded
13 telephone conversation from jail, co-conspirator E. Holguin
14 laughed while telling an individual that he was "in the hole"
15 and that it was the prison staff's fault for bringing "someone
16 that wasn't supposed to be around us."

17 D. NOTICE OF SPECIAL ALLEGATIONS

18 The Grand Jury further alleges that:

19 1. Beginning on a date unknown and continuing to on or
20 about October 18, 2017, in Los Angeles County, within the
21 Central District of California, and elsewhere, defendants LOZA
22 and SOTELLO, and co-conspirators Gaitan, Antolin, Olivas,
23 Arizmendi, Vasquez, Hernandez, Alvarez, Casillas, Goulet, A.
24 Gonzalez, A. Jaimez, Espinoza, Orozco, Viramontes, Rubio, A.
25 Salinas, Mendoza, Pantaleon, D. Contreras, Bowers, Rodriguez,
26 Villalba, S. Jaimez, Higuera, Paniagua, R. Contreras, De La Paz,
27 Vandoren, Morales, F. Holguin, E. Holguin, Martinez, A. Gaitan,
28 M. Jaimez, M. Salinas, Perez, Moreno, Nila, Gavaldon, Sr.,

1 Gallardo, Pizano, Alatorre, D. Gonzales, N. Jaimez, Gavaldon,
2 Jr., Franco, Cabrera, Murietta, and Felix, and others known and
3 unknown to the Grand Jury, conspired and agreed with each other
4 to knowingly and intentionally possess with intent to
5 distribute, and distribute at least 50 grams of methamphetamine,
6 a Schedule II controlled substance, and at least one kilogram of
7 a mixture and substance containing a detectable amount of
8 heroin, a Schedule I narcotic drug controlled substance, in
9 violation of Title 21, United States Code, Sections 846,
10 841(a)(1), and 841(b)(1)(A).

11 2. Beginning on a date unknown and continuing to on or
12 about July 11, 2013, in Los Angeles County, within the Central
13 District of California, co-conspirators Vasquez and Pantaleon,
14 and others known and unknown to the Grand Jury, willfully,
15 deliberately, and with premeditation, conspired to kill with
16 malice aforethought victim L.C., in violation of California
17 Penal Code Sections 182, 187, and 189.

18 3. On or about July 11, 2013, in Los Angeles County,
19 within the Central District of California, co-conspirators
20 Vasquez and Pantaleon, and others known and unknown to the Grand
21 Jury, willfully, deliberately, and with premeditation,
22 unlawfully attempted to kill with malice aforethought victim
23 L.C., in violation of California Penal Code Sections 21a, 31,
24 187, 189, and 664.

25 4. Beginning on a date unknown and continuing to on or
26 about April 19, 2016, in Los Angeles County, within the Central
27 District of California, and elsewhere, defendant LOZA, co-
28 conspirator Antolin, and others known and unknown to the Grand

1 Jury, willfully, deliberately, and with premeditation, conspired
2 to kill with malice aforethought victims D.G. and A.G., in
3 violation of California Penal Code Sections 182, 187, and 189.

4 5. On or about April 19, 2016, in Los Angeles County,
5 within the Central District of California, defendant LOZA, co-
6 conspirator Antolin, and others known and unknown to the Grand
7 Jury, unlawfully, willfully, deliberately, and with
8 premeditation, killed with malice aforethought victim D.G. in
9 violation of California Penal Code Sections 31, 187, and 189.

10 6. On or about April 19, 2016, in Los Angeles County,
11 within the Central District of California, defendant LOZA, co-
12 conspirator Antolin, and others known and unknown to the Grand
13 Jury, willfully, deliberately, and with premeditation,
14 unlawfully attempted to kill with malice aforethought victim
15 A.G., in violation of California Penal Code Sections 21a, 187,
16 189, and 664.

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COUNT TWO

[18 U.S.C. § 1959(a)(6)]

[DEFENDANT SOTELLO]

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4 1. At times relevant to this Second Superseding
5 Indictment, the Canta Ranas Organization, as described more
6 particularly in Paragraphs 1 through 14 of the General
7 Allegations, which paragraphs are re-alleged here, including its
8 leaders, members, and associates, constitutes an enterprise, as
9 that term is defined in Title 18, United States Code, Section
10 1959(b)(2), that is, a group of individuals associated in fact
11 which was engaged in, and the activities of which affect,
12 interstate and foreign commerce. The enterprise constitutes an
13 ongoing organization whose members functioned as a continuing
14 unit for a common purpose of achieving the objectives of the
15 enterprise.

