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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2012 Grand Jury

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)

CR No. **CR12-1135**

I N D I C T M E N T

VIANNA ROMAN,)
)
aka "V,")
)
aka "Old Girl,")
)
aka "Prima,")
)
aka "Female Cousin,")
MANUEL VALENCIA,)
)
aka "Droopy,")
)
aka "Debo,")
)
aka "D,")
)
aka "Mimi,")
)
aka "Minnie,")
AARON SOTO,)
)
aka "Bobby,")
DAVID CARPINTEYRO,)
)
aka "Tripper,")
)
aka "Trips,")
JAIME MONTANO,)
)
aka "Sporty,")
)
aka "Sports,")
BRYAN VALENCIA,)
)
aka "Flint,")
)
aka "Fred Flintstone,")
MANUEL BONILLA,)
)
aka "Chito,")
RAMON RAMOS,)
)
aka "Ray Ray,")
)
aka "Ray Bones,")
)
aka "Mago,")

[18 U.S.C. § 1962(d): Racketeer
Influenced and Corrupt
Organizations Conspiracy; 18
U.S.C. § 1959: Violent Crime in
Aid of Racketeering; 18 U.S.C.
§ 3: Accessory After the Fact;
21 U.S.C. § 846: Conspiracy to
Distribute Controlled
Substances; 21 U.S.C. §§ 848(a),
(b), (s): Continuing Criminal
Enterprise; 21 U.S.C.
§§ 841(a)(1), 841(b)(1)(A),
841(b)(1)(B), (b)(1)(C):
Possession with Intent to
Distribute and Distribution of
Controlled Substances; 21 U.S.C.
§ 843(b): Use of a Telephone to
Facilitate Drug Trafficking; 18
U.S.C. §§ 924(c)(1)(A),
(c)(1)(B), (j)(1): Use of a
Firearm During and in Relation
to, and Possession of a Firearm
in Furtherance of, a Crime of
Violence and a Drug Trafficking
Crime; 18 U.S.C. § 922(g)(1):
Felon in Possession of a Firearm
and Ammunition; 18 U.S.C.
§ 922(a)(1)(A): Engaging in the
Business of Dealing in Firearms

1	aka "Lips,")	Without a License; 21 U.S.C.
	JOSE RENTERIA,)	§ 860(a); Possession with Intent
2	aka "Grumpy,")	to Distribute and Distribution
	aka "Bubba,")	of Controlled Substances Near a
3	IMAN BUCKLEY,)	School, University, and
	aka "Chico,")	Playground; 18 U.S.C. § 2:
4	FNU LNU,)	Aiding and Abetting; 18 U.S.C.
	aka "Tigre,")	§ 1963: Criminal Forfeiture; 21
5	EDUARDO RAMIREZ,)	U.S.C. § 853: Criminal
	aka "Blackie,")	Forfeiture]
6	JUAN DELGADO,)	
	aka "Kimo,")	
7	aka "Bimo,")	
	CARLOS DELGADO,)	
8	aka "Oso,")	
	MIGUEL DELGADO,)	
9	aka "Little Oso,")	
	JIMMY RAMOS,)	
10	aka "Jimmy Bones,")	
	JORGE SANCHEZ,)	
11	aka "Gizmo,")	
	aka "Giz,")	
12	GWENDOLYN ETTA,)	
	aka "Gwen,")	
13	aka "G,")	
	MARILYN ETA,)	
14	CHRISTOPHER VELASQUEZ,)	
	aka "Whisper,")	
15	MARIO BASULTO,)	
	aka "Bouncer,")	
16	aka "Bounce,")	
	FNU LNU,)	
17	aka "Jimmy,")	
	RONNIE OROZCO,)	
18	RICARDO GALLEGOS,)	
	aka "Indio,")	
19	ANGEL CENEA,)	
	DANIEL PALACIO,)	
20	aka "Danny Boy,")	
	EDGAR GONZALEZ,)	
21	aka "Scrappy,")	
	aka "Scrap,")	
22	NANCY BUCKLEY, and)	
	DENISE HALAWI,)	
23)	
	Defendants)	
24)	
25)	
26	///)	
27	///)	
28	///)	

1 The Grand Jury charges:

2 GENERAL ALLEGATIONS

3 A. THE ENTERPRISE

4 1. At all times relevant to this indictment, defendants
5 VIANNA ROMAN, also known as ("aka") "V," aka "Old Girl," aka
6 "Prima," aka "Female Cousin" ("V. ROMAN"), MANUEL VALENCIA, aka
7 "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie" ("M.
8 VALENCIA"), AARON SOTO, aka "Bobby" ("SOTO"), DAVID CARPINTEYRO,
9 aka "Tripper," aka "Trips" ("CARPINTEYRO"), JAIME MONTANO, aka
10 "Sporty," aka "Sports" ("MONTANO"), BRYAN VALENCIA, aka "Flint,"
11 aka "Fred Flintstone" ("B. VALENCIA"), MANUEL BONILLA, aka
12 "Chito" ("BONILLA"), RAMON RAMOS, aka "Ray Ray," aka "Ray Bones,"
13 aka "Mago," aka "Lips" ("R. RAMOS"), JOSE RENTERIA, aka "Grumpy,"
14 aka "Bubba" ("RENTERIA"), IMAN BUCKLEY, aka "Chico" ("I.
15 BUCKLEY"), FNU LNU, aka "Tigre" ("TIGRE"), EDUARDO RAMIREZ, aka
16 "Blackie" ("RAMIREZ"), JUAN DELGADO, aka "Kimo," aka "Bimo" ("J.
17 DELGADO"), CARLOS DELGADO, aka "Oso" ("C. DELGADO"), MIGUEL
18 DELGADO, aka "Little Oso" ("M. DELGADO"), JIMMY RAMOS, aka "Jimmy
19 Bones" ("J. RAMOS"), JORGE SANCHEZ, aka "Gizmo," aka "Giz,"
20 ("SANCHEZ"), GWENDOLYN ETTA, aka "Gwen," aka "G" ("G. ETTA"),
21 MARILYN ETA ("M. ETA"), CHRISTOPHER VELASQUEZ, aka "Whisper"
22 ("VELASQUEZ"), MARIO BASULTO, aka "Bouncer," aka "Bounce"
23 ("BASULTO"), RONNIE OROZCO ("OROZCO"), RICARDO GALLEGOS, aka
24 "Indio" ("GALLEGOS"), EDGAR GONZALEZ, aka "Scrappy," aka "Scrap"
25 ("GONZALEZ"), and NANCY BUCKLEY ("N. BUCKLEY"), and others known
26 and unknown to the Grand Jury, were members and associates of an
27 organization engaged in, among other things, trafficking in
28 narcotics and controlled substances, murder, conspiring to commit

1 murder, robbery, and extortion. This organization, known
2 alternatively as the "Harpys" street gang and the "Harpys-Dead
3 End" gang (hereinafter referred to as the "Harpys" or "the Harpys
4 gang"), operated in the Central District of California and
5 elsewhere. The Harpys, including its leaders, members, and
6 associates, constituted an "enterprise," as defined by Title 18,
7 United States Code, Section 1961(4), that is, a group of
8 individuals associated in fact. The Harpys engaged in, and its
9 activities affected, interstate and foreign commerce. The Harpys
10 constituted an ongoing organization whose members functioned as a
11 continuing unit for a common purpose of achieving the objectives
12 of the enterprise.

13 2. The Harpys gang is a multi-generational gang that
14 originated in the mid- to late-1960s. Throughout the history of
15 the Harpys, the gang's claimed "territory" has extended as far
16 north as Olympic Boulevard and as far west as Crenshaw Boulevard
17 in Los Angeles, California. Currently, members of the Harpys
18 gang control the portion of Los Angeles within the area of
19 Figueroa Street to the east, Normandie Avenue to the west,
20 Washington Boulevard to the north, and Jefferson Boulevard to the
21 south (hereinafter referred to as the "Harpys Territory").
22 Members of the Harpys control that territory by, among other
23 things, prohibiting the sale of controlled substances by
24 individuals who are not members, affiliates, or clients of the
25 Harpys gang; committing robberies against local residents,
26 merchants, and unaffiliated drug dealers; excluding the presence
27 of members of other area street gangs through violence and the
28 threat of violence; placing graffiti, bearing the Harpys'

1 nicknames and symbols, throughout the area; conducting
2 surveillance against rival gang members and members of law
3 enforcement; challenging Hispanic and African-American male
4 residents and pedestrians in order to determine those
5 individuals' gang identities; and committing assaults, robberies,
6 and burglaries against students of the University of Southern
7 California.

8 3. Members of the Harpys use tattoos to identify
9 themselves and display their association with the Harpys gang.
10 Common Harpys gang tattoos feature the following words, numbers,
11 and symbols: "Harpys," "HPS," "Dead End," "DE," "13," and "H."
12 The Harpys also use spray-painted "tagging" (graffiti) to mark
13 and demonstrate control of their territory to rival gangs and the
14 local community. Harpys gang members place such graffiti
15 throughout Harpys Territory. Members are also known to tag
16 letters and numbers of rival gangs, and then cross them out, both
17 as a warning and a show of disrespect to the rival gangs. In
18 both tattoos and "tagging," the Harpys gang is often identified
19 by the letters "HPSDE" for "Harpys Dead-End" and "DEX3 HPS" for
20 "Dead-End Harpys." Harpys gang members also display their
21 membership in and allegiance to the gang by wearing clothing that
22 prominently displays the letter "H," such as clothing bearing the
23 logo of the Houston Astros, or that prominently display the
24 letter "D," such as clothing bearing the logo of the Detroit
25 Tigers. Harpys members also frequently wear clothing associated
26 with the Los Angeles Dodgers.

