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7
8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 February 2008 Grand Jury

11	UNITED STATES OF AMERICA,	)	CR 08-
		)	
12	Plaintiff,	)	<u>I N D I C T M E N T</u>
		)	
13	v.	)	[18 U.S.C. § 1962(c):
		)	Racketeer Influenced and
14	RUBEN CAVAZOS,	)	Corrupt Organizations; 18
	aka "Doc,"	)	U.S.C. § 1962(d): Racketeer
15	RUBEN CAVAZOS, JR.,	)	Influenced and Corrupt
	aka "Lil Rubes,"	)	Organizations Conspiracy; 18
16	HECTOR GONZALEZ, JR.,	)	U.S.C. § 1959: Violent Crime
	aka "Largo,"	)	in Aid of Racketeering;
17	ARTHUR ROSELI, JR.,	)	21 U.S.C. § 846: Conspiracy to
	aka "Chiques,"	)	Distribute Methamphetamine; 21
18	JUAN MANUEL NIEVES,	)	U.S.C. §§ 841(a)(1),
	aka "Listo,"	)	841(b)(1)(A): Distribution of
19	ANTHONY MARK TINOCO,	)	Methamphetamine; 21 U.S.C.
	aka "Bengal,"	)	§ 846: Conspiracy to
20	WILLIAM MICHAEL MUNZ,	)	Distribute Cocaine;
	LAWRENCE WILSON,	)	21 U.S.C. §§ 841(a)(1),
21	aka "Lars,"	)	841(b)(1)(B): Possession with
	WALTER RAMIREZ,	)	Intent to Distribute Cocaine;
22	aka "Bumper,"	)	18 U.S.C. § 922(g)(1): Felon
	ANDRES RODRIGUEZ,	)	in Possession of a Firearm; 18
23	aka "Rascal,"	)	U.S.C. § 924(c)(1): Use of a
	ENRIQUE LOUIS MUNOZ,	)	Firearm in Furtherance of a
24	aka "Hank,"	)	Crime of Violence or Drug-
	JOSE GARCIA,	)	Trafficking Crime; 18 U.S.C. §
25	aka "Big Joe,"	)	2(a): Aiding and Abetting; 18
	SHAWN BUSS,	)	U.S.C. § 3: Accessory After
26	aka "Monster,"	)	the Fact; 18 U.S.C. §§
	PETER SOTO,	)	1956(h), 1956(a)(1):
27	aka "Bouncer,"	)	Conspiracy to Launder Money;
	ROBERT VINCENT RIOS,	)	18 U.S.C. § 1957: Money
28	aka "Chente,"	)	Laundering;

CB:VOCS

1	AL CAVAZOS, JR.,	)	18 U.S.C. § 982(a)(1) and
	aka "Al the Suit,"	)	U.S.C. § 853(a): Criminal
2	MANUEL ARMENDAREZ,	)	Forfeiture]
	aka "Mandog,"	)	
3	ROGER MARTINEZ,	)	
	aka "Stamper,"	)	
4	RAFAEL LOZANO,	)	
	aka "Peligroso,"	)	
5	ALEX LOZANO,	)	
	aka "Reaper,"	)	
6	MARK GARCIA,	)	
	aka "Wolf,"	)	
7	HORACIO PONCE,	)	
	aka "Scorpio,"	)	
8	FELIX FIGUEROA,	)	
	aka, "Risky,"	)	
9	DAVID EDWARD GIL,	)	
	aka "L.A. Bull,"	)	
10	RICARDO GUTIERREZ,	)	
	JORGE VIRAMONTES,	)	
11	aka "Solo,"	)	
	JOHN CANALES,	)	
12	JUAN ALFRED GONZALEZ,	)	
	aka, "Negro,"	)	
13	ANTHONY ZUNIGA,	)	
	aka "Wicked,"	)	
14	BENJAMIN LEYVA,	)	
	aka "Secret,"	)	
15	WILLIAM OWENS,	)	
	aka "Target,"	)	
16	JON JAY MOREIN,	)	
	aka "White Boy Jon,"	)	
17	LUIS PADILLA,	)	
	aka "Kiko,"	)	
18	RAYMOND ANTHONY TRUJILLO,	)	
	DANIEL MEDEL,	)	
19	aka "Big Dog,"	)	
	JOHN ALEX AZANEDO,	)	
20	aka "Bullet,"	)	
	DENIS MALDONADO,	)	
21	aka "Steaky,"	)	
	NORBERTO JOSE MONTES,	)	
22	aka "Villain,"	)	
	ABRAM WEDIG,	)	
23	VINCENT RODRIGUEZ,	)	
	aka "Monk,"	)	
24	ALESSANDRO LOPEZ,	)	
	aka "Grumpy,"	)	
25	JOSEPH BRADEN,	)	
	aka "Socks,"	)	
26	RAMON CHAVEZ,	)	
	MANUEL MELGOZA,	)	
27	DAVID TELLEZ,	)	
	MARIO ANGULO,	)	
28	aka "Kermit,"	)	

1	RAMON CONTRERAS,	)
	aka "Speedy,"	)
2	RICHARD ESPINOZA,	)
	aka "Radone,"	)
3	ISMAEL RIVERA,	)
	aka "Yo-Yo,"	)
4	DAVID RIVERA,	)
	HAROLD REYNOLDS,	)
5	aka "Face,"	)
	ISMAEL PADILLA,	)
6	aka "Mouth,"	)
	JASON HULL,	)
7	SAM TREVINO,	)
	aka "Wapo,"	)
8	BRANDON CHEVILLE,	)
	aka "Suicide,"	)
9	RUDOLPH VALLE,	)
	aka "Swiftly,"	)
10	PAUL LEMAY,	)
	aka "Spider,"	)
11	WILLIAM SHAWLEY,	)
	aka "Dago Bull,"	)
12	AARON PRICE,	)
	aka "Sick Boy,"	)
13	PAUL CORDOVA,	)
	DAVID NAVA,	)
14	RENATO GOMEZ,	)
	BRIAN MCCAULEY,	)
15	WILLIAM LOUIE,	)
	JORGE COTTINI,	)
16	aka "House,"	)
	SAMUEL GONZALEZ,	)
17	aka "Serial Sam,"	)
	JAIME FLORES,	)
18	ALFONSO SOLIS,	)
	WILLIAM RAMIREZ,	)
19	aka "Moreno,"	)
	AUSTIN MELCER,	)
20	aka "Danger,"	)
	CHRISTOPHER LOZA,	)
21	aka "Punk Rock,"	)
	JOHN NEWMAN,	)
22	aka "Weto,"	)
	EDWARD MORENO,	)
23	aka "Violent Ed,"	)
	THOMAS SAVALA,	)
24	aka "Danger,"	)
	MANUEL JIMMIE VASQUEZ,	)
25	aka "Leatherface,"	)
	DAVID PADILLA,	)
26	THOMAS ALARCON,	)
	JOSE MORALES, and	)
27	LANCE EUSTICE,	)
		)
28	Defendants.	)

1 The Grand Jury charges:

2 GENERAL ALLEGATIONS

3 1. At all relevant times, defendants RUBEN CAVAZOS, also
4 known as ("aka") "Doc" ("CAVAZOS"), RUBEN CAVAZOS, JR., aka
5 "Little Rubes" ("R. CAVAZOS, JR."), HECTOR GONZALEZ, JR., aka
6 "Largo" ("H. GONZALEZ"), ARTHUR ROSELI, JR., aka "Chiques"
7 ("ROSELI"), JUAN MANUEL NIEVES, aka "Listo" ("NIEVES"), ANTHONY
8 MARK TINOCO, aka "Bengal" ("TINOCO"), WILLIAM MICHAEL MUNZ
9 ("MUNZ"), LAWRENCE WILSON, aka "Lars" ("WILSON"), WALTER RAMIREZ,
10 aka "Bumper" ("W. RAMIREZ"), ANDRES RODRIGUEZ, aka "Rascal"
11 ("RODRIGUEZ"), ENRIQUE LOUIS MUNOZ, aka "Hank" ("MUNOZ"), JOSE
12 GARCIA, aka "Big Joe" ("J. GARCIA"), SHAWN BUSS, aka "Monster"
13 ("BUSS"), PETER SOTO, aka "Bouncer" ("SOTO"), ROBERT VINCENT
14 RIOS, aka "Chente" ("RIOS"), AL CAVAZOS, JR., aka "Al the Suit"
15 ("A. CAVAZOS, JR."), MANUEL ARMENDAREZ, aka "Mandog"
16 ("ARMENDAREZ"), ROGER MARTINEZ, aka "Stamper," ("R. MARTINEZ"),
17 RAFAEL LOZANO, aka "Peligroso" ("R. LOZANO"), ALEX LOZANO, aka
18 "Reaper" ("A. LOZANO"), MARK GARCIA, aka "Wolf" ("M. GARCIA"),
19 HORACIO PONCE, aka "Scorpio" ("PONCE"), FELIX FIGUEROA, aka
20 "Risky" ("FIGUEROA"), DAVID EDWARD GIL, aka "L.A. Bull" ("GIL"),
21 RICARDO GUTIERREZ, aka "Ricko" ("GUTIERREZ"), JORGE VIRAMONTES,
22 aka "Solo" ("VIRAMONTES"), JOHN CANALES, aka "JC" ("CANALES"),
23 JUAN ALFRED GONZALEZ, aka "Negro" ("J. GONZALEZ"), ANTHONY
24 ZUNIGA, aka "Wicked" ("ZUNIGA"), BENJAMIN LEYVA, aka "Secret"
25 ("LEYVA"), WILLIAM OWENS, aka "Target" ("OWENS"), JON JAY MOREIN,
26 "White Boy Jon" ("MOREIN"), LUIS PADILLA, aka "Kiko" ("L.
27 PADILLA"), RAYMOND ANTHONY TRUJILLO, aka "Nasty" ("TRUJILLO"),
28 DANIEL MEDEL, aka "Big Dog" ("MEDEL"), JOHN ALEX AZANEDO, aka

1 "Bullet" ("AZANEDO"), DENIS MALDONADO, aka "Steaky"
2 ("MALDONADO"), NORBERTO JOSE MONTES, aka "Villain" ("MONTES"),
3 ABRAM WEDIG, aka "Cane" ("WEDIG"), VINCENT RODRIGUEZ, aka "Monk"
4 ("V. RODRIGUEZ"), ALESSANDRO LOPEZ, aka "Grumpy" ("A. LOPEZ"),
5 JOSEPH BRADEN, aka "Socks" ("BRADEN"), RAMON CHAVEZ ("CHAVEZ"),
6 MANUEL MELGOZA ("MELGOZA"), DAVID TELLEZ ("TELLEZ"), MARIO
7 ANGULO, aka "Kermit" ("ANGULO"), RAMON CONTRERAS, aka "Speedy"
8 ("CONTRERAS"), RICHARD ESPINOZA, aka "Radone" ("ESPINOZA"),
9 ISMAEL RIVERA, aka "Yo-Yo" ("RIVERA"), DAVID RIVERA ("D.
10 RIVERA"), HAROLD REYNOLDS, aka "Face" ("REYNOLDS"), ISMAEL
11 PADILLA, aka "Mouth" ("I. PADILLA"), JASON HULL, aka "Big J"
12 ("HULL"), SAM TREVINO, aka "Wapo" ("TREVINO"), BRANDON CHEVILLE,
13 aka "Suicide" ("CHEVILLE"), RUDOLPH VALLE, aka "Swiftly"
14 ("VALLE"), PAUL LEMAY, aka "Spider" ("LEMAY"), WILLIAM SHAWLEY,
15 aka "Dago Bull" ("SHAWLEY"), AARON PRICE, aka "Sick Boy"
16 ("PRICE"), PAUL CORDOVA, aka "Chopper" ("CORDOVA"), DAVID NAVA
17 ("NAVA"), RENATO GOMEZ ("R. GOMEZ"), BRIAN MCCAULEY ("MCCAULEY"),
18 WILLIAM LOUIE, aka "Chief" ("LOUIE"), JORGE COTTINI, aka "House"
19 ("COTTINI"), SAMUEL GONZALEZ, aka "Serial Sam" ("S. GONZALEZ"),
20 ALFONSO SOLIS ("SOLIS"), WILLIAM RAMIREZ, aka "Moreno" ("WILLIAM
21 RAMIREZ"), AUSTIN MELCER, aka "Danger" ("MELCER"), CHRISTOPHER
22 LOZA, aka "Punk Rock" ("LOZA"), JOHN NEWMAN, aka "Weto"
23 ("NEWMAN"), EDWARD MORENO, aka "Violent Ed" ("MORENO"), THOMAS
24 SAVALA, aka "Danger" ("SAVALA"), MANUEL JIMMIE VASQUEZ, aka
25 "Leatherface" ("VASQUEZ"), DAVID PADILLA, aka "Lazy Dave" ("D.
26 PADILLA"), THOMAS ALARCON, aka "Sinner" ("ALARCON"), JOSE
27 MORALES, aka "Pepe" ("MORALES"), LANCE EUSTICE, aka "Big El"
28 ("EUSTICE"), and others known and unknown to the Grand Jury, were

1 members and associates of an organization engaged in, among other
2 things, murder, conspiracy to commit murder, attempted murder,
3 conspiracy to traffic in narcotics, narcotics-trafficking,
4 robbery, extortion, money laundering, and witness intimidation.
5 At all relevant times, this organization, known as the "Mongols"
6 Biker gang, operated in the Central District of California and
7 elsewhere. The Mongols gang, including its leadership,
8 membership, and associates, constituted an "enterprise," as
9 defined by Title 18, United States Code, Section 1961(4), that
10 is, a group of individuals associated in fact. The enterprise
11 engaged in, and its activities affected, interstate and foreign
12 commerce. The enterprise constituted an ongoing organization
13 whose members functioned as a continuing unit for a common
14 purpose of achieving the objectives of the enterprise.

15 BACKGROUND OF THE MONGOLS GANG

16 2. The Mongols enterprise identifies itself as an "outlaw"
17 motorcycle gang. Its members identify themselves with patches,
18 tattoos and insignia, identifying their connection to the Mongols
19 and status within the organization. Specifically, Mongols will
20 frequently wear leather vests with the "patched" image of a
21 Mongol motorcycle rider and the name of the member's regional
22 "chapter" sewn on the vests. Many also display the designation
23 of "1%," which is a statement used to distinguish Mongols members
24 from the "99%" of motorcycle club members who are legitimate and
25 law-abiding. Mongols define themselves as within the "1%" who
26 are not legitimate and do not adhere to the law or the rights of
27 others. Members may also display the "MFFM" patch or tattoo to
28 identify themselves as "Mongols Forever Forever Mongols."

1 Females may be permitted to wear a jacket that bears a "Property
2 of" patch and identifying the Mongol member to whom they are
3 attached.

4 3. The Mongols gang is a nationwide organization and has
5 made efforts to expand internationally. The gang is believed to
6 have approximately 500 to 600 members. Approximately 400 of
7 those are believed to be located in Southern California. The
8 Mongols membership includes members or former members of a large
9 number of Los Angeles County street gangs, including "the
10 Avenues," "18th Street," San Gabriel Valley, South Side
11 Montebello, Lott Stoner, Maravilla and Varrio Nuevo street gangs.
12 The Mongols organization is comprised of approximately sixty-
13 eight identified "chapters." The "chapters" are located in
14 different geographical regions, although most are located within
15 the Central District of California. The Mongols also have
16 chapters in other parts of California, as well as in Oklahoma,
17 Florida, Nevada, Oregon, Maryland, Virginia, Indiana, New York,
18 Utah, Washington, Montana, Arizona, Colorado, Mexico and Canada.

19 4. The leadership and governing body of the Mongols is its
20 "Mother Chapter." The "Mother Chapter" exercises authority over
21 the actions of individual Mongols members and the regional
22 chapters. Mongols pay money into the "Mother Chapter" in the
23 form of fees, dues and "taxes." Those funds are used, in part,
24 to fund and promote the organization and pay for the legal
25 expenses of Mongols members when they are prosecuted for
26 committing crimes on behalf of the organization. The "Mother
27 Chapter" collects and reviews all membership applications and
28 fees for membership, resolves disputes within the organization,

1 and issues incentives, such as tattoos and Mongols patches that
2 honor Mongols members for committing acts of violence on behalf
3 of the Mongols, incurring physical injury on behalf of the
4 Mongols, or performing specific sexual acts at Mongols events.

5 5. The "Mother Chapter" is comprised of the Mongols
6 "national officers." It has been comprised of defendants
7 CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO and
8 MUNZ, with defendant RODRIGUEZ frequently present. Chapter
9 officers may be invited to present issues to the Mother Chapter
10 for decision. However, they are not permitted to share in the
11 deliberations of the Mother Chapter, and the Mother Chapter's
12 decisions are binding on the regional chapters. Lower-ranking
13 members and prospective Mongols members frequently are required
14 to patrol and provide armed security against the presence of law
15 enforcement and rival gang members outside the Mother Chapter
16 meetings. Those present at Mother Chapter meetings are heavily
17 armed, and the Mongols Mother Chapter maintains an arsenal of
18 firearms, including assault rifles, shotguns and semi-automatic
19 handguns, as well as bullet-proof vests and knives, at the Mother
20 Chapter residence in West Covina, California.

21 6. The Mongols maintain an established structure and
22 leadership. The Mongols maintain a written "constitution" and
23 "by-laws" of the organization, which set forth the rules of
24 membership and a code of conduct for the organization, as well as
25 penalties for non-compliance with the rules of the organization.

26 7. Below the national leadership and "Mother Chapter,"
27 regional Mongols chapters are directed by chapter "presidents"
28 and chapter officers. These officers include the chapter's

1 "president," "vice-president," "secretary/treasurer," and its
2 "sergeant-at-arms," who is required to maintain the weapons and
3 firearms for the chapter. The sergeant-at-arms may also be
4 required to maintain records of membership applications and
5 oversees the evaluation of prospective members by private
6 investigators.

7 8. Mongols crimes typically include acts of violence,
8 ranging from battery to murder, drug-trafficking offenses, money
9 laundering, weapons-trafficking, extortion and, very frequently,
10 hate crimes directed against African-American persons who might
11 come into contact with the Mongols. Members also frequently
12 conduct robberies, steal motorcycles, and engage in the theft of
13 credit card account information as a means to obtain funds for
14 themselves and the organization. Members often commit their
15 crimes and acts of violence with the conviction that they cannot
16 be prosecuted because they believe victims and witnesses are
17 afraid to testify against them or to cooperate with law
18 enforcement for fear of retaliation by the larger Mongols
19 organization. Mongols frequently use the reputation of the
20 criminal enterprise, especially its history of large-scale
21 violence and riots, as a means to threaten and intimidate the
22 victims and witnesses to their crimes and protect Mongols from
23 prosecution by local law enforcement.

24 9. The Mongols gang is actively engaged in drug-
25 trafficking, especially the distribution of methamphetamine and
26 cocaine. Mongols members commonly ingest methamphetamine and
27 cocaine at Mongols events. More than this, however, Mongols
28 members and leaders frequently engage in the distribution of

1 narcotic drugs, especially methamphetamine and cocaine, as a
2 source of income, both within the organization and to outside
3 customers and associates. Proceeds from drug-trafficking are
4 then owed to the Mongols leadership and "Mother Chapter" and
5 collected in the form of "dues" and membership fees. Large-scale
6 drug traffickers within the organization are often "taxed" at a
7 higher rate within the organization, and their membership in and
8 payments to the larger Mongols organization are used as a means
9 to protect them from the same types of penalties and "taxes" that
10 would ordinarily be claimed by rival street gangs and Mexican
11 Mafia (aka "La Eme") representatives in the areas controlled by
12 those rival gangs. Mongols members also are authorized to call
13 on other Mongols and Mongols leadership to enforce the collection
14 of proceeds owed from their narcotics customers.

15 10. The Mongols organization is typically in conflict with
16 the Mexican Mafia and local street gangs, specifically over the
17 control of narcotics-trafficking in and around Los Angeles,
18 California. Many Mongols members are former members of Los
19 Angeles-based street gangs and maintain their connections to
20 those gangs, particularly with regard to the distribution of
21 narcotics and firearms. Those members often claim immunity from
22 the collection of "taxes" by Mexican Mafia representatives as a
23 result of their Mongols membership. This conflict creates
24 tension between the Mongols and the established authority of the
25 Mexican Mafia over drug trafficking. Mongols leaders have
26 periodically attempted to negotiate a resolution over their
27 disputes with the Mexican Mafia over the control of drug
28 trafficking in particular territories by paying Mexican Mafia

1 representatives in exchange for their recognition of the Mongols'
2 right to traffic narcotics in Southern California.

3 11. Mongols gang members also enforce the authority of the
4 Mongols by directing attacks against rival motorcycle gangs, such
5 as the "Hells Angels," the "Outlaws" and the "Sons of Silence,"
6 as well as members of the general public who might defy or
7 unwittingly come into contact with the Mongols in a way that
8 might be deemed "disrespectful" to the organization. Persons in
9 conflict with, or who might be perceived to have shown disrespect
10 to, Mongols may be beaten severely or even killed by being kicked
11 repeatedly with steel-toed boots, stabbed or shot. The
12 organization also directs attacks against law enforcement
13 officers and witnesses who would be willing to cooperate with law
14 enforcement for the prosecution of the crimes committed by
15 members of the Mongols, and the organization frequently pays for
16 the legal representation of members who commit crimes, such as
17 assaults and murders, on behalf of the Mongols. The Mongols gang
18 ordinarily is vigilant to the presence or arrival of rival gang
19 members, and will frequently travel to areas claimed by rival
20 gangs in order to provoke a confrontation with them. Mongols are
21 likely to identify such persons and threaten to beat or kill them
22 if they do not surrender indicia (such as red and white colored
23 t-shirts, patches, jackets or sports jerseys bearing the number
24 "81") identifying support for a rival gang. The Mongols
25 organization is also racist and hostile to the presence of
26 African-Americans in bars or clubs where Mongols are present, or
27 African-Americans in the presence of females associated with the
28 Mongols or Mongols members.

1 12. The Mongols frequently exhibit their membership or
2 association with the gang by wearing gang vests, shirts, hats,
3 jewelry, and tattoos displaying the identified images of the
4 Mongols gang. The most prominent image is that of a Mongol
5 motorcycle rider, or a human head with a queue, facial hair and
6 sunglasses. Members also typically display a patch that
7 identifies the regional "chapter" to which the member belongs,
8 such as Cypress Park, Hollywood, Whittier and other regional
9 areas. Mongols "officers" also will frequently bear patches that
10 indicate that they are officers in the enterprise. Mongols also
11 are encouraged and expected to engage in sex acts at Mongols
12 functions or when pre-arranged "wing parties" are held. They
13 then are rewarded with different-colored wings patches. The
14 different colors of the patches identify specific sex acts
15 performed by the member in front of the organization, such as
16 green wings to represent sex with a woman who has a venereal
17 disease and purple wings to represent sex with a woman who is
18 dead. Additionally, the "Mother Chapter" members will reward
19 members who have distinguished themselves within the organization
20 by presenting them with specific patches or authorizing them to
21 bear a Mongols "full-patch" tattoo. The Mongols "Mother Chapter"
22 may award a specific Mongols member a "skull and crossbones" or
23 "Respect Few Fear None" patch to those members who have committed
24 murder or engaged acts of violence on behalf of the Mongols.

