FILED

2016 JUN 22 PM 2:58

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

BY _____

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2015 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. CARLOS HERNANDEZ, aka "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," Defendants.	CR No. 16- CR16- 0442 I N D I C T M E N T [18 U.S.C § 241: Conspiracy to Violate Civil Rights; 18 U.S.C. § 1959(a)(3), (a)(6): Violent Crime in Aid of Racketeering; 42 U.S.C. § 3631: Interference with Housing Rights by Force; 18 U.S.C § 844(f): Attempted Arson of Federal Property; 18 U.S.C. § 844(n): Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony; 18 U.S.C § 844(h): Use Fire and Carry Explosive to Commit Another Federal Felony; 18 U.S.C § 924(c)(1)(A)(i): Possess, Use, and Carry a Firearm During and in Relation to, and in Furtherance of, a Crime of Violence; 18 U.S.C. § 1001: Making a False Statement; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

A. THE RACKETEERING ENTERPRISE

1. At all times relevant to this Indictment, defendants CARLOS HERNANDEZ, aka "Creeper," aka "Rider" ("HERNANDEZ"), JOSE SAUCEDO, aka "Lil' Moe" ("SAUCEDO"), FRANCISCO FARIAS, aka "Bones" ("FARIAS"), JOSUE GARIBAY, aka "Malo" ("GARIBAY"), EDWIN FELIX, aka "Boogie" ("FELIX"), JONATHAN PORTILLO, aka "Pelon" ("PORTILLO"), and JOEL MATTHEW MONARREZ, aka "Gallo" ("MONARREZ"), and others known and unknown to the Grand Jury, were members and associates of the Big Hazard, or Hazard Grande, street gang, a criminal organization whose members and associates engaged in, among other things, murder, robbery, extortion, witness intimidation, and trafficking and conspiracy to traffic in controlled substances. At all times relevant to this Indictment, the Hazard criminal organization ("Hazard" or "Hazard gang") operated within the Central District of California and elsewhere.

2. Hazard is a multi-generational gang that originated in the early 1940s and claimed a territory in the East Los Angeles Area, which grew to include the Ramona Gardens Housing Project ("Ramona Gardens"), a federally funded public housing development built in the 1950s. Hazard derived its name from a park in the neighborhood the gang controlled, Hazard Park, and uses Ramona Gardens as a base of operations. As of June 2016, Hazard had an estimated membership of approximately 350 individuals.

3. Hazard is part of a network of Latino gangs in the greater Los Angeles area controlled by senior gang members who are also members and associates of an organization known as the "Mexican Mafia" or "La Eme." The Mexican Mafia is an organized group of individuals that controls the narcotics trafficking and other criminal activities within California's penal system and, through that control, controls the activities of Latino gangs, like the Hazard gang, on the streets.

B. PURPOSES OF THE HAZARD GANG

4. The purposes of Hazard include, but are not limited to, the following:

a. Promoting Hazard leaders' criminal reputation among other Latino gangs in Southern California and inside of state and federal prisons; carrying out Hazard leaders' orders against rival gang members and perceived enemies; and enhancing Hazard's reputation by promoting the criminal reputation of its members and associates.

b. Maintaining Hazard's control and authority over its territory, often through threats, intimidation, civil rights crimes, and other acts of violence, including murder, committed against local residents and rival gangs.

c. Violently retaliating against rival gang members who challenge Hazard's authority or who fail to pay debts owed to Hazard members and associates.

d. Promoting and enhancing the power and authority of the Hazard gang and associated Latino gangs operating under Hazard's leadership.

e. Exposing and punishing Hazard members and associates who are perceived as violating Hazard's rules.

f. Exposing and punishing potential witnesses to crimes committed by Hazard members and associates who are suspected of cooperating with law enforcement or otherwise "disrespecting" Hazard.

g. Imposing unwritten rules regarding the control of Hazard territory, including that African-American residents reside in Ramona Gardens at the pleasure of Hazard, and that the African-American residents face retaliation and expulsion from Ramona Gardens by Hazard if they offend Hazard members.