27 4. Harpys members also utilize a hand sign to display
28 their membership in and allegiance to the gang. The hand sign is

1 created by extending the index fingers of both hands out
2 horizontally and touching the tips together, creating a straight
3 line, and then extending both thumbs straight up in the air,
4 creating the appearance of an "H." Another hand sign utilized by
5 the Harpys is made with one hand; it is created by touching the
6 tip of the thumb and the tip of the index finger together and
7 extending the middle finger straight upwards, and the ring finger
8 and pinky are also extended outwards from the palm, thus creating
9 the appearance of a "D" and "E" representing the words "Dead
10 End." Harpys gang members wear tattoos that reflect their
11 respective cliques (or subsets of the Harpys), such as "25th St
12 Tiny Locos TLS" or "27th St Chicos Malos CMS." Other common
13 tattoos for Harpy gang members are an eagle (representing the
14 Harpy eagle); devil horns on the forehead, "sureño," "west side,"
15 "Los Angeles," and various tattoos associated with the Aztec
16 culture.

17 5. The Harpys gang is part of a network of Hispanic gangs
18 in the greater Los Angeles area controlled by senior gang members
19 who are also members and associates of an organization known as
20 the "Mexican Mafia" or "La Eme." The Mexican Mafia is an
21 organized group of individuals who control the narcotics
22 trafficking and other criminal activities within California's
23 penal system. Members of the Mexican Mafia come from the ranks
24 of local street gangs, including the Harpys gang. Members and
25 associates of the Harpys gang pay "taxes" to members and
26 associates of the Mexican Mafia in order to maintain control over
27 their territory and in order to assure protection for the Harpys
28 gang and its members once they enter California's penal

1 institutions. Mexican Mafia leaders issue directions and orders
2 to members of the Harpys and other Hispanic gangs, including
3 orders to kill rival gang members, members of law enforcement,
4 and members of the public, which are referred to as "green
5 lights." Those orders are to be executed by Harpys gang members
6 and are understood by Harpys gang members as opportunities to
7 gain elevated status within the Harpys gang and the Mexican
8 Mafia, or potentially become a "made" member of the Mexican
9 Mafia. Other Hispanic gang members who are incarcerated in
10 California's penal system frequently become "sureños," that is,
11 associates of the Mexican Mafia who assist in enforcing the
12 orders of Mexican Mafia members both for their own gangs and for
13 other gangs in Southern California. Members of the Harpys
14 frequently incorporate the number 13 in various forms (i.e., 13,
15 X3, or XIII) in both "tagging" and tattoos to demonstrate their
16 loyalty to the Mexican Mafia ("m" being the 13th letter in the
17 alphabet) and to signify that the gang has "sureño" (i.e.,
18 Southern California) loyalty.

19 6. The Mexican Mafia has established rules to govern
20 criminal activity committed by local street gang members,
21 including criminal activity committed by Harpys gang members. In
22 this regard, the Mexican Mafia requires Harpys gang members to
23 adhere to protocols in connection with the commission of violent
24 attacks, narcotics trafficking, and murders, including the
25 issuance of "green light" authorizations for murder. Failure to
26 adhere to Mexican Mafia rules can lead to the issuance of a
27 "green light" directing an attack on the offending gang member,
28 or the requirement that money be paid. "Green lights" are also

1 frequently issued in retaliation for a perceived acts of
2 "disrespect" to a Mexican Mafia leader, to punish the
3 unauthorized collection of "tax" payments in a neighborhood
4 controlled by the Harpys gang, and to sanction individuals who
5 traffic in narcotics without Harpys authorization or without
6 paying the required "tax" to the Harpys and Mexican Mafia.

7 7. Individuals become leaders within the Harpys by
8 "putting in work," that is, committing crimes in order to advance
9 the reputation and profits of the gang, with violent acts earning
10 the most respect and quickest advancement in seniority within the
11 organization. However, leadership and status sometimes change
12 within the Harpys as a result of internal conflicts and power
13 struggles. Those seeking leadership positions are said to
14 "politic," which means that they are attempting to gain favor
15 with other gang members and members of the Mexican Mafia in order
16 to attain a position of authority and responsibility in the
17 Harpys gang or Mexican Mafia.

18 8. Leaders of the Harpys recruit and initiate juveniles
19 into the gang and direct them to commit acts of violence and
20 drug-trafficking crimes on behalf of the gang. New members
21 ordinarily are then "jumped" into the gang, which typically
22 requires that the new members be physically beaten by other gang
23 members. The new member is then expected to "put in work" for
24 the gang, which includes distributing narcotics, "hunt" rival
25 gang members (seek out and assault rival gang members), "post up"
26 (act as a look-out to alert other gang members to the presence of
27 law enforcement), and "tag" areas with Harpys-related symbols.
28 The older members of the Harpys, commonly referred to as

1 "veteranos," generally instruct younger members to commit crimes
2 on behalf of the gang, based on the commonly-held belief among
3 Harpys members that the younger members, who are often juveniles,
4 will receive lenient sentences for such crimes, including the
5 possession of firearms, the possession of narcotics for sales,
6 and the commission of violent assaults on rival gang members, if
7 arrested and prosecuted.

8 9. The Harpys gang is controlled by Mexican Mafia member
9 and unindicted co-conspirator Danny Roman ("D. Roman"), who is a
10 member of the Harpys gang. D. Roman controls a territory in
11 South Los Angeles on behalf of the Mexican Mafia that includes
12 the Harpys Territory, and extends to all Hispanic gangs operating
13 within the following borders: Washington Boulevard to the north,
14 Alameda Street to the east, Western Avenue to the west, and
15 Imperial Highway to the south ("D. Roman Territory"). The
16 Hispanic gangs operating within D. Roman Territory, and thus
17 under the control of D. Roman, include the Harpys, Primera Flats,
18 38th Street, 36th Street, Ghetto Boys, Playboys, Alley Tiny
19 Criminals, Street Saints, East Side Trece, Barrio Mojados Sur,
20 Loco Park, K.A.B. 13, and H.O.B. gangs. Each of these gangs has
21 its own individual leadership structure and engages in criminal
22 activities within its territory, including the sale of controlled
23 substances and firearms, robberies, extortion, assaults, and
24 murder. However, these gangs also accept the authority of D.
25 Roman, pay "taxes" to D. Roman, and carry out D. Roman's orders.
26 Because of D. Roman's power within the D. Roman Territory and his
27 particular connection to the Harpys gang, Harpys gang members
28 have unique authority to engage in criminal activities, such as

1 the sale of drugs and firearms outside of Harpys Territory,
2 without the risk of violent reprisal that Hispanic gang members
3 ordinarily would suffer for engaging in such criminal activities
4 in territory controlled by other Hispanic gangs.

5 10. D. Roman is serving a term of life imprisonment without
6 the possibility of parole in Pelican Bay State Prison.
7 Accordingly, D. Roman most frequently passes orders to engage in
8 criminal conduct to his daughter, defendant V. ROMAN, a "sureña,"
9 and her husband, defendant SOTO, a "sureño," when they visit D.
10 Roman. Defendants V. ROMAN and SOTO, in turn, issue orders
11 emanating from D. Roman to the shot caller of the Harpys gang,
12 defendant M. VALENCIA, as well as to other sureños who are high-
13 ranking members or associates of the Harpys gang. As shot caller
14 of the Harpys gang, defendant M. VALENCIA enforces D. Roman's
15 orders, including overseeing the sale of drugs and violent
16 conduct within both Harpys Territory and the broader D. Roman
17 Territory. Defendant M. VALENCIA also controls and enforces the
18 collection of "tax" payments from all Hispanic gangs under D.
19 Roman's control. Leaders of those gangs turn to defendant M.
20 VALENCIA for orders from the Mexican Mafia, by virtue of
21 defendant M. VALENCIA acting as a surrogate for D. Roman and
22 defendant V. ROMAN. In this respect, Hispanic gang members under
23 D. Roman's control are associates of the Harpys in light of their
24 shared affiliation with D. Roman and because of the Harpys gang's
25 special role in collecting "taxes" on behalf of D. Roman and
26 enforcing D. Roman's directives.

27 11. The Harpys gang is continually engaged in the
28 distribution of methamphetamine, cocaine, cocaine base in the

1 form of crack cocaine, heroin, and other controlled substances.
:2 Members and associates of the gang are actively involved in
3 distributing those drugs in the neighborhoods controlled by the
4 Harpys gang. In particular, Harpys leaders obtain drugs and
5 control the distribution of drugs by providing "street-level"
6 distribution amounts of drugs to numerous gang members and
7 associates in the area controlled by the gang.

8 12. To support their narcotics trafficking and to enforce
9 their control of their claimed "territory," as well as the
10 authority of D. Roman, Harpys gang members maintain a ready
11 supply of firearms. They also sell these weapons for profit,
12 using the proceeds from such sales to purchase narcotics and
13 additional firearms, or to pay the required "taxes" to members of
14 the Mexican Mafia. Such weapons are frequently stolen or
15 unregistered, so that their use cannot be readily connected to
16 the gang member who either used the weapon or obtained it.
17 Weapons often are discarded or destroyed after being used to
18 commit acts of violence on behalf of the organization.
19 Therefore, gang leaders frequently need to maintain a consistent
20 source of supply for additional unregistered or non-traceable
21 firearms.

22 13. Mexican Mafia and Harpys gang members and associates
23 regularly exploit prison visits, telephone calls made by inmates,
24 policies concerning letter-communications with attorneys, and
25 prison monetary accounts maintained by inmates in order to
26 coordinate and store income derived from narcotics trafficking
27 and other crimes of the enterprise, so as to promote the criminal
28 enterprise and direct the operation of the Harpys gang from

1 within prison. Mexican Mafia leaders also require regular
2 payments from Harpys members and associates who are incarcerated.

3 14. The Harpys gang also controls the activities of its
4 members, enforces its and D. Roman's authority, and metes out
5 internal discipline within the gang by killing, attempting to
6 kill, conspiring to kill, assaulting, and threatening its own
7 members and other Hispanic gang members who fail to pay debts
8 owed to the enterprise or who present a threat to the enterprise.
9 Harpys gang members frequently seek authority for these attacks
10 from Mexican Mafia members and associates, obtaining "green
11 lights" to carry out murders and assaults. Harpys gang members
12 and associates typically continue to plan and execute crimes even
13 after they are arrested and incarcerated.