25 13. Mongols frequently refer to one another as "brothers"
26 and the organization as a "brotherhood." Leaders of the Mongols
27 gang recruit and initiate new members into the organization
28 through a structured application, vetting and probationary

process that is directed through the "Mother Chapter" in West Covina, California. Potential members must be sponsored by existing members and demonstrate their obedience and loyalty to the Mongols organization. They are then required to complete a written application, which is reviewed and researched by private investigators, and they may be subject to a polygraph examination by the Mongols if they are suspected to be a member of law enforcement or an informant to law enforcement. The focus of the investigation conducted before an individual may become a member of the Mongols is to establish the potential member's willingness to commit crimes on behalf of the organization and to preclude the membership of individuals with any connection to law enforcement or who might expose the crimes of the organization to law enforcement. Once he has passed the process, the potential member may be accepted as a prospective member, or "Prospect." He is given a vest and patches, which identify him as a Mongols "Prospect." The prospect is then assigned to perform duties for the Mongols members, including providing armed security, storing weapons and narcotics, and transporting Mongols leaders, for a probationary period. The membership applications and decisions are maintained, reviewed and determined by the Mother Chapter in West Covina, California.

14. The Mongols maintain a ready supply of firearms, including handguns, shotguns, automatic assault rifles, and machine-guns, in order to enforce the authority of the gang. Such weapons often are stolen or unregistered so that the use of the weapons cannot be readily connected to the gang member who either used the weapon or maintained it. Weapons often are

1 discarded or destroyed after an incident. Therefore, gang
2 leaders frequently need to maintain a source of supply for
3 additional unregistered or non-traceable firearms. The Mongols
4 leadership also controls the activities of its members and
5 enforces its authority and internal discipline by killing,
6 attempting to kill, conspiring to kill, assaulting, and
7 threatening its own members or others who would present a threat
8 to the Organization or its leadership. A member who is "out bad"
9 may be required to forfeit his property, especially his
10 motorcycle, and is subject to attack by active Mongols members.

11 15. Females commonly are addressed derisively in the
12 organization. Female associates typically are labeled as the
13 "property of" the Mongol member to whom they are connected, and
14 they are frequently expected to carry narcotics and firearms for
15 the member.

16 PURPOSES OF THE ENTERPRISE

17 16. The purposes of the Mongols criminal enterprise,
18 including its members and associates, include, but are not
19 limited to, the following:

20 a. Enriching members of the Mongols gang through,
21 among other things, control of and participation in the
22 distribution of narcotics in the territory controlled by the
23 Mongols.

24 b. Maintaining the control and authority of the
25 Mongols over the territory claimed by the Mongols.

26 c. Preserving, protecting, and expanding the power of
27 the Mongols through the use of intimidation, violence, threats of
28 violence, assault, and murder.

1 d. Promoting and enhancing the authority of the
2 Mongols members and associates.

3 THE MEANS AND METHODS OF THE ENTERPRISE

4 17. The means and methods by which the defendants and their
5 co-racketeers conduct and participate in the conduct of the
6 affairs of the Mongols include:

7 a. Members of the Mongols commit, attempt, and
8 threaten to commit acts of violence, including murder, to protect
9 and expand the enterprise's criminal operation, which includes
10 assaults, murder, intimidation, robbery, drug-trafficking and
11 threats of violence directed against rival gang members, law
12 enforcement, and potential witnesses to the crimes of the
13 enterprise.

14 b. Members of the Mongols promote a climate of fear
15 through intimidation, violence and threats of violence intended
16 to promote the authority of the Mongols enterprise and insulate
17 its members from liability for the drug-trafficking and violent
18 crimes of the organization.

19 c. Members of the Mongols use the enterprise to
20 murder, attempt to murder, assault, and threaten those who pose a
21 threat to the enterprise.

22 d. Participants in the Mongols engage in the
23 trafficking of controlled substances as a means to generate
24 income for themselves and the organization.

COUNT ONE

[18 U.S.C. § 1962(d)]

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

2. Beginning on a date unknown, and continuing to on or about October 9, 2008, in Los Angeles County, within the Central District of California and elsewhere, defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA, RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, MELCER, LOZA, NEWMAN, MORENO, SAVALA, VASQUEZ, and D. PADILLA, and others known and unknown to the Grand Jury, being persons employed by and associated with the Mongols criminal enterprise, which enterprise engaged in and the activities of which affected interstate and foreign commerce, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1962, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States

Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving murder, in violation of California Penal Code Sections 31, 182, 187, 189, 217.1, and 664; robbery, in violation of California Penal Code Sections 211, 212.5(a), and 213; distribution of controlled substances, including methamphetamine and cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and multiple acts indictable under Title 18, United States Code, Sections 1956 and 1957 (money laundering). It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

A. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

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

1. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RODRIGUEZ, BUSS, and RIOS would conduct organizational meetings and direct members of the Mongols criminal enterprise to conduct and engage in robberies, assaults, murders, extortion, and drug trafficking, as well as the collection and management of money, including proceeds generated from unlawful activity by Mongols members, in order to promote and further the activities of the Mongols gang.

2. Defendants NIEVES, W. RAMIREZ, J. GARCIA, SOTO, CANALES, J. GONZALEZ, MEDEL, and WEDIG and others would direct lower-ranking Mongols members and prospective Mongols members about the activities of the gang and their responsibilities for

1 the organization and deliver money from Mongols members,
2 prospects and the regional chapters to the Mongols "Mother
3 Chapter" leadership.

4 3. Defendants RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO,
5 RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.
6 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
7 J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS, MOREIN, L.
8 PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, MONTES, WEDIG, V.
9 RODRIGUEZ, CHAVEZ, MELGOZA, CONTRERAS, RIVERA, REYNOLDS, I.
10 PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, CORDOVA,
11 WILLIAM RAMIREZ, SAVALA, VASQUEZ, and D. PADILLA, and others
12 would obtain and distribute methamphetamine and cocaine to
13 Mongols members, associates and narcotics customers.

14 4. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ
15 and others would negotiate with Mexican Mafia representatives
16 concerning the collection of "tax" payments for the narcotics-
17 trafficking activities of Mongols members in areas otherwise
18 controlled by the Mexican Mafia.

19 5. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ,
20 ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ,
21 MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ,
22 R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA,
23 GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, TELLEZ,
24 R. GOMEZ, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
25 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
26 BRADEN, CHAVEZ, MELGOZA, ANGULO, CONTRERAS, ESPINOZA, RIVERA,
27 REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, LEMAY, SHAWLEY,
28 PRICE, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM

1 RAMIREZ, LOZA, NEWMAN, MORENO, and SAVALA, and others would
2 obtain firearms, knives, bullet-proof vests and explosives to be
3 used to enforce the authority of the Mongols against rival gang
4 members, the general public and law enforcement.

5 6. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ,
6 ROSELI, NIEVES, MUNZ, and WILSON would direct Mongols members to
7 travel to different locations and commit acts of violence,
8 including murder, against rival gang members, law enforcement or
9 other persons who would challenge the authority of the Mongols
10 criminal enterprise.

11 7. Defendants MUNZ, W. RAMIREZ, RODRIGUEZ, MUNOZ, J.
12 GARCIA, BUSS, SOTO, RIOS, ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.
13 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
14 CANALES, J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS,
15 MOREIN, L. PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, MONTES,
16 WEDIG, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, ANGULO, CONTRERAS,
17 ESPINOZA, RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE,
18 LEMAY, SHAWLEY, PRICE, NAVA, MCCAULEY, LOUIE, COTTINI, S.
19 GONZALEZ, WILLIAM RAMIREZ, MELCER, LOZA, NEWMAN, MORENO, and
20 SAVALA, and others would commit acts of violence, including
21 murder, against rival gang members, law enforcement or other
22 persons who would challenge the authority of the Mongols
23 organization.

24 8. Defendant CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI,
25 and TINOCO, and others would conduct financial transactions to
26 conceal the proceeds derived from the crimes of the organization
27 and convert those proceeds to promote the crimes of the Mongols
28 and enrich themselves.

1 9. Defendants CAVAZOS, R. CAVAZOS, JR., NIEVES, WILSON, J.
2 GARCIA, and SOTO, and others would recruit new members to the
3 Mongols organization and direct their initiation into the gang.

4 B. OVERT ACTS

5 In furtherance of the conspiracy, and to accomplish the
6 objects of the conspiracy, defendants CAVAZOS, R. CAVAZOS, JR.,
7 H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ,
8 RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR.,
9 ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE,
10 FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ,
11 ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
12 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
13 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
14 RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE,
15 LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCAULEY, LOUIE,
16 COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, MELCER, LOZA,
17 NEWMAN, MORENO, SAVALA, VASQUEZ, and D. PADILLA, and others known
18 and unknown to the Grand Jury committed various overt acts, on or
19 about the following times and dates, within the Central District
20 of California and elsewhere, including but not limited to the
21 following:

22 1. On March 16, 2002, in Riverside County, California,
23 defendants W. RAMIREZ, and ZUNIGA, and multiple other members of
24 the Mongols gang attended an "ultimate fighting" match at the
25 Morongo Casino in Cabazon, California, dressed in Mongols
26 "colors," and provoked a riot, during which W. RAMIREZ and other
27 Mongols attacked J.D., P.S., W.C., J.G., A.L., M.L., and numerous
28 other victims with knives, struck victims with chairs, and kicked

1 them with steel-toed boots.

2 2. On April 27, 2002, defendants W. RAMIREZ and LEYVA and
3 other Mongols gang members engaged in an armed confrontation with
4 "Hells Angels" gang members at the Harrah's Casino in Laughlin,
5 Nevada, during which Hells Angels gang members R.T. and J.B. and
6 Mongols gang member S.B. were killed.

7 3. On August 14, 2003, defendant BUSS attacked a rival gang
8 member in San Diego, California.

9 4. On August 5, 2005, defendant VIRAMONTES arranged to sell
10 cocaine and methamphetamine to a confidential government
11 informant in Ventura, California.

12 5. On August 12, 2005, defendant VIRAMONTES sold
13 approximately 28.1 grams of cocaine to an undercover law
14 enforcement officer and discussed arrangements to sell
15 methamphetamine and firearms to the undercover officer as well.

16 6. On October 9, 2005, multiple Mongols members, riding in
17 a pack of motorcycles and wearing Mongols riding vests, attacked
18 motorists on the highway near Palm Springs, California, by using
19 their motorcycles to "trap" the vehicles between them while a
20 Mongol attempted to stab the motorists with a knife.

21 7. On October 15, 2005, in Los Angeles, California,
22 defendant J. GONZALEZ arranged to sell multiple firearms,
23 including a Thompson sub-machine gun, to an undercover law
24 enforcement officer.

25 8. On October 21, 2005, by telephone using coded language,
26 defendant VIRAMONTES arranged to sell approximately 28 grams of
27 cocaine and 14 grams of methamphetamine to an undercover law
28 enforcement officer.

1 9. On November 2, 2005, defendant A. LOPEZ possessed a
2 short-barrel, 12-gauge shotgun, ammunition, methamphetamine and
3 Mongols paraphernalia at a residence in Montebello, California.

4 10. On November 3, 2005, in Los Angeles, California,
5 defendant VIRAMONTES sold approximately 18 grams of actual
6 methamphetamine to an undercover law enforcement officer, who was
7 then posing as a potential Mongols member.

8 11. On November 10, 2005, in Los Angeles, California,
9 defendant VIRAMONTES sold stolen stereo equipment to a
10 confidential government informant and two undercover law
11 enforcement officers, who were then posing as potential Mongols
12 members.

13 12. On November 17, 2005, defendant MORENO possessed a .22
14 caliber rifle, a 12-gauge shotgun, an M-1 carbine .30 caliber
15 rifle, a .45 caliber handgun, a .38 caliber revolver, ammunition,
16 and numerous articles of clothing that identified his membership
17 in the Mongols gang, at a residence in Montebello, California.

18 13. On December 2, 2005, in Los Angeles, California,
19 defendant J. GONZALEZ sold a .32 caliber handgun to a
20 confidential government informant.

21 14. On December 4, 2005, defendants RODRIGUEZ, ARMENDAREZ,
22 R. LOZANO, A. LOZANO, GUTIERREZ, and ANGULO, and other
23 unidentified Mongols members attacked rival gang members and an
24 off-duty fire department officer as they attempted to collect
25 donations at a "Toys for Tots" event in Norco, California.

26 15. On December 11, 2005, defendant CAVAZOS addressed
27 Mongols members at a "national run" conducted in Mexico and
28 congratulated members who had participated in the shooting of

1 rival "Hells Angels" gang members at the "Toys for Tots" event in
2 Norco, California on December 5, 2005, and CAVAZOS also discussed
3 plans to reward those members for taking violent action on behalf
4 of the Mongols.

5 16. On January 19, 2006, defendant J. GONZALEZ sold
6 approximately eight grams of actual methamphetamine to a
7 confidential government informant and two undercover law
8 enforcement officers who were posing as potential Mongols
9 members.

10 17. On January 19, 2006, defendants S. GONZALEZ and BRADEN
11 identified themselves as Mongols members and threatened to shoot
12 and stab other patrons of the "Firehouse" bar in Whittier,
13 California.

14 18. On February 8, 2006, in Los Angeles, California,
15 defendant TELLEZ sold approximately 13.2 grams of actual
16 methamphetamine to a confidential government informant.

17 19. On February 9, 2006, defendants J. GONZALEZ and R.
18 GOMEZ sold approximately 14 grams of methamphetamine to a
19 confidential government informant, and R. GOMEZ possessed a 9 mm
20 handgun and a shotgun during the transaction.

21 20. On February 10, 2006, in Victorville, California,
22 defendant D. PADILLA sold approximately 4.2 grams of actual
23 methamphetamine to a confidential government informant.

24 21. On February 10, 2006, defendants RODRIGUEZ, J. GARCIA,
25 and SOTO, and other unindicted Mongols members beat a patron at
26 the Key Club in Hollywood, California.

27 22. On February 10, 2006, in Las Vegas, Nevada, defendant
28 TREVINO sold four AK-47 assault rifles and 80 rounds of

ammunition to a confidential government informant.

23. On February 18, 2006, in Los Angeles, California, defendant R. GOMEZ sold approximately 28 grams of methamphetamine to a confidential government informant and an undercover law enforcement officer who was posing as a potential Mongols member.

24. On February 19, 2006, in Los Angeles, California, defendant MOREIN offered to sell methamphetamine to a confidential government informant.

25. On February 23, 2006, in Victorville, California, defendant D. PADILLA sold approximately 6.5 grams of actual methamphetamine to a confidential government informant.

26. On March 1, 2006, in Los Angeles, California, defendant TELLEZ sold approximately 15.1 grams of actual methamphetamine to a confidential government informant.

27. On March 2, 2006, in San Bernardino, California, defendant D. PADILLA sold approximately 12.6 grams of actual methamphetamine to a confidential government informant.

28. On March 3, 2006, in San Bernardino, California, defendant D. PADILLA sold approximately 15.4 grams of actual methamphetamine to a confidential government informant.

29. On March 11, 2006, at a Mongols "All Members" meeting in Los Angeles County, California, defendant CAVAZOS advised approximately 200 members that Mongols should be alert to the possibility of wiretap monitoring by federal law enforcement agents and should be careful not to discuss incriminating matters on the telephone, and CAVAZOS also discussed criminal investigations conducted by the Bureau of Alcohol, Tobacco and Firearms, as well as the risk to the Mongols of prosecution for

1 its racketeering crimes.

2 30. On March 13, 2006, defendant J. GONZALEZ arranged to
3 sell methamphetamine to an undercover law enforcement officer who
4 was posing as a potential Mongols member.

5 31. On March 22, 2006, defendant TELLEZ sold approximately
6 29.5 grams of actual methamphetamine to an undercover law
7 enforcement officer.

8 32. On March 23, 2006, defendant ZUNIGA distributed cocaine
9 to a confidential government informant.

10 33. On March 29, 2006, defendant J. GONZALEZ sold
11 approximately 5.4 grams of actual methamphetamine to an
12 undercover law enforcement officer posing as a potential Mongols
13 member.

14 34. On April 1, 2006, defendant CAVAZOS addressed a Mongols
15 "All Members" Meeting in Baja, Mexico, and advised members that
16 the Mongols would "exterminate" the "rats" who had provided
17 incriminating information about CAVAZOS to law enforcement.

18 35. On April 9, 2006, defendants CAVAZOS, R. CAVAZOS, JR.,
19 H. GONZALEZ, MUNZ, and CANALES led a Mongols meeting in which
20 they discussed a confrontation with rival "Hells Angels" gang
21 members.

22 36. On April 17, 2006, defendant OWENS discussed
23 arrangements to provide firearms to an undercover law enforcement
24 officer who was posing as a potential Mongols members, and OWENS
25 stated that the weapons could be obtained from defendants
26 RODRIGUEZ and SHAWLEY.

27 37. On April 22, 2006, in Los Angeles, California,
28 defendant CHEVILLE arranged to purchase one kilogram of cocaine

1 with a confidential government informant.

2 38. On April 26, 2006, defendant MUNZ led a "Church
3 Meeting" of the Mongols San Diego chapter to address the rules of
4 the organization.

5 39. On April 28, 2006, defendant OWENS discussed the
6 distribution of methamphetamine with a confidential government
7 informant, and OWENS advised the informant that he regularly
8 obtained methamphetamine from a Mexican Mafia source.

9 40. On April 29, 2006, defendants MUNZ, SHAWLEY, BUSS,
10 CHEVILLE, and MCCAULEY carried firearms and attended a Mongols
11 party in Temecula, California.

12 41. On May 5, 2006, in Los Angeles county, California,
13 defendant OWENS sold approximately 23 grams of actual
14 methamphetamine to an undercover law enforcement officer.

15 42. On May 5, 2006, defendants MUNZ, BUSS, SHAWLEY, and
16 CHEVILLE attacked a rival "Hells Angels" gang member in a casino
17 in Las Vegas, Nevada.

18 43. On May 5, 2006, defendant SHAWLEY told an undercover
19 law enforcement officer that MUNZ had killed three rival "Hells
20 Angels" gang members.

21 44. On May 10, 2006, defendant TELLEZ sold approximately
22 10.9 grams of actual methamphetamine to an undercover law
23 enforcement officer.

24 45. On May 14, 2006, defendant MUNZ recruited Mongols
25 members to retaliate against rival "Hells Angels" gang members
26 following an attack on a Mongols member and that member's
27 girlfriend.

28 46. On May 16, 2006, defendant R. GOMEZ possessed three

1 shotguns, a Tech-9 handgun, and a .45 caliber handgun at the
2 residence R. GOMEZ shared with defendant J. GARCIA, and R. GOMEZ
3 offered to sell highly pure methamphetamine to a confidential
4 government informant.

5 47. On May 18, 2006, in Los Angeles, California, defendant
6 R. GOMEZ sold approximately 11.8 grams of actual methamphetamine
7 to three undercover law enforcement officers and a confidential
8 government informant, and R. GOMEZ showed the undercover officers
9 the firearms and surveillance equipment that he maintained in
10 connection with his drug-trafficking activities.

11 48. On May 24, 2006, defendants RODRIGUEZ and GIL sold
12 approximately 11 grams of actual methamphetamine to two
13 undercover law enforcement officers and a confidential government
14 informant.

15 49. On May 24, 2006, defendant R. GOMEZ sold approximately
16 11 grams of actual methamphetamine to an undercover law
17 enforcement officer and displayed a short-barreled shotgun, which
18 he claimed to "love" because it could "rip someone up."

19 50. On May 31, 2006, defendant GIL sold approximately 9.6
20 grams of actual methamphetamine to an undercover law enforcement
21 officer and a confidential government informant.

22 51. On June 3, 2006, defendant VIRAMONTES possessed a 9 mm
23 handgun, which he had hidden behind the glove box in his car, in
24 Las Vegas, Nevada.

25 52. On June 3, 2006, defendant CAVAZOS led a meeting for
26 the Mongols Nevada members and advised them that proceeds
27 collected from Mongols members were being used to pay for the
28 lawyers of the Mongols charged in connection with the 2002

1 Laughlin, Nevada shootings, and members accused CAVAZOS of using
2 Mongols funds to "pay-off" the Mexican Mafia for the narcotics-
3 trafficking conducted by the Mongols and also accused CAVAZOS of
4 stealing money from the Mongols gang.

5 53. On June 3, 2006, defendants VIRAMONTES and LEMAY sold
6 methamphetamine to two undercover law enforcement officers.

7 54. On June 8, 2006, defendant GIL sold approximately 26.1
8 grams of actual methamphetamine to two undercover law enforcement
9 officers.

10 55. On June 12, 2006, by telephone using coded language,
11 defendant GIL offered to sell methamphetamine to an undercover
12 law enforcement officer.

13 56. On June 21, 2006, defendant RODRIGUEZ and an unindicted
14 co-conspirator arranged to sell methamphetamine and machine-guns
15 to a confidential government informant.

16 57. On June 22, 2006, defendant RODRIGUEZ delivered
17 approximately 23.4 grams of actual methamphetamine to a
18 confidential government informant.

19 58. On June 25, 2006, defendants GIL and MARTINEZ attended
20 a Mongols "run" in Pasadena, California, with three undercover
21 law enforcement officers who were posing as potential Mongols
22 members, and GIL and MARTINEZ advised the undercover officers
23 that membership in the Mongols would require them to engage in
24 violent confrontations with rival gang members in order to
25 enforce the authority of the Mongols.

26 59. On July 1, 2006, defendant MARTINEZ possessed cocaine.

27 60. On July 16, 2006, defendant SOTO discussed the
28 distribution of cocaine with an undercover law enforcement

1 officer.

2 61. On July 18, 2006, defendant RODRIGUEZ sold
3 approximately 23.8 grams of actual methamphetamine to an
4 undercover law enforcement officer.

5 62. On July 19, 2006, defendant GIL arranged to sell
6 methamphetamine to an undercover law enforcement officer.

7 63. On July 19, 2006, defendant SOTO sold approximately
8 seven grams of methamphetamine to a confidential government
9 informant.

10 64. On July 20, 2006, in Los Angeles, California, defendant
11 ESPINOZA and an unidentified Mongols member beat and repeatedly
12 stabbed S.A. when they observed S.A. in the company of an
13 African-American male.