C. RAMONA GARDENS

5. As of June 2016, Ramona Gardens was occupied by approximately 95 percent Hispanic residents and approximately 3 percent African-American residents. Ramona Gardens was originally constructed with money provided by the federal government, namely, the United States Housing Authority, and the residents' rent is subsidized by the federal government, namely, the United States Department of Housing and Urban Development, in order to provide affordable housing. At all times relevant to this Indictment, Ramona Gardens was managed by the Housing Authority of the City of Los Angeles.

D. THE VICTIMS

6. The victims in this case included the following:

a. Victim 1, an African-American adult female, Victim 1's African-American minor children, and Victim 2, an African-American adult male, who were residing in a unit inside Ramona Gardens ("Unit A").

b. Victim 3, an African-American adult female, Victim 3's African-American minor children, and Victim 4, an African-American adult male, who were residing in a unit inside Ramona Gardens ("Unit B").

c. Victim 5, an African-American adult female, and Victim 5's African-American children and African-American grandchildren, who were residing in a unit inside Ramona Gardens ("Unit C").

d. Victim 6, a Hispanic adult female, who was residing in a unit directly adjacent to Victim 1's Unit A inside Ramona Gardens ("Unit D").

7. These Introductory Allegations are hereby incorporated by reference into each count of this Indictment.

COUNT ONE

[18 U.S.C. § 241]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, and continuing until at least on or about September 29, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, aka "Creeper," aka "Rider" ("HERNANDEZ"), JOSE SAUCEDO, aka "Lil' Moe" ("SAUCEDO"), FRANCISCO FARIAS, aka "Bones" ("FARIAS"), JOSUE GARIBAY, aka "Malo" ("GARIBAY"), EDWIN FELIX, aka "Boogie" ("FELIX"), JONATHAN PORTILLO, aka "Pelon" ("PORTILLO"), and JOEL MATTHEW MONARREZ, aka "Gallo" ("MONARREZ"), and other co-conspirators known and unknown to the Grand Jury who were also members or associates of the Hazard gang, willfully conspired to injure, oppress, threaten, and intimidate African-American residents in the Ramona Gardens Housing Project ("Ramona Gardens") in Boyle Heights, California, in the free exercise and enjoyment of rights secured to those residents by the Constitution and laws of the United States, namely, the right to occupy a dwelling free from injury, intimidation, and interference based on race and color.

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

The object of the conspiracy was accomplished and was to be accomplished, in substance, as follows:

1. Big Hazard criminal street gang ("Hazard") members and associates would claim Ramona Gardens as the gang's territory.

2. Hazard would adopt as one of its unwritten tenets that members of the gang would harass, intimidate, and use violence

to drive African-American residents out of the gang's territory, including Ramona Gardens, if the African-American residents offended Hazard.

3. In order to identify the territory controlled by Hazard, and to instill fear in African-Americans and other residents who lived in or near the gang's territory, including Ramona Gardens, members of Hazard would spray paint (or "tag") their gang monikers and gang symbols on businesses, residences, and property in the gang's territory, including Ramona Gardens.

4. Hazard members, including defendants HERNANDEZ and FARIAS, and associates would obtain and possess guns and other dangerous weapons in order to, among other things: enforce the authority of Hazard; intimidate rivals and residents; attack rivals and African-Americans; and protect Hazard members from retaliation or gang rivals.

5. Hazard members and associates would monitor the activity of African-Americans residing in the gang's territory, including Ramona Gardens, and defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, would meet to discuss ways to threaten, intimidate, and attack African-Americans in their residences, on the streets, and elsewhere, to deter African-Americans from continuing to reside in Ramona Gardens and to drive African-Americans out of the gang's territory, including Ramona Gardens, because of their race and color.

6. Members of the Hazard gang, including defendant SAUCEDO, would confront African-American residents, including mixed-race children, and individually and collectively threaten

them by telling them that they were not welcome in Hazard gang territory, namely, Ramona Gardens, and that they risked harm if they remained as residents.