14 15. The Alameda Swap Meet, located at 4433 South Alameda
15 Street and 4501 South Alameda Street ("the Alameda Swap Meet"),
16 at the edge of the territory claimed by the 38th Street gang
17 within D. Roman Territory, has long been a central location for
18 criminal activity by members of the 38th Street gang. The 38th
19 Street gang operates within D. Roman Territory and acts under D.
20 Roman's authority. 38th Street gang members and other members
21 and associates of Hispanic gangs under the authority of D. Roman
22 regularly use threats of violence and violence to extort "taxes"
23 from vendors at the Alameda Swap Meet, and other businesses
24 within D. Roman Territory, as authorized by defendants V. ROMAN
25 and M. VALENCIA, and other co-conspirators.

26 B. PURPOSES OF THE ENTERPRISE

27 16. The purposes of the Harpys gang include, but are not
28 limited to, the following:

1 a. Enriching D. Roman through the remittance of the
2 proceeds of the Harpys gang's criminal activities (referred to as
3 "taxes"), including drug sales, extortion, and robbery; enriching
4 D. Roman through the collection and remittance of "taxes"
5 generated by the criminal activity of other Hispanic street gangs
6 falling under D. Roman's authority; promoting D. Roman's criminal
7 reputation among other Hispanic gangs in Southern California, as
8 well as among other sworn members of the Mexican Mafia; carrying
9 out D. Roman's orders against rival gang members and enemies; and
10 enhancing the Harpys' reputation by promoting D. Roman's
11 reputation.

12 b. Enriching members and associates of the Harpys
13 through, among other things, the control of and participation in
14 the distribution of narcotics within the Harpys Territory, as
15 well as through engaging in armed robberies of local residents,
16 including students of the University of Southern California, and
17 the extortion of businesses operating within D. Roman Territory.

18 c. Maintaining the control and authority of the
19 Harpys, often through threats, intimidation, and acts of violence
20 committed against local residents and rival gangs.

21 d. Promoting and enhancing the power and authority of
22 the Harpys gang and associated Hispanic gangs operating within D.
23 Roman Territory.

24 e. Violently retaliating against rival gang members
25 who challenge the authority of the Harpys or D. Roman, or who
26 fail to pay debts owed to Harpys members and associates.

27 f. Punishing Harpys members and associates who are
28 perceived as violating the Harpys' rules.

1 C. THE MEANS AND METHODS OF THE ENTERPRISE

2 17. The means and methods by which the defendants and their
3 associates conducted and participated in the conduct of the
4 affairs of the Harpys gang included the following:

5 a. Members and associates of the Harpys committed,
6 attempted, and threatened to commit acts of violence to protect
7 and expand the enterprise's criminal operation, including
8 assaults, murders, acts of intimidation, and threats of violence
9 directed against rival gang members and witnesses in criminal
10 cases, and to violently discipline insubordinate members of the
11 enterprise.

12 b. Members and associates of the Harpys promoted a
13 climate of fear, particularly among rival gang members and
14 unaffiliated local residents in and near the Harpys Territory,
15 through acts of violence and threats to commit acts of violence.

16 c. Members and associates of the Harpys engaged in
17 drug trafficking, gun trafficking, robbery, and extortion as a
18 means to generate income.

19 d. Members and associates of the Harpys frequently
20 engaged in the aforementioned criminal activity in the presence
21 of other Harpys members and/or associates in order to enhance the
22 status within the Harpys of those affirmatively conducting the
23 criminal acts.

24 e. Members and associates of the Harpys followed the
25 direction and control of Mexican Mafia member D. Roman by
26 corresponding with D. Roman through prison visits and written
27 correspondence; remitting portions of drug sales, robberies, and
28 other illegal activities to D. Roman and defendant V. ROMAN;

1 carrying out violent acts against targets designated by D. Roman;
2 and corresponding with, and remitting criminal proceeds generated
3 by members and associates of the Harpys to, other Mexican Mafia
4 members and associates on behalf of D. Roman.

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COUNT ONE

[18 U.S.C. § 1962(d)]

Paragraphs 1 through 17 of the General Allegations are re-
alleged and incorporated by reference as if fully set forth
herein.

A. THE CONSPIRACY

1. Beginning on a date unknown, and continuing to on or
about November 28, 2012, in Los Angeles County, within the
Central District of California, and elsewhere, defendants V.
ROMAN, M. VALENCIA, SOTO, CARPINTEYRO, MONTANO, B. VALENCIA,
BONILLA, R. RAMOS, RENTERIA, I. BUCKLEY, TIGRE, RAMIREZ, J.
DELGADO, C. DELGADO, M. DELGADO, J. RAMOS, SANCHEZ, G. ETTA, M.
ETTA, VELASQUEZ, BASULTO, OROZCO, GALLEGOS, GONZALEZ, and N.
BUCKLEY, and others known and unknown to the Grand Jury, being
persons employed by and associated with the Harpys, an enterprise
which was 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 that 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 chargeable under the
following provisions of state and federal law:

- a. acts involving murder, committed in violation of
California Penal Code Sections 31, 182, 187, 189,
and 664;
- b. acts involving robbery, committed in violation of

1 California Penal Code Sections 31, 182, 211, and
2 664;

3 c. acts involving extortion, committed in violation
4 of California Penal Code Sections 31, 182, 520,
5 and 664;

6 d. offenses involving the distribution of, and
7 conspiracy to distribute, controlled substances
8 including heroin, methamphetamine, cocaine, and
9 cocaine base in the form of crack cocaine, in
10 violation of Title 21, United States Code,
11 Sections 841(a)(1) and 846; and

12 e. acts indictable under Title 18, United States
13 Code, Section 1951 (relating to interference with
14 commerce through robbery and extortion).

15 2. It was a further part of the conspiracy that each
16 defendant agreed that a conspirator would commit at least two
17 acts of racketeering activity in the conduct of the affairs of
18 the enterprise.

19 B. MEANS OF THE CONSPIRACY

20 The objects of the conspiracy were to be accomplished in
21 substance as follows:

22 1. Defendants V. ROMAN, M. VALENCIA, SOTO, and
23 CARPINTEYRO, would exercise leadership over the Harpys gang by
24 directly corresponding with Mexican Mafia member D. Roman; would
25 collect drug "tax" payments from Harpys-affiliated drug dealers
26 and from other Hispanic gang members falling under the control of
27 D. Roman; would send "tax" payments to D. Roman through money
28 orders and gifts that D. Roman could receive in prison; would

1 meet with shot callers and members of the Harpys and other
2 Hispanic gangs in order to pass on D. Roman's orders; would
3 supply bulk quantities of controlled substances to Harpys-
4 affiliated drug dealers for redistribution; would command
5 assaults and attacks against, and conspire to murder, enemies of
6 the Harpys and D. Roman; and would antagonize rival gang members
7 who were affiliated with Mexican Mafia members other than D.
8 Roman.

9 2. Defendants M. VALENCIA, CARPINTEYRO, B. VALENCIA,
10 BONILLA, R. RAMOS, RAMIREZ, J. DELGADO, C. DELGADO, M. DELGADO,
11 J. RAMOS, VELASQUEZ, and BASULTO, as Harpys gang members, would
12 act as "foot soldiers" for the Harpys gang by committing crimes
13 for the gang, including crimes involving the possession of
14 firearms; would agree to assault rival gang members and enemies
15 of D. Roman; would engage in drug sales; would collect "tax"
16 payments from Harpys-affiliated gangs and gang members; would
17 commit violent crimes against civilians within Harpys Territory
18 and D. Roman Territory; would commit violent crimes against rival
19 gang members in prison and jail; and would represent D. Roman's
20 interests while in prison and jail.

21 3. Defendants SOTO, MONTANO, RENTERIA, I. BUCKLEY, TIGRE,
22 SANCHEZ, G. ETTA, M. ETA, OROZCO, GALLEGOS, and GONZALEZ, as
23 members and associates of other Hispanic Southern California-
24 based street gangs operating within D. Roman Territory, would
25 associate with the Harpys in order to enrich, promote, and
26 enhance D. Roman, by, among other things, helping Harpys members
27 sell drugs, and extort victims; would make "tax" payments to and
28 collect "tax" payments for D. Roman; would communicate with D.

1 Roman; and would carry out orders by D. Roman and senior Harpys
2 members to commit acts of violence.

3 4. Defendants R. RAMOS, RAMIREZ, and J. RAMOS would sell
4 firearms and ammunition and would pay "taxes" to senior Harpys
5 members for ultimate disbursement to D. Roman based on their
6 sales of firearms and ammunition within the Harpys Territory and
7 D. Roman Territory.

8 5. Defendant N. BUCKLEY would support Harpys members by
9 helping them acquire and sell controlled substances, communicate
10 with D. Roman, and deliver proceeds of drug sales to D. Roman.

11 C. OVERT ACTS

12 In furtherance of the conspiracy and to accomplish the
13 objects of the conspiracy, on or about the following dates,
14 defendants V. ROMAN, M. VALENCIA, SOTO, CARPINTEYRO, MONTANO, B.
15 VALENCIA, BONILLA, R. RAMOS, RENTERIA, I. BUCKLEY, TIGRE,
16 RAMIREZ, J. DELGADO, C. DELGADO, M. DELGADO, J. RAMOS, SANCHEZ,
17 G. ETTA, M. ETA, VELASQUEZ, BASULTO, OROZCO, GALLEGOS, GONZALEZ,
18 and N. BUCKLEY, and others known and unknown to the Grand Jury,
19 committed various overt acts within the Central District of
20 California, and elsewhere, including but not limited to the
21 following:

22 1. On April 23, 2010, defendants M. VALENCIA and
23 CARPINTEYRO, within Harpys Territory, collected, on behalf of D.
24 Roman, a \$500 "tax" payment from someone they believed to be a
25 representative of the 36th Street gang, but who was actually a
26 confidential informant working for law enforcement ("CI-1").

27 2. On April 23, 2010, defendant M. VALENCIA told CI-1 to
28 inform 36th Street gang members that they needed to increase

1 their sales of controlled substances so that they could make full
2 and timely "tax" payments to D. Roman.

3 3. On June 1, 2010, using coded language in a telephone
4 conversation, defendant CARPINTEYRO arranged to meet CI-1 at a
5 location in Harpys Territory in order for defendant CARPINTEYRO
6 to deliver drugs to CI-1.