14 65. On July 21, 2006, defendants RODRIGUEZ and GIL sold
15 approximately 15.4 grams of actual methamphetamine to an
16 undercover law enforcement officer.

17 66. On July 22, 2006, defendant SOTO sold approximately
18 seven grams of methamphetamine to a confidential government
19 informant.

20 67. On July 22, 2006, defendant VIRAMONTES sold a gas
21 grenade to an undercover law enforcement officer and advised the
22 officer about the availability of other weapons, including hand
23 grenades and rocket launchers, that he and other Mongols had
24 planned to use in order to "blow up" a court house where a
25 Mongols member was on trial.

26 68. On July 25, 2006, defendant SOTO sold approximately
27 13.5 grams of actual methamphetamine to two undercover law
28 enforcement officers.

1 69. On July 27, 2006, defendant CAVAZOS led a Mongols
2 "Sergeant-at-Arms" meeting in Los Angeles County and directed
3 members that they should carry sufficient weapons and travel with
4 a sufficient number of members, so they would not need to call
5 for "back-up" assistance during violent confrontations with rival
6 gangs.

7 70. On July 28, 2006, defendant SOTO possessed a .45
8 caliber handgun and sold narcotics in the parking lot of a tattoo
9 shop in Hollywood, California.

10 71. On August 5, 2006, defendant R. GOMEZ arranged to sell
11 methamphetamine to an undercover law enforcement officer in Los
12 Angeles County.

13 72. On August 5, 2006, defendant LEMAY sold narcotics at
14 the "Studio Café" in Los Angeles, California.

15 73. On August 8, 2006, defendant GIL arranged to distribute
16 narcotics to two undercover law enforcement officers.

17 74. On August 11, 2006, defendant SOTO possessed a .45
18 caliber handgun, and defendant SHAWLEY possessed a .40 caliber
19 handgun, while ingesting cocaine at the "Scrap Iron Kustom"
20 motorcycle shop in Van Nuys, California.

21 75. On August 12, 2006, in Arleta, California, defendants
22 SHAWLEY and SOTO sold cocaine to a customer who identified
23 himself as a football coach for a Catholic high school in the San
24 Fernando Valley.

25 76. On August 13, 2006, defendants SHAWLEY and SOTO armed
26 themselves with unregistered firearms and transported narcotics
27 to a Mongols function in San Diego, California, and SHAWLEY
28 advised an undercover officer that the Mongols would employ a

1 "shoot-on-sight" policy for rival gang members.

2 77. On August 13, 2006, in San Diego, California, defendant
3 CHEVILLE advised an undercover law enforcement officer who was
4 posing as a potential Mongols member that he must be willing to
5 kill and die for the Mongols if he wanted to join the
6 organization.

7 78. On August 16, 2006, in South Pasadena, California,
8 defendant GIL sold approximately 16.1 grams of actual
9 methamphetamine to an undercover law enforcement officer, while
10 driving a tow truck for a private towing company.

11 79. On August 16, 2006, defendant MUNZ led a Mongols
12 "Church Meeting" in San Diego, California.

13 80. On August 17, 2006, defendants SHAWLEY, SOTO and A.
14 LOPEZ conducted a meeting of the Mongols Hollywood chapter in
15 which they discussed the need to arm members and provide "back-
16 up" support for confrontations in Hollywood, California, and
17 surrounding areas.

18 81. On August 17, 2006, defendants ARMENDAREZ and R. LOZANO
19 sold approximately 57.2 grams of actual methamphetamine to an
20 undercover law enforcement officer and a confidential government
21 informant.

22 82. On August 17, 2006, defendant VIRAMONTES discussed
23 efforts to obtain narcotics and firearms with an undercover law
24 enforcement officer and a confidential government informant, and
25 VIRAMONTES also discussed plans to rob his step-mother, whom he
26 believed to possess \$10,000.

27 83. On August 18, 2006, defendants BUSS, SHAWLEY, and
28 CHEVILLE, and an unindicted co-conspirator delivered an

1 automatic, SKS assault rifle, bearing a 60-round magazine and a
2 12-gauge shotgun to an unindicted co-conspirator at a Mongols
3 event in Temecula, California.

4 84. On August 18, 2006, in Los Angeles County, defendant
5 SHAWLEY advised an undercover law enforcement officer that he and
6 defendants GIL and PRICE had captured an individual and tortured
7 him for three hours, by breaking the man's knuckles with a pair
8 of pliers, breaking his knee by hitting it with a metal pipe, and
9 then kicking the victim as he attempted to escape.

10 85. On August 20, 2006, defendants BUSS, SHAWLEY, and SOTO
11 possessed two machine guns in anticipation of an attack on rival
12 gang members in Riverside County.

13 86. On August 24, 2006, defendants RODRIGUEZ and AZANEDO
14 sold approximately 18.3 grams of actual methamphetamine to an
15 undercover law enforcement officer and a confidential government
16 informant.

17 87. On August 27, 2006, defendant W. RAMIREZ attacked an
18 unidentified victim in the parking lot of the "Van Guard" night
19 club in Hollywood, California.

20 88. On August 31, 2006, an unindicted Mongols member told
21 an undercover law enforcement officer that Mongols members had
22 severely beaten three patrons of the "Cheetahs" bar in Los
23 Angeles, California.

24 89. On August 31, 2006, defendant SOTO possessed
25 approximately 12.5 grams of methamphetamine and 5.6 grams of
26 cocaine at the Tokio Lounge, in Hollywood, California.

27 90. On September 2, 2006, defendant SOTO possessed a
28 firearm and sold narcotics outside the Tokio Lounge in Hollywood,

1 California.

2 91. On September 7, 2006, defendant J. GARCIA told a
3 confidential government informant that defendants and Mongols
4 "Mother Chapter" leaders CAVAZOS, R. CAVAZOS, JR., and RODRIGUEZ
5 and others were concerned about the loss of a negotiated "truce"
6 with the Mexican Mafia over the collection of "taxes" for drug-
7 trafficking conducted by Mongols members.

8 92. On September 8, 2006, defendant R. MARTINEZ drove a
9 confidential informant to the residence of defendant RODRIGUEZ in
10 order to purchase methamphetamine, and RODRIGUEZ possessed two
11 firearms in connection with the transaction.

12 93. On September 18, 2006, defendant VIRAMONTES sold
13 approximately 85.1 grams of actual methamphetamine to an
14 undercover law enforcement officer.

15 94. On September 20, 2006, defendant RODRIGUEZ sold
16 approximately 37.6 grams of actual methamphetamine to an
17 undercover law enforcement officer and a confidential government
18 informant.

19 95. On September 23, 2006, defendant R. GOMEZ arranged to
20 sell approximately 113 grams of methamphetamine to an undercover
21 law enforcement officer.

22 96. On September 30, 2006, defendant R. MARTINEZ told
23 undercover law enforcement officers that the Mongols "Mother
24 Chapter" required R. MARTINEZ and other Mongols to contribute an
25 additional \$2,500 of the proceeds they generated from the
26 distribution of narcotics and that the funds would be used to pay
27 the legal fees for Mongols members charged in the 2002
28 confrontation between Mongols and Hells Angels members in

Laughlin, Nevada.

97. On September 30, 2006, defendants RODRIGUEZ and GIL arranged to sell narcotics to two undercover law enforcement officers who were posing as potential Mongols members, and RODRIGUEZ offered to distribute narcotics to the officers at a lower price that he reserved for Mongols members.

98. On September 30, 2006, defendant SOTO maintained narcotics for distribution to Mongols members at the Tokio Lounge in Hollywood, California.

99. On October 1, 2006, in Hollywood, California, defendant SHAWLEY advised an undercover law enforcement officer, who was posing as a potential Mongols gang member, that patrons of the Tokio Lounge would be assaulted or killed if they "disrespected" Mongols members, and SHAWLEY subsequently attacked a patron in the parking lot of the club.

100. On October 1, 2006, defendant CONTRERAS possessed a dagger outside a residence in Montebello, California.

101. On October 5, 2006, defendant CAVAZOS led a Mongols "Sergeant-At-Arms" Meeting in El Monte, California, and directed Mongols about the plans for a Mongols "National Run" in Palm Springs, California.

102. On October 6, 2006, defendants SOTO and ZUNIGA maintained methamphetamine for distribution to Mongols members at the Mongols "National Run" in Palm Springs, California.

103. On October 13, 2006, defendant SOTO possessed a .45 caliber semi-automatic handgun and distributed narcotics at the Tokio Lounge in Hollywood, California.

104. On October 24, 2006, defendant R. LOZANO discussed

1 prior sale of methamphetamine to an undercover law enforcement
2 officer and confidential government informant, and R. LOZANO
3 offered to sell an additional one-half pound of methamphetamine
4 to the undercover officer.

5 105. On October 27, 2006, defendants RODRIGUEZ and GIL
6 arranged to sell methamphetamine to an undercover law enforcement
7 officer.

8 106. On October 29, 2006, defendants NIEVES and SOTO
9 possessed firearms in Hollywood, California.

10 107. On October 30, 2006, defendant RIOS possessed a
11 firearm in Alhambra, California.

12 108. On November 3, 2006, defendant J. GARCIA addressed
13 Mongols members at a "Church Meeting" in Los Angeles, California,
14 and advised the members that defendant CAVAZOS had warned members
15 that their telephone conversations were being monitored by law
16 enforcement and also advised that Mongols members are obligated
17 to join with other Mongols during violent confrontations.

18 109. On November 6, 2006, in San Bernardino, California,
19 defendant R. LOZANO sold approximately 113.7 grams of actual
20 methamphetamine to an undercover law enforcement officer and
21 advised the officer that the methamphetamine was the same quality
22 as the methamphetamine that had previously been sold by
23 defendants ARMENDAREZ and R. LOZANO.

24 110. On November 6, 2006, in Los Angeles County, defendant
25 SOTO arranged to provide methamphetamine to a confidential
26 government informant and advised the informant that SOTO obtained
27 the methamphetamine from the same source of supply as defendant
28 RODRIGUEZ.

1 111. On November 11, 2006, in Los Angeles, California,
2 defendant PRICE told an undercover law enforcement officer that
3 he had used a stick as a weapon against a "Hells Angels" gang
4 member.

5 112. On November 12, 2006, in Los Angeles, California,
6 defendant S. GONZALEZ forced a suspected "Hells Angels" gang
7 member to remove his shirt and surrender it to S. GONZALEZ under
8 threat of violence.

9 113. On November 13, 2006, defendants CAVAZOS, R. CAVAZOS,
10 JR., A. CAVAZOS, JR., RODRIGUEZ, RIOS, and FIGUEROA, and other
11 Mongols met at the "Ink Slingers" tattoo shop in Alhambra,
12 California, and CAVAZOS advised Mongols members that law
13 enforcement officers were in the area and that they should hide
14 their weapons or other contraband in order to prevent them from
15 being discovered by law enforcement.

16 114. On November 17, 2006, in Hollywood, California,
17 defendants R. MARTINEZ and SOTO arranged to sell methamphetamine
18 to defendant PRICE.

19 115. On November 17, 2006, in Hollywood, California, an
20 unindicted Mongols member advised an undercover officer that he
21 had beaten a rival gang member and kept that rival's severed
22 tooth taped to a microwave oven in his kitchen.

23 116. On November 18, 2006, in Los Angeles, California,
24 defendant J. GARCIA advised undercover officers who were posing
25 as potential Mongols members that they would be subject to a
26 polygraph examination as a condition to their membership in the
27 Mongols gang, based on the need to protect the gang from
28 infiltration by law enforcement.

1 117. On November 24, 2006, in Hollywood, California,
2 defendants SOTO and GIL displayed quantities of narcotics for
3 sale, and GIL arranged to sell narcotics to undercover law
4 enforcement officers.

5 117. On November 26, 2006, in Los Angeles County,
6 defendants RODRIGUEZ and GIL sold approximately 56.7 grams of
7 actual methamphetamine to an undercover law enforcement officer.

8 118. On November 28, 2006, in Riverside County, defendants
9 R. LOZANO and A. LOZANO arranged to sell stolen motorcycles to an
10 undercover law enforcement officer.

11 119. On December 1, 2006, in Montebello, California,
12 defendant CONTRERAS possessed approximately 4.4 grams of
13 methamphetamine, one-half pound of "cutting" agent, packaging
14 material, a scale, United States currency and his Mongols riding
15 vest.

16 120. On December 1, 2006, in Las Vegas, Nevada, defendant
17 CORDOVA sold approximately 246 grams of cocaine to a law
18 enforcement officer and a confidential government informant.

19 121. On December 2, 2006, in Riverside, California,
20 defendant J. GARCIA told undercover law enforcement officers that
21 J. GARCIA would be responsible for their membership in the
22 Mongols and ensuring that they were not undercover law
23 enforcement officers.

24 122. On December 2, 2006, defendant RODRIGUEZ arranged to
25 sell one pound of methamphetamine to an undercover law
26 enforcement officer at a Mongols party in San Bernardino,
27 California.

28 123. On December 4, 2006, at a Mongols "Mother Chapter"

1 meeting in West Covina, California, defendant CAVAZOS advised
2 members that he had identified 20 to 25 "front-line warriors" for
3 the Mongols who would be responsible for addressing the most
4 significant violent confrontations for the organization, and
5 CAVAZOS directed members to leave their weapons at his residence
6 in order to prevent them from being identified and seized by law
7 enforcement after the meeting.

8 124. On December 9, 2006, in Los Angeles, California,
9 defendant RIOS told an undercover law enforcement officer that
10 RIOS had chosen to join the Hollywood chapter of the Mongols in
11 order to help the Mongols take control of Hollywood as Mongols
12 territory.

13 125. On December 9, 2006, in Los Angeles, California,
14 defendant BRADEN attempted to purchase cocaine from an undercover
15 law enforcement officer.

16 126. On December 9, 2006, an unidentified Mongols member
17 offered to provide semi-automatic pistols and an AK-47 assault
18 rifle to the Mongols Chino chapter in furtherance of the criminal
19 enterprise.

20 127. On December 10, 2006, defendants BUSS, RIOS, WEDIG,
21 and BRADEN attacked and beat an African-American patron at the
22 Tokio Lounge in Hollywood, California, while shouting racist
23 slurs at the victim.

24 128. On December 15, 2006, in Los Angeles, California,
25 defendant J. GARCIA advised three undercover law enforcement
26 officers who were posing as potential Mongols members that
27 Mongols rules required them to obtain permission from J. GARCIA
28 as their chapter president before they trafficked in narcotics

1 with Mongols members, and J. GARCIA advised that he would inform
2 CAVAZOS about their narcotics transactions.

3 129. On December 17, 2006, in Maywood, California,
4 defendant OWENS discussed his narcotics sales and criminal
5 history with a confidential government informant.

6 130. On January 9, 2007, defendants BUSS and WEDIG, and
7 other unindicted co-conspirators attacked a rival "Hells Angels"
8 gang member at a "Chuck E. Cheese" restaurant in San Diego,
9 California, and forced him to surrender his gang clothing.

10 131. On January 13, 2007, in Los Angeles, California,
11 defendant J. GARCIA met with undercover law enforcement officers
12 and advised them to prepare information to present to members of
13 the Mongols "Mother Chapter" in considering them for membership.

14 132. On February 3, 2007, defendant J. GARCIA met with
15 undercover law enforcement officers posing as members of an
16 organized criminal enterprise in Chicago, Illinois, and told them
17 that the Mongols organization is a criminal gang whose members
18 pay "dues" every month to finance the operation of the
19 organization, including hiring lawyers to represent members
20 charged with the crimes of the organization.

21 133. On February 9, 2007, defendant R. LOZANO sold
22 approximately 4.9 grams of actual methamphetamine to an
23 undercover law enforcement officer in San Bernardino, California.

24 134. On February 10, 2007, in Las Vegas, Nevada, defendant
25 CORDOVA sold approximately 493.5 grams of cocaine to an
26 undercover law enforcement officer and showed the officer the
27 "brass knuckles" that he and an unindicted co-conspirator used to
28 beat a victim at a bar in Denver, Colorado.

1 135. On February 14, 2007, defendants MONTES and MELCER
2 beat L.H. to death at "Young's Tavern" in Lancaster, California.

3 136. On March 23, 2007, in San Bernardino, California,
4 defendant R. LOZANO sold approximately 14.1 grams of actual
5 methamphetamine to an undercover law enforcement officer.

6 137. On March 23, 2007, in San Bernardino, California,
7 defendant ARMENDAREZ sold approximately 55.5 grams of actual
8 methamphetamine to an undercover law enforcement officer and a
9 confidential government informant.

10 138. On April 7, 2007, defendant PONCE sold approximately
11 78 grams of actual methamphetamine to a confidential government
12 informant.

13 139. On April 7, 2007, defendant MUNZ and other
14 unidentified Mongols attacked an elderly male in Lancaster,
15 California.

16 140. On April 8, 2007, defendant MALDONADO shot M.G. and
17 Z.S. at the "Nicola's" bar in Los Angeles, California.

18 141. On April 8, 2007, defendants MUNZ, SHAWLEY, and
19 ROSELI, and other unidentified Mongols members drove defendant
20 MALDONADO to San Diego, California, in order to prevent MALDONADO
21 from being identified and apprehended by law enforcement after
22 MALDONADO shot two victims at the "Nicola's" bar in Los Angeles.

23 142. On April 10, 2007, defendant CAVAZOS led a Mongols
24 "Presidents" and "Sergeant-at-Arms" Meeting in Los Angeles,
25 California, and directed Mongols members to prepare for
26 retaliation from rival Maravilla gang members in response to the
27 April 8, 2007 shooting at the "Nicola's" bar and also addressed
28 similar confrontations between the Mongols and the Mexican Mafia,

1 also known as "La Eme."

2 143. On May 22, 2007, in Carlsbad, California, defendant
3 VIRAMONTES possessed a handgun with an obliterated serial number.

4 144. On May 23, 2007, in Los Angeles, California, defendant
5 M. GARCIA sold approximately 57.5 grams of actual methamphetamine
6 to a confidential government informant.

7 145. On May 25, 2007, by telephone using coded language,
8 defendant CHAVEZ arranged to purchase narcotics from defendant
9 RODRIGUEZ and discussed the purchase of firearms from RODRIGUEZ.

10 146. On May 25, 2007, by telephone using coded language,
11 defendant MOREIN arranged to purchase narcotics from defendant
12 RODRIGUEZ, and RODRIGUEZ stated that he would leave the narcotics
13 on the front porch of his residence for MOREIN to retrieve.

14 147. On May 25, 2007, by telephone using coded language,
15 defendant RODRIGUEZ told defendant MEDEL that defendant R.
16 CAVAZOS, JR., should direct a Mongols "prospect" to collect drug
17 proceeds from RODRIGUEZ for R. CAVAZOS, JR.

18 148. On June 2, 2007, by telephone using coded language,
19 defendant MOREIN and defendant RODRIGUEZ discussed the fact that
20 they needed to carry firearms to protect their drug-trafficking
21 activities.

22 149. On June 4, 2007, by telephone using coded language,
23 defendants RODRIGUEZ and SOLIS discussed the fact that RODRIGUEZ
24 was paying for construction work on a bar with narcotics.

25 150. On June 7, 2007, by telephone using coded language,
26 defendant CHAVEZ arranged to purchase methamphetamine and
27 ammunition from defendant RODRIGUEZ.

28 151. On June 7, 2007, defendant MOREIN distributed

1 narcotics and managed prostitutes operating from the Best Western
2 motel in Pasadena, California.

3 152. On June 9, 2007, in Los Angeles, California, defendant
4 TINOCO collected membership applications from three undercover
5 law enforcement officers posing as potential Mongols members and
6 stated that he would deliver the applications to defendant R.
7 CAVAZOS, JR., after which they would be reviewed by a private
8 investigator for the Mongols gang.

9 153. On June 9, 2007, by telephone using coded language,
10 defendant RODRIGUEZ told defendant SOLIS that defendant MOREIN
11 owed RODRIGUEZ \$4900 for narcotics and that RODRIGUEZ would kill
12 MOREIN if MOREIN did not pay this money.

13 154. On June 10, 2007, by telephone using coded language,
14 an unindicted co-conspirator told defendant RODRIGUEZ that he had
15 encountered trouble at the Luminares restaurant in Los Angeles,
16 California, and RODRIGUEZ told the unindicted co-conspirator that
17 he was on his way and was prepared to start shooting when he
18 arrived.

19 155. On July 11, 2007, by telephone using coded language,
20 defendant M. GARCIA arranged to obtain methamphetamine from
21 defendant RODRIGUEZ for \$4000.

22 156. On June 12, 2007, in Los Angeles, California,
23 defendant J. GARCIA led a meeting of the Mongols Cypress Park
24 chapter, read the Mongols "constitution," and explained the
25 "rules" of Mongols membership to the three undercover law
26 enforcement officers posing as potential members of the Mongols
27 gang.

28 157. On June 13, 2007, by telephone using coded language,

1 defendant RODRIGUEZ spoke to a construction worker and threatened
2 to shoot him in his head.

3 158. On June 13, 2007, by telephone using coded language,
4 defendant RODRIGUEZ told defendant W. RAMIREZ that RODRIGUEZ had
5 five kilograms of cocaine available at a price of \$13,700 per
6 kilogram.

7 159. On June 16, 2007, by telephone using coded language,
8 defendant CHAVEZ arranged to purchase approximately 113 grams of
9 methamphetamine from defendant RODRIGUEZ for \$2800.

10 160. On June 16, 2007, in Los Angeles, California,
11 defendants CAVAZOS, MUNZ and J. GARCIA addressed Mongols at an
12 "all members" meeting, and CAVAZOS stated that the "Hells Angels"
13 president had called CAVAZOS and begged him to prevent a
14 confrontation between the Mongols and the Hells Angels gangs.

15 161. On June 20, 2007, by telephone using coded language,
16 defendant RODRIGUEZ directed defendant MOREIN to deliver \$3000 in
17 drug proceeds to defendant TRUJILLO.

18 162. On June 21, 2007, by telephone using coded language,
19 defendant W. RAMIREZ offered to sell kilograms of cocaine to
20 RODRIGUEZ for \$12,500 per kilogram.

21 163. On June 23, 2007, in San Diego County, California,
22 defendant MUNZ directed an unidentified co-conspirator to
23 administer a polygraph examination to three undercover law
24 enforcement officers as a condition to their membership in the
25 Mongols gang.

26 164. On June 24, 2007, by telephone using coded language,
27 defendant MOREIN told defendant RODRIGUEZ that an "Avenues" gang
28 member had threatened to collect "taxes" from MOREIN because

1 MOREIN was selling methamphetamine in territory controlled by the
2 Avenues gang.

3 165. On June 24, 2007, by telephone using coded language,
4 defendant RODRIGUEZ told an unindicted co-conspirator that
5 RODRIGUEZ needed to kill a rival Avenues gang member because the
6 Avenues gang member had attempted to "tax" him for selling
7 methamphetamine.

