

1 and defendant V. ROMAN and CI-4 discussed controlled substances
2 that defendant TIGRE had available for sale.

3 190. On May 22, 2012, within Harpys Territory, defendants
4 SANCHEZ and G. ETTA sold to CI-6 approximately 436.1 grams of
5 methamphetamine.

6 191. On May 22, 2012, within Harpys Territory, defendant G.
7 ETTA and others provided shelter to defendant BONILLA, knowing
8 that law enforcement was searching for defendant BONILLA for the
9 murder of victim R.M.

10 192. On June 9, 2012, defendant M. ETA, aware that law
11 enforcement was searching for defendant BONILLA for the murder of
12 victim R.M., reserved a motel room under her name, at which
13 defendants M. ETA and BONILLA stayed together for the purpose of
14 assisting defendant BONILLA in evading detection by law
15 enforcement.

16 193. On June 18, 2012, defendant M. ETA, aware that law
17 enforcement was searching for defendant BONILLA for the murder of
18 victim R.M., reserved a motel room under her name, at which
19 defendants M. ETA and BONILLA stayed together for the purpose of
20 assisting defendant BONILLA in evading detection by law
21 enforcement.

22 194. On June 20, 2012, using coded language during a
23 meeting, defendant M. VALENCIA informed defendants V. ROMAN and
24 SOTO that defendant M. VALENCIA had beaten a Harpys gang member
25 identified as "Dragon" ("Dragon") over a drug debt owed by Dragon
26 and an 18th Street gang member identified as "Peewee" ("Peewee").

27 195. On June 20, 2012, using coded language during a
28 meeting, defendant V. ROMAN asked defendant M. VALENCIA how

1 Dragon and Peewee would repay the drug debt, and defendant M.
2 VALENCIA stated that defendant M. VALENCIA gave Dragon the choice
3 of paying \$20,000 or giving Dragon's car to defendant M.
4 VALENCIA.

5 196. On June 20, 2012, using coded language during a
6 meeting, defendants V. ROMAN and M. VALENCIA agreed that Peewee
7 would be required to give two of his cars to defendant M.
8 VALENCIA to repay Peewee's portion of the drug debt.

9 197. On August 21, 2012, defendant J. RAMOS, using coded
10 language in a telephone conversation, agreed to sell controlled
11 substances to CS-6.

12 198. On August 24, 2012, using coded language in a telephone
13 conversation, defendant J. RAMOS agreed to meet with CI-6 to
14 arrange for the sale of methamphetamine to CI-6.

15 199. On August 27, 2012, using coded language in a telephone
16 conversation, defendant J. RAMOS agreed to meet with CI-6 the
17 next day to sell to CI-6 four ounces of methamphetamine for \$700
18 per ounce.

19 200. On August 28, 2012, within Harpys Territory, defendant
20 J. RAMOS delivered to CI-6 approximately 110.2 grams of
21 methamphetamine for \$2,800.

22 201. On September 20, 2012, using coded language during a
23 meeting within Harpys Territory, defendant J. RAMOS agreed to
24 sell a firearm to CI-6, and defendant J. RAMOS informed CI-6 that
25 defendant R. RAMOS supplied controlled substances to defendant J.
26 RAMOS and would continue to do so.

27 202. On October 1, 2012, using coded language in a telephone
28 conversation, defendant C. DELGADO informed CI-6 that an unknown

1 person had stolen a pound of methamphetamine that defendant C.
2 DELGADO planned to deliver on behalf of defendant M. VALENCIA and
3 that defendant C. DELGADO was required to repay defendant M.
4 VALENCIA the value of the stolen drugs, which caused defendant C.
5 DELGADO to fear for his life and hide from defendant M. VALENCIA.
6 203. On October 11, 2012, within Harpys Territory, defendant
7 J. RAMOS delivered approximately 110.3 grams of methamphetamine
8 to CI-6.

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SPECIAL SENTENCING ALLEGATIONS

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THE GRAND JURY FURTHER ALLEGES THAT:

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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.
ETA, VELASQUEZ, BASULTO, OROZCO, GALLEGOS, GONZALEZ, and N.
BUCKLEY, and others known and unknown to the Grand Jury,
conspired and agreed with each other to knowingly and
intentionally distribute, and possess with intent to distribute:
a. at least one kilogram of a mixture and substance
containing a detectable amount of heroin, a Schedule I narcotic
drug controlled substance, in violation of Title 21, United
States Code, Sections 841(a)(1) and 841(b)(1)(A)(i);
b. at least five kilograms of a mixture and substance
containing a detectable amount of cocaine, a Schedule II narcotic
drug controlled substance, in violation of Title 21, United

1 States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii);

2 c. at least 280 grams of a mixture and substance
3 containing a detectable amount of cocaine base in the form of
4 crack cocaine, a Schedule II narcotic drug controlled substance,
5 in violation of Title 21, United States Code, Sections 841(a)(1)
6 and 841(b)(1)(A)(iii);