C. OVERT ACTS

In furtherance of the conspiracy, and to accomplish the object of the conspiracy, defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and other members and associates of the Hazard gang known and unknown to the Grand Jury, committed various overt acts, on or about the following dates, within the Central District of California, and elsewhere, including, but not limited to, the following:

1. In early May of 2014, defendant HERNANDEZ led a Hazard meeting at a gang location in Hazard territory, at which defendants SAUCEDO, FARIAS, GARIBAY, FELIX, and PORTILLO, and others, attended, and told them they were going to use "Molotov cocktails" to firebomb residential units in Ramona Gardens occupied by African-American families, including children.

2. In early May of 2014, at the same meeting described above, defendant HERNANDEZ told defendants SAUCEDO, FARIAS, GARIBAY, FELIX, and PORTILLO, and others, that they were firebombing these units to "get the niggers out of the neighborhood," or words to that effect.

3. On May 11, 2014, Mother's Day, defendant HERNANDEZ contacted co-conspirators and instructed them to meet at a gang location in Hazard territory to prepare for the firebombing of the residential units occupied by the African-American families.

4. On May 11, 2014, defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, met

at a gang location in Hazard territory to prepare for the firebombing of the residential units occupied by the African-American families.

5. On May 11, 2014, at the same meeting, defendant HERNANDEZ provided defendants SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, instructions as to how they were to conduct the firebombing of the residential units occupied by the African-American families, and distributed disguises, gloves, and materials for the firebombs.

6. On May 11, 2014, at the same meeting, defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, split into two groups, and defendant HERNANDEZ assigned each a duty in the firebombing, including: (a) breaking the windows of the African-Americans' residences to allow the firebombs to make clean entries; (b) igniting the firebombs; and (c) throwing the firebombs into the residences through the broken windows in order to maximize damage.

7. On May 11, 2014, defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, deliberately left behind their cellular telephones prior to engaging in the firebombing in order to thwart law enforcement's ability to track their movements through their cellular telephones.

8. On May 11, 2014, defendant HERNANDEZ armed himself with a semi-automatic handgun and used a stolen van to transport the group, including defendants SAUCEDO, FARIAS, also armed with a semi-automatic handgun, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, via a route where they knew the security

cameras inside of Ramona Gardens would be unable to record them as they exited the van to conduct their firebombing.

9. On May 12, 2014, shortly after midnight, defendants HERNANDEZ, SAUCEDO, FARIAS, GARIBAY, FELIX, PORTILLO, and MONARREZ, and others, entered Ramona Gardens, split into their two groups, and firebombed four residential units in Ramona Gardens, three of which were occupied by African-American families and one of which was immediately adjacent to a unit occupied by an African-American family, as follows:

a. Unit A, occupied by Victim 1, Victim 1's five minor children, and Victim 2; Victim 1 was on the couch with her baby immediately prior to the firebombing, and the firebomb landed where Victim 1 and her baby had been sleeping before hearing the sound of a window breaking;

b. Unit B, occupied by Victim 3, Victim 3's minor children, and Victim 4;

c. Unit C, occupied by Victim 5 and Victim 5's children and grandchildren; defendant HERNANDEZ, in the process of throwing one of the ignited Molotov cocktails into Unit C, cut his right arm on broken glass, causing it to bleed profusely and require later medical attention; and

d. Unit D, occupied by Victim 6, directly adjacent to Victim 1's Unit A.

10. On May 12, 2014, defendant FARIAS, driving the stolen van the group had utilized earlier, transported defendant HERNANDEZ to White Memorial Hospital where defendant HERNANDEZ received medical treatment for the cut he sustained to his right arm while carrying out the firebombing, before returning the

remaining co-conspirators to a gang location in Hazard territory.

11. On May 12, 2014, and within a few days following the firebombing, defendants SAUCEDO, PORTILLO, and MONARREZ, and others, returned to the gang location in Hazard territory to collect their personal items they had left behind in order to thwart law enforcement tracking.