8 166. On June 24, 2007, in Los Angeles, California,
9 defendant J. GARCIA told undercover law enforcement officers that
10 "La Eme" representatives had attempted to collect "taxes" from
11 the Mongols because they were engaged in narcotics trafficking
12 and that J. GARCIA had not wanted to pay, but that he had to
13 support his "brother" Mongols.

14 167. On June 26, 2007, by telephone using coded language,
15 defendant RODRIGUEZ told an unindicted co-conspirator that he had
16 four handguns for sale.

17 168. On June 29, 2007, by telephone using coded language,
18 defendant MOREIN told defendants RODRIGUEZ and GIL that he had
19 been threatened during a drug transaction, and GIL stated that he
20 would determine if the persons who threatened MOREIN were part of
21 the Mexican Mafia.

22 169. On June 30, 2007, by telephone using coded language,
23 defendant RODRIGUEZ offered to sell a shotgun to an unidentified
24 co-conspirator and said that he needed to obtain more handguns.

25 170. On June 30, 2007, by telephone using coded language,
26 defendant RODRIGUEZ arranged to sell "eight-balls" of
27 methamphetamine to an unidentified co-conspirator.

28 171. On July 1, 2008, in Hollywood, California, defendant

1 SOTO told an undercover law enforcement officer that SOTO and
2 other Mongols had been "hunting" members of the "Hells Angels"
3 biker gang in Hollywood, California, and physically attacking
4 them when possible.

5 172. On July 5, 2007, in Los Angeles, California, defendant
6 J. GARCIA discussed his efforts to establish the Cypress Park
7 "chapter" of the Mongols gang and conflicts with the rival
8 Cypress park street gang.

9 173. On July 5, 2007, by telephone using coded language, an
10 unidentified co-conspirator arranged to purchase approximately 28
11 grams of methamphetamine from defendant RODRIGUEZ for \$700, and
12 RODRIGUEZ directed defendant TRUJILLO to deliver it for him.

13 174. On July 7, 2007, in Los Angeles, California,
14 defendants CAVAZOS, R. CAVAZOS, JR., and MUNZ and other
15 unidentified Mongols gang members rewarded defendant MALDONADO
16 with authorization to display a Mongol "full patch" insignia
17 tattooed on his head for having shot two members of the rival
18 Maravilla gang on April 8, 2007.

19 175. On July 10, 2007, by telephone using coded language,
20 defendant RODRIGUEZ directed defendant MOREIN to deliver \$1500 in
21 drug proceeds to RODRIGUEZ's residence.

22 176. On July 13, 2007, by telephone using coded language,
23 defendant RODRIGUEZ directed defendant MEDEL to collect drug
24 proceeds from an unindicted co-conspirator.

25 177. On July 14, 2007, in Los Angeles, California,
26 defendant RODRIGUEZ offered to sell methamphetamine to an
27 undercover law enforcement officer.

28 178. On July 14, 2007, by telephone using coded language,

1 defendant RODRIGUEZ told defendant MEDEL that RODRIGUEZ had to
2 take a gun from defendant TRUJILLO because TRUJILLO had been
3 randomly shooting at people on the freeway.

4 179. On July 15, 2007, by telephone using coded language,
5 defendant GIL arranged to purchase methamphetamine from defendant
6 RODRIGUEZ and retrieve it from RODRIGUEZ's residence.

7 180. On July 16, 2007, by telephone using coded language,
8 defendant FIGUEROA told defendant RODRIGUEZ that an unidentified
9 co-conspirator had failed to pay him for methamphetamine, and
10 RODRIGUEZ stated that the Mongols would "teach him a lesson."

11 181. On July 17, 2007, by telephone using coded language,
12 defendant A. CAVAZOS, JR., asked to obtain methamphetamine from
13 defendant FIGUEROA.

14 182. On July 17, 2007, by telephone using coded language,
15 defendant RODRIGUEZ told defendant A. CAVAZOS, JR., that
16 RODRIGUEZ believed he was being watched by federal law
17 enforcement officers and might need to flee the area.

18 183. On July 17, 2007, by telephone using coded language,
19 defendant VALLE told defendant RODRIGUEZ that VALLE would use a
20 stolen credit card to pay VALLE's telephone bill.

21 184. On July 17, 2007, by telephone using coded language,
22 defendant RODRIGUEZ directed defendant MOREIN to locate an
23 unidentified co-conspirator in order to obtain a firearm for
24 RODRIGUEZ.

25 185. On July 19, 2007, by telephone using coded language,
26 defendant RODRIGUEZ sold two handguns to an unidentified co-
27 conspirator, and RODRIGUEZ told the co-conspirator that defendant
28 SOLIS would retrieve one of the guns immediately.

1 186. On July 19, 2007, defendants CAVAZOS, R. CAVAZOS, JR.,
2 H. GONZALEZ, RODRIGUEZ, SOTO, MUNOZ, J. GARCIA, R. MARTINEZ, R.
3 LOZANO, and A. LOZANO, and others conducted a Mongols
4 "Presidents" and "Sergeant-at-Arms" meeting in Los Angeles
5 County, California, and CAVAZOS told members that they needed to
6 demonstrate the "strength and muscle" of the Mongols and
7 described the expansion of the Mongols gang into other states
8 across the nation, and CAVAZOS discussed the need to use violence
9 to expand the authority of the Mongols into new areas not
10 previously controlled by the Mongols.

11 187. On July 19, 2007, by telephone using coded language,
12 defendants RODRIGUEZ and SOLIS arranged to obtain a gun for
13 defendant FIGUEROA.

14 188. On July 22, 2007, in Los Angeles, California,
15 defendant J. GARCIA advised an undercover law enforcement officer
16 that J. GARCIA was responsible for "taxing" Mongols members who
17 are put out of the organization in "bad standing," which would
18 include seizing the former member's motorcycle.

19 189. On July 22, 2007, by telephone using coded language,
20 defendants RODRIGUEZ and SOLIS discussed using a stolen gift card
21 to purchase items from Home Depot.

22 190. On July 22, 2007, by telephone using coded language,
23 defendant AZANEDO advised defendant RODRIGUEZ that he had
24 attacked an African-American man.

25 191. On July 23, 2007, by telephone using coded language,
26 defendant AZANEDO offered to sell a .40 caliber handgun that
27 AZANEDO had used to commit a murder to defendant RODRIGUEZ for
28 \$650, and RODRIGUEZ said that AZANEDO could still use the gun for

1 the Mongols North East Los Angeles Chapter.

2 192. On July 23, 2007, by telephone using coded language,
3 defendant RODRIGUEZ told defendant MEDEL that defendant M. GARCIA
4 had been arrested with methamphetamine that RODRIGUEZ had
5 provided to M. GARCIA and that RODRIGUEZ had lost \$7000 as a
6 result.

7 193. On July 24, 2007, by telephone using coded language,
8 defendant RODRIGUEZ told defendant CHAVEZ that defendant AZANEDO
9 would bring him a .40 caliber handgun that AZANEDO had used to
10 commit a murder.

11 194. On July 25, 2007, by telephone using coded language,
12 defendant CAVAZOS told defendant WILSON that CAVAZOS had learned
13 that about 50 "Hells Angels" members were in Nebraska and that
14 the rival "Sons of Silence" gang had issued an order to shoot
15 Mongols members on sight.

16 195. On July 26, 2007, by telephone using coded language,
17 defendant VALLE asked to obtain methamphetamine from defendant
18 RODRIGUEZ, and RODRIGUEZ told VALLE that he would leave it at his
19 residence with defendant TRUJILLO.

20 196. On July 27, 2007, defendants CAVAZOS and MUNZ directed
21 Mongols members to attack rival gang members in order to expand
22 the authority of the Mongols into Florida.

23 197. On July 27, 2007, defendant MELGOZA physically
24 attacked and shot at patrons of "Sevilla's" bar in Riverside,
25 California, and then attempted to kill patrons by driving over
26 them in the parking lot of the bar.

27 198. On July 27, 2007, by telephone using coded language,
28 defendant GIL offered to steal items from cars for defendant

1 RODRIGUEZ when GIL worked as a tow-truck driver.

2 199. On July 27, 2007, by telephone using coded language,
3 defendant CAVAZOS asked defendant MUNZ to attend a meeting with
4 CAVAZOS in Reno, Nevada.

5 200. On July 27, 2007, by telephone using coded language,
6 defendant CAVAZOS discussed arrangements to meet in Reno, Nevada,
7 with defendant WILSON, and WILSON also discussed the need to
8 avoid meeting in casinos where they could be observed on video
9 cameras.

10 201. On July 28, 2007, by telephone using coded language,
11 defendant MELGOZA told defendant RODRIGUEZ that MELGOZA had shot
12 at patrons at "Sevilla's" bar in Riverside, California, and then
13 attempted to drive over people in the parking lot, and MELGOZA
14 stated that he hoped to be able to read the newspaper the next
15 day and confirm that people were dead.

16 202. On July 31, 2007, by telephone using coded language,
17 defendants R. CAVAZOS, JR., and ROSELI issued an "all call"
18 message to Mongols to advise that Mongols chapter dues were
19 required to be delivered to the Mother Chapter the next day and
20 that late chapters would be fined.

21 203. On August 1, 2007, by telephone using coded language,
22 defendants CAVAZOS and WILSON discussed forming an alliance with
23 the "Pagans" gang as a means to combat the rival "Sons of
24 Silence" gang in Indiana.

25 204. On August 2, 2007, by telephone using coded language,
26 defendant CAVAZOS advised defendant WILSON about forming a new
27 Mongols chapter in Nevada and told WILSON that WILSON did not
28 need to cover his swastika tattoos, but that Mongols had to wait

1 five years before they could receive a Mongols "full patch"
2 tattoo.

3 205. On August 2, 2007, by telephone using coded language,
4 defendant MUNZ told defendant CAVAZOS that he had recruited three
5 new members with applications, but that the new members did not
6 have their money ready at that time.

7 206. On August 7, 2007, by telephone using coded language,
8 an unidentified co-conspirator advised defendant RODRIGUEZ that
9 he would seize defendant M. GARCIA's motorcycle and give it to
10 RODRIGUEZ to compensate RODRIGUEZ for the methamphetamine that
11 was seized from M. GARCIA when he was arrested.

12 207. On August 10, 2007, defendant RODRIGUEZ told two
13 unindicted co-conspirators that they needed to carry firearms
14 when they were with defendant FIGUEROA.

15 208. On August 11, 2007, by telephone using coded language,
16 defendant MUNOZ advised defendant CAVAZOS that a Mongols member
17 had been arrested with a gun.

18 209. On August 14, 2007, by telephone, defendant RODRIGUEZ
19 told defendant VALLE that RODRIGUEZ would sell VALLE a chrome
20 Smith & Wesson handgun for \$500.

21 210. On August 18, 2007, in Los Angeles County, an
22 unindicted co-conspirator advised Mongols members and associates
23 that defendant CAVAZOS had directed Mongols members from
24 California and other states to respond to threats from a rival
25 gang in Indiana.

26 211. On August 18, 2007, Mongols members from Indiana,
27 Oklahoma and California used guns, knives, brass knuckles,
28 bullet-proof vests, and baseball bats to seize control of bars

1 and bar patrons and then attacked rival "Sons of Silence" and
2 "Outlaws" Motorcycle gang members in Indianapolis, Indiana.

3 212. On August 19, 2007, by telephone using coded language,
4 defendant WILSON advised defendant CAVAZOS that a Mongols member
5 had been arrested in Oklahoma with a gun.

6 213. On August 25, 2007, by telephone using coded language,
7 defendant MUNZ advised defendant CAVAZOS that Mongols members in
8 Canada were impatient with the issuance of a Mongols "code 55"
9 order and believed that the Mongols were not responding with
10 force to actions against the gang, and MUNZ also said that he had
11 discussed "snitching" with defendant WILSON.

12 214. On August 25, 2007, by telephone using coded language,
13 defendants CAVAZOS and R. CAVAZOS, JR., ordered Mongols to stay
14 out of Norwalk, California, that day, in order to avoid contact
15 with law enforcement.

16 215. On August 27, 2007, by telephone using coded language,
17 defendant MOREIN told defendant RODRIGUEZ that MOREIN had \$6000
18 in drug proceeds and 30 stolen credit cards that he intended to
19 use at the Burbank mall.

20 216. On August 27, 2007, by telephone using coded language,
21 defendant RODRIGUEZ directed defendant CHAVEZ to retrieve
22 methamphetamine, and CHAVEZ asked if CHAVEZ should maintain guns
23 that RODRIGUEZ had provided to him.

24 217. On August 29, 2007, by telephone using coded language,
25 an unidentified co-conspirator asked permission from defendant
26 CAVAZOS to collect legal defense funds for defendant M. GARCIA
27 after his arrest.

28 218. On August 30, 2007, in Los Angeles, California,

1 defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, and J. GARCIA,
2 and others attended a Mongols "Treasurers" meeting, and CAVAZOS
3 advised Mongols that he would meet with prospective members in
4 New York and Florida, but that they should anticipate violent
5 confrontations with rival gang members already established in
6 other states.

7 219. On August 31, 2007, by telephone using coded language,
8 defendant AZANEDO arranged to purchase narcotics from defendant
9 RODRIGUEZ for distribution.

10 220. On September 1, 2007, in Los Angeles, California,
11 defendant RIOS discussed recent assaults committed by the Mongols
12 at the "Tokio" bar in Hollywood, California.

13 221. On September 11, 2007, by telephone, defendants
14 CAVAZOS and TINOCO discussed arrangements to send Mongols patches
15 to members in chapters outside California and the receipt of
16 proceeds from out-of-state chapters.

17 222. On September 13, 2007, defendants CAVAZOS, R. CAVAZOS,
18 JR., A. CAVAZOS, JR., MUNZ, and WILSON traveled to Atlantic City,
19 New Jersey, in order to form an alliance with the "Pagans"
20 motorcycle gang and thereby expand the authority of the Mongols,
21 and CAVAZOS advised persons at the meeting about the authority of
22 the Mongols, weapons available to the Mongols, as well as the
23 distribution of methamphetamine and firearms by Mongols members.

24 223. On September 15, 2007, by telephone using coded
25 language, defendant MELGOZA agreed to broker a narcotics
26 transaction for defendant RODRIGUEZ and told RODRIGUEZ that
27 MELGOZA would need to get a scale before meeting to conduct the
28 transaction.

1 224. On September 18, 2007, in San Bernardino, California,
2 defendants R. LOZANO, REYNOLDS, and I. PADILLA, and an unindicted
3 co-conspirator armed themselves with firearms and arranged to
4 purchase 33 kilograms of cocaine with an undercover law
5 enforcement officer and a confidential government informant.

6 225. On September 20, 2007, by telephone using coded
7 language, defendant CAVAZOS asked defendant H. GONZALEZ about the
8 collection of payments from Mongols members and the availability
9 of funds collected from Mongols.

10 226. On September 21, 2007, by telephone, defendant TINOCO
11 told defendant CAVAZOS that TINOCO had \$740 available for CAVAZOS
12 to use to travel to Palm Springs, California, and that TINOCO
13 would coordinate with defendant NIEVES to deliver the money to
14 CAVAZOS.

15 227. On September 21, 2007, by telephone using coded
16 language, defendant L. PADILLA told defendant RODRIGUEZ that L.
17 PADILLA's source of supply would be transporting cocaine into the
18 United States from Sinaloa, Mexico.

19 228. On September 27, 2007, defendants CAVAZOS and R.
20 CAVAZOS, JR., addressed Mongols members at a "Sergeant-At-Arms"
21 meeting in Whittier, California, and instructed them about the
22 conduct of the Mongols "national run" in Palm Springs,
23 California.

24 229. On October 1, 2007, defendant H. GONZALEZ collected
25 "dues" from Mongols chapter "treasurers" at his residence in El
26 Monte, California.

27 230. On October 4, 2007, by telephone using coded language,
28 defendant FIGUEROA discussed proceeds from drug trafficking with

1 defendant RODRIGUEZ.

2 231. On October 6, 2007, in Palm Springs, California,
3 defendant CAVAZOS identified defendant WILSON as his "right-hand
4 man" for the Mongols' anticipated expansion into the East Coast
5 and awarded Mongols "Respect Few Fear None" patches to Mongols
6 members, including defendants H. GONZALEZ, WILSON, RIOS, and
7 MEDEL, for having committed acts of violence on behalf of the
8 Mongols.

9 232. On October 6, 2007, defendants CAVAZOS, MUNZ, and W.
10 RAMIREZ addressed Mongols at the Mongols "national run" in Palm
11 Springs, California, and recommended that three undercover law
12 enforcement officers be accepted as prospective members of the
13 Mongols.

14 233. On October 7, 2007, in Palm Springs, California,
15 defendants CAVAZOS, MUNZ, and WILSON issued a "Respect Few Fear
16 None" patch and a "Black Heart" patch to a Mongols member as a
17 reward for that member having engaged in a confrontation with a
18 rival gang member on behalf of the Mongols in Indianapolis,
19 Indiana.

20 234. On October 9, 2007, by telephone using coded language,
21 defendant CAVAZOS discussed arrangements to obtain funds to pay
22 for the legal representation of defendant MALDONADO after
23 MALDONADO had attempted to kill rival Mara Villa gang members on
24 April 8, 2007, and H. GONZALEZ stated that there were many issues
25 to address at the next "Mother Chapter" meeting related to the
26 shooting.

27 235. On October 10, 2007, by telephone using coded
28 language, defendant W. RAMIREZ asked defendant RODRIGUEZ for a

1 quantity of narcotics to show to a prospective drug customer, and
2 RODRIGUEZ asked for a payment of \$6200.

3 236. On October 10, 2007, by telephone using coded
4 language, defendant CAVAZOS asked defendant MUNOZ about the
5 status of payments from Mongols members owed to CAVAZOS, so that
6 CAVAZOS could pay his taxes.

7 237. On October 11, 2007, by telephone using coded
8 language, defendant MOREIN told defendant RODRIGUEZ that MOREIN
9 would deliver cash to RODRIGUEZ so that RODRIGUEZ could give it
10 to defendant CAVAZOS.

11 238. On October 13, 2007, by telephone using coded
12 language, defendant W. RAMIREZ told defendant RODRIGUEZ that he
13 was interested in purchasing eight kilograms of cocaine for
14 \$16,000 per kilogram.

15 239. On October 13, 2007, by telephone using coded
16 language, defendant AZANEDO arranged to sell a gun to defendant
17 RODRIGUEZ.

18 240. On October 14, 2007, by telephone using coded
19 language, defendant GUTIERREZ told defendant RODRIGUEZ that
20 GUTIERREZ had a gun.

21 241. On October 14, 2007, by telephone using coded
22 language, defendant CAVAZOS arranged to retrieve Mongols payments
23 from defendant H. GONZALEZ, and H. GONZALEZ told CAVAZOS that H.
24 GONZALEZ needed to cash a money order and check a post office box
25 for additional funds.

26 242. On October 18, 2007, defendant SOTO possessed two
27 semi-automatic handguns, narcotics, and a scale at his residence
28 in Pacoima, California.

1 243. On October 19, 2007, by telephone using coded
2 language, defendant GUTIERREZ arranged to obtain narcotics from
3 defendant RODRIGUEZ.

4 244. On October 20, 2007, defendant WILSON met with members
5 of a rival gang in Daytona Beach, Florida, and arranged to
6 purchase firearms from them.

7 245. On October 21, 2007, by telephone using coded
8 language, defendant AZANEDO asked to purchase narcotics from
9 defendant RODRIGUEZ, and RODRIGUEZ asked AZANEDO why he had not
10 attempted to purchase narcotics from defendant FIGUEROA.

11 246. On October 22, 2007, by telephone using coded
12 language, defendant RODRIGUEZ told an unindicted co-conspirator
13 that a pound of pure methamphetamine would cost \$17,000.

14 247. On October 22, 2007, defendant MOREIN possessed a
15 loaded handgun and methamphetamine in Los Angeles County,
16 California.

17 248. On October 22, 2007, by telephone using coded
18 language, defendant RODRIGUEZ told defendant L. PADILLA that
19 RODRIGUEZ had been offered cocaine for \$16,000 per kilogram, and
20 L. PADILLA stated that "Bird" had been selling low quality
21 narcotics but that L. PADILLA's source would be transporting
22 narcotics from Sinaloa, Mexico, that weekend.

23 249. On October 23, 2007, by telephone using coded
24 language, defendant RODRIGUEZ directed defendant SOLIS to obtain
25 guns.

26 250. On October 28, 2007, by telephone using coded
27 language, defendant RODRIGUEZ asked an unindicted Mongols member
28 if he was carrying his firearm with him.

1 251. On November 1, 2007, by telephone using coded
2 language, defendant AZANEDO asked to purchase narcotics from
3 defendant RODRIGUEZ.

4 252. On November 6, 2007, in Azusa, California, defendants
5 SOLIS and TRUJILLO robbed M.R. of home theater equipment, using a
6 knife and handgun.

7 253. On November 6, 2007, defendant TINOCO provided patches
8 to defendant J. GARCIA to be awarded to new Mongol members.

9 254. On November 10, 2007, in Whittier, California,
10 defendants R. MARTINEZ and NIEVES met with undercover law
11 enforcement officers to explain the requirements of their
12 "prospect" status, and defendant PRICE attempted to compel one of
13 the officers to ingest methamphetamine.

14 255. On November 11, 2007, defendant RODRIGUEZ possessed
15 ammunition at the "Sportsman" bar in Hacienda Heights,
16 California, and an unindicted co-conspirator directed undercover
17 law enforcement officers, posing as Mongols "prospects," and
18 defendant ANGULO to act as security during a Mongols meeting
19 being conducted in the bar.

20 256. On November 16, 2007, by telephone using coded
21 language, defendant TRUJILLO arranged to provide narcotics to an
22 unindicted Mongols member.

23 257. On November 16, 2007, defendant NIEVES directed
24 undercover law enforcement officers, posing as Mongols
25 "prospects," to attend a Mongols function at the "Dawg House"
26 bar, and defendant LEMAY attempted to distribute cocaine while
27 possessing a firearm.

28 258. On November 18, 2007, in Los Angeles, California,

1 defendant J. GARCIA advised an undercover law enforcement officer
2 that the Mongols would be collecting funds to pay for an attorney
3 to represent defendant MALDONADO, because the April 8, 2007
4 shooting at the Nicholas bar was conducted on behalf of the
5 Mongols.

6 259. On November 18, 2007, by telephone using coded
7 language, defendant MUNOZ asked an unidentified Mongols member if
8 the Mongols would be attacking members of a rival gang who ride
9 sport motorcycles.