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

10 e. at least 500 grams of a mixture and substance
11 containing a detectable amount of methamphetamine, a Schedule II
12 controlled substance, in violation of Title 21, United States
13 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

14 2. On or about January 25, 2012, in Los Angeles County,
15 within the Central District of California, defendant RAMIREZ
16 knowingly and intentionally distributed at least 50 grams, that
17 is, approximately 56 grams, of methamphetamine, a Schedule II
18 controlled substance, in violation of Title 21, United States
19 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

20 3. On or about May 8, 2012, in Los Angeles County, within
21 the Central District of California, defendant BONILLA unlawfully
22 killed with malice aforethought victim R.M., in violation of
23 California Penal Code Sections 187 and 189.

24 4. On or about May 8, 2012, in Los Angeles County, within
25 the Central District of California, defendants M. VALENCIA,
26 BONILLA, and M. ETA, each intentionally aiding and abetting the
27 other, knowingly and intentionally possessed with intent to
28 distribute at least 500 grams, that is, approximately 650 grams,

1 of a mixture and substance containing a detectable amount of
2 methamphetamine, a Schedule II controlled substance, in violation
3 of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(A)(viii), and Title 18, United States Code, Section
5 2(a).

6 5. On or about May 8, 2012, in Los Angeles County, within
7 the Central District of California, defendants SANCHEZ, G. ETTA,
8 and JIMMY, each intentionally aiding and abetting the other,
9 knowingly and intentionally distributed at least 50 grams, that
10 is, approximately 55.1 grams, of methamphetamine, a Schedule II
11 controlled substance, in violation of Title 21, United States
12 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and Title 18,
13 United States Code, Section 2(a).

14 6. On or about May 22, 2012, in Los Angeles County, within
15 the Central District of California, defendants SANCHEZ and G.
16 ETTA, each intentionally aiding and abetting the other, knowingly
17 and intentionally distributed at least 50 grams, that is,
18 approximately 436.1 grams, of methamphetamine, a Schedule II
19 controlled substance, in violation of Title 21, United States
20 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and Title 18,
21 United States Code, Section 2(a).

22 7. On or about August 28, 2012, in Los Angeles County,
23 within the Central District of California, defendant J. RAMOS
24 knowingly and intentionally distributed at least 50 grams, that
25 is, approximately 110.2 grams, of methamphetamine, a Schedule II
26 controlled substance, in violation of Title 21, United States
27 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

28 8. On or about October 11, 2012, in Los Angeles County,

1 within the Central District of California, defendant J. RAMOS
2 knowingly and intentionally distributed at least 50 grams, that
3 is, approximately 110.3 grams, of methamphetamine, a Schedule II
4 controlled substance, in violation of Title 21, United States
5 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

6 All in violation of 18 U.S.C. § 1962(d).
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COUNT TWO

[18 U.S.C. § 1959(a)(5)]

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3 1. At all times relevant to this Indictment, the Harpys
4 gang, as described more particularly in paragraphs 1 through 17
5 of the General Allegations, which paragraphs are re-alleged and
6 incorporated by reference as if fully set forth herein,
7 constituted an enterprise, as that term is defined in Title 18,
8 United States Code, Section 1959(b)(2), that is, a group of
9 individuals associated in fact, which was engaged in, and the
10 activities of which affected, interstate and foreign commerce.
11 The enterprise constituted an ongoing organization whose members
12 functioned as a continuing unit for a common purpose of achieving
13 the objectives of the enterprise.

14 2. At all times relevant to this Indictment, the Harpys
15 gang, through its members and associates, engaged in racketeering
16 activity, as defined in Title 18, United States Code, Sections
17 1959(b)(1) and 1961(1), that is, acts involving murder, robbery,
18 and extortion, in violation of the California Penal Code; acts
19 involving conspiracy to distribute and the distribution of
20 controlled substances, including heroin, methamphetamine,
21 cocaine, and cocaine base in the form of crack cocaine, in
22 violation of Title 21, United States Code, Sections 846 and
23 841(a)(1); and acts indictable under Title 18, United States
24 Code, Section 1951 (extortion).

25 3. Beginning on a date unknown, and continuing until on or
26 about August 24, 2011, in Los Angeles County, within the Central
27 District of California, for the purpose of maintaining and
28 increasing position in the Harpys gang, an enterprise engaged in

1 racketeering activity, defendant JAIME MONTANO, also known as
2 ("aka") "Sporty," aka "Sports," and others known and unknown to
3 the Grand Jury, conspired to murder victim I.T., in violation of
4 California Penal Code Sections 182, 187, and 189.

5 All in violation of Title 18, United States Code, Section
6 1959(a)(5).

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COUNT THREE

[18 U.S.C. § 1959(a)(6)]

1-2. Paragraphs 1 and 2 of Count Two are re-alleged and incorporated by reference as if fully set forth herein.