7 4. On June 7, 2010, within Harpys Territory, defendant
8 CARPINTEYRO distributed approximately 25.7 grams of heroin to
9 CS-1, and collected, on D. Roman's behalf, a \$500 "tax" payment
10 from CI-1.

11 5. On August 4, 2010, within Harpys Territory, defendant
12 CARPINTEYRO collected, on behalf of D. Roman, a \$500 "tax"
13 payment from CI-1.

14 6. On December 14, 2010, using coded language in a
15 telephone conversation, defendant M. VALENCIA instructed CI-1 to
16 meet defendant M. VALENCIA at a location in Harpys Territory in
17 order for defendant M. VALENCIA to deliver drugs to CI-1.

18 7. On December 14, 2010, at a location in Harpys
19 Territory, defendant M. VALENCIA distributed approximately 20.9
20 grams of methamphetamine to CI-1.

21 8. On December 14, 2010, defendant M. VALENCIA told CI-1
22 to inform 36th Street gang members not to engage in drive-by
23 shootings, and M. VALENCIA stated that all shootings by Hispanic
24 gangs under D. Roman's control must be done on foot.

25 9. On May 18, 2011, within D. Roman Territory, defendant
26 RAMIREZ sold a Mossberg Western Field M550 ABD short-barreled 12-
27 gauge pump-action shotgun, bearing serial number G603464, in
28 addition to seven rounds of Flocchi ammunition and two rounds of

1 Remington ammunition, to someone whom defendant RAMIREZ believed
2 to be a Harpys gang member, but who was actually a confidential
3 informant working for law enforcement ("CI-3").

4 10. On June 8, 2011, within D. Roman Territory, defendant
5 RAMIREZ distributed approximately 26.9 grams of methamphetamine
6 to CI-3, and sold to CI-3 an ECM .25 caliber semiautomatic
7 pistol, bearing serial number MI44135, and one round of
8 Winchester .25 caliber ammunition.

9 11. On July 12, 2011, within D. Roman Territory, defendant
10 RAMIREZ distributed approximately 21.2 grams of methamphetamine
11 to CI-3.

12 12. On July 20, 2011, using coded language in a telephone
13 conversation, defendant M. VALENCIA discussed with someone whom
14 defendant M. VALENCIA believed was a Mexican Mafia associate, but
15 who actually was a confidential informant working for law
16 enforcement ("CI-4"), defendant M. VALENCIA's plan to collect
17 "tax" payments from the nearby Primera Flats gang on behalf of D.
18 Roman.

19 13. On July 21, 2011, using coded language in a telephone
20 conversation, defendant M. VALENCIA discussed with CI-4 defendant
21 M. VALENCIA's plan to collect "tax" payments from the Alley Tiny
22 Criminals gang on behalf of D. Roman.

23 14. On July 21, 2011, using coded language in a telephone
24 conversation, defendant GONZALEZ spoke to CI-4 about the
25 collection of "tax" payments from the Hood Family, 39th Street,
26 and 55th Street gangs, and defendant GONZALEZ offered to help
27 CI-4 collect the "tax" payment from the 39th Street gang.

28 15. On July 21, 2011, using coded language in a telephone

1 conversation, defendant GONZALEZ informed CI-4 that defendant
2 GONZALEZ had written to D. Roman regarding a problem that had
3 arisen among the Mexican Mafia at Red Rock Correctional Center,
4 and defendant GONZALEZ asked CI-4 to inform defendant GONZALEZ of
5 any communications that CI-4 received from D. Roman.

6 16. On July 22, 2011, using coded language in a telephone
7 conversation, defendant M. VALENCIA spoke with CI-4 about
8 collecting "tax" payments on behalf of D. Roman from a nearby
9 gang.

10 17. On July 22, 2011, using coded language in a telephone
11 conversation, defendant M. VALENCIA instructed CI-4 to notify the
12 representatives of Hispanic street gangs of an upcoming meeting
13 at which those gangs could pay "taxes" to D. Roman.

14 18. On July 22, 2011, using coded language in a telephone
15 conversation, defendant RENTERIA discussed with CI-4 the
16 collection of "taxes" from various Hispanic gangs within D. Roman
17 Territory and discussed defendant RENTERIA's involvement in the
18 sale of narcotics while he was incarcerated, including the fact
19 that defendant RENTERIA received authorization from D. Roman to
20 murder representatives of the Mexican Mafia who interfere with
21 defendant RENTERIA's drug sales.

22 19. On July 22, 2011, using coded language in a telephone
23 conversation, defendant RENTERIA told CI-4 that, prior to
24 defendant RENTERIA's transfer from Folsom State Prison to
25 Centinela State Prison, defendant RENTERIA left seven ounces of
26 heroin with defendant I. BUCKLEY at Folsom State Prison to sell
27 on behalf of D. Roman.

28 20. On July 22, 2011, using coded language in a telephone

1 conversation, defendant M. VALENCIA instructed CI-4 to begin
2 collecting "taxes" from a local Hispanic street gang on D.
3 Roman's behalf.

4 21. On July 23, 2011, using coded language while meeting
5 with D. Roman at Pelican Bay State Prison, defendant V. ROMAN
6 informed D. Roman that victim R.J. was causing problems for
7 defendant V. ROMAN and that defendant V. ROMAN met with a rival
8 Hispanic gang to address a dispute involving defendant V. ROMAN
9 and victim R.J.

10 22. On July 26, 2011, using coded language in a telephone
11 conversation, defendant M. VALENCIA discussed with an unindicted
12 co-conspirator and representative of a Hispanic gang within D.
13 Roman Territory the Hispanic gang's obligation to pay "taxes" to
14 D. Roman and an outstanding \$20,000 debt the gang owed to D.
15 Roman.

16 23. On July 29, 2011, at the direction of defendant I.
17 BUCKLEY, defendant N. BUCKLEY sent \$200 to D. Roman, which money
18 constituted proceeds from defendant I. BUCKLEY's sales of
19 controlled substances at Folsom State Prison.

20 24. On July 29, 2011, using coded language in a telephone
21 conversation, defendant M. VALENCIA discussed with CI-4 whether
22 other Hispanic gangs owed outstanding "tax" payments to D. Roman.

23 25. On July 29, 2011, using coded language in a telephone
24 conversation, defendant M. VALENCIA instructed CI-4 to arrange a
25 meeting with a representative of a Hispanic gang in order to
26 collect the gang's outstanding "tax" obligation owed to D. Roman.

27 26. On July 29, 2011, using coded language in a telephone
28 conversation, defendant M. VALENCIA spoke with CI-4 about

1 representatives of local Hispanic street gangs who were ready to
2 pay "taxes" to D. Roman through defendant M. VALENCIA.

3 27. On August 3, 2011, using coded language in a telephone
4 conversation, defendant M. VALENCIA asked whether CI-4 had
5 received any recent communication from D. Roman and then directed
6 CI-4 to check the status of an outstanding "tax" payment owed by
7 the owner of a local grocery store.

8 28. On August 3, 2011, using coded language in a telephone
9 conversation, defendant M. VALENCIA spoke with CI-4 about CI-4's
10 collection of "taxes" from the Barrio Mojados gang on behalf of
11 D. Roman.

12 29. On August 8, 2011, using coded language in a telephone
13 conversation, defendant M. VALENCIA discussed with defendant
14 RENTERIA the fact that, according to defendants V. ROMAN and
15 SOTO, defendant RENTERIA owed "tax" payments to D. Roman from
16 defendant RENTERIA's drug sales at Centinela State Prison.

17 30. On August 8, 2011, using coded language in a telephone
18 conversation, defendant RENTERIA explained to defendant M.
19 VALENCIA the scope of defendant RENTERIA's prison drug sale
20 operation and told defendant M. VALENCIA that defendant RENTERIA
21 had made timely and complete "tax" payments to D. Roman.

22 31. On August 9, 2011, using coded language in a telephone
23 conversation, defendant RENTERIA told defendant M. VALENCIA that
24 defendant RENTERIA planned to send correspondence to D. Roman
25 regarding defendant RENTERIA's supposed unpaid "taxes," in
26 response to which defendant M. VALENCIA stated that defendant M.
27 VALENCIA would follow D. Roman's orders regarding any outstanding
28 debt owed by defendant RENTERIA.

1 32. On August 11, 2011, using coded language in a telephone
2 conversation, defendant GONZALEZ provided CI-4 with contact
3 information for the shot caller of the 55th Street gang, and
4 defendant GONZALEZ offered to provide CI-4 the contact
5 information for shot callers of the Hood Family, 38th Street, and
6 King Boulevard gangs.

7 33. On August 15, 2011, in Imperial, California, defendant
8 RENTERIA possessed heroin inside a prison cell at Centinela State
9 Prison, which defendant RENTERIA concealed in an attempt to evade
10 detection by Centinela State Prison officials.

11 34. On August 22, 2011, using coded language in a telephone
12 conversation, defendant MONTANO informed CI-4 of defendant
13 MONTANO's discovery that victim I.T. had previously testified at
14 a criminal trial against another Hispanic gang member and that
15 defendant MONTANO stated that he planned to acquire court
16 paperwork confirming that the testimony had occurred.

17 35. On August 22, 2011, using coded language in a telephone
18 conversation, defendant MONTANO informed CI-4 that defendant
19 MONTANO was going to arrange to murder victim I.T. with other
20 inmates housed with defendant MONTANO at Centinela State Prison.

21 36. On August 22, 2011, using coded language in a telephone
22 conversation, defendant MONTANO asked CI-4 to have a message
23 passed to D. Roman that defendant MONTANO was investigating
24 whether victim I.T. had testified against another Hispanic gang
25 member, and defendant MONTANO asked CI-4 to seek authorization
26 from D. Roman to murder victim I.T.

27 37. On August 24, 2011, using coded language in a telephone
28 conversation, defendant MONTANO informed CI-4 that defendant

1 MONTANO would obtain a transcript of victim I.T.'s prior
2 testimony and would have the transcript delivered to CI-4.

3 38. On August 25, 2011, using coded language in a telephone
4 conversation, defendant GONZALEZ informed CI-4 that defendant
5 GONZALEZ would represent D. Roman among the Mexican Mafia at Red
6 Rock Correctional Center.