10 260. On November 20, 2007, in Los Angeles, California, an
11 unindicted co-conspirator permitted Mongols members to use the
12 "Sportsman" bar after hours in order to conduct a Mongols meeting
13 and directed undercover law enforcement officers posing as
14 Mongols "prospects" to maintain security for the bar.

15 261. On November 21, 2007, in Los Angeles, California,
16 defendant MUNOZ possessed and attempted to transport
17 approximately 66.8 grams of actual methamphetamine.

18 262. On November 21, 2007, by telephone using coded
19 language, defendant MUNOZ told defendants W. RAMIREZ and
20 RODRIGUEZ that he had been arrested with methamphetamine.

21 263. On November 22, 2007, by telephone using coded
22 language, defendant MUNOZ told defendant CAVAZOS that he had been
23 arrested and that narcotics investigators had attempted to
24 interview him.

25 264. On November 24, 2007, in Los Angeles, California,
26 Mongols members retrieved defendant J. GONZALEZ's motorcycle from
27 his in-laws' residence in Los Angeles, California, and the
28 Mongols required the family members to pay \$500 to repair the

1 motorcycle tires, which had been flattened.

2 265. On November 28, 2007, in Los Angeles, California,
3 defendant J. GARCIA advised an undercover law enforcement agent,
4 who was posing as a Mongols "prospect," that defendant CAVAZOS
5 was attempting to negotiate with "La Eme" to compensate them for
6 the narcotics-trafficking being conducted by Mongols members, and
7 that CAVAZOS had met with "La Eme" representatives at "City Walk"
8 in Studio City to offer them a one-time "tax" payment, but that
9 the offer had been rejected and "La Eme" had ordered a "green-
10 light" on the Mongols.

11 266. On November 30, 2007, by telephone using coded
12 language, defendant SAVALA asked defendant FIGUEROA if SAVALA
13 could retrieve a firearm from FIGUEROA's residence.

14 267. On December 1, 2007, defendant ANGULO traveled with an
15 undercover law enforcement officer and transported cash collected
16 from Mongols members from defendant TINOCO's residence to the
17 residence of defendant H. GONZALEZ in City of Industry,
18 California.

19 268. On December 1, 2007, defendants SOTO and WEDIG
20 distributed narcotics at the "Crazy Girls" club in Hollywood,
21 California.

22 269. On December 1, 2007, in Los Angeles, California,
23 defendants ARMENDAREZ and R. LOZANO arranged to sell
24 methamphetamine and marijuana to an undercover law enforcement
25 officer who was posing as a narcotics trafficker.

26 270. On December 1, 2007, by telephone using coded
27 language, defendant L. PADILLA told defendant RODRIGUEZ that L.
28 PADILLA had narcotics for RODRIGUEZ and that RODRIGUEZ should

1 call him on a different telephone.

2 271. On December 2, 2007, defendants VIRAMONTES, SHAWLEY,
3 and GIL distributed narcotics at the "Hustler" club in Colton,
4 California, and an unidentified Mongols member assaulted a
5 waitress in the club.

6 272. On December 5, 2007, by telephone using coded
7 language, defendants RODRIGUEZ and SOLIS discussed the use of
8 stolen credit cards and gift cards.

9 273. On December 6, 2007, by telephone using coded
10 language, defendant SAVALA arranged to distribute narcotics to
11 defendant FIGUEROA.

12 274. On December 7, 2007, by telephone using coded
13 language, defendant RODRIGUEZ asked to purchase a gun from
14 defendant AZANEDO.

15 275. On December 9, 2007, defendant NIEVES instructed
16 Mongols "prospects," including undercover law enforcement
17 officers posing as Mongols "prospects," to arm themselves as a
18 security force at a location near defendant CAVAZOS' residence in
19 West Covina, California.

20 276. On December 9, 2007, defendant PRICE directed
21 undercover officers posing as Mongols "prospects" to arm
22 themselves against rival gang members outside the "House Lounge"
23 in Hollywood, California.

24 277. On December 11, 2007, by telephone using coded
25 language, defendant RODRIGUEZ directed defendant FIGUEROA to
26 bring a gun with him to a meeting.

27 278. On December 11, 2007, defendant RODRIGUEZ offered to
28 provide a gun to an unidentified co-conspirator for \$600.

1 279. On December 11, 2007, defendant FIGUEROA possessed a
2 stolen handgun.

3 280. On December 11, 2007, defendant PRICE provided a
4 handgun to an unidentified Mongols "prospect" who was serving as
5 security outside a "Church Meeting" of the Mongols Marrano Beach
6 chapter.

7 281. On December 13, 2007, defendant RODRIGUEZ possessed a
8 loaded Glock Model 30 .45 caliber semi-automatic handgun, a Llama
9 .45 caliber semi-automatic handgun, a Glock 9 mm handgun and
10 Mongols clothing, and defendant L. PADILLA delivered
11 approximately 112 grams of methamphetamine to RODRIGUEZ and
12 defendant TRUJILLO at their residence in Arcadia, California.

13 282. On December 13, 2007, by telephone using coded
14 language, defendant L. PADILLA told defendant RODRIGUEZ that L.
15 PADILLA had been arrested and asked RODRIGUEZ to meet with him,
16 but to sneak him in through a rear entrance.

17 283. On December 14, 2007, defendant RODRIGUEZ told
18 defendants A. CAVAZOS, JR., and MEDEL that he had been arrested
19 the previous day and that a firearm and narcotics had been
20 recovered from his residence.

21 284. On December 14, 2007, by telephone using coded
22 language, defendants MEDEL and FIGUEROA discussed the fact that
23 FIGUEROA had been arrested with a weapon and scale at his
24 residence and that FIGUEROA was the suspect in a murder
25 investigation, and MEDEL told RODRIGUEZ that defendant L. PADILLA
26 had also been arrested with narcotics.

27 285. On December 14, 2007, by telephone using coded
28 language, defendant AZANEDO arranged to distribute narcotics to

1 defendant FIGUEROA.

2 286. On December 16, 2007, an undercover law enforcement
3 officer drove defendant MCCAULEY from Los Angeles International
4 Airport to CAVAZOS' residence in West Covina, California, and
5 MCCAULEY told the undercover officer that he would lose his
6 position in the military if his superiors learned that he was a
7 member of the Mongols.

8 287. On December 16, 2007, defendant RODRIGUEZ told
9 undercover law enforcement officers, who were posing as Mongols
10 "prospects," that he had influence within the Mongols and a close
11 relationship with defendant CAVAZOS, which would enable him to
12 help the officers in the Mongols.

13 288. On December 16, 2007, defendant NIEVES possessed a
14 handgun in Reno, Nevada.

15 289. On December 18, 2007, defendant MUNZ and other
16 unindicted Mongols offered to provide weapons to Mongols during a
17 Christmas party in Reno, Nevada.

18 290. On December 21, 2007, by telephone using coded
19 language, defendant WILSON arranged to obtain 20 patches for new
20 Mongols members and discussed a plan to add new members in Italy.

21 291. On December 21, 2007, in West Covina, California,
22 defendant R. LOZANO told an undercover law enforcement officer,
23 who was posing as a narcotics trafficker, that R. LOZANO had a
24 source of supply for methamphetamine who could provide higher
25 quality narcotics than defendant ARMENDAREZ did.

26 292. On December 22, 2007, defendants CAVAZOS, R. CAVAZOS,
27 JR., A. CAVAZOS, JR., H. GONZALEZ, CANALES, NIEVES, and MUNOZ,
28 and other Mongols conducted a Mongols "Mother Chapter" meeting at

1 CAVAZOS' residence in West Covina, California, while Mongols
2 "prospects" were required to maintain an armed presence outside
3 the residence.

4 293. On December 22, 2007, by telephone using coded
5 language, defendant SAVALA arranged to collect narcotics proceeds
6 from defendant FIGUEROA.

7 294. On December 26, 2007, by telephone using coded
8 language, defendant WILSON directed an unidentified Mongols
9 member to beat an individual posing as a Mongol member in Canada.

10 295. On December 27, 2007, by telephone using coded
11 language, defendant MUNZ asked defendant CAVAZOS about the
12 availability of funds for the defense of Mongols facing criminal
13 charges, and CAVAZOS stated that he would discuss the request
14 with defendant H. GONZALEZ.

15 297. On December 27, 2007, by telephone using coded
16 language, defendant H. GONZALEZ told defendant CAVAZOS that the
17 Mongols would be collecting \$40 from all members to pay legal
18 costs for Mongols members who were facing charges for crimes
19 committed on behalf of the Mongols.

20 298. On December 28, 2007, in El Monte, California,
21 defendants H. GONZALEZ and TINOCO collected cash payments from
22 Mongols members to pay defense attorneys to represent the Mongols
23 and to pay cellular telephone "dues."

24 299. On December 28, 2007, in Los Angeles, California,
25 defendant CONTRERAS told an undercover law enforcement officer,
26 who was posing as a Mongols "prospect," that he maintained a
27 stolen motorcycle.

28 300. On December 28, 2007, in Los Angeles, California,

1 defendant NIEVES advised undercover law enforcement officers that
2 NIEVES and other Mongols had been "taxing" a former Mongol and
3 also warned the undercover officers that he had been alerted by a
4 Nextel employee that federal law enforcement officers had begun
5 "tapping" the telephones of Mongols members.

6 301. On December 30, 2007, defendant NIEVES possessed a
7 Smith & Wesson .40 caliber handgun.

8 302. On January 2, 2008, by telephone using coded language,
9 defendant WILSON sought authorization from defendant H. GONZALEZ
10 to attack J.D.

11 303. On January 7, 2008, by telephone using coded language,
12 defendant WILSON told defendant MUNZ that he planned to admit
13 defendants BUSS and MCCAULEY into the Mongols "World" chapter and
14 that he planned to expand the Mongols organization into every
15 state in the United States.

16 304. On January 7, 2008, by telephone, defendant CAVAZOS
17 told F.G. that he would provide funds to pay for defendant
18 MALDONADO's legal fees following MALDONADO's attempt to kill two
19 Maravilla gang members, and CAVAZOS also stated that a gun used
20 by MALDONADO in the shooting had been found in a Mongols members'
21 car.

22 305. On January 10, 2008, by telephone using coded
23 language, defendant WILSON directed an unidentified Mongols
24 member to beat rival "Pagan" gang members in Baltimore, Maryland.

25 306. On January 19, 2008, by telephone using coded
26 language, defendants MUNZ and WILSON discussed the rules of
27 membership in the Mongols, including the fact that all decisions
28 must be approved through the "Mother Chapter" members, and WILSON

1 stated that speaking disrespectfully about the Mongols is a
2 punishable offense.

3 307. On January 19, 2008, defendants CAVAZOS, R. CAVAZOS,
4 JR., and ROSELI ejected a former Mongol from the "House Lounge"
5 in Maywood, California, for his connection to the Mexican Mafia.

6 308. On January 19, 2008, defendant R. LOZANO arranged to
7 sell methamphetamine he obtained from defendant RIVERA to an
8 undercover law enforcement officer, and R. LOZANO later discussed
9 plans to obtain law enforcement uniforms in order to conduct the
10 robbery of a residence where Mongols members believed cocaine had
11 been stored.

12 309. On January 19, 2008, defendant CAVAZOS addressed
13 Mongols members at the House Lounge in Maywood, California, and
14 claimed that the Mongols had expanded into foreign countries and
15 all fifty states.

16 310. On January 20, 2008, by telephone using coded
17 language, defendant WILSON told defendant H. GONZALEZ that
18 defendant CAVAZOS had directed WILSON to remove Mongols patches
19 from a former Mongols member.

20 311. On January 21, 2008, by telephone using coded
21 language, defendant MUNZ instructed a Mongols "prospect" that he
22 would be required to report to defendants CHEVILLE and an
23 unindicted co-conspirator everyday, as a condition to his re-
24 instated Mongols membership.

25 312. On January 26, 2008, defendants CAVAZOS and NIEVES
26 attended a Mongols meeting at "Kelly's Pub" in Arcadia,
27 California, and CAVAZOS possessed a firearm during the meeting.

28 313. On January 26, 2008, in Arcadia, California, defendant

1 ARMENDAREZ discussed the distribution of narcotics with an
2 undercover law enforcement officer, and defendant R. LOZANO
3 discussed arrangements to pay the undercover officer for a
4 narcotics transaction conducted with the president of the Mongols
5 Okane Park chapter.

6 314. On January 26, 2008, by telephone using coded
7 language, defendant WILSON advised defendant CAVAZOS that a
8 Mongols member had been forced to surrender his motorcycle to the
9 gang.

10 315. On January 28, 2008, defendant R. LOZANO arranged to
11 purchase one half-pound of methamphetamine from an undercover law
12 enforcement officer at the "Laugh Factory" in Hollywood,
13 California.

14 316. On February 1, 2008, defendant NIEVES threatened to
15 shoot rival gang members at the "Katie Jakes" bar in Covina,
16 California.

17 317. On February 2, 2008, in Los Angeles, California,
18 defendant J. GARCIA advised an undercover law enforcement
19 officer, posing as a Mongols "prospect," that he should not
20 display Mongols emblems in Cypress Park because of ongoing
21 conflicts with the Mexican Mafia, and J. GARCIA offered to sell a
22 Tech-9 assault weapon to the undercover officer.

23 318. On February 3, 2008, by telephone using coded
24 language, defendant WILSON told defendant H. GONZALEZ that
25 defendant R. CAVAZOS, JR., had required that all Mongols
26 applications include serial numbers.

27 319. On February 4, 2008, by telephone using coded
28 language, an unindicted co-conspirator warned defendant MUNZ that

1 law enforcement officers were looking for MUNZ and another
2 Mongols member in connection with the investigation of the murder
3 of "Hells Angels" gang member C.T., and the co-conspirator
4 advised MUNZ that he told officers that MUNZ did not live at the
5 location.

6 320. On February 4, 2008, by telephone using coded
7 language, defendant MUNZ advised defendant CHEVILLE that law
8 enforcement officers were looking for him and an unindicted co-
9 conspirator at the residence of defendant SHAWLEY in connection
10 with the investigation of the murder of C.T. and that CHEVILLE
11 and others needed to remove evidence of their crimes from their
12 residences.

13 321. On February 5, 2008, by telephone using coded
14 language, defendants CAVAZOS and MUNZ discussed the Mongols'
15 conflicts with the Mexican Mafia based on the Mongols' refusal to
16 pay "taxes" to "La Eme" for their narcotics trafficking and the
17 consequences of Mongols members entering protective custody while
18 in prison.

19 322. On February 8, 2008, by telephone using coded
20 language, defendants WILSON and BUSS discussed plans to seize
21 control of the Mongols from defendant CAVAZOS.

22 323. On February 9, 2008, defendants CAVAZOS, R. CAVAZOS,
23 JR., and A. CAVAZOS, JR., possessed firearms and bullet-proof
24 vests at their residence in West Covina, California.

25 324. On February 9, 2008, defendant NIEVES and an
26 unindicted co-conspirator armed themselves for a confrontation
27 with rival gang members at the "Around the Corner" bar in West
28 Covina, California.

1 325. On February 10, 2008, in Los Angeles, California,
2 defendant J. GARCIA advised three undercover law enforcement
3 officers that they had been approved as "full patch" members of
4 the Mongols.

5 326. On February 11, 2008, defendant MUNZ directed Mongols
6 associates to attack rival "Hells Angels" gang members at the
7 "Parkway Bowl" in El Cajon, California, and admonished the
8 victims that they were in Mongols territory.

9 327. On February 12, 2008, defendants R. LOZANO and RIVERA
10 delivered approximately 97 grams of actual methamphetamine to an
11 undercover law enforcement officer at a "Target" store in
12 Rosemead, California, and R. LOZANO advised the officer that R.
13 LOZANO, RIVERA and defendant A. LOZANO could provide armed
14 protection for another narcotics transaction involving 20 to 30
15 kilograms of cocaine.

16 328. On February 14, 2008, by telephone, defendants CAVAZOS
17 and R. CAVAZOS, JR., discussed obtaining a trademark on the
18 Mongols image.

19 329. On February 16, 2008, by telephone using coded
20 language, defendant MUNZ warned defendant CAVAZOS that a Mongols
21 associate might be providing information to law enforcement about
22 the crimes of the Mongols.

23 330. On February 17, 2008, in West Covina, California,
24 defendant R. CAVAZOS, JR., directed undercover law enforcement
25 officers, posing as Mongols "prospects," to store firearms in R.
26 CAVAZOS, JR.'s, car so that they would be readily accessible if
27 Mongols needed to use them, and defendants RODRIGUEZ and NIEVES
28 discussed retaliating against rival gang members who had shot at

1 NIEVES on February 1, 2008.

2 331. On February 20, 2008, defendants CAVAZOS, R. CAVAZOS,
3 JR., MUNZ, H. GONZALEZ, and J. GARCIA attended a Mongols
4 "Sergeant-At-Arms" meeting in El Monte, California, and CAVAZOS
5 advised members that a Mongols "prospect" was cooperating with
6 the government in the prosecution of defendant MALDONADO for the
7 April 8, 2007 shooting of Maravilla gang members, and CAVAZOS
8 also warned members about the possible infiltration of the
9 Mongols by undercover law enforcement officers.

10 332. On February 22, 2008, defendants H. GONZALEZ and
11 NIEVES attended a Mongols "mother chapter" meeting in El Monte,
12 California, and directed defendant ANGULO and an undercover law
13 enforcement officer to act as a security force outside the
14 meeting location.

15 333. On February 23, 2008, defendants CAVAZOS, R. CAVAZOS,
16 JR., NIEVES, and ANGULO carried firearms and attended the Mongols
17 Harbor chapter party in Wilmington, California, and defendant J.
18 GARCIA admitted three undercover law enforcement officers as
19 Mongols members.

20 334. On February 26, 2008, by telephone using coded
21 language, defendants CAVAZOS and MUNZ discussed plans to direct
22 defendant WILSON to confront the Mongols "Mother Chapter" over
23 allegations that he has been disloyal to the Mongols.

24 335. On February 26, 2008, in West Covina, California,
25 defendants CAVAZOS, MUNZ, GONZALES, and CANALES, and other
26 unindicted co-conspirators attended a Mongols "Mother Chapter"
27 meeting and addressed the expansion of the Mongols across the
28 United States and internationally.

1 336. On February 28, 2008, in Los Angeles, California,
2 defendants H. GONZALEZ and J. GARCIA collected dues from Mongols
3 members for the Mongols organization.

4 337. On February 29, 2008, in Los Angeles, California,
5 defendants H. GONZALEZ and ROSELI collected dues payments from
6 Mongols members for the Mongols organization.

7 338. On February 29, 2008, in Las Vegas, Nevada, defendant
8 TREVINO recruited an undercover law enforcement officer, who was
9 posing as a drug trafficker, to join the Mongols and told the
10 officer that his drug trafficking would benefit the Mongols,
11 although he would be expected to "go to war" for the Mongols and,
12 once a member of the Mongols, would not be permitted to quit the
13 organization.

14 339. On February 4, 2008, in Whittier, California,
15 unindicted Mongols threatened to assault an African-American
16 patron at "Steve's BBQ" if he did not leave the restaurant.

17 340. On March 6, 2008, by telephone using coded language,
18 defendant CAVAZOS directed defendant WILSON to remind Mongols
19 members that they must answer to the Mongols "Mother Chapter" and
20 specifically to CAVAZOS.

21 341. On March 9, 2008, in Las Vegas, Nevada, defendants
22 HULL and TREVINO encouraged an undercover law enforcement
23 officer, who was posing as a drug trafficker, to join the
24 Mongols, and HULL told the officer that he could make a lot of
25 money trafficking drugs with him.

26 342. On March 11, 2008, by telephone, defendant CAVAZOS
27 discussed preparing a story on the Mongols with a news reporter,
28 and CAVAZOS told the reporter that he could provide specific

1 details about a Mongols murder committed at a tattoo shop and
2 involving the Mexican Mafia, including information about the
3 planning and preparation for the murder.

4 343. On March 12, 2008, by telephone using coded language,
5 defendant CAVAZOS directed an unindicted Mongols member to
6 deliver Mongols dues payments to CAVAZOS at his residence in West
7 Covina, California.

8 344. On March 14, 2008, defendant BUSS directed an
9 unidentified Mongols member known as "Convict" to locate and
10 attack the owner of an art gallery in Pomona, California, and
11 "Convict" carried a .45 caliber handgun with him when he
12 attempted to carry out the attack.

13 345. On March 14, 2008, defendant TREVINO sold a firearm to
14 an undercover law enforcement officer and a confidential
15 government informant in Las Vegas, Nevada.

16 346. On March 17, 2008, defendants CAVAZOS, R. CAVAZOS,
17 JR., H. GONZALEZ, ROSELI, A. CAVAZOS, JR., MEDEL, and MCCAULEY
18 possessed a loaded .22 caliber rifle, a Sturm Ruger mini-thirty
19 rifle, a 12-gauge shotgun, .30 caliber rifle, two Taurus 9 mm
20 handguns, five .45 caliber handguns, a .223 caliber rifle, a
21 loaded 5.56 caliber rifle, and two .38 caliber revolvers for the
22 Mongols at their residence in West Covina, California.

23 347. On March 17, 2008, defendant CAVAZOS sent a telephone
24 message to Mongols chapters to warn Mongols that law enforcement
25 officers were searching his residence and they should prepare for
26 further law enforcement action.

27 348. On March 22, 2008, in San Diego County, defendant A.
28 LOZANO possessed two handguns.

1 349. On March 23, 2008, by telephone using coded language,
2 defendant ARMENDAREZ told defendant MUNZ that defendant A. LOZANO
3 had been arrested but that ARMENDAREZ and another Mongols member
4 were trying to post bail for A. LOZANO.

5 350. On March 23, 2008, by telephone using coded language,
6 defendant MUNZ told defendant CAVAZOS that defendant A. LOZANO
7 had been arrested.

8 351. On March 26, 2008, in Las Vegas, Nevada, defendants
9 TREVINO, HULL, and WILLIAM RAMIREZ armed themselves as "security"
10 to protect the distribution of 20 kilograms of cocaine.

11 352. On March 31, 2008, in Los Angeles, California,
12 defendant ROSELI issued an order to Mongols members to pay legal
13 defense funds to the Mongols "Mother Chapter."

14 353. On April 1, 2008, in El Monte, California, defendants
15 H. GONZALEZ and ROSELI collected cash from Mongols members for
16 the organization.

17 354. On April 1, 2008, in Montebello, California, defendant
18 FIGUEROA possessed approximately 97 grams of actual
19 methamphetamine and a loaded .45 caliber handgun.

20 355. On April 1, 2008, by telephone using coded language,
21 defendant CAVAZOS warned members that law enforcement officers
22 were conducting a "raid" on defendant FIGUEROA and that Mongols
23 should hide evidence of their crimes.

24 356. On April 6, 2008, defendants LOZA and NEWMAN stabbed
25 R. H. and beat J. H. at a Mobile gas station in Pasadena,
26 California.