3. On or about December 16, 2011, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Harpys gang, an enterprise engaged in racketeering activity, defendants MANUEL BONILLA, also known as ("aka") "Chito," and MIGUEL DELGADO, aka "Little Oso," and others known and unknown to the Grand Jury, conspired to commit assault with a dangerous weapon against victims V.G., B.G., and J.G., in violation of California Penal Code Sections 182 and 245(a)(2).

All in violation of Title 18, United States Code, Section 1959(a)(6).

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COUNT FOUR

[18 U.S.C. § 1959(a)(6)]

1-2. Paragraphs 1 and 2 of Count Two are re-alleged and incorporated by reference as if fully set forth herein.

3. Beginning on an unknown date, and continuing until on or about March 26, 2012, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Harpys gang, an enterprise engaged in racketeering activity, defendants MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," and RICARDO GALLEGOS, aka "Indio," and others known and unknown to the Grand Jury, conspired to commit assault with a dangerous weapon against victim M.J., in violation of California Penal Code Sections 182 and 245(a)(2).

All in violation of Title 18, United States Code, Section 1959(a)(6).

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COUNT FIVE

[18 U.S.C. § 1959(a)(5)]

1-2. Paragraphs 1 and 2 of Count Two are re-alleged and incorporated by reference as if fully set forth herein.

3. Beginning on a date unknown, and continuing until on or about May 8, 2012, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Harpys gang, an enterprise engaged in racketeering activity, defendants VIANNA ROMAN, also known as ("aka") "V," aka "Old Girl," aka "Prima," aka "Female Cousin," and MANUEL VALENCIA, aka "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," and others known and unknown to the Grand Jury, conspired to murder victim R.J., in violation of California Penal Code Sections 182, 187 and 189.

All in violation of Title 18, United States Code, Section 1959(a)(5).

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COUNT SIX

[18 U.S.C. §§ 1959(a)(1)]

1-2. Paragraphs 1 and 2 of Count Two are re-alleged and incorporated by reference as if fully set forth herein.

3. On or about May 8, 2012, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Harpys gang, an enterprise engaged in racketeering activity, defendant MANUEL BONILLA, also known as "Chito," unlawfully murdered victim R.M. with malice aforethought, in violation of California Penal Code Sections 187 and 189.

All in violation of Title 18, United States Code, Section 1959(a)(1).

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COUNT SEVEN

[18 U.S.C. § 3]

Beginning on or about May 8, 2012, and continuing to on or about June 18, 2012, in Los Angeles County, within the Central District of California, defendant MARILYN ETA, knowing that an offense against the United States had been committed, namely, a violent crime in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(1), as charged in Count Six of this Indictment, received, relieved, comforted, and assisted the offender, defendant MANUEL BONILLA, also known as "Chito," in order to hinder and prevent the offender's apprehension, trial, and punishment.

All in violation of 18 U.S.C. § 3.

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COUNT EIGHT

[21 U.S.C. § 846]

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

A. OBJECTS OF 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. ETA, VELASQUEZ, BASULTO, FNU LNU, aka "Jimmy" ("JIMMY"), OROZCO, GALLEGOS, ANGEL CENEA ("CENEA"), GONZALEZ, N. BUCKLEY, and DENISE HALAWI ("HALAWI"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally distribute, and possess with intent to distribute, the following controlled substances:

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

b. at least five kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii);

c. at least 280 grams of a mixture and substance containing cocaine base in the form of crack cocaine, a Schedule

1 II narcotic drug controlled substance, in violation of Title 21,
2 United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii);

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

6 e. at least 500 grams of a mixture and substance
7 containing a detectable amount of methamphetamine, a Schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

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

12 1-5. The Grand Jury re-alleges and incorporates by reference
13 as if fully set forth herein paragraphs 1 through 5 of Section B
14 of Count One of this Indictment.

15 6. Defendant JIMMY would assist defendants SANCHEZ and G.
16 ETTA in obtaining and selling controlled substances.

17 7. Defendant CENEA would attempt to smuggle controlled
18 substances to incarcerated co-conspirators.

19 8. Defendant HALAWI would support Harpys members by
20 helping those members acquire and sell controlled substances, by
21 communicating with D. Roman, and by delivering proceeds of drug
22 sales to D. Roman.

23 C. OVERT ACTS

24 In furtherance of the conspiracy, and to accomplish the
25 objects of the conspiracy, on or about the following dates,
26 defendants V. ROMAN, M. VALENCIA, SOTO, CARPINTEYRO, MONTANO, B.
27 VALENCIA, BONILLA, R. RAMOS, RENTERIA, I. BUCKLEY, TIGRE,
28 RAMIREZ, J. DELGADO, C. DELGADO, M. DELGADO, J. RAMOS, SANCHEZ,

1 G. ETTA, M. ETA, VELASQUEZ, BASULTO, JIMMY, OROZCO, GALLEGOS,
2 CENEA, GONZALEZ, N. BUCKLEY, and HALAWI, and others known and
3 unknown to the Grand Jury, committed various overt acts within
4 the Central District of California, and elsewhere, including but
5 not limited to the following:

6 1-203. The Grand Jury re-alleges and incorporates by
7 reference as if fully set forth herein paragraphs 1 through 203
8 of Section C of Count One of this Indictment.