16 2. At times relevant to this Second Superseding
17 Indictment, the Canta Ranas Organization, through its members
18 and associates, engaged in racketeering activity, as defined in
19 Title 18, United States Code, Sections 1959(b)(1) and 1961(1),
20 that is:

21 a. offenses involving the distribution of,
22 possession with intent to distribute, and conspiracy to
23 distribute and/or possess with intent to distribute, controlled
24 substances, in violation of Title 21, United States Code,
25 Sections 841(a)(1) and 846;
26 and acts indictable under:

27 b. Title 18, United States Code, Section 1956 (money
28 laundering);

1 c. Title 18, United States Code, Section 1028
2 (identity theft);

3 d. Title 18, United States Code, Section 1029
4 (access device fraud);

5 and multiple acts involving:

6 f. robbery, in violation of California Penal Code
7 Sections 21a, 31, 182, 211, 212.5(a), 213, and 664;

8 g. murder, in violation of California Penal Code
9 Sections 21a, 31, 182, 187, 189, 190, and 664; and

10 h. extortion, in violation of California Penal Code
11 Sections 21(a), 31, 182, 518, 520, and 664.

12 3. Beginning on a date unknown to the Grand Jury, and
13 continuing to on or about August 10, 2013, in Los Angeles
14 County, within the Central District of California, for the
15 purpose of maintaining and increasing position in the Canta
16 Ranas Organization, an enterprise engaged in racketeering
17 activity, defendant RONALD SOTELLO, also known as ("aka")
18 "Downer," and co-conspirator Brandon Espinoza; aka "Downer," and
19 others known and unknown to the Grand Jury, unlawfully and
20 knowingly conspired to assault victim R.C. with a dangerous
21 weapon, in violation of California Penal Code Section 245(a)(2).
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COUNT THREE

[18 U.S.C. § 1959(a)(3)]

[DEFENDANT SOTELLO]

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4 1. Paragraphs 1 through 14 of the General Allegations
5 and Paragraphs 1 and 2 of Count Two of this Second Superseding
6 Indictment are re-alleged here.

7 2. On or about August 10, 2013, in Los Angeles County,
8 within the Central District of California, for the purpose of
9 maintaining and increasing position in the Canta Ranas
10 Organization, an enterprise engaged in racketeering activity,
11 defendant RONALD SOTELLO, also known as ("aka") "Downer," and
12 co-conspirator Brandon Espinoza, aka "Downer," unlawfully and
13 knowingly assaulted victim R.C. with a dangerous weapon, in
14 violation of California Penal Code Section 245(a)(2).

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COUNT FOUR

[18 U.S.C. § 1959(a)(5)]

[DEFENDANT LOZA]

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4 1. Paragraphs 1 through 14 of the General Allegations and
5 Paragraphs 1 and 2 of Count Two of this Second Superseding
6 Indictment are re-alleged here.

7 2. Beginning on a date unknown to the Grand Jury and
8 continuing to on or about April 19, 2016, in Los Angeles County,
9 within the Central District of California, for the purpose of
10 maintaining and increasing position in the Canta Ranas
11 Organization, an enterprise engaged in racketeering activity,
12 defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin
13 Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C,"
14 "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka
15 "Rowdy" and "Rowdy Boy," and others known and unknown to the
16 Grand Jury, unlawfully and knowingly conspired to murder victims
17 D.G. and A.G., in violation of California Penal Code Sections
18 182, 187, and 189.

COUNT FIVE

[18 U.S.C. § 1959(a)(1)]

[DEFENDANT LOZA]

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4 1. Paragraphs 1 through 14 of the General Allegations and
5 Paragraphs 1 and 2 of Count Two of this Second Superseding
6 Indictment are re-alleged here.