27 357. On April 7, 2008, by telephone using coded language,
28 defendant CAVAZOS directed Mongols members to disguise their

1 membership in the enterprise following the April 6, 2008 attack
2 in Pasadena, California.

3 358. On April 10, 2008, defendant GUTIERREZ sold
4 approximately 107.1 grams of actual methamphetamine to an
5 undercover law enforcement officer and a confidential government
6 informant in Montebello, California.

7 359. On April 11, 2008, defendants ARMENDAREZ, R. LOZANO,
8 HULL, and RIVERA discussed arrangements to distribute
9 methamphetamine and cocaine with an undercover law enforcement
10 officer.

11 360. On April 12, 2008, defendants CAVAZOS, MUNZ and R.
12 CAVAZOS, JR., led a Mongols "All Members" meeting at the "House
13 Lounge" in Maywood, California, and CAVAZOS instructed Mongols
14 that they must protect one another against law enforcement and
15 would not be permitted to cooperate in an Internal Revenue
16 Service investigation of CAVAZOS.

17 361. On April 12, 2008, in Maywood, California, defendant
18 MUNZ addressed Mongols at an "all members" meeting and told them
19 that he believed defendant CAVAZOS was being investigated for
20 "terrorist recruitment," and defendant R. CAVAZOS, JR., directed
21 members to contribute to a fund for CAVAZOS' legal fees.

22 362. On April 14, 2008, defendant R. CAVAZOS, JR., met with
23 an undercover law enforcement officer, who was posing as a new
24 Mongols member, at the "Yard House" in Pasadena, California, and
25 R. CAVAZOS, JR., told the officer that the "Mother Chapter" would
26 preserve the "Mongol Nation" and ensure that information about
27 the Mongols' crimes did not reach law enforcement.

28 363. On April 17, 2008, in Los Angeles, California,

1 defendant J. GARCIA collected money from Mongols members to pay
2 for defendant CAVAZOS' legal defense.

3 364. On April 27, 2008, in Whittier, California, defendants
4 NAVA, COTTINI, and LOUIE stabbed N. G. when they suspected he was
5 a rival gang member.

6 365. On April 27, 2008, in Long Beach, California,
7 unidentified Mongols used knives to forcibly remove support
8 patches for the "Hells Angels" from patrons at the Long Beach
9 motorcycle swap meet.

10 366. On May 1, 2008, in Alhambra, California, defendants
11 ROSELI and J. GARCIA collected money from Mongols for the
12 enterprise.

13 367. On May 1, 2008, in Montebello, California, defendant
14 GUTIERREZ sold approximately 75.4 grams of actual methamphetamine
15 to an undercover law enforcement officer and a confidential
16 government informant.

17 368. On May 3, 2008, defendants CAVAZOS and R. CAVAZOS,
18 JR., collected dues payments from Mongols gang members at their
19 residence in West Covina, California, and R. CAVAZOS, JR.,
20 displayed a semi-automatic handgun as he collected payments from
21 Mongols.

22 369. On May 24, 2008, defendant MCCAULEY, with defendant R.
23 CAVAZOS, JR., and two other Mongols members, displayed a .45
24 caliber semi-automatic handgun, and threatened to kill D.Q. in
25 the parking lot of the "Ordonez" restaurant in Montebello,
26 California, threatening, "We are going to fuck you up. You are
27 fucking with Mongols. Everyone here is going to know that you
28 are little bitches, and they are going to know who the Mongols

1 are."

2 370. On June 6, 2008, at the Mongols "National Run" in San
3 Diego County, defendant CAVAZOS awarded the Mongols "Respect Few
4 Fear None" patch to defendants LOZA and NEWMAN to reward them for
5 the attack on R.H. and J.H. in Pasadena, California, on April 6,
6 2008.

7 371. On June 19, 2008, in San Bernardino County, defendant
8 R. LOZANO sold approximately 62.5 grams of actual methamphetamine
9 to an undercover law enforcement officer, posing as a Mongols
10 member.

11 372. On July 24, 2008, by telephone using coded language,
12 defendant H. GONZALEZ told a confidential government informant
13 that he delivered approximately \$15,000 to \$17,000 in United
14 States currency from Mongols chapters every month to defendants
15 CAVAZOS and R. CAVAZOS, JR.; that CAVAZOS had directed him to
16 destroy the records of collecting the funds; and that the funds
17 collected were now missing.

18 373. On July 24, 2008, defendant RIVERA and David Rivera
19 transported approximately 214.4 grams of actual methamphetamine
20 and \$6,980 in United States currency in Fontana, California.

21 374. On July 26, 2008, defendants CAVAZOS, R. CAVAZOS, JR.,
22 H. GONZALEZ, ROSELI, MUNZ, NIEVES, CANALES, ZUNIGA, and MEDEL,
23 and other unindicted co-conspirators attended a Mongols
24 "presidents" meeting in El Monte, California, and defendant H.
25 GONZALEZ advised the Mongols "presidents" that he would be
26 running the enterprise more strictly and that they should careful
27 about their telephone conversations in order to avoid detection
28 by law enforcement.

1 375. On July 26, 2008, defendant CAVAZOS advised Mongols
2 "presidents" that defendants R. CAVAZOS, JR., RODRIGUEZ, ROSELI,
3 A. CAVAZOS, JR., ARMENDAREZ, FIGUEROA, and SOTO, and others would
4 provide security for CAVAZOS, and defendant MUNOZ advised CAVAZOS
5 that he was angry CAVAZOS had exposed MUNOZ' effort to negotiate
6 with Mexican Mafia representatives and the fact that MUNOZ had
7 tried to kill rival gang members by shooting at them.

8 376. On July 27, 2008, defendant H. GONZALEZ discussed his
9 discovery that CAVAZOS had been stealing cash funds delivered by
10 Mongols to the "Mother Chapter," and that there was believed to
11 be approximately \$150,000 in funds missing from Mongols
12 organization.

13 377. On July 30, 2008, by telephone using coded language,
14 defendant V. RODRIGUEZ delivered approximately 26.1 grams of
15 actual methamphetamine and arranged to sell methamphetamine to an
16 undercover law enforcement officer, who was posing as a Mongols
17 member, and V. RODRIGUEZ told the undercover officer that
18 defendants RODRIGUEZ, MARTINEZ, and VALLE also sold
19 methamphetamine.

20 378. On August 1, 2008, defendant V. RODRIGUEZ delivered
21 approximately 91.1 grams of actual methamphetamine to an
22 undercover law enforcement officer, who was posing as a Mongols
23 member, for \$5,300.

24 379. On August 24, 2008, by telephone using coded language,
25 defendant H. GONZALEZ directed Mongols "Sergeants-at-Arms" that
26 H. GONZALEZ had been "tipped" about possible law enforcement
27 action against the Mongols and that Mongols should be directed to
28 hide illegal items.

1 380. On August 25, 2008, by telephone using coded language,
2 defendant NIEVES directed Mongols not to display clothing or
3 paraphernalia identifying themselves as Mongols members after a
4 shooting at the "Crazy Girls" bar in Hollywood, California.

5 381. On August 30, 2008, at the "House Lounge" in Vernon,
6 California, defendants H. GONZALEZ and MUNZ led a Mongols "All
7 Members" meeting in which they advised Mongols members that
8 defendant CAVAZOS had stolen money from the organization,
9 provoked greater tension with the Mexican Mafia, and members
10 voted CAVAZOS "out bad" from the organization.

11 382. On August 30, 2008, in Vernon, California, defendant
12 H. GONZALEZ advised Mongols that H. GONZALEZ had met with Mexican
13 Mafia representatives in order to resolve conflicts between the
14 Mexican Mafia and the Mongols, and defendants NIEVES, ZUNIGA,
15 CANALES, and others were identified as national officers and
16 Mongols "Mother Chapter" members.

17 383. On September 17, 2008, in Los Angeles County,
18 California, defendant VASQUEZ possessed approximately 52 grams of
19 methamphetamine, black tar heroin, approximately \$505 in United
20 States currency, digital scales, three cellular telephones,
21 Mongols literature and his Mongols black leather vest, and, when
22 apprehended, told officers that he could not be placed with a
23 general inmate population because he is a Mongol.

24
25 THE GRAND JURY FURTHER ALLEGES THAT:

26 1. Beginning on a date unknown and continuing to on or
27 about August 21, 2008, in Los Angeles County, within the Central
28 District of California, defendants CAVAZOS, R. CAVAZOS, JR., H.

1 GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RAMIREZ,
2 RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR.,
3 ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE,
4 FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ,
5 ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
6 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
7 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
8 RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE,
9 LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCAULEY, LOUIE,
10 COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, MELCER, LOZA,
11 NEWMAN, MORENO, SAVALA, D. PADILLA, and others known and unknown
12 to the Grand Jury, knowingly and intentionally conspired and
13 agreed with each other to distribute at least 50 grams of actual
14 methamphetamine, a schedule II controlled substance, in violation
15 of Title 21, United States Code, Sections 846, 841(a)(1), and
16 841(b)(1)(A).

17 2. On or about December 4, 2005, in Los Angeles County,
18 within the Central District of California, defendants A.
19 RODRIGUEZ, ARMENDAREZ, R. LOZANO, A. LOZANO, GUTIERREZ, and
20 ANGULO willfully, deliberately, and with premeditation, did aid,
21 abet, advise, encourage, and otherwise participate in the
22 unlawful attempt to kill with malice aforethought D.F., J.V. and
23 S.G., in violation of California Penal Code, Sections 21a, 31,
24 187, and 664.

25 3. On or about July 20, 2006, in Los Angeles County,
26 within the Central District of California, defendant ESPINOZA
27 willfully, deliberately, and with premeditation, unlawfully
28 attempted to kill with malice aforethought S.A., in violation of

1 California Penal Code, Sections 21a, 31, 187, 189, and 664.

2 4. On or about February 14, 2007, in Los Angeles County,
3 within the Central District of California, defendants MONTES and
4 MELCER did willfully, deliberately, and with premeditation, kill
5 with malice aforethought L.H., in violation of California Penal
6 Code, Sections 21a, 31, 187, and 189.

7 5. On or about April 8, 2007, in Los Angeles County,
8 within the Central District of California, defendant MALDONADO
9 willfully, deliberately, and with premeditation, unlawfully
10 attempted to kill with malice aforethought rival gang members in
11 violation of California Penal Code, Sections 21a, 31, 187, 189,
12 and 664.

13 6. On or about June 28, 2007, in Los Angeles County,
14 within the Central District of California, defendant MELGOZA
15 willfully, deliberately, and with premeditation, unlawfully
16 attempted to kill with malice aforethought M.T., in violation of
17 California Penal Code, Sections 21a, 31, 187, 189, and 664.

18 7. On or about August 18, 2007, in Los Angeles County,
19 within the Central District of California, defendants CAVAZOS and
20 WILSON willfully, deliberately, and with premeditation, conspired
21 to kill with malice aforethought rival gang members, in violation
22 of California Penal Code, Sections 21a, 31, 182, 187, and 189.

23 8. On or about April 6, 2008, in Pasadena, California,
24 within the Central District of California, defendants LOZA and
25 NEWMAN willfully, deliberately, and with premeditation,
26 unlawfully attempted to kill with malice aforethought R.H. and
27 J.H., in violation of California Penal Code, Sections 21a, 31,
28 187, 189, and 664.

COUNT TWO

[18 U.S.C. § 1962(c)]

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

THE RACKETEERING OFFENSE

2. Beginning on a date unknown and continuing to on or about October 9, 2008, in Los Angeles County, within the Central District of California, and elsewhere, defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO, MUNZ, WILSON, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, ARMENDAREZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, J. GONZALEZ, ZUNIGA, TELLEZ, OWENS, MOREIN, L. PADILLA, TRUJILLO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, BRADEN, MELGOZA, ANGULO, CONTRERAS, ESPINOZA, RIVERA, LEMAY, CORDOVA, R. GOMEZ, MELCER, LOZA, NEWMAN, and D. PADILLA, and others known and unknown to the Grand Jury, being persons employed by and associated with the Mongols criminal enterprise, which was an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly did conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise, through a pattern of racketeering activity, that is, through the commission of the acts set forth below.

THE PATTERN OF RACKETEERING ACTIVITY

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

1 Racketeering Act One

2 Conspiracy to Distribute Narcotics

3 4. Beginning on a date unknown to the Grand Jury and
4 continuing to on or about October 9, 2008, in Los Angeles County,
5 within the Central District of California, and elsewhere,
6 defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO,
7 MUNZ, WILSON, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO,
8 ARMENDAREZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA,
9 GIL, GUTIERREZ, VIRAMONTES, J. GONZALEZ, AZANEDO, ZUNIGA, TELLEZ,
10 OWENS, MOREIN, L. PADILLA, TRUJILLO, MALDONADO, MONTES, WEDIG, V.
11 RODRIGUEZ, BRADEN, MELGOZA, RIOS, ANGULO, CONTRERAS, ESPINOZA,
12 RIVERA, LEMAY, CORDOVA, R. GOMEZ, MELCER, LOZA, NEWMAN, and D.
13 PADILLA, and others known and unknown to the Grand Jury,
14 conspired and agreed with each other to knowingly and
15 intentionally commit the following offenses:

16 a. To distribute at least 500 grams of a mixture or
17 substance containing a detectable amount of cocaine, a schedule
18 II controlled substance, in violation of Title 21, United States
19 Code, Sections 841(a)(1) and 841(b)(1)(B);

20 b. To distribute at least 50 grams of actual
21 methamphetamine, a schedule II controlled substance, in violation
22 of Title 21, United States Code, Sections 841(a)(1) and
23 841(b)(1)(A); and

24 c. To distribute at least five grams of actual
25 methamphetamine, a schedule II controlled substance, in violation
26 of Title 21, United States Code, Sections 841(a)(1) and
27 841(b)(1)(B).

1 Racketeering Act Two

2 Conspiracy to Commit Money Laundering

3 5. Beginning on a date unknown and continuing until on or
4 about October 9, 2008, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants CAVAZOS, R.
6 CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO, MUNZ, WILSON, J.
7 GARCIA, and RIOS, and others known and unknown to the Grand Jury,
8 knowingly and intentionally conspired and agreed with each other
9 to conduct financial transactions, knowing that the property
10 involved in the financial transactions represented the proceeds
11 of some form of unlawful activity, and which property was, in
12 fact, the proceeds of specified unlawful activity, that is,
13 conspiracy to distribute cocaine and methamphetamine, with the
14 intent to promote the carrying on of said specified unlawful
15 activity, and to conceal and disguise the nature, location,
16 source, ownership, and control the proceeds of said specified
17 unlawful activity, in violation of Title 18, United States Code,
18 Sections 1956(a)(1)(A)(I) and 1956(a)(1)(B)(I).

19 Racketeering Act Three

20 Distribution of Cocaine

21 6. On or about August 12, 2005, in Los Angeles County,
22 within the Central District of California, defendant VIRAMONTES
23 knowingly and intentionally distributed cocaine, a schedule II
24 controlled substance, in violation of Title 21, United States
25 Code, Section 841(a)(1).

26 //

27 //

28 //

1 Racketeering Act Four

2 Distribution of Methamphetamine

3 7. On or about November 3, 2005, in Los Angeles County,
4 within the Central District of California, defendant VIRAMONTES
5 knowingly and intentionally distributed methamphetamine, a
6 schedule II controlled substance, in violation of Title 21,
7 United States Code, Section 841(a)(1).

8 Racketeering Act Five

9 Attempted Murder

10 8. On or about December 4, 2005, in Riverside County,
11 within the Central District of California, defendants RODRIGUEZ,
12 ARMENDAREZ, R. LOZANO, A. LOZANO, GUTIERREZ, and ANGULO
13 willfully, deliberately, and with premeditation, unlawfully
14 attempted to kill with malice aforethought D.F., J.V., and S.G.,
15 in violation of California Penal Code, Sections 21a, 31, 187,
16 189, and 664.

17 Racketeering Act Six

18 Distribution of Methamphetamine

19 9. On or about January 19, 2006, in Los Angeles County,
20 within the Central District of California, defendant J. GONZALEZ
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Seven

25 Distribution of Methamphetamine

26 10. On or about February 9, 2006, in Los Angeles County,
27 within the Central District of California, defendants J. GONZALEZ
28 and R. GOMEZ knowingly and intentionally distributed

1 methamphetamine, a schedule II controlled substance, in violation
2 of Title 21, United States Code, Section 841(a)(1).

3 Racketeering Act Eight

4 Distribution of Methamphetamine

5 11. On or about February 18, 2006, in Los Angeles County,
6 within the Central District of California, defendants J. GARCIA
7 and R. GOMEZ knowingly and intentionally distributed
8 methamphetamine, a schedule II controlled substance, in violation
9 of Title 21, United States Code, Section 841(a)(1).

10 Racketeering Act Nine

11 Distribution of Methamphetamine

12 12. On or about March 1, 2006, in Los Angeles County,
13 within the Central District of California, defendant TELLEZ
14 knowingly and intentionally distributed methamphetamine, a
15 schedule II controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Ten

18 Distribution of Methamphetamine

19 13. On or about March 2, 2006, in San Bernardino County,
20 within the Central District of California, defendant D. PADILLA
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Eleven

25 Distribution of Methamphetamine

26 14. On or about March 3, 2006, in Los Angeles County,
27 within the Central District of California, defendant D. PADILLA
28 knowingly and intentionally distributed methamphetamine, a

1 schedule II controlled substance, in violation of Title 21,
2 United States Code, Section 841(a)(1).

3 Racketeering Act Twelve

4 Distribution of Methamphetamine

5 15. On or about March 22, 2006, in Los Angeles County,
6 within the Central District of California, defendant TELLEZ
7 knowingly and intentionally distributed methamphetamine, a
8 schedule II controlled substance, in violation of Title 21,
9 United States Code, Section 841(a)(1).

10 Racketeering Act Thirteen

11 Distribution of Cocaine

12 16. On or about March 23, 2006, in Los Angeles County,
13 within the Central District of California, defendant ZUNIGA
14 knowingly and intentionally distributed cocaine, a schedule II
15 narcotic drug controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Fourteen

18 Distribution of Methamphetamine

19 17. On or about March 29, 2006, in Los Angeles County,
20 within the Central District of California, defendant J. GONZALEZ
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Fifteen

25 Distribution of Methamphetamine

26 18. On or about May 4, 2006, in Los Angeles County, within
27 the Central District of California, defendant OWENS knowingly and
28 intentionally distributed methamphetamine, a schedule II

1 controlled substance, in violation of Title 21, United States
2 Code, Section 841(a)(1).

3 Racketeering Act Sixteen

4 Distribution of Methamphetamine

5 19. On or about May 10, 2006, in Los Angeles County, within
6 the Central District of California, defendant TELLEZ knowingly
7 and intentionally distributed methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Seventeen

11 Distribution of Methamphetamine

12 20. On or about May 18, 2006, in Los Angeles County, within
13 the Central District of California, defendant R. GOMEZ knowingly
14 and intentionally distributed methamphetamine, a schedule II
15 controlled substance, in violation of Title 21, United States
16 Code, Section 841(a)(1).

17 Racketeering Act Eighteen

18 Distribution of Methamphetamine

19 21. On or about May 24, 2006, in Los Angeles County, within
20 the Central District of California, defendants RODRIGUEZ and GIL
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Nineteen

25 Distribution of Methamphetamine

26 22. On or about May 24, 2006, in Los Angeles County, within
27 the Central District of California, defendant R. GOMEZ knowingly
28 and intentionally distributed methamphetamine, a schedule II

1 controlled substance, in violation of Title 21, United States
2 Code, Section 841(a)(1).

3 Racketeering Act Twenty

4 Distribution of Methamphetamine

5 23. On or about May 31, 2006, in Los Angeles County, within
6 the Central District of California, defendant GIL knowingly and
7 intentionally distributed methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Twenty-One

11 Distribution of Methamphetamine

12 24. On or about June 3, 2006, in Clark County, Nevada,
13 defendants VIRAMONTES and LEMAY knowingly and intentionally
14 distributed methamphetamine, a schedule II controlled substance,
15 in violation of Title 21, United States Code, Section 841(a)(1).

16 Racketeering Act Twenty-Two

17 Distribution of Methamphetamine

18 25. On or about June 8, 2006, in Los Angeles County, within
19 the Central District of California, defendant GIL knowingly and
20 intentionally distributed methamphetamine, a schedule II
21 controlled substance, in violation of Title 21, United States
22 Code, Section 841(a)(1).

23 Racketeering Act Twenty-Three

24 Distribution of Methamphetamine

25 26. On or about June 22, 2006, in Los Angeles County,
26 within the Central District of California, defendant RODRIGUEZ
27 knowingly and intentionally distributed methamphetamine, a
28 schedule II controlled substance, in violation of Title 21,

1 United States Code, Section 841(a)(1).

2 Racketeering Act Twenty-Four

3 Distribution of Methamphetamine

4 27. On or about July 18, 2006, in Los Angeles County,
5 within the Central District of California, defendant RODRIGUEZ
6 knowingly and intentionally distributed methamphetamine, a
7 schedule II controlled substance, in violation of Title 21,
8 United States Code, Section 841(a)(1).

9 Racketeering Act Twenty-Five

10 Distribution of Methamphetamine

11 28. On or about July 19, 2006, in Los Angeles County,
12 within the Central District of California, defendant SOTO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Twenty-Six

17 Attempted Murder

18 29. On or about July 20, 2006, in Los Angeles County,
19 within the Central District of California, defendant ESPINOZA
20 unlawfully, willfully, deliberately, and with premeditation, did
21 attempt to kill with malice aforethought S.A., in violation of
22 California Penal Code, Sections 21a, 31, 664, 187, and 189.

23 Racketeering Act Twenty-Seven

24 Distribution of Methamphetamine

25 30. On or about July 21, 2006, in Los Angeles County,
26 within the Central District of California, defendants RODRIGUEZ
27 and GIL knowingly and intentionally distributed methamphetamine,
28 a schedule II controlled substance, in violation of Title 21,

1 United States Code, Section 841(a)(1).

2 Racketeering Act Twenty-Eight

3 Distribution of Methamphetamine

4 31. On or about July 22, 2006, in Los Angeles County,
5 within the Central District of California, defendant SOTO
6 knowingly and intentionally distributed methamphetamine, a
7 schedule II controlled substance, in violation of Title 21,
8 United States Code, Section 841(a)(1).

9 Racketeering Act Twenty-Nine

10 Distribution of Methamphetamine

11 32. On or about July 25, 2006, in Los Angeles County,
12 within the Central District of California, defendant SOTO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Thirty

17 Distribution of Methamphetamine

18 33. On or about August 16, 2006, in Los Angeles County,
19 within the Central District of California, defendant GIL
20 knowingly and intentionally distributed methamphetamine, a
21 schedule II controlled substance, in violation of Title 21,
22 United States Code, Section 841(a)(1).