9 204. On October 30, 2011, using coded language in a
10 telephone conversation, defendant HALAWI arranged to pay
11 defendant M. VALENCIA \$900 for a quantity of methamphetamine and
12 heroin.

13 205. On October 30, 2011, using coded language in a text
14 message, defendant HALAWI asked defendant M. VALENCIA whether he
15 was available to receive money from defendant HALAWI.

16 206. On November 15, 2011, defendant CENEA attempted to
17 smuggle into Lancaster State Prison approximately 35.1 grams of a
18 mixture and substance containing heroin, approximately 46.8 grams
19 of methamphetamine, approximately 31.8 grams of marijuana, and 22
20 cellular telephones.

21 207. On May 8, 2012, within Harpys Territory, defendant
22 JIMMY assisted in selling to CI-6 approximately 55.1 grams of
23 methamphetamine.

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COUNT NINE

[21 U.S.C. §§ 848(a), (b), (s)]

Beginning on an unknown date, and continuing to on or about November 28, 2012, in Los Angeles County, within the Central District of California, and elsewhere, defendants VIANNA ROMAN, also known as ("aka") "V," aka "Old Girl," aka "Prima," aka "Female Cousin" ("V. ROMAN"), and MANUEL VALENCIA, aka "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie" ("M. VALENCIA"), engaged in a continuing criminal enterprise in that they knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1) and 846, by committing violations, including, but not limited to the felony violations alleged in Counts Eight, Eleven, Thirty-Four, Forty-One, and Forty-Two, which Counts are re-alleged and incorporated herein by reference as if fully set forth in this Count, all of which violations were part of a continuing series of felony violations of subchapters I and II of Title 21 of the United States Code, undertaken by defendants V. ROMAN and M. VALENCIA in concert with at least five other persons with respect to whom defendants V. ROMAN and M. VALENCIA occupied a position of organizer, supervisor, and manager, and from which continuing series of violations defendants V. ROMAN and M. VALENCIA obtained substantial income and resources.

Furthermore, defendants V. ROMAN and M. VALENCIA were principal administrators, organizers, and leaders of a criminal enterprise which involved the possession with intent to distribute and distribution of methamphetamine, a Schedule II

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1 controlled substance, and the amount of said methamphetamine was
2 at least 1000 grams.

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COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about June 7, 2010, in Los Angeles County, within the Central District of California, defendant DAVID CARPINTEYRO, also known as ("aka") "Tripper," aka "Trips," knowingly and intentionally distributed approximately 25.7 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

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COUNT ELEVEN

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

On or about December 14, 2010, in Los Angeles County, within the Central District of California, defendant MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," knowingly and intentionally distributed at least five grams, that is, approximately 20.9 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT TWELVE

[21 U.S.C. § 843(b)]

On or about August 8, 2011, in Los Angeles County, within the Central District of California, defendant JOSE RENTERIA, also known as ("aka") "Grumpy," aka "Bubba," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTEEN

[21 U.S.C. § 843(b)]

On or about November 2, 2011, in Los Angeles County, within the Central District of California, defendant JUAN DELGADO, also known as ("aka") "Kimo," aka "Bimo," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT FOURTEEN

[18 U.S.C. §§ 924(c)(1)(A), 2(a)]

On or about December 16, 2011, in Los Angeles County, within the Central District of California, defendants MANUEL BONILLA, also known as ("aka") "Chito," and MIGUEL DELGADO, aka "Little Oso," each intentionally aiding and abetting the other, knowingly used and carried a firearm during and in relation to, and possessed a firearm in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One, and Violent Crime in Aid of Racketeering, as charged in Count Three.

COUNTS FIFTEEN through TWENTY

[18 U.S.C. § 922(g)(1)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie" ("RAMIREZ"), knowingly possessed the following firearms and ammunition, each in and affecting interstate and foreign commerce.

Such possession occurred after defendant RAMIREZ had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely, Possession of a Controlled Substance for Sale, in violation of California Health and Safety Code Section 11351.5, in the Superior Court for the State of California, County of Los Angeles, Case Number BA358475, on or about July 30, 2009:

COUNT	DATE	FIREARMS AND AMMUNITION
FIFTEEN	May 18, 2011	One Mossberg Western Field M550 ABD 12-gauge short-barreled pump-action shotgun, bearing serial number G603464; seven rounds of Fiocchi ammunition; and two rounds of Remington ammunition.
SIXTEEN	June 8, 2011	One ECM .25 caliber semi-automatic pistol, bearing serial number MI44135, and one round of Winchester .25 caliber ammunition.
SEVENTEEN	November 2, 2011	One AMR Amadeo Rossi & Company .38 caliber revolver, bearing serial number 15582, and 17 rounds of Special .38 caliber ammunition.