7 2. On or about April 19, 2016, in Los Angeles County,
8 within the Central District of California, for the purpose of
9 maintaining and increasing position in the Canta Ranas
10 Organization, an enterprise engaged in racketeering activity,
11 defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin
12 Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C,"
13 "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka
14 "Rowdy" and "Rowdy Boy," unlawfully and knowingly murdered
15 victim D.G., in violation of California Penal Code Sections 31,
16 187, and 189.

COUNT SIX

[18 U.S.C. § 1959(a)(5)]

[DEFENDANT LOZA]

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4 1. Paragraphs 1 through 14 of the General Allegations and
5 Paragraphs 1 and 2 of Count Two of this Second Superseding
6 Indictment are re-alleged here.

7 2. On or about April 19, 2016, in Los Angeles County,
8 within the Central District of California, for the purpose of
9 maintaining and increasing position in the Canta Ranas
10 Organization, an enterprise engaged in racketeering activity,
11 defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin
12 Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C,"
13 "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka
14 "Rowdy" and "Rowdy Boy," and others known and unknown to the
15 Grand Jury, unlawfully and knowingly attempted to murder victim
16 A.G., in violation of California Penal Code Sections 21a, 31,
17 187, 189, and 664.

COUNT SEVEN

[18 U.S.C. § 1959(a)(3)]

[DEFENDANT LOZA]

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4 1. Paragraphs 1 through 14 of the General Allegations and
5 Paragraphs 1 and 2 of Count Two of this Second Superseding
6 Indictment are re-alleged here.

7 2. On or about April 19, 2016, in Los Angeles County,
8 within the Central District of California, for the purpose of
9 maintaining and increasing position in the Canta Ranas
10 Organization, an enterprise engaged in racketeering activity,
11 defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin
12 Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C,"
13 "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka
14 "Rowdy" and "Rowdy Boy," and others known and unknown to the
15 Grand Jury, unlawfully and knowingly assaulted victim L.L. with
16 a dangerous weapon, in violation of California Penal Code
17 Section 245(a)(2).

COUNT EIGHT

[21 U.S.C. § 846]

[DEFENDANTS LOZA AND SOTELLO]

Paragraphs 1 through 14 of the General Allegations of this Second Superseding Indictment are re-alleged here.

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown and continuing to on or about October 18, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants LOZA and SOTELLO, and co-conspirators Gaitan, Antolin, Olivas, Arizmendi, Vasquez, Hernandez, Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez, Espinoza, Orozco, Viramontes, Rubio, A. Salinas, Mendoza, Pantaleon, D. Contreras, Bowers, Rodriguez, Villalba, S. Jaimez, Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales, F. Holguin, E. Holguin, Martinez, A. Gaitan, M. Jaimez, M. Salinas, Perez, Moreno, Nila, Gavaldon, Sr., Gallardo, Pizano, Alatorre, D. Gonzales, N. Jaimez, Gavaldon, Jr., Franco, Cabrera, Murietta, and Felix, and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally (i) possess with intent to distribute, and (ii) distribute, the following controlled substances:

1. at least 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii);

2. at least five grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii);

1 3. at least one kilogram of a mixture and substance
2 containing a detectable amount of heroin, a Schedule I narcotic
3 drug controlled substance, in violation of Title 21, United
4 States Code, Sections 841(a)(1) and 841(b)(1)(A)(i); and

5 4. at least 100 grams of a mixture and substance
6 containing a detectable amount of heroin, a Schedule I narcotic
7 drug controlled substance, in violation of Title 21, United
8 States Code, Sections 841(a)(1) and 841(b)(1)(B)(i).

9 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
10 ACCOMPLISHED

11 1. The Canta Ranas Organization, acting under the
12 authority of Mexican Mafia D.G. and at the direction of the
13 presiding shot caller, would use violence and intimidation to
14 control narcotics trafficking in territories it controlled.

15 2. Members and associates of the Canta Ranas
16 Organization, along with wholesale narcotics suppliers and
17 street narcotics dealers, would receive authorization to traffic
18 in controlled substances within these territories and in return
19 were required to pay a portion of the drug proceeds, known as a
20 "tax," to the Canta Ranas Organization leadership and Mexican
21 Mafia D.G.