7 39. On September 1, 2011, at the direction of defendant I.
8 BUCKLEY, defendant N. BUCKLEY sent \$200 to D. Roman, which money
9 constituted proceeds from defendant I. BUCKLEY's sales of
10 controlled substances at Folsom State Prison.

11 40. On September 8, 2011, using coded language in a
12 telephone conversation, defendant MONTANO informed CI-4 that
13 representatives of the Mexican Mafia at Centinela State Prison
14 were prepared to order the murder of victim I.T. upon being
15 presented with proof of victim I.T.'s prior testimony.

16 41. On September 9, 2011, using coded language in a
17 telephone conversation, defendant GONZALEZ spoke to CI-4 about
18 the collection of "tax" payments from Hispanic gangs under the
19 authority of D. Roman and informed CI-4 that defendant GONZALEZ
20 wrote to D. Roman stating that defendant GONZALEZ would represent
21 D. Roman among the Mexican Mafia at the Red Rock Correctional
22 Center.

23 42. On September 13, 2011, using coded language in a
24 telephone conversation, an unindicted co-conspirator acting on
25 behalf of defendant MONTANO agreed to meet with CI-4 to provide
26 CI-4 with transcripts of victim I.T.'s prior testimony.

27 43. On September 19, 2011, using coded language in a
28 telephone conversation, defendant MONTANO discussed with CI-4 the

1 need to ensure that D. Roman's representatives maintained
2 leadership roles within the Mexican Mafia at San Quentin State
3 Prison and Folsom State Prison.

4 44. On September 19, 2011, using coded language in a
5 telephone conversation, defendant I. BUCKLEY told CI-4 that
6 defendant I. BUCKLEY would continue to send to D. Roman a portion
7 of the proceeds from defendant I. BUCKLEY's sales of controlled
8 substances and other contraband at Folsom State Prison

9 45. On September 19, 2011, using coded language in a
10 telephone conversation, defendant I. BUCKLEY informed CI-4 that
11 defendant N. BUCKLEY would send money orders and letters
12 discussing matters related to the Mexican Mafia to D. Roman on
13 defendant I. BUCKLEY's behalf.

14 46. On September 20, 2011, using coded language in a
15 telephone conversation, defendant I. BUCKLEY informed defendant
16 M. VALENCIA and CI-4 that defendant I. BUCKLEY would send "tax"
17 payments to D. Roman.

18 47. On September 20, 2011, using coded language in a
19 telephone conversation, defendant M. VALENCIA informed defendant
20 I. BUCKLEY and CI-4 that any person working for D. Roman would be
21 required to show legal paperwork within one day of release from
22 prison to demonstrate that they were not cooperating with law
23 enforcement.

24 48. On September 26, 2011, using coded language in a
25 telephone conversation, defendant I. BUCKLEY informed CI-4, while
26 defendant N. BUCKLEY also participated in the call, that
27 defendant I. BUCKLEY had received authorization from D. Roman to
28 inflict violence on rival Mexican Mafia associates who did not

1 respect D. Roman's authority, and defendant I. BUCKLEY said that
2 he wanted to inform D. Roman about the activities of such rival
3 Mexican Mafia associates.

4 49. On September 26, 2011, using coded language in a
5 telephone conversation, defendant N. BUCKLEY informed CI-4 and
6 defendant I. BUCKLEY that defendant N. BUCKLEY would send a
7 communication to D. Roman on behalf of defendant I. BUCKLEY
8 regarding the activities of rival Mexican Mafia associates at
9 Folsom State Prison.

10 50. On September 29, 2011, using coded language in a
11 telephone conversation, defendant V. ROMAN informed defendant
12 MONTANO, defendant M. VALENCIA, and CI-4 that defendant RENTERIA
13 had placed defendant V. ROMAN in danger and must seek D. Roman's
14 forgiveness.

15 51. On September 29, 2011, using coded language in a
16 telephone conversation, defendant V. ROMAN told defendant
17 MONTANO, defendant M. VALENCIA, and CI-4 that defendant V. ROMAN
18 would visit D. Roman at Pelican Bay State Prison and then give
19 defendant M. VALENCIA orders from D. Roman to pass on to
20 defendant RENTERIA.

21 52. On September 29, 2011, using coded language in a
22 telephone conversation, defendant V. ROMAN informed defendant
23 MONTANO, defendant M. VALENCIA, and CI-4 that defendant M.
24 VALENCIA was ordered to assist and protect defendant V. ROMAN as
25 ordered by D. Roman and that defendant M. VALENCIA spoke on
26 behalf of defendant V. ROMAN.

27 53. On September 29, 2011, using coded language in a
28 telephone conversation, defendant V. ROMAN informed defendant

1 MONTANO, defendant M. VALENCIA, and CI-4 that defendant V. ROMAN
2 did not want to speak over the telephone out of fear of detection
3 by law enforcement.

4 54. On October 2, 2011, using coded language in a telephone
5 conversation, defendant GONZALEZ informed CI-4 that a Hispanic
6 gang member identified as "Triste" had asked defendant GONZALEZ
7 to assist in murdering various associates of the Mexican Mafia
8 housed at Red Rock Correction Center, and that defendant GONZALEZ
9 had responded to Triste's request by telling him that defendant
10 GONZALEZ would first need permission from D. Roman.

11 55. On October 2, 2011, using coded language in a telephone
12 conversation, defendant GONZALEZ informed CI-4 that defendant
13 GONZALEZ and other Hispanic gang members at Red Rock Correctional
14 Center were prepared to murder Triste.

15 56. On October 2, 2011, using coded language in a telephone
16 conversation, defendant GONZALEZ informed CI-4 that defendant
17 GONZALEZ had sent money to and received letters from D. Roman.

18 57. On October 6, 2011, using coded language in a telephone
19 conversation, defendant J. DELGADO informed defendant M. VALENCIA
20 that defendant J. DELGADO had collected "taxes" from Hispanic
21 gangs controlled by D. Roman.

22 58. On October 6, 2011, using coded language in a telephone
23 conversation, defendant B. VALENCIA asked for and received
24 authorization from defendant M. VALENCIA to beat a Harpys gang
25 member identified as "Menace" who had refused to deliver a
26 firearm to other Harpys gang members.

27 59. On October 6, 2011, using coded language in a telephone
28 conversation, defendant M. VALENCIA instructed CI-4 to meet

1 defendant M. VALENCIA near the residence of victim R.J. so they
2 could locate and murder victim R.J.

3 60. On October 7, 2011, using coded language in a telephone
4 conversation, defendant V. ROMAN asked defendant M. VALENCIA if
5 defendant M. VALENCIA had been able to find victim R.J. the prior
6 night, and defendant M. VALENCIA responded that he did not find
7 victim R.J. because victim R.J. did not go to victim R.J.'s home.

8 61. On October 8, 2011, using coded language in a telephone
9 conversation, defendant M. VALENCIA agreed to sell one-half of
10 methamphetamine to a drug customer.

11 62. On October 9, 2011, using coded language in a telephone
12 conversation, defendant M. VALENCIA informed a drug customer that
13 defendant M. VALENCIA had high-quality cocaine available for sale
14 but that defendant M. VALENCIA could sell diluted cocaine for a
15 reduced price.

16 63. On October 12, 2011, defendant M. VALENCIA received a
17 text message in coded language from a drug customer asking to
18 purchase methamphetamine from defendant M. VALENCIA and offering
19 to pay defendant M. VALENCIA \$1,600.

20 64. On October 13, 2011, using coded language in a
21 telephone conversation, defendant R. RAMOS informed defendant M.
22 VALENCIA that defendant R. RAMOS would supply defendant M.
23 VALENCIA with controlled substances the following day.

24 65. On October 14, 2011, defendant N. BUCKLEY, on behalf of
25 defendant I. BUCKLEY, sent \$150 to D. Roman, which money
26 constituted proceeds from defendant I. BUCKLEY's sale of
27 controlled substances at Folsom State Prison.

28 66. On October 14, 2011, using coded language in a

1 telephone conversation, defendant V. ROMAN informed defendant M.
2 VALENCIA that she would check on whether she had methamphetamine
3 available for sale.

4 67. On October 14, 2011, using coded language in a
5 telephone conversation, defendant M. VALENCIA asked a drug
6 customer about the status of controlled substances that defendant
7 M. VALENCIA had earlier ordered from the drug customer.

8 68. On October 16, 2011, using coded language in a
9 telephone conversation, an unindicted co-conspirator told
10 defendant M. VALENCIA that he had money to pay to defendant M.
11 VALENCIA for an outstanding drug debt and that the unindicted co-
12 conspirator's drug customers were complaining to him about the
13 quality of defendant M. VALENCIA's drug product.

14 69. On October 20, 2011, using coded language in a
15 telephone conversation, defendant R. RAMOS agreed to meet
16 defendant M. VALENCIA to supply defendant M. VALENCIA with
17 controlled substances.

18 70. On October 20, 2011, using coded language in a
19 telephone conversation, defendant GONZALEZ spoke to CI-4 about
20 the smuggling and sale of controlled substances at Red Rock
21 Correctional Center, and defendant GONZALEZ informed CI-4 that he
22 and an unindicted co-conspirator would collect proceeds from the
23 sales of drugs at the prison for D. Roman.

24 71. On October 21, 2011, using coded language in a
25 telephone conversation, defendant B. VALENCIA told defendant M.
26 VALENCIA that defendant B. VALENCIA would deliver controlled
27 substances to a drug customer, and defendants M. VALENCIA and B.
28 VALENCIA discussed how much money the drug customer had

1 previously paid to them for cocaine.

2 72. On October 21, 2011, using coded language in a
3 telephone conversation, defendant B. VALENCIA informed defendant
4 M. VALENCIA that a drug customer owed a drug debt of \$1,600 to
5 defendants M. VALENCIA and B. VALENCIA.

6 73. On October 21, 2011, using coded language in a
7 telephone conversation, defendant B. VALENCIA stated that he and
8 others, including defendant J. DELGADO, had beaten a Harpys gang
9 member identified as "Menace."