1 2 3 4 5	EIGHTEEN December 5, 2011	One Manhurin S.A. .25 caliber semi-automatic handgun, bearing serial number 81777; one Smith & Wesson .22 caliber revolver, bearing serial number 2K7K874; and one round of Fiocchi 7.65 mm ammunition.
6 7	NINETEEN January 19, 2012	One Bryco/Jennings .380 caliber semi-automatic handgun, bearing serial number ZD7684.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TWENTY January 25, 2012	One Mossberg Revelation model R330B 410-gauge shotgun, bearing serial number 409676.

COUNT TWENTY-ONE

[18 U.S.C. §§ 924(c)(1)(A)(i), (c)(1)(B)(i)]

Beginning on or about May 18, 2011, and continuing to on or about January 25, 2012, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," knowingly used and carried the following firearms during and in relation to, and possessed those firearm in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One; and a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in Count Eight.

	FIREARMS
(1)	One Mossberg Western Field M550 ABD 12-gauge short-barreled pump-action shotgun, bearing serial number G603464.
(2)	One ECM .25 caliber semiautomatic pistol, bearing serial number MI44135.
(3)	One AMR Amadeo Rossi & Company .38 caliber revolver, bearing serial number 15582.
(4)	One Manhurin S.A. .25 caliber semi-automatic handgun, bearing serial number 81777, one Smith & Wesson .22 caliber revolver, bearing serial number 2K7K874.
(5)	One Bryco/Jennings .380 caliber semi-automatic handgun, bearing serial number ZD7684.
(6)	One Mossberg Revelation model R330B 410-gauge shotgun, bearing serial number 409676.

COUNT TWENTY-TWO

[18 U.S.C. § 922(a)(1)(A)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," not being a licensed importer, licensed manufacturer, or licensed dealer, knowingly and willfully engaged in the business of importing, manufacturing, and dealing in the following firearms:

DATE	FIREARMS
May 18, 2011	One Mossberg Western Field M550 ABD 12-gauge short-barreled pump-action shotgun, bearing serial number G603464.
June 8, 2011	One ECM .25 caliber semiautomatic pistol, bearing serial number MI44135.
November 2, 2011	One AMR Amadeo Rossi & Company .38 caliber revolver, bearing serial number 15582.
December 5, 2011	One Manhurin S.A. .25 caliber semi-automatic handgun, bearing serial number 81777, and one Smith & Wesson .22 caliber revolver, bearing serial number 2K7K874.
January 19, 2011	One Bryco/Jennings .380 caliber semi-automatic handgun, bearing serial number ZD7684.
January 25, 2012	One Mossberg Revelation model R330B 410 gauge shotgun, bearing serial number 409676.

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COUNT TWENTY-THREE

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

On or about June 8, 2011, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," knowingly and intentionally distributed at least five grams, that is, approximately 26.9 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT TWENTY-FOUR

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

On or about July 12, 2011, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," knowingly and intentionally distributed at least five grams, that is, approximately 21.2 grams, of methamphetamine, a Schedule II controlled substance.

1 COUNTS TWENTY-FIVE and TWENTY-SIX

2 [18 U.S.C. § 922(g)(1)]

3 On or about the following dates, in Los Angeles County,
4 within the Central District of California, defendant DANIEL
5 PALACIO, also known as "Danny Boy" ("PALACIO"), knowingly
6 possessed the following firearms and ammunition, each in and
7 affecting interstate and foreign commerce.

8 Such possession occurred after defendant PALACIO had been
9 convicted of a felony punishable by a term of imprisonment
10 exceeding one year, namely, Evading a Police Officer, in
11 violation of California Vehicle Code Section 2800.2(a), in the
12 Superior Court for the State of California, County of Los
13 Angeles, Case Number YA050139, on or about December 20, 2001:

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COUNT	DATE	FIREARMS AND AMMUNITION
15 TWENTY- 16 FIVE	August 18, 2011	One Mossberg model 500 ATP 12-gauge 17 shotgun, bearing serial number 18 H894366, and five rounds of Remington 12-gauge shotgun shells.
19 TWENTY- 20 SIX	January 12, 2012	One Bryo/Jennings .380 caliber 21 semi-automatic handgun, bearing 22 serial number 570521, and 45 rounds 23 of Winchester .380 caliber 24 ammunition. 25 26 27 28

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COUNT TWENTY-SEVEN

[18 U.S.C. § 924(c)(1)(A)(i)]

Beginning on or about August 18, 2011, and continuing to on or about January 12, 2012, in Los Angeles County, within the Central District of California, defendant DANIEL PALACIO, also known as "Danny Boy," knowingly used and carried the following firearms during and in relation to, and possessed those firearms in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One; and a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in Count Eight:

	FIREARMS
(1)	One Mossberg model 500 ATP 12-gauge shotgun, bearing serial number H894366.
(2)	One Bryco/Jennings .380 caliber semi-automatic handgun, bearing serial number 570521.