22 3. Defendant LOZA and co-conspirators Gaitan, Arizmendi,
23 Vasquez, Hernandez, Casillas, A. Salinas, Rubio, D. Contreras,
24 Martinez, and A. Gaitan, and Cabrera and Murietta, and others
25 known and unknown to the Grand Jury, would supply controlled
26 substances to Canta Ranas Organization members and associates,
27 as well as street narcotics dealers, who were authorized to
28 distribute narcotics within Canta Ranas Organization territories

1 for further distribution within these territories.

2 4. Defendants LOZA and SOTELLO, and co-conspirators
3 Gaitan, Antolin, Arizmendi, Vasquez, Hernandez, Casillas,
4 Goulet, Rubio, A. Salinas, Mendoza, D. Contreras, Bowers,
5 Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales,
6 F. Holguin, E. Holguin, Martinez, A. Gaitan, Moreno, Nila,
7 Pizano, D. Gonzales, Cabrera, and Murietta, and others known and
8 unknown to the Grand Jury, would possess with intent to
9 distribute, distribute, and facilitate the distribution of
10 narcotics in the territories controlled by the Canta Ranas
11 Organization.

12 5. Co-conspirators Gaitan, A. Jaimez, Espinoza, A.
13 Salinas, S. Jaimez, M. Jaimez, M. Salinas, Perez, and Nila, and
14 others known and unknown to the Grand Jury, would smuggle or
15 otherwise cause controlled substances to be smuggled into the
16 incarceration system for distribution to Canta Ranas
17 Organization members and other inmates.

18 6. Defendant LOZA and co-conspirators Gaitan, Antolin,
19 Olivas, Arizmendi, Hernandez, Alvarez, Casillas, Goulet, A.
20 Gonzalez, A. Jaimez, Bowers, Rodriguez, R. Contreras, A. Gaitan,
21 M. Jaimez, N. Jaimez, Murietta, and Felix, and others known and
22 unknown to the Grand Jury, would collect "tax" payments from the
23 Canta Ranas Organization members and associates, and the street
24 narcotics dealers, authorized to distribute narcotics in Canta
25 Ranas Organization-controlled territories.

26 7. Co-conspirators M. Jaimez and M. Salinas, acting under
27 the authority of Mexican Mafia D.G. and with the assistance of
28 fellow Canta Ranas Organization members and associates, would

1 organize the delivery of narcotics into the prison facilities in
2 which they were housed, distribute the narcotics within the
3 facilities, and send a portion of the sale proceeds, i.e., the
4 "tax," to Mexican Mafia D.G.

5 8. Co-conspirators Gaitan, Olivas, Arizmendi, Vasquez,
6 Hernandez, Orozco, Rodriguez, F. Holguin, Martinez, Murietta,
7 and Felix, and others known and unknown to the Grand Jury, would
8 deliver payment of the collected taxes to Mexican Mafia D.G. or
9 his designees, including through the depositing of money into
10 Mexican Mafia D.G.'s prison account and the mailing of money
11 orders and cashier's checks to Mexican Mafia D.G. at Pelican Bay
12 State Prison.

13 9. Defendants LOZA and SOTELLO, and co-conspirators
14 Gaitan, Antolin, Vasquez, Hernandez, Alvarez, Casillas, Goulet,
15 A. Gonzalez, Viramontes, A. Salinas, Mendoza, Villalba, Higuera,
16 Paniagua, De La Paz, Morales, Martinez, A. Gaitan, Perez,
17 Moreno, Nila, Gallardo, Alatorre, D. Gonzales, Franco, and
18 Felix, and others known and unknown to the Grand Jury, would
19 obtain, possess, store, and/or use firearms and ammunition to
20 maintain and strengthen the Canta Rana Organization's control
21 over the narcotics trafficking occurring within its territories,
22 including but not limited to, protecting those selling narcotics
23 and collecting narcotics proceeds on its behalf from competition
24 and/or robbery by rivals and ensuring compliance with its
25 requirements regarding the payment of taxes by those authorized
26 to distribute narcotics on its behalf.