23 Racketeering Act Thirty-One

24 Distribution of Methamphetamine

25 34. On or about August 17, 2006, in Riverside County,
26 within the Central District of California, defendants ARMENDAREZ
27 and R. LOZANO knowingly and intentionally distributed
28 methamphetamine, a schedule II controlled substance, in violation

of Title 21, United States Code, Section 841(a)(1).

Racketeering Act Thirty-Two

Distribution of Methamphetamine

35. On or about August 24, 2006, in Los Angeles County, within the Central District of California, defendants RODRIGUEZ and AZANEDO knowingly and intentionally distributed methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Racketeering Act Thirty-Three

Distribution of Methamphetamine

37. On or about November 26, 2006, in Los Angeles County, within the Central District of California, defendants RODRIGUEZ and GIL knowingly and intentionally distributed methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Racketeering Act Thirty-Four

Possession with Intent to Distribute Methamphetamine

38. On or about December 1, 2006, in Los Angeles County, within the Central District of California, defendant CONTRERAS knowingly and intentionally possessed with the intent to distribute methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Racketeering Act Thirty-Five

Distribution of Cocaine

39. On or about December 1, 2006, in Clark County, Nevada, defendant CORDOVA knowingly and intentionally distributed cocaine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Thirty-Six

2 Attempted Murder

3 40. On or about December 10, 2006, in Los Angeles County,
4 within the Central District of California, defendants BUSS, RIOS,
5 WEDIG, and BRADEN willfully, deliberately, and with
6 premeditation, unlawfully attempted to kill with malice
7 aforethought A.S., in violation of California Penal Code,
8 Sections 21a, 31, 187, 189, and 664.

9 Racketeering Act Thirty-Seven

10 Distribution of Methamphetamine

11 41. On or about February 9, 2007, in San Bernardino County,
12 within the Central District of California, defendant R. LOZANO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Thirty-Eight

17 Distribution of Cocaine

18 42. On or about February 10, 2006, in Clark County, Nevada,
19 defendant CORDOVA knowingly and intentionally distributed
20 cocaine, a schedule II narcotic drug controlled substance, in
21 violation of Title 21, United States Code, Section 841(a)(1).

22 Racketeering Act Thirty-Nine

23 Murder

24 43. On or about February 14, 2007, in Los Angeles County,
25 within the Central District of California, defendants MONTES and
26 MELCER with malice aforethought willfully participated in the
27 murder of L.H., in violation of California Penal Code, Sections
28 31, 187, and 189.

1 Racketeering Act Forty

2 Distribution of Methamphetamine

3 44. On or about March 23, 2007, in San Bernardino County,
4 within the Central District of California, defendant R. LOZANO
5 knowingly and intentionally distributed methamphetamine, a
6 schedule II controlled substance, in violation of Title 21,
7 United States Code, Section 841(a)(1).

8 Racketeering Act Forty-One

9 Distribution of Methamphetamine

10 45. On or about March 23, 2007, in San Bernardino County,
11 within the Central District of California, defendant ARMENDAREZ
12 knowingly and intentionally distributed methamphetamine, a
13 schedule II controlled substance, in violation of Title 21,
14 United States Code, Section 841(a)(1).

15 Racketeering Act Forty-Two

16 Distribution of Methamphetamine

17 46. On or about April 7, 2007, in Los Angeles County,
18 within the Central District of California, defendant PONCE
19 knowingly and intentionally distributed methamphetamine, a
20 schedule II controlled substance, in violation of Title 21,
21 United States Code, Section 841(a)(1).

22 Racketeering Act Forty-Three

23 Attempted Murder

24 47. On or about April 8, 2007, in Los Angeles County,
25 within the Central District of California, defendant MALDONADO
26 willfully, deliberately, and with premeditation, unlawfully
27 attempted to kill with malice aforethought M.G. and Z.S., in
28 violation of California Penal Code, Sections 21a, 31, 187, 189,

1 and 664.

2 Racketeering Act Forty-Four

3 Distribution of Methamphetamine

4 48. On or about May 22, 2007, in Los Angeles County, within
5 the Central District of California, defendant M. GARCIA knowingly
6 and intentionally distributed methamphetamine, a schedule II
7 controlled substance, in violation of Title 21, United States
8 Code, Section 841(a)(1).

9 Racketeering Act Forty-Five

10 Distribution of Methamphetamine

11 49. On or about June 7, 2007, in Los Angeles County, within
12 the Central District of California, defendant MOREIN knowingly
13 and intentionally distributed methamphetamine, a schedule II
14 controlled substance, in violation of Title 21, United States
15 Code, Section 841(a)(1).

16 Racketeering Act Forty-Six

17 Attempted Murder

18 50. On or about July 28, 2007, in Riverside County, within
19 the Central District of California, defendant MELGOZA willfully,
20 deliberately, and with premeditation, unlawfully attempted to
21 kill with malice aforethought M.T. and others, in violation of
22 California Penal Code, Sections 21a, 31, 187, 189, and 664.

23 Racketeering Act Forty-Seven

24 Possession with Intent to Distribute Methamphetamine

25 51. On or about November 21, 2007, in Los Angeles County,
26 within the Central District of California, defendant MUNOZ
27 knowingly and intentionally possessed with the intent to
28 distribute methamphetamine, a schedule II controlled substance,

1 in violation of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Forty-Eight

3 Possession with Intent to Distribute Methamphetamine

4 52. On or about December 13, 2007, in Los Angeles County,
5 within the Central District of California, defendants RODRIGUEZ,
6 L. PADILLA, and TRUJILLO knowingly and intentionally possessed
7 with the intent to distribute methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Forty-Nine

11 Conspiracy to Commit Murder

12 53. On or about August 18, 2007, in Los Angeles County and
13 elsewhere, defendants CAVAZOS and WILSON, and others conspired to
14 murder rival gang members in Indianapolis, Indiana, in violation
15 of California Penal Code, Sections 21a, 31, 182, 187, and 189.

16 Racketeering Act Fifty

17 Distribution of Methamphetamine

18 54. On or about February 12, 2008, in Los Angeles County,
19 within the Central District of California, defendant R. LOZANO
20 and RIVERA knowingly and intentionally distributed
21 methamphetamine, a schedule II controlled substance, in violation
22 of Title 21, United States Code, Section 841(a)(1).

23 Racketeering Act Fifty-One

24 Possession with the Intent to Distribute Methamphetamine

25 55. On or about April 1, 2008, in Los Angeles County,
26 within the Central District of California, defendant FIGUEROA
27 knowingly and intentionally possessed methamphetamine, a schedule
28 II controlled substance, with the intent to distribute it to

1 others, in violation of Title 21, United States Code, Section
2 841(a)(1).

3 Racketeering Act Fifty-Two

4 Attempted Murder

5 56. On or about April 6, 2008, in Pasadena, California,
6 defendants LOZA and NEWMAN willfully, deliberately, and with
7 premeditation, unlawfully attempted to kill with malice
8 aforethought R.H. and J.H., in violation of California Penal
9 Code, Sections 21a, 31, 187, 189, and 664.

10 Racketeering Act Fifty-Three

11 Distribution of Methamphetamine

12 57. On or about April 10, 2008, in Los Angeles County,
13 within the Central District of California, defendant GUTIERREZ
14 knowingly and intentionally distributed methamphetamine, a
15 schedule II controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Fifty-Four

18 Distribution of Methamphetamine

19 58. On or about May 1, 2008, in Los Angeles County, within
20 the Central District of California, defendant GUTIERREZ knowingly
21 and intentionally distributed methamphetamine, a schedule II
22 controlled substance, in violation of Title 21, United States
23 Code, Section 841(a)(1).

24 Racketeering Act Fifty-Five

25 Possession with Intent to Distribute Methamphetamine

26 59. On or about July 30, 2008, in Los Angeles County,
27 within the Central District of California, defendant V. RODRIGUEZ
28 knowingly and intentionally possessed with the intent to

1 distribute methamphetamine, a schedule II controlled substance,
2 in violation of Title 21, United States Code, Section 841(a)(1).

3 Racketeering Act Fifty-Six

4 Possession with Intent to Distribute Methamphetamine

5 60. On or about August 1, 2008, in Los Angeles County,
6 within the Central District of California, defendant V. RODRIGUEZ
7 knowingly and intentionally possessed with the intent to
8 distribute methamphetamine, a schedule II controlled substance,
9 in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

[18 U.S.C. § 1959(a)(5)]

1. At all times relevant to this Indictment, the Mongols criminal enterprise, as described more particularly in paragraphs One through Seventeen of the General Allegations, which paragraphs are incorporated and re-alleged herein as if set forth in full, constituted an enterprise as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce.

2. At all times relevant to this Indictment, the Mongols criminal enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, robbery, and extortion, in violation of the California Penal Code; the distribution of controlled substances, including methamphetamine and cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and acts indictable under Title 18, United States Code, Sections 1956 and 1957 (money laundering).

3. On or about December 4, 2005, within the Central District of California and elsewhere, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants RODRIGUEZ, ARMENDAREZ, R. LOZANO, A. LOZANO, GUTIERREZ, and ANGULO unlawfully and knowingly attempted to kill D.F., J.V., and S.G., in violation of California Penal Code

Sections 31 and 187, all in violation of Title 18, United States
Code, Section 1959(a)(5).

COUNT FOUR

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about July 20, 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendant ESPINOZA did unlawfully and knowingly attempt to murder S.A., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FIVE

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about December 10, 2006, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants BUSS, RIOS, WEDIG, and BRADEN did unlawfully and knowingly attempt to kill A.S., in violation of California Penal Code, Sections 21a, 31, 664, 187, and 189 all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT SIX

[18 U.S.C. § 1959(a)(1)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about February 14, 2007, within the Central District of California and elsewhere, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants MONTES and MELCER unlawfully and with malice aforethought willfully participated in the murder of L.H., in violation of California Penal Code Sections 31 and 189, all in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT SEVEN

[18 U.S.C. §§ 1959(a)(2), 3]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about April 8, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendant MALDONADO did unlawfully and knowingly maim M.G., in violation of California Penal Code, Sections 31 and 203, all in violation of Title 18, United States Code, Section 1959(a)(2).

3. After the commission of the above-described offense, defendants CAVAZOS, ROSELI, MUNZ, ALARCON, MORALES and EUSTICE received, relieved, comforted, and assisted MALDONADO in order to hinder or prevent MALDONADO's apprehension, trial, or punishment, in violation of Title 18, United States Code, Section 3.

COUNT EIGHT

[18 U.S.C. §§ 1959(a)(5), 3]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about April 8, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendant MALDONADO did unlawfully and knowingly attempt to kill M.G. and Z.S., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

3. After the commission of the above-described offense, defendants CAVAZOS, ROSELI, MUNZ, ALARCON, MORALES and EUSTICE received, relieved, comforted, and assisted MALDONADO in order to hinder or prevent his apprehension, trial, or punishment, in violation of Title 18, United States Code, Section 3.

COUNT NINE

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about July 28, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendant MELGOZA did unlawfully and knowingly attempt to murder M.T., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TEN

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about August 18, 2007, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants CAVAZOS and WILSON unlawfully conspired to murder rival gang members, in violation of California Penal Code, Sections 21a, 31, 187, and 664, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT ELEVEN

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about April 6, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants LOZA and NEWMAN did unlawfully and knowingly attempt to murder R.H. and J.H., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWELVE

[18 U.S.C. § 1959(a)(5)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about April 27, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants LOUIE, COTTINI and NAVA did unlawfully and knowingly attempt to murder N.G., in violation of California Penal Code, Sections 31, 664, and 187, all in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT THIRTEEN

[18 U.S.C. § 1959(a)(3)]

1. Paragraphs One through Seventeen of the General Allegations and Paragraphs One and Two of Count Three are hereby incorporated and re-alleged herein as if set forth in full.

2. On or about May 24, 2008, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the Mongols criminal enterprise, an enterprise engaged in racketeering activity, defendants R. CAVAZOS, JR., and MCCAULEY unlawfully did assault D.Q. with a dangerous weapon, namely, a .45 caliber firearm, in violation of California Penal Code Section 245(a)(2), and in violation of Title 18, United States Code, Section 1959(a)(3).

COUNT FOURTEEN

[21 U.S.C. § 846]

1. Paragraphs One through Seventeen of the Introductory Allegations are re-alleged and incorporated herein by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown, and continuing to on or about October 9, 2008, in Los Angeles County, within the Central District of California, and elsewhere, defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA, RIVERA, DAVID RIVERA ("D. RIVERA"), REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA, NEWMAN, MORENO, SAVALA, VASQUEZ, D. PADILLA, and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other to commit the following offenses:

1. To distribute at least 50 grams of actual methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii);

5. To distribute at least five grams of actual methamphetamine, a schedule II controlled substance, in violation

of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii); and

3. To distribute at least 500 grams of a mixture or 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)(B)(ii).

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

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

1. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RODRIGUEZ, BUSS, and RIOS would conduct organizational meetings and direct Mongols in the conduct of robberies, assaults, murders, extortion, and drug trafficking, as well as the collection and management of proceeds generated through the commission of unlawful activities from Mongols members, in order to promote and further the activities of the Mongols gang.

2. Defendants NIEVES, W. RAMIREZ, J. GARCIA, SOTO, CANALES, J. GONZALEZ, MEDEL, and WEDIG, and others known and unknown to the Grand Jury, would direct lower-ranking Mongols members and prospective Mongols members about the activities of the gang and their responsibilities for the organization and deliver proceeds generated through the commission of unlawful activities from Mongols members, prospects and the regional chapters to the Mongols "Mother Chapter" leadership.

3. Defendants RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.

1 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
2 J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS, MOREIN, L.
3 PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, WEDIG, V.
4 RODRIGUEZ, CHAVEZ, MELGOZA, RIOS, CONTRERAS, RIVERA, D. RIVERA,
5 REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY,
6 SHAWLEY, CORDOVA, WILLIAM RAMIREZ, MORENO, SAVALA, VASQUEZ, and
7 D. PADILLA, and others would obtain and distribute
8 methamphetamine and cocaine to Mongols members, associates and
9 narcotics customers.

10 4. Defendant CAVAZOS and others would negotiate with
11 Mexican Mafia representatives to address the collection of "tax"
12 payments for the narcotics trafficking activities of Mongols
13 members in areas otherwise controlled by the Mexican Mafia.

14 5. Defendants CAVAZOS, H. GONZALEZ, ROSELI, NIEVES,
15 TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUNOZ, J. GARCIA,
16 BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R.
17 LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ,
18 VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ,
19 LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO,
20 WEDIG, V. RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, RIOS,
21 ANGULO, CONTRERAS, ESPINOZA, RIVERA, D. RIVERA, REYNOLDS, I.
22 PADILLA, HULL, TREVINO, CHEVILLE, SHAWLEY, PRICE, MCCAULEY,
23 LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA,
24 NEWMAN, MORENO, and SAVALA, and others known and unknown to the
25 Grand Jury would obtain firearms, knives, bullet-proof vests, and
26 explosives to be used to enforce the authority of the Mongols
27 against rival gang members, the general public, and law
28 enforcement.

1 6. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ,
2 ROSELI, NIEVES, MUNZ, and WILSON would direct Mongols members to
3 travel to different locations and commit acts of violence,
4 including murder, against rival gang members, law enforcement or
5 other persons who would challenge the authority of the Mongols
6 organization.

7 7. Defendants MUNZ, W. RAMIREZ, RODRIGUEZ, MUNOZ, J.
8 GARCIA, BUSS, SOTO, RIOS, ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.
9 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
10 CANALES, J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS,
11 MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO, MONTES, WEDIG, A.
12 LOPEZ, BRADEN, CHAVEZ, MELGOZA, ANGULO, CONTRERAS, ESPINOZA,
13 RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, NAVA,
14 SHAWLEY, PRICE, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, LOZA,
15 NEWMAN, MORENO, and SAVALA, and others known and unknown to the
16 Grand Jury would commit acts of violence, including murder,
17 against rival gang members, law enforcement or other persons who
18 would challenge the authority of the Mongols organization.

19 8. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ,
20 and others would conduct financial transactions to conceal the
21 proceeds derived from the crimes of the organization and convert
22 those proceeds to further the crimes of the Mongols and enrich
23 themselves.

24 9. Defendants CAVAZOS, R. CAVAZOS, JR., NIEVES, WILSON, J.
25 GARCIA, and SOTO and others known and unknown to the Grand Jury
26 would recruit new members to the Mongols organization and direct
27 their initiation into the gang.

1 C. OVERT ACTS

2 In furtherance of the conspiracy, and to accomplish the
3 objects of the conspiracy, defendants CAVAZOS, R. CAVAZOS, JR.,
4 H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ,
5 RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR.,
6 ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE,
7 FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ,
8 ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
9 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
10 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
11 RIVERA, D. RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE,
12 VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCAULEY,
13 LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA,
14 NEWMAN, MORENO, SAVALA, VASQUEZ, and D. PADILLA, and others known
15 and unknown to the Grand Jury committed various overt acts,
16 within the Central District of California and elsewhere,
17 including overt acts numbered 1 through 383 as set forth in Count
18 One and hereby incorporated by reference, on or about the dates
19 specified therein.

COUNT FIFTEEN

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

On or about November 3, 2005, in Los Angeles County, within the Central District of California, defendant JORGE VIRAMONTES, also known as "Solo," knowingly and intentionally distributed at least five grams, that is, approximately 18 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT SIXTEEN

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

On or about January 19, 2006, in Los Angeles County, within the Central District of California, defendant JUAN ALFRED GONZALEZ, also known as "Negro," knowingly and intentionally distributed at least five grams, that is, approximately eight grams, of actual methamphetamine, a schedule II controlled substance.

COUNT SEVENTEEN

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

On or about February 8, 2006, in Los Angeles County, within the Central District of California, defendant DAVID TELLEZ knowingly and intentionally distributed at least five grams, that is, approximately 13.2 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT EIGHTEEN

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

On or about March 1, 2006, in Los Angeles County, within the Central District of California, defendant DAVID TELLEZ knowingly and intentionally distributed at least five grams, that is, approximately 15.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT NINETEEN

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

On or about March 2, 2006, in Los Angeles County, within the Central District of California, defendant DAVID PADILLA, also known as "Lazy Dave," knowingly and intentionally distributed at least five grams, that is, approximately 15.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY

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

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendant DAVID PADILLA, also known as "Lazy Dave," knowingly and intentionally distributed at least five grams, that is, approximately 15.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-ONE

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

On or about March 22, 2006, in Los Angeles County, within the Central District of California, defendant DAVID TELLEZ knowingly and intentionally distributed at least five grams, that is, approximately 29.5 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-TWO

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

On or about March 23, 2006, in Los Angeles County, within the Central District of California, defendant JUAN ALFRED GONZALEZ, aka "Negro," knowingly and intentionally possessed with the intent to distribute at least five grams, that is, approximately 5.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-THREE

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

On or about May 5, 2006, in Los Angeles County, within the Central District of California, defendant WILLIAM OWENS, also known as "Target," knowingly and intentionally distributed at least five grams, that is, approximately 23 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-FOUR

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

On or about May 10, 2006, in Los Angeles County, within the Central District of California, defendant DAVID TELLEZ knowingly and intentionally distributed at least five grams, that is, approximately 10.9 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-FIVE

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

On or about May 18, 2006, in Los Angeles County, within the Central District of California, defendant RENATO GOMEZ knowingly and intentionally distributed at least five grams, that is, approximately 11.8 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-SIX

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

On or about May 24, 2006, in Los Angeles County, within the Central District of California, defendants ANDRES RODRIGUEZ, also known as ("aka") "Rascal," and DAVID EDWARD GIL, aka "L.A. Bull," knowingly and intentionally distributed at least five grams, that is, approximately 11 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-SEVEN

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

On or about May 24, 2006, in Los Angeles County, within the Central District of California, defendant RENATO GOMEZ knowingly and intentionally distributed at least five grams, that is, approximately 11 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-EIGHT

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

On or about May 31, 2006, in Los Angeles County, within the Central District of California, defendant DAVID EDWARD GIL, also known as "L.A. Bull," knowingly and intentionally distributed at least five grams, that is, approximately 9.6 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWENTY-NINE

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

On or about June 8, 2006, in Los Angeles County, within the Central District of California, defendant DAVID EDWARD GIL, also known as "L. A. Bull," knowingly and intentionally distributed at least five grams, that is, approximately 26.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY

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

On or about July 18, 2006, in Los Angeles County, within the Central District of California, defendant ANDRES RODRIGUEZ, also known as "Rascal," knowingly and intentionally distributed at least five grams, that is, approximately 23.8 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-ONE

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

On or about July 19, 2006, in Los Angeles County, within the Central District of California, defendant PETER SOTO, also known as "Bouncer," knowingly and intentionally distributed at least five grams, that is, approximately 9.6 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-TWO

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

On or about July 21, 2006, in Los Angeles County, within the Central District of California, defendants ANDRES RODRIGUEZ, also known as ("aka") "Rascal," and DAVID EDWARD GIL, aka "L.A. Bull," knowingly and intentionally distributed at least five grams, that is, approximately 15.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-THREE

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

On or about July 25, 2006, in Los Angeles County, within the Central District of California, defendant PETER SOTO, also known as "Bouncer," knowingly and intentionally distributed at least five grams, that is, approximately 13.5 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-FOUR

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

On or about August 16, 2006, in Los Angeles County, within the Central District of California, defendant DAVID EDWARD GIL, also known as "L.A. Bull," knowingly and intentionally distributed at least five grams, that is, approximately 16.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-FIVE

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

On or about August 17, 2006, in Los Angeles County, within the Central District of California, defendants MANUEL ARMENDAREZ, also known as ("aka") "Mandog," and RAFAEL LOZANO, aka "Peligroso," knowingly and intentionally distributed at least 50 grams, that is, approximately 57.2 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-SIX

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

On or about August 24, 2006, in Los Angeles County, within the Central District of California, defendants ANDRES RODRIGUEZ, also known as ("aka") "Rascal," and JOHN ALEX AZANEDO, aka "Bullet," knowingly and intentionally distributed at least five grams, that is, approximately 18.3 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-SEVEN

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

On or about September 18, 2006, in Los Angeles County, within the Central District of California, defendant JORGE VIRAMONTES, also known as "Solo," knowingly and intentionally distributed at least 50 grams, that is, approximately 85.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-EIGHT

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

On or about September 20, 2006, in Los Angeles County, within the Central District of California, defendant ANDRES RODRIGUEZ, also known as "Rascal," knowingly and intentionally distributed at least five grams, that is, approximately 37.6 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT THIRTY-NINE

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

On or about November 6, 2006, in Los Angeles County, within the Central District of California, defendant RAFAEL LOZANO, also known as "Peligroso," knowingly and intentionally distributed at least 50 grams, that is, approximately 113.7 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY

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

On or about November 26, 2006, in Los Angeles County, within the Central District of California, defendants ANDRES RODRIGUEZ, also known as ("aka") "Rascal, and DAVID EDWARD GIL, aka "L. A. Bull," knowingly and intentionally distributed at least 50 grams, that is, approximately 56.7 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-ONE

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

On or about March 23, 2007, in Los Angeles County, within the Central District of California, defendant RAFAEL LOZANO, also known as "Peligroso," knowingly and intentionally distributed at least five grams, that is, approximately 14.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-TWO

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

On or about March 23, 2007, in San Bernardino County, within the Central District of California, defendant MANUEL ARMENDAREZ, also known as "Mandog," knowingly and intentionally distributed at least 50 grams, that is, approximately 55 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-THREE

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

On or about April 7, 2007, in Los Angeles County, within the Central District of California, defendant HORACIO PONCE, also known as "Scorpio," knowingly and intentionally distributed at least 50 grams, that is, approximately 78 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-FOUR

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

On or about May 23, 2007, in Los Angeles County, within the Central District of California, defendant MARK GARCIA, also known as "Wolf," knowingly and intentionally distributed at least 50 grams, that is, approximately 57.5 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-FIVE

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

On or about June 13, 2007, in Los Angeles County, within the Central District of California, defendant JAIME FLORES knowingly and intentionally distributed at least five grams, that is, approximately 9.5 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-SIX

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

On or about November 21, 2007, in Los Angeles County, within the Central District of California, defendant ENRIQUE LOUIS MUNOZ, also known as "Hank," knowingly and intentionally possessed with the intent to distribute at least 50 grams, that is, approximately 66.8 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-SEVEN

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

On or about December 13, 2007, in Los Angeles County, within the Central District of California, defendant LUIS PADILLA, also known as "Kiko," knowingly and intentionally possessed with the intent to distribute at least five grams, that is, approximately 34 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-EIGHT

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

On or about February 12, 2008, in Los Angeles County, within the Central District of California, defendants RAFAEL LOZANO, also known as ("aka") "Peligroso," and ISMAEL RIVERA, aka "Yo-Yo," knowingly and intentionally distributed at least 50 grams, that is, approximately 97 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FORTY-NINE

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

On or about April 1, 2008, in Los Angeles County, within the Central District of California, defendant FELIX FIGUEROA, also known as "Risky," knowingly and intentionally possessed with the intent to distribute at least 50 grams, that is, approximately 97 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY

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

On or about April 10, 2008, in Los Angeles County, within the Central District of California, defendant RICARDO GUTIERREZ, also known as "Rick-O," knowingly and intentionally distributed at least 50 grams, that is, approximately 107.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-ONE

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

On or about May 1, 2008, in Los Angeles County, within the Central District of California, defendant RICARDO GUTIERREZ, also known as "Money," knowingly and intentionally distributed at least 50 grams, that is, approximately 75.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-TWO

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

On or about June 19, 2008, in San Bernardino County, within the Central District of California, defendant RAFAEL LOZANO, also known as "Peligroso," knowingly and intentionally distributed at least 50 grams, that is, approximately 62.5 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-THREE

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

On or about July 24, 2008, in San Bernardino County, within the Central District of California, defendants ISMAEL RIVERA, also known as "Yo-Yo," and DAVID RIVERA knowingly and intentionally possessed with the intent to distribute at least 50 grams, that is, approximately 214.4 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-FOUR

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

On or about July 31, 2008, in Los Angeles County, within the Central District of California, defendant VINCENT RODRIGUEZ, also known as "Monk," knowingly and intentionally distributed at least 50 grams, that is, approximately 91.1 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-FIVE

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

On or about September 17, 2008, in Los Angeles County, within the Central District of California, defendant MANUEL JIMMIE VASQUEZ, also known as "Leatherface," knowingly and intentionally possessed with the intent to distribute at least five grams, that is, approximately 26 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT FIFTY-SIX

[18 U.S.C. § 922(g)(1)]

On or about October 15, 2005, in Los Angeles County, within the Central District of California, defendant JUAN ALFRED GONZALEZ, also known as "Negro" ("GONZALEZ"), knowingly possessed a firearm, namely, a Glock, Model 19 9 mm handgun, serial number GBB197, in and affecting interstate and foreign commerce.

Such possession occurred after defendant GONZALEZ had been convicted of at least one of the following crimes punishable by imprisonment for a term exceeding one year:

1. Assault with a Deadly Weapon, in violation of California Penal Code Section 245(a)(1), in the Los Angeles Superior Court, Case Number A361728, on or about March 12, 1981;

2. Assault with Intent to Commit Bodily Harm, in violation of California Penal Code Section 245(a)(1), in the Los Angeles Superior Court, Case Number 32623, on or about October 15, 1982.

COUNT FIFTY-SEVEN

[18 U.S.C. § 922(g)(1)]

On or about December 2, 2005, in Los Angeles County, within the Central District of California, defendant JUAN ALFRED GONZALEZ, also known as "Negro" ("GONZALEZ"), knowingly possessed a firearm, namely, a Smith & Wesson, Model 732, .32 caliber handgun, serial number AR3981, in and affecting interstate and foreign commerce.

Such possession occurred after defendant GONZALEZ had been convicted of at least one of the following crimes punishable by imprisonment for a term exceeding one year:

1. Assault with a Deadly Weapon, in violation of California Penal Code Section 245(a)(1), in the Los Angeles Superior Court, Case Number A361728, on or about March 12, 1981;

2. Assault with Intent to Commit Bodily Harm, in violation of California Penal Code Section 245(a)(1), in the Los Angeles Superior Court, Case Number 32623, on or about October 15, 1982.

COUNT FIFTY-EIGHT

[18 U.S.C. § 922(g)(1)]

On or about May 18, 2006, in Los Angeles County, within the Central District of California, defendant RENATO GOMEZ ("GOMEZ") knowingly possessed at least one of the following firearms: an Intra-Tec, 9 mm handgun, serial number A039070; and a Mossberg 12 gauge shotgun, serial number R362343, in and affecting interstate and foreign commerce.

Such possession occurred after defendant GOMEZ had been convicted of at least one of the following crimes punishable by imprisonment for a term exceeding one year:

1. Carrying a Loaded Firearm, in violation of California Penal Code Section 11359, in the Los Angeles Superior Court Case Number BA265141, on or about June 29, 2004;

2. Possession of a Controlled Substance, in violation of California Health & Safety Code Section 11377(a), in the Los Angeles Superior Court Case Number BA265141, on or about June 29, 2004;

3. Possessing a Firearm at a Public School, in violation of California Penal Code Section 626.9, in the Los Angeles Superior Court Case Number BA144810, on or about January 3, 1997.

COUNT FIFTY-NINE

[18 U.S.C. § 922(g)(1)]

On or about June 5, 2007, in Los Angeles County, within the Central District of California, defendant JAIME FLORES ("FLORES") knowingly possessed a firearm, namely, a Norinco SKS assault rifle, serial number 1601319, in and affecting interstate and foreign commerce.

Such possession occurred after defendant FLORES had been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Possession of Marijuana for Sale, in violation of California Health and Safety Code Section 11359, in the Los Angeles Superior Court, Case Number BA259879, on or about April 21, 2004.

COUNT SIXTY

[18 U.S.C. § 922(g)(1)]

On or about June 13, 2007, in Los Angeles County, within the Central District of California, defendant JAIME FLORES ("FLORES") knowingly possessed a firearm, namely, a Mossberg shotgun, serial number R823455, in and affecting interstate and foreign commerce.

Such possession occurred after defendant FLORES had been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Possession of Marijuana for Sale, in violation of California Health and Safety Code Section 11359, in the Los Angeles Superior Court, Case Number BA259879, on or about April 21, 2004.

COUNT SIXTY-ONE

[18 U.S.C. § 924(c)]

On or about April 8, 2007, in Los Angeles County, within the Central District of California, defendant DENIS MALDONADO, also known as "Steaky," knowingly possessed a firearm, namely, a Baikal ACP .380 caliber handgun, bearing serial number G020976-BTM9983, during and in relation to, and in furtherance of, a crime of violence, namely, the racketeering conspiracy set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT SIXTY-TWO

[18 U.S.C. § 924(c)]

On or about December 13, 2007, in Los Angeles County, within the Central District of California, defendant ANDRES RODRIGUEZ, also known as "Rascal," knowingly possessed firearms, namely, a Glock Model 30 .45 caliber handgun, bearing serial number GKB912; a Glock 9 mm handgun, with an obliterated serial number; and a Llama .45 caliber handgun, bearing serial number A12613, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute methamphetamine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and a crime of violence, namely, the racketeering conspiracy set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT SIXTY-THREE

[18 U.S.C. § 924(c)]

On or about March 17, 2008, in Los Angeles County, within the Central District of California, defendant RUBEN CAVAZOS, also known ("aka") as "Doc," RUBEN CAVAZOS, JR., aka "Lil Rubes," HECTOR GONZALEZ, JR., aka "Largo," ARTHUR ROSELI, JR., aka "Chiques," ALVARO CAVAZOS, JR., aka "Al the Suit," DANIEL MEDEL, aka "Big Dog," and BRIAN MCCAULEY knowingly possessed firearms, namely, a .22 caliber Marlin rifle, bearing serial number 93448421; a Sturm Ruger Mini Thirty rifle, bearing serial number 197-09346; a 12 gauge Mossberg shotgun, bearing serial number K419567; a .30 caliber Iver Johnson rifle, bearing serial number AA66083; a loaded Taurus 9 mm handgun, bearing serial number TJH52492; a loaded .45 caliber Beretta handgun, bearing serial number 098560MC; a .45 caliber Para-Ordnance Warthog handgun, bearing serial number P162909; a .223 caliber Keltec semi-automatic rifle, bearing serial number NSD52; a loaded 5.56 caliber Keltec semi-automatic rifle, bearing serial number N4M46; a .38 caliber Titan revolver, bearing serial number 0523545; a .45 caliber Colt semi-automatic handgun, bearing serial number 15829B70; a .45 caliber Firestorm semi-automatic handgun, bearing serial number 71-04-09140-02; a .38 caliber Smith & Wesson revolver, bearing serial number BBT4960; a .45 caliber Sig-Sauer handgun, bearing serial number G343 763; and a Taurus 9 mm semi-automatic handgun, bearing serial number TV1 66551, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute methamphetamine and cocaine, schedule II narcotic drug controlled substances, in violation of

1 Title 21, United States Code, Sections 846 and 841(a)(1), and a
2 crime of violence, namely, the racketeering conspiracy set forth
3 in Count One of this Indictment, a violation of Title 18, United
4 States Code, Section 1962(d).

COUNT SIXTY-FOUR

[18 U.S.C. § 924(c)]

On or about April 1, 2008, in Los Angeles County, within the Central District of California, defendant FELIX FIGUEROA, also known as "Risky," knowingly possessed a firearm, namely, a Springfield Armory .45 caliber handgun, bearing serial number 22073, during and in relation to, and in furtherance of, a drug trafficking crime, namely, conspiracy to distribute methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and a crime of violence, namely, the racketeering conspiracy set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT SIXTY-FIVE

[18 U.S.C. § 924(c)]

On or about May 24, 2008, in Los Angeles County, within the Central District of California, defendants RUBEN CAVAZOS, JR., also known as "Lil Rubes," and BRIAN MCCAULEY, knowingly possessed a firearm, namely, an H&K .45 caliber handgun, bearing serial number 25-093654, during and in relation to, and in furtherance of, a crime of violence, namely, the racketeering conspiracy set forth in Count One of this Indictment, a violation of Title 18, United States Code, Section 1962(d).

COUNT SIXTY-SIX

[18 U.S.C. § 1956(h)]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about October 9, 2008, in Los Angeles County, within the Central District of California, and elsewhere, defendants RUBEN CAVAZOS, also known as ("aka") "Doc" ("CAVAZOS"), RUBEN CAVAZOS, JR., aka "Lil Rubes" ("R. CAVAZOS, JR."), HECTOR GONZALEZ, JR., aka "Largo" ("H. GONZALEZ"), ARTHUR ROSELI, JR., aka "Chiques" ("ROSELI"), JUAN MANUEL NIEVES, aka "Listo" ("NIEVES"), ANTHONY MARK TINOCO, aka "Bengal" ("TINOCO"), WILLIAM MICHAEL MUNZ ("MUNZ"), LAWRENCE WILSON, aka "Lars" ("WILSON"), JOSE GARCIA, aka "Big Joe" ("J. GARCIA"), ROBERT VINCENT RIOS, aka "Chente" ("RIOS"), and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other to conduct financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, that is, a conspiracy to distribute methamphetamine and cocaine, with the intent to promote the carrying on of said specified unlawful activity, and to conceal and disguise the nature, location, source, ownership, and control the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

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

The objects of the conspiracy were to be accomplished in

substance as follows:

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 9 of Count One, setting forth the means described in the conspiracy charged in Count One of this Indictment.

2. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 9 of Count Fourteen, setting forth the means described in the conspiracy charged in Count Fourteen of this Indictment.

3. Defendants would conspire and arrange with others to obtain crack cocaine and methamphetamine.

4. Defendants H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, J. GARCIA, and RIOS and others known and unknown to the Grand Jury would collect proceeds derived from the drug-trafficking and other crimes of the Mongols criminal enterprise on a monthly basis.

5. Defendants H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, J. GARCIA, and RIOS, and others known and unknown to the Grand Jury would deliver proceeds to defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ for the organization.

6. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ would maintain bank and credit card accounts to receive proceeds from the Mongols criminal enterprise.

7. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ would use the proceeds to promote the activities and offenses of the Mongols criminal enterprise.

C. OVERT ACTS

In furtherance of the conspiracy, and to accomplish the

1 objects of the conspiracy, defendants CAVAZOS, R. CAVAZOS, JR.,
2 H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, J. GARCIA, and
3 RIOS, and others known and unknown to the Grand Jury, committed
4 various overt acts on or about the following dates, within the
5 Central District of California and elsewhere, including but not
6 limited to the following:

7 1-383. The Grand Jury re-alleges and incorporates by
8 reference paragraphs 1 through 383 of Count One setting forth the
9 overt acts of the conspiracy charged in Count One of this
10 Indictment.

COUNTS SIXTY-SEVEN THROUGH EIGHTY-FOUR

[18 U.S.C. §§ 1956(a)(1)(B)(I), 2(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendants RUBEN CAVAZOS, also known as ("aka") "Doc" ("CAVAZOS"), HECTOR GONZALEZ, JR., aka "Largo" ("GONZALEZ"), ARTHUR ROSELI, JR., aka "Chiques" ("ROSELI"), JUAN MANUEL NIEVES, aka "Listo" ("NIEVES"), ANTHONY MARK TINOCO, aka "Bengal" ("TINOCO"), WILLIAM MICHAEL MUNZ ("MUNZ"), LAWRENCE WILSON, aka "Lars" ("WILSON"), WALTER RAMIREZ, aka "Bumper" ("W. RAMIREZ"), ANDRES RODRIGUEZ, aka "Rascal" ("RODRIGUEZ"), ENRIQUE LOUIS MUNOZ, aka "Hank" ("MUNOZ"), JOSE GARCIA, aka "Big Joe" ("J. GARCIA"), SHAWN BUSS, aka "Monster" ("BUSS"), PETER SOTO, aka "Bouncer" ("SOTO"), and VICENTE RIOS, aka "Chente" ("RIOS"), knowingly and willfully conducted and aided, abetted, counseled, commanded, induced, and procured the following financial transactions affecting interstate and foreign commerce, knowing that the property involved in each of the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, that is, a conspiracy to distribute methamphetamine and cocaine, knowing that each of the transactions was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
SIXTY-SEVEN	9/20/06	Payment in the amount of \$26,625 to The Comfort Inn

1	SIXTY-EIGHT	9/20/06	\$24,087.65 in United States currency deposited in the Marquis Villas, Palm Springs account
2			
3	SIXTY-NINE	10/06/06	\$2,000 in United States currency deposited in Marquis Villas, Palm Springs Account
4			
5	SEVENTY	10/06/06	\$2,000 in United States currency deposited to Marquis Villa, Palm Springs
6			
7	SEVENTY-ONE	10/10/06	Business check in the amount of \$3,252.86 issued by Trading Places International, LLC
8			
9	SEVENTY-TWO	10/19/06	Business check in the amount of \$2,000 issued by Palm Springs Inn, LLC
10			
11	SEVENTY-THREE	10/24/06	Deposit of US Bank check in the amount of \$3,252.86 into Washington Mutual Bank
12			
13	SEVENTY-FOUR	8/06/07	Deposit of \$2,500 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
14			
15	SEVENTY-FIVE	8/14/07	Payment to Delta Airlines charged to Washington Mutual account xxxxxxxx2048
16			
17	SEVENTY-SIX	9/06/07	Payment of \$7,356 in United States currency to Washington Mutual credit card account xxxxxxxxx2048
18			
19	SEVENTY-SEVEN	9/22/07	Payment of \$5,000 to Marquis Villas, Palm Springs from Washington Mutual credit card account number xxxxxxx2048
20			
21	SEVENTY-EIGHT	10/03/07	Deposit of \$5,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
22			
23	SEVENTY-NINE	10/05/07	\$3,000 in United States currency deposited to Marquis Villa, Palm Springs
24			
25	EIGHTY	10/30/07	Deposit of US Bank check in the amount of \$2,750 into Washington Mutual Bank
26			
27	EIGHTY-ONE	12/03/07	Deposit of \$2,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
28			
29	EIGHTY-TWO	5/13/08	Deposit of \$2,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048

1 EIGHTY-THREE 6/10/08 Deposit of \$2,500 in United States
2 currency to Washington Mutual credit
card account xxxxxxxxxxxx2048

3 EIGHTY-FOUR 7/17/08 Deposit of \$2,500 in United States
4 currency to Washington Mutual credit
card account xxxxxxxxxxxx2048

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COUNT EIGHTY-FIVE

[18 U.S.C. § 1963]

1. Paragraphs One through Seventeen of the Introductory Allegations are re-alleged and incorporated herein by reference as though fully set forth herein.

2. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence, in accordance with Title 18, United States Code, Section 1963, in the event of any defendant's conviction under Counts One and/or Two of this Indictment.

3. The defendants CAVAZOS, R. CAVAZOS, JR., GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RAMIREZ, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, BULLET, MALDONADO, MONTES, WEDIG, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA, RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, GOMEZ, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, MELCER, LOZA, NEWMAN, MORENO, SAVALA, and D. PADILLA:

a. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. have an interest in, security of, claims against, and property and contractual rights that afford a source of influence over, the enterprise named and described herein, which

1 the defendants established, operated, controlled, conducted, and
2 participated in the conduct of, in violation of Title 18, United
3 States Code, Section 1962, which interests, securities, claims,
4 and rights are subject to forfeiture to the United States
5 pursuant to Title 18, United States Code, Section 1963 (a)(2);
6 and

7 c. have property constituting and derived from
8 proceeds obtained, directly and indirectly, from racketeering
9 activity, in violation of Title 18, United States Code, Section
10 1962, which property is subject to forfeiture to the United
11 States pursuant to Title 18, United States Code, Section
12 1963(a)(3).

13 4. The interests of the defendants subject to forfeiture to
14 the United States pursuant to Title 18, United States Code,
15 Section 1963(a)(1), (a)(2), and (a)(3), include but are not
16 limited to:

17 a. At least \$5,000,000.

18 b. The trademark/service mark "Mongols" (Registration
19 No. 2916965), issued to Mongol Nation, purportedly for use in
20 commerce in connection with promoting the interests of persons
21 interested in the recreation of riding motorcycles.

22 c. The real property located at 3007 Cordova Court,
23 West Covina, California.

24 5. If any of the property described in paragraph 3 above,
25 as a result of any act or omission of a defendant,

26 a. cannot be located upon the exercise of due
27 diligence;

28 b. has been transferred or sold to, or deposited with,

1 a third party;

2 c. has been placed beyond the jurisdiction of the
3 court;

4 d. has been substantially diminished in value; or

5 e. has been commingled with other property that cannot
6 be divided without difficulty, the court shall order the
7 forfeiture of any other property of the defendants up to the
8 value of any property set forth in paragraph 3 above.

9 6. The above-named defendants, and each of them, are
10 jointly and severally liable for the forfeiture obligations as
11 alleged above.

COUNT EIGHTY-SIX

[18 U.S.C. § 982(a)(1); 21 U.S.C. § 853(a)]

1. Paragraphs One through Seventeen of the Introductory Allegations are re-alleged and incorporated herein by reference as though fully set forth herein.

2. The allegations contained in Counts Twelve through Fifty-Five of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1), in the event of any defendant's conviction under Counts Twelve through Fifty-Five of this Indictment.

3. Defendants CAVAZOS, H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUNOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, R. GOMEZ, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA, RIVERA, DAVID RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, NAVA, R. GOMEZ, MCCAULEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA, NEWMAN, MORENO, SAVALA, VASQUEZ and D. PADILLA

1 shall forfeit to the United States the following property:

2 a. All right, title, and interest in any and all property
3 (1) constituting, or derived from, any proceeds
4 obtained, directly or indirectly, as a result of any such
5 offense; and

6 (2) any property used, or intended to be used, in
7 any manner or part, to commit, or to facilitate the commission of
8 any such offense, including but not limited to:

9 a. The real property located at 3007 Cordova Court, West
10 Covina, California.

11 b. A sum of money equal to the total value of the property
12 described in subsection (a).

13 4. Pursuant to Title 21, United States Code, Section
14 853(p), each defendant shall forfeit substitute property, up to
15 the value of the total amount described in paragraph 1, if, as
16 the result of any act or omission of said defendant, the property
17 described in paragraph 1, or any portion thereof:

18 a. cannot be located upon the exercise of due
19 diligence;

20 b. has been transferred, sold to or deposited with a
21 third party;

22 c. has been placed beyond the jurisdiction of the
23 court;

24 d. has been substantially diminished in value; or

25 e. has been commingled with other property which
26 cannot be divided without difficulty.

27 5. For each of Counts Twelve through Fifty-Four for which
28 more than one defendant is found guilty, each such defendant

1 shall be jointly and severally liable for the entire amount
2 ordered forfeited pursuant to that count.

3
4 A TRUE BILL

5
6 Foreperson

7
8 THOMAS P. O' BRIEN
9 United States Attorney

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

13 ROBERT E. DUGDALE
14 Assistant United States Attorney
15 Chief, Violent and Organized Crime Section

16 CHRISTOPHER BRUNWIN
17 Assistant United States Attorney
18 Deputy Chief, Violent and Organized Crime Section

19 REEMA M. EL-AMAMY
20 Assistant United States Attorney
21 Violent and Organized Crime Section