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COUNT TWENTY-EIGHT

[21 U.S.C. § 843(b)]

On or about October 20, 2011, in Los Angeles County, within the Central District of California, defendant EDGAR GONZALEZ, also known as ("aka") "Scrappy," aka "Scrap," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT TWENTY-NINE

[21 U.S.C. § 843(b)]

On or about October 21, 2011, in Los Angeles County, within the Central District of California, defendant BRYAN VALENCIA, also known as ("aka") "Flint," aka "Fred Flintstone," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTY

[21 U.S.C. § 843(b)]

On or about October 30, 2011, in Los Angeles County, within the Central District of California, defendant DENISE HALAWI knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTY-ONE

[21 U.S.C. § 843(b)]

On or about October 31, 2011, in Los Angeles County, within the Central District of California, defendant RAMON RAMOS, also known as ("aka") "Ray Ray," aka "Ray Bones," aka "Mago," aka "Lips," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTY-TWO

[21 U.S.C. § 843(b)]

On or about November 2, 2011, in Los Angeles County, within the Central District of California, defendant NANCY BUCKLEY knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTY-THREE

[21 U.S.C. § 843(b)]

On or about November 10, 2011, in Los Angeles County, within the Central District of California, defendant MARIO BASULTO, also known as ("aka") "Bouncer," aka "Bounce," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

COUNT THIRTY-FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

On or about November 15, 2011, in Los Angeles County, within the Central District of California, defendants MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," MANUEL BONILLA, aka "Chito," MARIO BASULTO, aka "Bouncer," aka "Bounce," and ANGEL CENEA, each intentionally aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 46.8 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT THIRTY-FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

On or about November 17, 2011, in Los Angeles County, within the Central District of California, defendants MANUEL BONILLA, also known as ("aka") "Chito," CARLOS DELGADO, aka "Oso," and MARILYN ETA, each intentionally aiding and abetting the other, knowingly and intentionally distributed at least five grams, that is, approximately 6.6 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT THIRTY-SIX

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

On or about December 5, 2011, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," knowingly and intentionally distributed at least five grams, that is, approximately 27.3 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT THIRTY-SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about December 20, 2011, in Los Angeles County, within the Central District of California, defendants EDUARDO RAMIREZ, also known as ("aka") "Blackie," and CHRISTOPHER VELASQUEZ, aka "Whisper," each intentionally aiding and abetting the other, knowingly and intentionally distributed approximately 6.9 grams of a mixture and substance containing a detectable amount of cocaine base in the form of crack cocaine, a Schedule II narcotic drug controlled substance.

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COUNT THIRTY-EIGHT

[21 U.S.C. § 843(b)]

On or about January 9, 2012, in Los Angeles County, within the Central District of California, defendant FNU LNU, also known as "Tigre," knowingly and intentionally used a communication facility, that is, a telephone, in committing, causing, and facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances.

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COUNT THIRTY-NINE

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

On or about January 25, 2012, in Los Angeles County, within the Central District of California, defendant EDUARDO RAMIREZ, also known as "Blackie," knowingly and intentionally distributed at least 50 grams, that is, approximately 56 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT FORTY

[18 U.S.C. §§ 924(c)(1)(A), 2(a)]

On or about March 26, 2012, in Los Angeles County, within the Central District of California, defendants MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," and RICARDO GALLEGOS, aka "Indio," each intentionally aiding and abetting the other, knowingly used and carried a firearm during and in relation to, and possessed a firearm in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One, and Violent Crime in Aid of Racketeering, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Four.

COUNT FORTY-ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

On or about May 8, 2012, in Los Angeles County, within the Central District of California, defendants MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," MANUEL BONILLA, aka "Chito," and MARILYN ETA, each intentionally aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least 500 grams, that is, approximately 650 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

COUNT FORTY-TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii); 18 U.S.C. § 2(a)]

On or about May 8, 2012, in Los Angeles County, within the Central District of California, defendants MANUEL VALENCIA, also known as ("aka") "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie," MANUEL BONILLA, aka "Chito," and MARILYN ETA, each intentionally aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least 28 grams, that is, approximately 78 grams, of a mixture and substance containing a detectable amount of cocaine base in the form of crack cocaine, a Schedule II narcotic drug controlled substance.

COUNT FORTY-THREE

[18 U.S.C. § 922(g)(1)]

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3 On or about May 8, 2012, in Los Angeles County, within the
4 Central District of California, defendant MANUEL BONILLA, also
5 known as "Chito" ("BONILLA"), knowingly possessed a firearm,
6 namely, a Beretta 92F 9mm handgun, bearing serial number
7 BER026290Z, in and affecting interstate and foreign commerce.