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28 C. OVERT ACTS

1 In furtherance of the conspiracy, and to accomplish the
2 objects of the conspiracy, defendants LOZA and SOTELLO, and co-
3 conspirators Gaitan, Antolin, Olivas, Arizmendi, Vasquez,
4 Hernandez, Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez,
5 Espinoza, Orozco, Viramontes, Rubio, A. Salinas, Mendoza,
6 Pantaleon, D. Contreras, Bowers, Rodriguez, Villalba, S. Jaimez,
7 Higuera, Paniagua, R. Contreras, De La Paz, Vandoren, Morales,
8 F. Holguin, E. Holguin, Martinez, A. Gaitan, M. Jaimez, M.
9 Salinas, Perez, Moreno, Nila, Gavaldon, Sr., Gallardo, Pizano,
10 Alatorre, D. Gonzales, N. Jaimez, Gavaldon, Jr., Franco,
11 Cabrera, Murietta, and Felix, and others known and unknown to
12 the Grand Jury, committed various overt acts, within the Central
13 District of California, and elsewhere, including, but not
14 limited to, overt acts 2-4, 7-8, 18-20, 25-29, 33-35, 39-42, 44-
15 46, 48, 50, 52, 55-56, 59-109, 111-124, 126-127, 130-172, 174-
16 183, 185-188, 190-194, 197-200, 203-205, 207-209, 212-214, 227,
17 229-267, 270-288, 290-291, 293-302, 304-315, 319-325, 327-331,
18 333, 335-336, 339-345, 350, 352, 355, 360-361, 364-367, 370-377,
19 379-381, 383-386, 388, 390-402, 406-416, 418-434, 437, 439, 445,
20 448, 450, 452-453, 455-459, 462-463, 465, 467, 470-471, 476,
21 480, 485, 490-492, 493-495, and 496-500, as set forth in Count
22 One, which are re-alleged here.

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COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT LOZA]

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4 On or about May 23, 2016, in Los Angeles County, within the
5 Central District of California, defendant JOSE LOZA, also known
6 as "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy,"
7 "Joseph," "Big Head," "C," "Joey," and "Toons," and others known
8 and unknown to the Grand Jury, knowingly and intentionally
9 possessed with intent to distribute at least 50 grams, that is,
10 approximately 430 grams, of methamphetamine, a Schedule II
11 controlled substance.
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COUNT TEN

[18 U.S.C. §§ 924(c)(1)(A)(iii), (j)(1); 18 U.S.C. § 2(a)]

[DEFENDANT LOZA]

On or about April 19, 2016, in Los Angeles County, within the Central District of California, defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C," "Joey," and "Toons" ("LOZA") and co-conspirator Leonardo Antolin, aka "Rowdy" and "Rowdy Boy" ("Antolin"), each aiding and abetting the other, knowingly used and carried firearms during and in relation to, and possessed these firearms in furtherance of, a crime of violence, namely, violent crime in aid of racketeering ("VICAR") conspiracy and VICAR, in violation of Title 18, United States Code, Sections 1959(a)(5) and (a)(1), as charged in Counts Four and Five of this Second Superseding Indictment, and in so doing, brandished and discharged the firearms.

In the commission of this offense, and through the use and discharge of the firearms, defendant LOZA and co-conspirator Antolin caused the death of D.G., and D.G.'s death constituted a murder, as defined in Title 18, United States Code, Section 1111.

COUNT ELEVEN

[18 U.S.C. § 924(c)(1)(A)(iii); 18 U.S.C. § 2(a)]

[DEFENDANT LOZA]

On or about April 19, 2016, in Los Angeles County, within the Central District of California, defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C," "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka "Rowdy" and "Rowdy Boy," each aiding and abetting each other, knowingly used and carried loaded firearms during and in relation to, and possessed the firearms in furtherance of, a crime of violence, namely, violent crime in aid of racketeering activity ("VICAR"), in violation of Title 18, United States Code, Section 1959(a)(5), as charged in Count Six of this Second Superseding Indictment, and in so doing, brandished and discharged the firearms.

COUNT TWELVE

[18 U.S.C. § 924(c)(1)(A)(iii); 18 U.S.C. § 2(a)]

[DEFENDANT LOZA]

On or about April 19, 2016, in Los Angeles County, within the Central District of California, defendant JOSE LOZA, also known as ("aka") "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy," "Joseph," "Big Head," "C," "Joey," and "Toons," and co-conspirator Leonardo Antolin, aka "Rowdy" and "Rowdy Boy," each aiding and abetting the other, knowingly used and carried loaded firearms during and in relation to, and possessed the firearms in furtherance of, a crime of violence, namely, Racketeer Influenced Corrupt Organizations Conspiracy, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One of this Second Superseding Indictment, and violent crime in aid of racketeering activity ("VICAR"), in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Seven of this Second Superseding Indictment, and in so doing, brandished and discharged the firearms.