10 74. On October 21, 2011, using coded language in a
11 telephone conversation, defendant B. VALENCIA spoke with
12 defendant M. VALENCIA about defendant B. VALENCIA's sales of
13 controlled substances.

14 75. On October 26, 2011, using coded language in a
15 telephone conversation, a drug customer ordered one-half ounce of
16 methamphetamine from defendant M. VALENCIA for \$450 in addition
17 to an unspecified quantity of cocaine.

18 76. On October 28, 2011, using coded language in a
19 telephone conversation, defendant N. BUCKLEY asked CI-4 to assist
20 defendant N. BUCKLEY in sending a coded message to D. Roman on
21 behalf of defendant I. BUCKLEY regarding activities at Folsom
22 State Prison relating to the Mexican Mafia.

23 77. On October 28, 2011, using coded language in a
24 telephone conversation, defendant M. VALENCIA instructed
25 defendant J. DELGADO to join defendant M. VALENCIA in collecting
26 a debt owed by a Hispanic gang member.

27 78. On October 28, 2011, using coded language in a
28 telephone conversation, defendant M. VALENCIA spoke with CI-4

1 about collecting a debt owed by a Hispanic gang member.

2 79. On October 29, 2011, using coded language in a
3 telephone conversation, defendant M. VALENCIA agreed to deliver
4 to a drug customer one-half ounce of methamphetamine and an
5 eighth-ounce of cocaine.

6 80. On October 30, 2011, defendant M. VALENCIA received a
7 text message in coded language from a drug customer ordering
8 eight ounces of methamphetamine.

9 81. On October 30, 2011, using coded language in a
10 telephone conversation, defendant B. VALENCIA informed defendant
11 M. VALENCIA that defendants J. DELGADO, J. RAMOS, and VELASQUEZ
12 would be present at a meeting to be held later that day.

13 82. On October 30, 2011, using coded language in a
14 telephone conversation, defendant B. VALENCIA informed defendant
15 M. VALENCIA that defendant B. VALENCIA would collect any
16 outstanding drug debts from two drug customers.

17 83. On October 31, 2011, using coded language in a
18 telephone conversation, defendant R. RAMOS agreed to supply
19 defendant M. VALENCIA with controlled substances the next day.

20 84. On October 31, 2011, defendant M. VALENCIA received a
21 text message in coded language from a drug customer ordering two
22 ounces of methamphetamine.

23 85. On November 2, 2011, using coded language in a
24 telephone conversation, defendant N. BUCKLEY informed CI-4 that
25 defendants N. BUCKLEY and MONTANO had written a coded letter to
26 D. Roman on behalf of defendant I. BUCKLEY to relate matters
27 about the Mexican Mafia.

28 86. On November 2, 2011, defendant N. BUCKLEY mailed a

1 letter on behalf of defendant I. BUCKLEY to D. Roman in which
2 defendant N. BUCKLEY used coded language to pass information
3 relating to Mexican Mafia activities at Folsom State Prison.

4 87. On November 2, 2011, using coded language in a
5 telephone conversation, defendant J. DELGADO informed defendant
6 M. VALENCIA that defendant J. DELGADO would collect a drug debt
7 from a drug customer.

8 88. On November 2, 2011, using coded language in a
9 telephone conversation, defendant M. VALENCIA told a drug
10 customer that a third party would arrive to collect a drug debt.

11 89. On November 2, 2011, in D. Roman Territory, defendant
12 RAMIREZ sold to CI-3 an AMR Amadeo Rossi & Company .38 caliber
13 revolver, bearing serial number 15582, in addition to 17 rounds
14 of Special .38 caliber ammunition.

15 90. On November 3, 2011, using coded language in a
16 telephone conversation, defendant J. DELGADO, who was with
17 defendant J. RAMOS, asked defendant M. VALENCIA for advice on the
18 quality of a firearm that defendant J. DELGADO wanted to
19 purchase.

20 91. On November 3, 2011, using coded language in a
21 telephone conversation, defendant R. RAMOS agreed to supply
22 defendant M. VALENCIA with controlled substances, which defendant
23 M. VALENCIA stated would be distributed to and sold by Harpys
24 gang members.

25 92. On November 3, 2011, using coded language in a
26 telephone conversation, an unindicted co-conspirator asked
27 defendant M. VALENCIA for permission to go to another drug
28 supplier to find drugs that defendant M. VALENCIA did not then

1 have available, and defendant M. VALENCIA instructed the
2 unindicted co-conspirator to wait before purchasing his drugs.

3 93. On November 10, 2011, using coded language in a
4 voicemail message, defendant BASULTO asked defendant M. VALENCIA
5 to arrange to smuggle drugs and cellular telephones into
6 Lancaster State Prison.

7 94. On November 10, 2011, using coded language in a
8 telephone conversation, defendant M. VALENCIA spoke to defendant
9 BONILLA to arrange for the delivery of drugs to defendant BASULTO
10 at Lancaster State Prison.

11 95. On November 10, 2011, using coded language in a
12 telephone conversation, defendant M. VALENCIA agreed with
13 defendant BASULTO to deliver to defendant BONILLA five cellular
14 telephones and drugs, including heroin, methamphetamine, and
15 marijuana, which defendant BONILLA would then deliver to
16 defendant BASULTO at Lancaster State Prison.

17 96. On November 10, 2011, using coded language in a
18 telephone conversation, defendant BONILLA agreed to meet
19 defendant M. VALENCIA that night so that defendant M. VALENCIA
20 could provide controlled substances and cellular telephones to
21 BONILLA, which items would then be delivered to defendant
22 BASULTO.

23 97. On November 10, 2011, using coded language in a
24 telephone conversation, defendant M. VALENCIA told defendant
25 BASULTO that defendants M. VALENCIA and BONILLA would deliver
26 controlled substances and cellular telephones to an unidentified
27 person that night.

28 98. On November 12, 2011, using coded language in two

1 telephone conversations, defendant M. VALENCIA agreed to sell to
2 a drug customer one-half ounce of methamphetamine in exchange for
3 \$400.

4 99. On November 14, 2011, using coded language in a
5 telephone conversation, defendant N. BUCKLEY spoke to CI-4 on
6 behalf of defendant I. BUCKLEY and informed CI-4 about the
7 activities of the Mexican Mafia at Folsom State Prison.

8 100. On November 15, 2011, using coded language in a
9 telephone conversation, defendant M. VALENCIA agreed to sell to a
10 drug customer one-half ounce of methamphetamine in exchange for
11 \$400, and defendant M. VALENCIA stated that an unidentified
12 person would deliver the methamphetamine.

13 101. On November 15, 2011, using coded language in a
14 telephone conversation, defendant B. VALENCIA informed defendant
15 M. VALENCIA that defendant B. VALENCIA had attempted to contact a
16 drug customer who had ordered methamphetamine from defendant M.
17 VALENCIA.

18 102. On November 15, 2011, using coded language in a text
19 message, defendant BASULTO informed defendant M. VALENCIA that
20 defendant Angel Cenea ("Cenea") had been arrested by law
21 enforcement while attempting to deliver controlled substances and
22 cellular telephones to defendant BASULTO at Lancaster State
23 Prison.

24 103. On November 17, 2011, defendants BONILLA, C. DELGADO,
25 and M. ETA distributed approximately 6.6 grams of methamphetamine
26 to CI-3.

27 104. On November 18, 2011, defendant M. VALENCIA received a
28 text message in coded language from a drug customer asking to

1 purchase one-half ounce of methamphetamine for \$450.

2 105. On November 19, 2011, using coded language in a
3 telephone conversation, defendant M. VALENCIA discussed the sale
4 of one-half ounce of cocaine at a discounted price with a drug
5 customer.

6 106. On November 19, 2011, using coded language in a
7 telephone conversation, defendant M. VALENCIA instructed
8 defendant BASULTO to repay the value of the controlled substances
9 and cellular telephones that law enforcement had seized from
10 defendant Cenea.

11 107. On November 23, 2011, using coded language in a
12 telephone conversation, defendant BASULTO informed defendant M.
13 VALENCIA that defendant BONILLA would smuggle controlled
14 substances to defendant BASULTO at Lancaster State Prison so that
15 defendant BASULTO could sell the controlled substances and
16 provide the proceeds to defendant M. VALENCIA.

17 108. On November 29, 2011, using coded language in a
18 telephone conversation, defendant M. VALENCIA discussed a drug
19 customer's agreement to immediately pay a \$500 drug debt owed to
20 defendant M. VALENCIA.

21 109. On November 29, 2011, using coded language in a
22 telephone conversation, defendant B. VALENCIA informed defendant
23 M. VALENCIA that defendant B. VALENCIA had arrived at the
24 location where defendant B. VALENCIA would collect a drug debt
25 from a drug customer.

26 110. On November 30, 2011, using coded language in a
27 telephone conversation, defendant M. VALENCIA agreed to sell to a
28 drug customer one-half ounce of heroin.

1 111. On November 30, 2011, using coded language in a
2 telephone conversation, defendant M. VALENCIA informed an
3 unindicted co-conspirator that defendant M. VALENCIA had sent
4 drugs to other Harpys gang members in California state prison,
5 including defendant BASULTO.

6 112. On November 30, 2011, using coded language in a
7 telephone conversation, defendant M. VALENCIA spoke with CI-4
8 about meeting with representatives from the 36th Street, Loco
9 Park, and 55th Street gangs to collect "taxes" owed to D. Roman.

10 113. On December 2, 2011, using coded language in a
11 telephone conversation, defendant M. VALENCIA agreed to sell two
12 ounces of heroin to a drug customer.

13 114. On December 5, 2011, using coded language in a text
14 message, defendant BASULTO informed defendant M. VALENCIA that
15 defendant BASULTO would send an associate to pick up drugs from
16 defendant M. VALENCIA, which defendant BASULTO would then sell in
17 Lancaster State Prison.

18 115. On December 5, 2011, in D. Roman Territory, defendant
19 RAMIREZ sold to CI-3 a Manhurin S.A. .25 caliber semi-automatic
20 handgun, bearing serial number 81777; a Smith & Wesson .22
21 caliber revolver, bearing serial number 2K7K874; one round of
22 Fiocchi 7.65 mm ammunition; and approximately 27.3 grams of
23 methamphetamine.