8 Such possession occurred after defendant BONILLA had been
9 convicted of at least one of the following felonies, each
10 punishable by a term of imprisonment exceeding one year, namely:

11 (1) Possession of a Controlled Substance, in violation of
12 California Health and Safety Code Section 11350(a), in the
13 Superior Court for the State of California, County of Los
14 Angeles, Case Number BA284849, on or about August 22, 2005;

15 (2) Possession of a Controlled Substance, in violation of
16 California Health and Safety Code Section 11350(a), in the
17 Superior Court for the State of California, County of Los
18 Angeles, Case Number BA287462, on or about October 18, 2005;

19 (3) Possession of a Controlled Substance, in violation of
20 California Health and Safety Code Section 11350(a), in the
21 Superior Court for the State of California, County of Los
22 Angeles, Case Number BA308539, on or about September 14, 2006;

23 (4) Possession of a Controlled Substance, in violation of
24 California Health and Safety Code Section 11350(a), in the
25 Superior Court for the State of California, County of Los
26 Angeles, Case Number BA387980, on or about November 15, 2011.

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COUNT FORTY-FOUR

[18 U.S.C. §§ 924(c), 924(j)(1)]

On or about May 8, 2012, in Los Angeles County, within the Central District of California, defendant MANUEL BONILLA, also known as "Chito" ("BONILLA"), knowingly used, possessed, brandished, and discharged a firearm, namely, a .40 caliber firearm, during and in relation to, and in furtherance of a crime of violence, namely, Violent Crime in Aid of Racketeering, as charged in Count Six; and a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in Count Eight.

In the commission of this offense, and through the use and discharge of the firearm, defendant BONILLA caused the death of victim R.M., and R.M.'s death constituted a murder, as defined in Title 18, United States Code, Section 1111.

COUNT FORTY-FIVE

[18 U.S.C. § 924(c)(1)(A)(i)]

Beginning on an unknown date, and continuing to on or about May 8, 2012, in Los Angeles County, within the Central District of California, defendants MANUEL BONILLA, also known as "Chito," and MARILYN ETA knowingly used and carried a firearm, namely, a Beretta 92F 9mm handgun, bearing serial number BER026290Z, during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d), as charged in Count One, and a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in Count Eight.

COUNT FORTY-SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

On or about May 8, 2012, in Los Angeles County, within the Central District of California, defendants JORGE SANCHEZ, also known as ("aka") "Gizmo," aka "Giz," GWENDOLYN ETTA, aka "Gwen," aka "G," and FNU LNU, aka "Jimmy," each intentionally aiding and abetting the other, knowingly and intentionally distributed at least 50 grams, that is, approximately 55.1 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT FORTY-SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

On or about May 22, 2012, in Los Angeles County, within the Central District of California, defendants JORGE SANCHEZ, also known as ("aka") "Gizmo," aka "Giz," and GWENDOLYN ETTA, aka "Gwen," aka "G," each intentionally aiding and abetting the other, knowingly and intentionally distributed at least 50 grams, that is, approximately 436.1 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT FORTY-EIGHT

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

On or about August 28, 2012, in Los Angeles County, within the Central District of California, defendant JIMMY RAMOS, also known as "Jimmy Bones," knowingly and intentionally distributed at least 50 grams, that is, approximately 110.2 grams, of methamphetamine, a Schedule II controlled substance.

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COUNT FORTY-NINE

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

On or about October 11, 2012, in Los Angeles County, within the Central District of California, defendant JIMMY RAMOS, also known as "Jimmy Bones," knowingly and intentionally distributed at least 50 grams, that is, approximately 110.3 grams, of methamphetamine, a Schedule II controlled substance.

COUNTS FIFTY through SIXTY

[21 U.S.C. § 860(a); 18 U.S.C. § 2(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, the following defendants knowingly and intentionally possessed with intent to distribute and distributed the following controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C), in and on, and within 1,000 feet of, the real property comprising a public and private elementary school, university, and playground:

Count	Description
FIFTY	On June 7, 2010, defendant DAVID CARPINTEYRO, also known as ("aka") "Tripper," aka "Trips," knowingly and intentionally distributed approximately 25.7 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.
FIFTY-ONE	On December 14, 2010, defendant MANUEL VALENCIA, aka "Droopy," aka "Debo," aka "D," aka "Mimi," aka "Minnie" ("M. VALENCIA"), knowingly and intentionally distributed approximately 20.9 grams of methamphetamine, a Schedule II controlled substance.
FIFTY-TWO	On June 8, 2011, defendant EDUARDO RAMIREZ, aka "Blackie" ("RAMIREZ"), knowingly and intentionally distributed approximately 26.9 grams of methamphetamine, a Schedule II controlled substance.
FIFTY-THREE	On July 12, 2011, defendant RAMIREZ knowingly and intentionally distributed approximately 21.2 grams of methamphetamine, a Schedule II controlled substance.