COUNT THIRTEEN

[18 U.S.C. § 922(g)(1)]

[DEFENDANT LOZA]

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4 On or about May 23, 2016, in Los Angeles County, within the
5 Central District of California, defendant JOSE LOZA, also known
6 as "Cartune," "Pumpkin Head," "Pumpkin," "P," "JC," "Gordy,"
7 "Joseph," "Big Head," "C," "Joey," and "Toons" ("LOZA"),
8 knowingly possessed a firearm, namely, a Glock model 26, 9mm
9 Luger caliber semi-automatic pistol, bearing serial number
10 XYH335, in and affecting interstate and foreign commerce.

11 Defendant LOZA possessed such firearm knowing that he had
12 previously been convicted of a felony crime punishable by a term
13 of imprisonment exceeding one year, namely, Attempted Murder, in
14 violation of California Penal Code Sections 664 and 187(a), in
15 the Superior Court of the State of California, County of Los
16 Angeles, case number VA046163, on or about July 10, 1998.

COUNT FOURTEEN

[18 U.S.C. § 1956(h)]

[DEFENDANT LOZA]

Paragraphs 1 through 14 of the General Allegations of this Second Superseding Indictment are re-alleged here.

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing until on or about October 18, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant LOZA and co-conspirators Gaitan, Antolin, Olivas, Arizmendi, Vasquez, Hernandez, Alvarez, Casillas, Goulet, A. Gonzalez, A. Jaimez, Orozco, Bowers, Rodriguez, R. Contreras, F. Holguin, A. Gaitan, Murietta, and Felix, and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally conduct financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, that is, robbery, extortion, identity theft, and conspiracy to possess with intent to distribute and to distribute methamphetamine and heroin, with the intent to promote the carrying on of said specified unlawful activity, and to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i).

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
2 ACCOMPLISHED

3 The objects of the conspiracy were to be accomplished in
4 substance as follows:

5 1. Mexican Mafia D.G., through his position as a Mexican
6 Mafia member, controlled various territories throughout the
7 State of California. In return for a portion of drug proceeds
8 generated in these territories, Mexican Mafia D.G. authorized
9 others to traffic in narcotics within these territories.

10 2. Defendant LOZA and co-conspirators Gaitan, Antolin,
11 Olivas, Arizmendi, Hernandez, Alvarez, Casillas, Goulet, A.
12 Gonzalez, A. Jaimez, Bowers, Rodriguez, R. Contreras, A. Gaitan,
13 Murietta, and Felix, and others known and unknown to the Grand
14 Jury, would collect "tax" payments from Canta Ranas Organization
15 members and associates, and drug wholesalers and street level
16 narcotics dealers, who were authorized to distribute narcotics
17 within these territories.

18 3. Co-conspirators Gaitan, Olivas, Arizmendi, Vasquez,
19 Orozco, Rodriguez, F. Holguin, and Murietta, and others known
20 and unknown to the Grand Jury, would forward and direct others
21 to forward the "tax" payments to Mexican Mafia D.G. and his
22 designees, including incarcerated members and associates of the
23 Mexican Mafia and the Canta Ranas Organization, such as co-
24 conspirator Gavaldon, Sr.

25 4. Having received such payment, Mexican Mafia D.G. would
26 grant continued authorization to these individuals to engage in
27 narcotics trafficking within these territories.

28 5. Defendant LOZA and co-conspirator Gaitan, and others

1 known and unknown to the Grand Jury, would use additional
2 proceeds derived from the sale of narcotics within these
3 territories to purchase weapons, phones, and other materials and
4 thereby conceal the source of the proceeds of the Canta Ranas
5 Organization's drug trafficking operation.