24 116. On December 8, 2011, using coded language in a
25 telephone conversation, defendant V. ROMAN instructed CI-4 to
26 meet with defendants V. ROMAN and M. VALENCIA to discuss matters
27 related to D. Roman in advance of a meeting between D. Roman and
28 defendant V. ROMAN at Pelican Bay State Prison.

1 117. On December 9, 2011, using coded language in a
2 telephone conversation, defendant M. VALENCIA informed defendant
3 BASULTO that defendant B. VALENCIA would provide defendant
4 BASULTO with a quantity of methamphetamine for \$700, which
5 defendant BASULTO could pick up from defendant BONILLA.

6 118. On December 9, 2011, using coded language in a text
7 message, defendant M. VALENCIA sent defendant B. VALENCIA's
8 telephone number to defendant BASULTO.

9 119. On December 16, 2011, defendants BONILLA, M. DELGADO, **USC students**
10 and an unindicted co-conspirator robbed at gunpoint University of
11 Southern California students J.G., B.G., and V.G.

12 120. On December 19, 2011, using coded language in a
13 telephone conversation, defendant M. VALENCIA agreed to sell to
14 an unindicted co-conspirator one-half ounce of cocaine and one-
15 half ounce of methamphetamine.

16 121. On December 19, 2011, using coded language in a
17 telephone conversation, defendant M. VALENCIA informed defendant
18 R. RAMOS that a drug customer had asked defendant M. VALENCIA for
19 cocaine, and defendant M. VALENCIA asked if defendant R. RAMOS
20 had cocaine available for sale.

21 122. On December 20, 2011, in Harpys Territory, defendants
22 RAMIREZ and VELASQUEZ sold to CI-3 approximately 6.9 grams of
23 crack cocaine.

24 123. On December 23, 2011, using coded language in a
25 telephone conversation, defendant SOTO confirmed with defendant
26 M. VALENCIA that defendant TIGRE would arrive at an agreed-upon
27 location to meet with them and discuss the collection of "tax"
28 payments from vendors at the Alameda Swap Meet.

1 124. On December 29, 2011, using coded language in a
2 telephone conversation, defendant TIGRE asked to meet with
3 defendant SOTO and other unnamed co-conspirators later that day,
4 to which defendant SOTO agreed.

5 125. On December 29, 2011, using coded language in a
6 telephone conversation, defendant M. VALENCIA spoke with CI-4
7 about meeting with representatives from the Loco Park, K.A.B. 13,
8 and H.O.B. gangs to collect "taxes" owed to D. Roman.

9 126. On December 29, 2011, using coded language in a
10 telephone conversation, defendant M. VALENCIA spoke with CI-4
11 about collecting "taxes" owed to D. Roman from 38th Street and
12 other Hispanic gangs, which defendant M. VALENCIA said would be
13 delivered to defendant V. ROMAN.

14 127. On December 29, 2011, using coded language in a
15 telephone conversation, defendant V. ROMAN told CI-4 that she
16 would provide CI-4 with her bank account number so that an
17 unidentified co-conspirator could deliver to defendant V. ROMAN
18 revenues from the collection of "taxes."

19 128. On December 29, 2011, using coded language in a
20 telephone conversation, defendant M. VALENCIA spoke with CI-4
21 about collecting "taxes" from rival Hispanic gangs, which they
22 would then deposit into defendant V. ROMAN's bank account.

23 129. On January 6, 2012, using coded language during a
24 meeting, defendant TIGRE went over a list of vendors at the
25 Alameda Swap Meet with an unindicted co-conspirator and CI-4,
26 discussed which of the vendors had refused to pay "taxes" to D.
27 Roman, and stated that defendant TIGRE would personally assist in
28 collecting the "taxes" if those vendors continued to resist.

1 130. On January 7, 2012, using coded language during a
2 meeting, defendant TIGRE informed CI-4 that, during telephone
3 conversations, members and associates of the Harpys gang would
4 falsely refer to vendors at the Alameda Swap Meet as "unions,"
5 and the collection of "taxes" as the collection of "union dues,"
6 which would be code words used to frustrate any investigation by
7 law enforcement into their activities.

8 131. On January 7, 2012, using coded language during a
9 meeting, defendant TIGRE informed CI-4 that defendant OROZCO
10 would assist in collecting "tax" payments from vendors at the
11 Alameda Swap Meet.

12 132. On January 8, 2012, using coded language during a
13 meeting, defendant M. VALENCIA informed CI-4 and an unidentified
14 co-conspirator that vendors at the Alameda Swap Meet would be
15 required to pay increased amounts in "tax" payments.

16 133. On January 9, 2012, using coded language in a telephone
17 conversation, defendant TIGRE confirmed for CI-4 that violence
18 would be used on any Alameda Swap Meet vendor who refused to pay
19 "taxes" or that defendant TIGRE would force such vendors to stop
20 doing business at the swap meet.

21 134. On January 9, 2012, using coded language in a telephone
22 conversation, defendant MONTANO informed CI-4 that 38th Street
23 gang members collecting "taxes" from vendors at the Alameda Swap
24 Meet were not providing sufficient "tax" proceeds to D. Roman.

25 135. On January 9, 2012, using coded language in a telephone
26 conversation, defendant TIGRE told CI-4 that defendant TIGRE was
27 in Mexico and spoke to CI-4 about importing multi-kilogram
28 quantities of methamphetamine from Mexico into the United States

1 for sale by Harpys members and associates.

2 136. On January 16, 2012, using coded language in a
3 telephone conversation, defendant M. VALENCIA spoke with CI-4
4 about delivering "tax" proceeds collected from vendors at the
5 Alameda Swap Meet to an unidentified co-conspirator.

6 137. On January 17, 2012, using coded language in a
7 telephone conversation, defendant TIGRE informed CI-4 that
8 vendors at the Alameda Swap Meet who refused to pay taxes to D.
9 Roman would be forced to stop doing business at that location.

10 138. On January 19, 2012, in D. Roman Territory, defendant
11 RAMIREZ sold to CI-3 a Bryco/Jennings .380 caliber semi-automatic
12 handgun, bearing serial number ZD7684.

13 139. On January 21, 2012, using coded language in a
14 telephone conversation, defendant M. VALENCIA discussed with CI-4
15 that Pelican Bay State Prison officials had banned defendant V.
16 ROMAN from visiting D. Roman for one year, and defendant M.
17 VALENCIA and CI-4 discussed finding a female co-conspirator to
18 meet with D. Roman in place of defendant V. ROMAN.

19 140. On January 23, 2012, using coded language over a series
20 of text messages, defendant V. ROMAN told CI-4 to contact
21 defendant TIGRE to discuss the collection of "tax" proceeds from
22 vendors at the Alameda Swap Meet.

23 141. On January 24, 2012, using coded language in a
24 telephone conversation, defendant BONILLA demanded that victim
25 R.M. immediately pay a drug debt that victim R.M. owed defendant
26 BONILLA.

27 142. On January 24, 2012, using coded language in a
28 telephone conversation, victim R.M. informed defendant BONILLA

1 that victim R.M. would have the money owed to defendant BONILLA
2 within two days, to which defendant BONILLA responded that victim
3 R.M. was required to pay all drug debts on time.

4 143. On January 25, 2012, using coded language in a
5 telephone conversation, defendant G. ETTA informed defendant
6 BONILLA that she had received a cache of an unspecified type of
7 controlled substances and asked to borrow a scale from defendant
8 BONILLA to assist in selling the controlled substances, to which
9 defendant BONILLA responded that defendants BONILLA and B.
10 VALENCIA would meet defendant G. ETTA at her residence.

11 144. On January 25, 2012, using coded language during a
12 meeting, defendant M. VALENCIA spoke with CI-4 about officials at
13 Pelican Bay State Prison imposing a one-year prohibition on
14 visits between defendant V. ROMAN and D. Roman.

15 145. On January 25, 2012, using coded language during a
16 meeting, defendant M. VALENCIA informed defendant OROZCO and CI-4
17 that members of Hispanic gangs would not be allowed to collect
18 "tax" payments at the Alameda Swap Meet on behalf of any Mexican
19 Mafia member other than D. Roman and that the Mexican Mafia had
20 agreed that D. Roman would have the exclusive right to collect
21 "tax" payments at that location.

22 146. On January 25, 2012, using coded language during a
23 meeting, defendant M. VALENCIA informed defendant OROZCO and CI-4
24 that the 38th Street gang was not timely paying a \$500 monthly
25 "tax" payment, that the gang should sell additional controlled
26 substances, including methamphetamine and cocaine, to raise the
27 gang's revenues, and that the gang should notify defendant M.
28 VALENCIA whenever the gang was unable to pay the full "tax"

1 amount.

2 147. On January 25, 2012, in D. Roman Territory, defendant
3 RAMIREZ sold to CI-3 a Mossberg Revelation model R330B 410-gauge
4 shotgun, bearing serial number 409676, and approximately 56 grams
5 of methamphetamine.

6 148. On January 25, 2012, defendants J. DELGADO and J. RAMOS
7 transported \$21,900 in cash inside a vehicle's hidden
8 compartment.

9 149. On January 26, 2012, using coded language during a
10 meeting, defendant V. ROMAN informed defendant M. VALENCIA and
11 CI-4, while defendant SOTO participated in the meeting, that
12 certain gangs were not paying sufficient "tax" payments to D.
13 Roman, even though those gangs were selling large amounts of
14 controlled substances and thus could afford to pay the "taxes."

15 150. On January 26, 2012, using coded language during a
16 meeting, defendant V. ROMAN stated to defendant M. VALENCIA and
17 CI-4, while defendant SOTO participated in the meeting, that a
18 Pelican Bay State Prison warden had barred defendant V. ROMAN
19 from visiting D. Roman and that the warden had stated that
20 defendant V. ROMAN was using the prison visits to discuss and
21 coordinate matters related to the Mexican Mafia.

22 151. On January 26, 2012, using coded language during a
23 meeting, defendant SOTO informed defendant V. ROMAN, defendant M.
24 VALENCIA, and CI-4 that defendant SOTO would continue to visit D.
25 Roman on behalf of defendant V. ROMAN, and defendant V. ROMAN
26 stated that D. Roman also would write letters to defendant M.
27 VALENCIA and CI-4 with further orders.