12. On September 29, 2014, defendant SAUCEDO, while in Ramona Gardens, confronted and threatened a mixed-race family that resided in Ramona Gardens, including a young mixed-race child, and warned that they should leave Ramona Gardens or that they too would get firebombed.

COUNT TWO

[18 U.S.C. §§ 1959(a)(3), 2(a)]

1. At all times relevant to Counts Two and Three, the Big Hazard criminal street gang ("Hazard"), as described more particularly in Paragraphs 1 through 4 of the Introductory Allegations, 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. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to Counts Two and Three, Hazard, 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 California law; offenses involving the manufacturing, selling, and otherwise dealing in controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1); and acts indictable under Title 18, United States Code, Section 1951 (Interference with Commerce by Threats or Violence), and Title 18, United States Code, Section 1512 (Tampering with a Witness, Victim, or Informant).

3. On or about May 12, 2014, in Los Angeles County, within the Central District of California, for the purpose of gaining entrance to and maintaining and increasing position in Hazard, an enterprise engaged in racketeering activity, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper,"

aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting the other, and others known and unknown to the Grand Jury, committed assault with dangerous weapons, namely, Molotov cocktails (i.e., firebombs), against African-American Victims 1, 2, 3, 4, 5, and others, in violation of California Penal Code Section 245.

COUNT THREE

[18 U.S.C. § 1959(a)(6)]

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

2. On or about May 12, 2014, in Los Angeles County, within the Central District of California, for the purpose of gaining entrance to and maintaining and increasing position in Hazard, an enterprise engaged in racketeering activity, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," and others known and unknown to the Grand Jury, attempted to commit assault with dangerous weapons, namely, Molotov cocktails (i.e., firebombs), against African-American Victims 1, 2, 3, 4, 5, and others, in violation of California Penal Code Sections 245 and 664.

COUNT FOUR

[42 U.S.C. § 3631; 18 U.S.C. § 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, attempted to and did, by force and threat of force, willfully injure, intimidate, and interfere with African-American residents of the Ramona Gardens Housing Project ("Ramona Gardens") in Boyle Heights, California, namely, African-American Victims 1, 2, 3, 4, and 5 ("the Victims"), and others, by the use and attempted use of a dangerous weapon, explosives, and fire, namely, by making and throwing Molotov cocktails (i.e., firebombs) at and into the Victims' residential units in Ramona Gardens, because of the Victims' race and color, and because the Victims were occupying dwellings in Ramona Gardens.

COUNT FIVE

[18 U.S.C. §§ 844(f)(1),(2), 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, maliciously damaged and attempted to damage, by means of fire and explosives, buildings and real property, namely, four residential units in the Ramona Gardens Housing Project, which were in whole or in part owned, possessed, and operated and administered by the Housing Authority of the City of Los Angeles, an organization receiving financial assistance from the United States Department of Housing and Urban Development, and in so doing, created a substantial risk of injury to Victims 1, 2, 3, 4, and 5, and others.

COUNT SIX

[18 U.S.C. § 844(n)]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about September 29, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendants CARLOS HERNANDEZ, aka "Creeper," aka "Rider" ("HERNANDEZ"), JOSE SAUCEDO, aka "Lil' Moe" ("SAUCEDO"), FRANCISCO FARIAS, aka "Bones" ("FARIAS"), JOSUE GARIBAY, aka "Malo" ("GARIBAY"), EDWIN FELIX, aka "Boogie" ("FELIX"), JONATHAN PORTILLO, aka "Pelon" ("PORTILLO"), and JOEL MATTHEW MONARREZ, aka "Gallo" ("MONARREZ"), and others known and unknown to the Grand Jury (collectively, "defendants"), conspired to knowingly and intentionally use fire to commit, and carry explosives during the commission of, at least one of the following federal felonies:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime In Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Two of the Indictment;

3. Violent Crime In Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Three of the Indictment; and

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment;

all in violation of Title 18, United States Code, Section 844(h).