6 C. OVERT ACTS

7 In furtherance of the conspiracy, and to accomplish the
8 object of the conspiracy, defendant LOZA and co-conspirators
9 Gaitan, Antolin, Olivas, Arizmendi, Vasquez, Hernandez, Alvarez,
10 Casillas, Goulet, A. Gonzalez, A. Jaimez, Orozco, Bowers,
11 Rodriguez, R. Contreras, F. Holguin, A. Gaitan, Murietta, and
12 Felix, and others known and unknown to the Grand Jury, committed
13 various overt acts, within the Central District of California,
14 and elsewhere, including overt acts 2-4, 7-8, 18-20, 25, 44, 48,
15 50, 61-62, 67, 73-74, 78, 80-82, 85, 87-90, 95-99, 101, 108,
16 111-112, 114, 117-119, 122-124, 126-127, 131-141, 147-148, 151,
17 154, 156, 163, 169, 171, 175, 178-179, 187, 197, 203-205, 207,
18 209, 212, 214, 229-233, 235-236, 238-239, 241-242, 244, 248,
19 251, 253, 257-258, 260, 262, 264, 274, 285, 287, 296, 308, 319,
20 327, 329, 331, 341, 345, 350, 361, 364, 366, 372, 374-377, 379-
21 381, 386, 388, 391-392, 400, 409, 424, 432-434, 437, 439, 445,
22 455-456, 458, 462, 465, 471, 476, 480, and 485, as set forth in
23 Count One, which are re-alleged here.

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FORFEITURE ALLEGATION ONE

[18 U.S.C. § 1963]

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3 1. Paragraphs 1 through 14 of the General Allegations of
4 this Second Superseding Indictment are re-alleged here.

5 2. The allegations contained in Count One of this Second
6 Superseding Indictment are re-alleged here for the purpose of
7 alleging forfeiture pursuant to the provisions of Title 18,
8 United States Code, Section 1963. Pursuant to Rule 32.2, Fed.
9 R. Crim. P., notice is hereby given to the defendants that the
10 United States will seek forfeiture as part of any sentence, in
11 accordance with Title 18, United States Code, Section 1963, in
12 the event of any defendant's conviction under Count One this
13 Second Superseding Indictment.

14 3. Any and each defendant convicted of Count One of this
15 Second Superseding Indictment shall forfeit to the United
16 States:

17 a. any interest said defendant has acquired or
18 maintained in violation of Title 18, United States Code, Section
19 1962;

20 b. any interest in, security of, claim against, or
21 property or contractual right affording a source of influence
22 over any enterprise which said defendant has established,
23 operated, controlled, conducted, or participated in the conduct
24 of, in violation of Title 18, United States Code, Section 1962;
25 and

26 c. any property constituting or derived from any
27 proceeds obtained, directly or indirectly, from racketeering
28

1 activity in violation of Title 18, United States Code, Section
2 1962.

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

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FORFEITURE ALLEGATION TWO

[21 U.S.C. § 853]

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3 1. Paragraphs 1 through 14 of the General Allegations of
4 this Second Superseding Indictment are re-alleged here.

5 2. The allegations contained in Counts Eight and Nine of
6 this Second Superseding Indictment are re-alleged here for the
7 purpose of alleging forfeiture pursuant to the provisions of
8 Title 21, United States Code, Section 853. Pursuant to Rule
9 32.2, Fed. R. Crim. P., notice is hereby given to the defendants
10 that the United States will seek forfeiture as part of any
11 sentence in accordance with Title 21, United States Code,
12 Section 853, in the event of any defendant's conviction under
13 Counts Eight or Nine of this Second Superseding Indictment.

14 3. Each defendant convicted of Counts Eight or Nine of
15 this Second Superseding Indictment shall forfeit to the United
16 States the following:

17 a. All right, title, and interest in any and all
18 property, real or personal (i) constituting, or derived from,
19 any proceeds obtained, directly or indirectly, as a result of
20 any such offense; and (ii) used, or intended to be used, in any
21 manner or part, to commit, or to facilitate the commission of,
22 any such offense; and

23 b. To the extent such property is not available for
24 forfeiture, a sum of money equal to the total value of the
25 property described in paragraph 3.a.