28 152. On January 26, 2012, using coded language in a

1 telephone conversation, defendant BONILLA instructed an
2 unindicted co-conspirator to go to the corner of Mariposa and
3 Cardova Streets in Los Angeles, California, within Harpys
4 Territory, to meet with an unidentified female and receive an
5 unspecified type of controlled substance.

6 153. On January 26, 2012, using coded language in a
7 telephone conversation, defendant BONILLA asked defendant G. ETTA
8 to inform defendant M. ETA to go to the corner outside her
9 residence to give an unspecified type of controlled substance to
10 a drug customer.

11 154. On January 27, 2012, using coded language in a
12 telephone conversation, defendant G. ETTA discussed with
13 defendant BONILLA packaging methamphetamine for sale to others.

14 155. On January 27, 2012, using coded language in a
15 telephone conversation, defendant M. DELGADO asked defendant
16 BONILLA to inform defendant M. VALENCIA that rival Hispanic gang
17 members planned to resist paying "taxes" to D. Roman, and
18 defendant BONILLA responded that he would pass the information to
19 defendant M. VALENCIA.

20 156. On January 27, 2012, using coded language in a text
21 message, defendant BONILLA asked defendant M. VALENCIA to call
22 defendant BONILLA as soon as possible.

23 157. On January 27, 2012, using coded language in a
24 telephone conversation, defendant BONILLA informed victim R.M.
25 that victim R.M. owed defendant BONILLA a drug debt of \$230
26 instead of \$115, and defendant BONILLA stated that the debt had
27 doubled because of victim R.M.'s failure to pay the debt on time.

28 158. On January 27, 2012, using coded language in a text

1 message, defendant B. VALENCIA asked defendant BONILLA for an
2 update on defendant BONILLA's methamphetamine sales.

3 159. On January 27, 2012, using coded language in a text
4 message, defendant BONILLA informed defendant B. VALENCIA that
5 defendant BONILLA was in possession of methamphetamine and that
6 defendant C. DELGADO had sold methamphetamine to three drug
7 customers outside defendant G. ETTA's residence.

8 160. On January 27, 2012, using coded language in a
9 telephone conversation, defendant B. VALENCIA informed defendant
10 BONILLA that defendant B. VALENCIA was in contact with a
11 purchaser of methamphetamine and asked how much methamphetamine
12 was in defendant BONILLA's possession.

13 161. On January 27, 2012, using coded language in a
14 telephone conversation, defendant BONILLA informed defendant B.
15 VALENCIA that defendant BONILLA possessed one-tenth of an ounce
16 of methamphetamine inside a black bag in his residence.

17 162. On January 27, 2012, using coded language in a
18 telephone conversation, defendant BONILLA informed defendant B.
19 VALENCIA that defendant BONILLA stored methamphetamine in a black
20 bag, which defendant BONILLA kept together with a firearm.

21 163. On January 28, 2012, in D. Roman Territory, defendant
22 GALLEGOS collected "taxes" from vendors at the Alameda Swap Meet
23 on behalf of D. Roman.

24 164. On January 28, 2012, using coded language in a
25 telephone conversation, defendant M. ETA assisted defendant
26 BONILLA in locating a stash of an unspecified type of drug.

27 165. On January 28, 2012, using coded language in two
28 telephone conversations, defendant M. VALENCIA spoke with CI-4

1 about the arrest of defendant GALLEGOS while defendant GALLEGOS
2 was collecting "taxes" from vendors at the Alameda Swap Meet.

3 166. On January 29, 2012, using coded language in two
4 telephone conversations, defendant TIGRE informed CI-4 that
5 defendant TIGRE had evicted vendors at the Alameda Swap Meet who
6 were suspected of calling the police the previous day leading to
7 the arrest of defendant GALLEGOS.

8 167. On January 30, 2012, using coded language during a
9 meeting, defendant TIGRE told an unidentified co-conspirator that
10 defendant TIGRE would inflict violence on any vendor at the
11 Alameda Swap Meet who refused to provide "tax" payments to D.
12 Roman and that defendant TIGRE would murder any vendor who
13 provided information to law enforcement leading to the arrest of
14 any gang member collecting "taxes."

15 168. On February 25, 2012, using coded language in a
16 telephone conversation, defendant M. VALENCIA discussed with CI-4
17 the collection of "tax" payments from Hispanic gangs within D.
18 Roman Territory.

19 169. On March 26, 2012, defendants M. VALENCIA and GALLEGOS,
20 together with other unindicted co-conspirators, forced victim
21 M.J. out of victim M.J.'s car and then stole victim M.J.'s car
22 together with marijuana contained inside it.

23 170. On March 28, 2012, using coded language in a telephone
24 conversation, defendant MONTANO informed CI-4 that rival Mexican
25 Mafia members had stabbed defendant I. BUCKLEY at Folsom State
26 Prison.

27 171. On March 29, 2012, defendant GALLEGOS possessed
28 marijuana that had been stolen the previous day from victim M.J.

1 172. On April 30, 2012, using coded language in a telephone
2 conversation, defendant M. VALENCIA spoke with CI-4 about the
3 collection of "taxes" from vendors at the Alameda Swap Meet by
4 defendant TIGRE.

5 173. On May 3, 2012, using coded language in a telephone
6 conversation, defendant GALLEGOS spoke with CI-4 about the
7 collection of "taxes" from vendors at the Alameda Swap Meet.

8 174. On May 8, 2012, defendant BONILLA contacted victim R.M.
9 by telephone four separate times between approximately 12:33 a.m.
10 and approximately 12:42 a.m.

11 175. On May 8, 2012, at approximately 12:47 a.m., defendant
12 BONILLA murdered victim R.M.

13 176. On May 8, 2012, in an apartment in which defendant
14 BONILLA resided within Harpys Territory, defendants M. VALENCIA,
15 BONILLA, and M. ETA possessed approximately 650 grams of a
16 mixture and substance containing methamphetamine and 78 grams of
17 a mixture and substance containing cocaine base in the form of
18 crack cocaine; a Beretta 92F 9mm handgun; two digital scales; a
19 letter written from D. Roman to defendants M. VALENCIA and V.
20 ROMAN; a letter written to defendant M. VALENCIA by defendant M.
21 DELGADO; and memoranda documenting prior drug sales and drug
22 debts owed, including drug debts owed by victim R.M. to defendant
23 BONILLA.

24 177. On May 8, 2012, using coded language in a telephone
25 conversation, defendant SANCHEZ spoke with a person who defendant
26 SANCHEZ believed was an associate of the Harpys gang, but who
27 actually was a confidential informant working for law enforcement
28 ("CI-6"), and defendant SANCHEZ arranged to meet CI-6 at a

187

1 location within Harpys Territory so that defendants SANCHEZ and
2 G. ETTA could deliver methamphetamine to CI-6.

3 178. On May 8, 2012, within Harpys Territory, defendants
4 SANCHEZ and G. ETTA sold to CI-6 approximately 55.1 grams of
5 methamphetamine.

6 179. On May 8, 2012, defendant G. ETTA informed CS-6 that
7 defendant BONILLA had murdered victim R.M. and that, as a result,
8 defendant BONILLA was wanted by law enforcement.

9 180. On May 10, 2012, using coded language in a telephone
10 conversation, defendant TIGRE told CI-4 that defendant TIGRE was
11 in Mexico and could arrange for the smuggling of cocaine into the
12 United States for sale by Harpys members and associates.

13 181. On May 16, 2012, using coded language in a telephone
14 conversation, defendant G. ETTA informed CS-6 that defendants
15 SANCHEZ and G. ETTA would sell to CS-6 one pound of
16 methamphetamine for \$10,000.

17 182. On May 16, 2012, using coded language in a telephone
18 conversation, defendant TIGRE spoke with CI-4 about the failure
19 of members of the 38th Street gang to pay "taxes" to D. Roman,
20 and defendant TIGRE stated that D. Roman and D. Roman's
21 associates may authorize violence against those gang members who
22 continued to fail to pay the "taxes."

23 183. On May 17, 2012, using coded language in a telephone
24 conversation, defendant TIGRE informed CI-4 that defendant TIGRE
25 had a large cache of an unspecified type of controlled substances
26 available for sale and that defendant TIGRE needed CI-4 to
27 provide a car with a hidden compartment to transport the drugs in
28 a manner that would avoid detection by law enforcement.

1 184. On May 18, 2012, using coded language in a telephone
2 conversation, defendant OROZCO informed CI-4 that defendant
3 OROZCO had given defendant V. ROMAN proceeds of "tax" payments
4 made by vendors at the Alameda Swap Meet and that defendant
5 OROZCO would provide additional "tax" proceeds later that week.

6 185. On May 18, 2012, using coded language in a telephone
7 conversation, defendant OROZCO informed CI-4 that defendants
8 TIGRE and OROZCO would deliver, later that evening, proceeds from
9 "tax" payments made by vendors at the Alameda Swap Meet.

10 186. On May 19, 2012, using coded language in a telephone
11 conversation, defendant TIGRE informed CI-4 that defendant TIGRE
12 remained loyal to D. Roman and that D. Roman should not murder
13 members of the 38th Street gang in response to any failure by
14 defendant TIGRE to collect adequate sums of "tax" money from
15 vendors at the Alameda Swap Meet.

16 187. On May 20, 2012, using coded language in a telephone
17 conversation, defendant V. ROMAN ordered CI-4 to have defendant
18 TIGRE beaten because defendant TIGRE had failed to deliver
19 proceeds of "tax" payments collected from vendors at the Alameda
20 Swap Meet.

21 188. On May 20, 2012, using coded language in two telephone
22 conversations, defendant TIGRE informed CI-4 that defendants
23 TIGRE and OROZCO had beaten an unidentified person for failure to
24 pay "taxes" to D. Roman and that defendant TIGRE had three ounces
25 of controlled substances available for sale.

26 189. On May 20, 2012, using coded language in a telephone
27 conversation, defendant V. ROMAN ordered CI-4 to inform defendant
28 TIGRE to deliver "tax" proceeds to defendant V. ROMAN that day,