1 2 3 4 5	FIFTY-FOUR	On November 17, 2011, defendants MANUEL BONILLA, aka "Chito" ("BONILLA"), CARLOS DELGADO, aka "Oso," and MARILYN ETA ("M. ETA"), each intentionally aiding and abetting the other, knowingly and intentionally distributed approximately 6.6 grams of methamphetamine, a Schedule II controlled substance.
6 7 8	FIFTY-FIVE	On December 5, 2011, defendant RAMIREZ knowingly and intentionally distributed approximately 27.3 grams of methamphetamine, a Schedule II controlled substance.
9 10 11 12	FIFTY-SIX	On December 20, 2011, defendants RAMIREZ and CHRISTOPHER VELASQUEZ, aka "Whisper," each intentionally aiding and abetting the other, knowingly and intentionally distributed approximately 6.9 grams of a mixture and substance containing a detectable amount of cocaine base in the form of crack cocaine, a Schedule II narcotic drug controlled substance.
13 14 15	FIFTY-SEVEN	On January 25, 2012, defendant RAMIREZ knowingly and intentionally distributed approximately 56 grams of methamphetamine, a Schedule II controlled substance.
16 17 18 19 20	FIFTY-EIGHT	On May 8, 2012, defendants M. VALENCIA, BONILLA, and M. ETA, each intentionally aiding and abetting the other, knowingly and intentionally possessed with intent to distribute approximately 650 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.
21 22 23 24 25	FIFTY-NINE	On May 8, 2012, defendants JORGE SANCHEZ, aka "Gizmo," aka "Giz," ("SANCHEZ"), GWENDOLYN ETTA, aka "Gwen," aka "G" ("G. ETTA"), and FNU LNU, aka "Jimmy," each aiding and abetting the other, knowingly and intentionally distributed approximately 55.1 grams of methamphetamine, a Schedule II controlled substance.

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SIXTY	On May 22, 2012, defendants SANCHEZ and G. ETTA, each intentionally aiding and abetting the other, knowingly and intentionally distributed approximately 436.1 grams of methamphetamine, a Schedule II controlled substance.
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FORFEITURE ALLEGATION ONE

[18 U.S.C. § 1963]

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3 1. Pursuant to Title 18, United States Code, Sections
4 1963(a)(1), (2), and (3), any defendant convicted of the offense
5 set forth in Count One of this Indictment shall forfeit to the
6 United States the following property:

7 (a) Any interest the person acquired or maintained in
8 violation of Title 18, United States Code, Section 1962(d)
9 ("Section 1962(d)");

10 (b) Any interest in, security of, claim against, or
11 property or contractual right of any kind affording a source of
12 influence over any enterprise which the defendant has
13 established, operated, controlled, conducted, or participated in
14 the conduct of, in violation of Section 1962(d).

15 (c) Any and all property, real and personal,
16 constituting or derived from, any proceeds which the defendant
17 obtained, directly or indirectly, from any offense set forth in
18 Count One of this Indictment; and

19 (d) A sum of money equal to the total value of the
20 property described in subparagraphs 1(a) through 1(c) above.

21 2. Pursuant to Title 18, United States Code, Section
22 1963(m), each such defendant shall forfeit substitute property,
23 if, by any act or omission of the defendant, the property
24 described in paragraph 1, or any portion thereof, cannot be
25 located upon the exercise of due diligence; has been transferred,
26 sold to, or deposited with a third party; has been placed beyond
27 the jurisdiction of the court; has been substantially diminished
28 in value; or has been commingled with other property that cannot

1 be divided without difficulty.

2 3. If more than one defendant is convicted of Count One of
3 the Indictment, each such defendant shall be jointly and
4 severally liable for the entire amount ordered forfeited pursuant
5 to that Count.

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FORFEITURE ALLEGATION TWO

[21 U.S.C. § 853]

1. Pursuant to Title 21, United States Code, Section 853, any defendant convicted of any of the offenses set forth in Counts Eight or Nine of this Indictment shall forfeit to the United States the following property:

(a) All right, title, and interest in any and all property, real and personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title, and interest in any and all property, real and personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and

(c) A sum of money equal to the total value of the property described in subparagraphs 1(a) and (b) above.

2. Pursuant to Title 21, United States Code, Section 853(p), the defendant shall forfeit substitute property, if, by any act or omission of the defendant, the property described in paragraph 1, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property that cannot be divided without difficulty.

3. If more than one defendant is convicted of Counts Eight or Nine of the Indictment, each such defendant shall be jointly

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1 and severally liable for the entire amount ordered forfeited
2 pursuant to that Count.

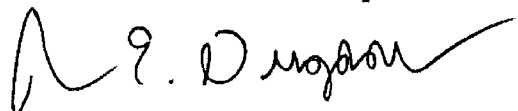
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A TRUE BILL

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Foreperson

ANDRÉ BIROTTE JR.
United States Attorney



ROBERT E. DUGDALE
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