26 4. Pursuant to Title 21, United States Code, Section
27 853(p), each defendant convicted of Counts Eight or Nine of this
28 Second Superseding Indictment shall forfeit substitute property,

1 up to the total value of the property described in the preceding
2 paragraph if, as the result of any act or omission of a
3 defendant, the property described in the preceding paragraph, or
4 any portion thereof: (a) cannot be located upon the exercise of
5 due diligence; (b) has been transferred, sold to, or deposited
6 with a third party; (c) has been placed beyond the jurisdiction
7 of the court; (d) has been substantially diminished in value; or
8 (e) has been commingled with other property that cannot be
9 divided without difficulty.

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FORFEITURE ALLEGATION THREE

[18 U.S.C. § 924(d), 26 U.S.C. § 5872, and 28 U.S.C. § 2461(c)]

1. Paragraphs 1 through 14 of the General Allegations of this Second Superseding Indictment are re-alleged here.

2. The allegations contained in Counts Ten through Thirteen of this Second Superseding Indictment are re-alleged here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction under any of Counts Ten through Thirteen of this Second Superseding Indictment. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction under any of Counts Ten through Thirteen of this Second Superseding Indictment.

3. Upon any defendant's conviction under any of Counts Ten through Thirteen of this Second Superseding Indictment, such defendant shall forfeit to the United States any firearms and/or ammunition involved in, used, or received or possessed in the knowing commission of such offense.

4. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), each defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph,

1 if, as the result of any act or omission of that defendant, the
2 property described in the preceding paragraph, or any portion
3 thereof: (a) cannot be located upon the exercise of due
4 diligence; (b) has been transferred, sold to, or deposited with
5 a third party; (c) has been placed beyond the jurisdiction of
6 the court; (d) has been substantially diminished in value; or
7 (e) has been commingled with other property that cannot be
8 divided without difficulty.

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FORFEITURE ALLEGATION FOUR

[18 U.S.C. § 982(a)(1)]

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3 1. Paragraphs 1 through 14 of the General Allegations of
4 this Second Superseding Indictment are re-alleged here.

5 2. The allegations contained in Count Fourteen of this
6 Second Superseding Indictment are re-alleged here for the
7 purpose of alleging forfeiture pursuant to the provisions of
8 Title 18, United States Code, Section 982(a)(1), in the event of
9 any defendant's conviction under Count Fourteen of this Second
10 Superseding Indictment. Pursuant to Rule 32.2(a), Fed. R. Crim.
11 P., notice is hereby given to defendants that the United States
12 will seek forfeiture as part of any sentence in accordance with
13 Title 18, United States Code, Section 982(a)(1), in the event of
14 any defendant's conviction under Count Fourteen of this Second
15 Superseding Indictment.

16 3. Each defendant convicted of Count Fourteen of this
17 Second Superseding Indictment shall forfeit to the United States
18 the following:

19 a. All right, title, and interest in any and all
20 property, real or personal, involved in or traceable to the
21 commission of any such offense or any transaction set forth in
22 Count Fourteen of this Second Superseding Indictment; and

23 b. To the extent such property is not available for
24 forfeiture, a sum of money equal to the total value of the
25 property described in paragraph 3.a.

26 4. Pursuant to Title 21, United States Code, Section
27 853(p), as incorporated by Title 18, United States Code, Section
28 982(b)(1), each defendant convicted of Count Fourteen of this

1 Second Superseding Indictment shall forfeit substitute property,
2 up to the total value of the property described in the preceding
3 paragraph if, as the result of any act or omission of a
4 defendant, the property described in the preceding paragraph, or
5 any portion thereof: (a) cannot be located upon the exercise of
6 due diligence; (b) has been transferred, sold to, or deposited
7 with a third party; (c) has been placed beyond the jurisdiction
8 of the court; (d) has been substantially diminished in value; or

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1 (e) has been commingled with other property that cannot be
2 divided without difficulty.

3 A TRUE BILL

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5 151
6 _____
Foreperson

7 NICOLA T. HANNA
8 United States Attorney

9 
10 *Scott Garinger*
11 *Deputy Chief, Criminal Division for:*

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

15 CAROL ALEXIS CHEN
16 Assistant United States Attorney
17 Chief, International Narcotics,
18 Money Laundering, and Racketeering
19 Section

20 VICTORIA A. DEGTAREVA
21 KATHY YU
22 Assistant United States Attorneys
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24 and Racketeering Section
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