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

The object of the conspiracy was accomplished and was to be accomplished, in substance, as follows:

1. Big Hazard criminal street gang ("Hazard") members and associates would claim Ramona Gardens as the gang's territory.

2. Hazard would adopt as one of its unwritten tenets that members of the gang would harass, intimidate, and use violence to drive African-American residents out of the gang's territory, including Ramona Gardens, if the African-American residents offended Hazard.

3. In order to identify the territory controlled by Hazard, and to instill fear in African-Americans and other residents who lived in or near the gang's territory, including Ramona Gardens, members of Hazard would spray paint (or "tag") their gang monikers and gang symbols on businesses, residences, and property in the gang's territory, including Ramona Gardens.

4. Hazard members, including defendants HERNANDEZ and FARIAS, and associates would obtain and possess guns and other dangerous weapons in order to, among other things: enforce the authority of Hazard; intimidate rivals and residents; attack rivals and African-Americans; and protect Hazard members from retaliation or gang rivals.

5. Hazard members and associates would monitor the activity of African-Americans residing in the gang's territory, including Ramona Gardens, and defendants HERNANDEZ, SAUCEDO, FARIAS, FELIX, GARIBAY, PORTILLO, and MONARREZ, and others, would meet to discuss ways to threaten, intimidate, and attack African-Americans in their residences, on the streets, and elsewhere, to deter African-Americans from continuing to reside in Ramona Gardens and to drive African-Americans out of the gang's territory, including Ramona Gardens, because of their race and color.

6. Members of the Hazard gang, including defendant SAUCEDO, would confront African-American residents, including mixed-race children, and individually and collectively threaten them by telling them that they were not welcome in Hazard gang territory, namely, Ramona Gardens, and that they risked harm if they remained as residents.

7. Defendants HERNANDEZ, SAUCEDO, FARIAS, FELIX, GARIBAY, PORTILLO, and MONARREZ, and others, would make Molotov cocktails (i.e., firebombs) to throw into the residences of African-American families.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, on or about the listed dates, defendants HERNANDEZ, SAUCEDO, FARIAS, FELIX, GARIBAY, PORTILLO, and MONARREZ, and others known and unknown to the Grand Jury, committed various overt acts within the Central District of California, and elsewhere, including, but not limited to, Overt Acts numbered 1 through 12 as set forth in Count One, which are

re-alleged and incorporated by reference as if fully set forth herein.

COUNT SEVEN

[18 U.S.C. §§ 844(h)(1), (h)(2), 2(a)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendants CARLOS HERNANDEZ, also known as ("aka") "Creeper," aka "Rider," JOSE SAUCEDO, aka "Lil' Moe," FRANCISCO FARIAS, aka "Bones," JOSUE GARIBAY, aka "Malo," EDWIN FELIX, aka "Boogie," JONATHAN PORTILLO, aka "Pelon," and JOEL MATTHEW MONARREZ, aka "Gallo," each aiding and abetting each other, and others known and unknown to the Grand Jury, knowingly used fire, namely, Molotov cocktails (i.e., firebombs), to commit, and carried explosives during the commission of, at least one of the following felonies prosecutable in a court of the United States:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime In Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Two of the Indictment;

3. Violent Crime In Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Three of the Indictment; and

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment.

COUNT EIGHT

[18 U.S.C. § 924(c)(1)(A)(i)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendant CARLOS HERNANDEZ, also known as ("aka") "Rider," aka "Creeper," knowingly used and carried a firearm, namely, a semi-automatic handgun, during and in relation to, and possessed that firearm in furtherance of, at least one of the following crimes of violence:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime in Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Two of the Indictment;

3. Violent Crime in Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Three of the Indictment;

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment;

5. Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(n), as charged in Count Six of the Indictment; and

6. Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(h), as charged in Count Seven of the Indictment.

COUNT NINE

[18 U.S.C. § 924(c)(1)(A)(i)]

On or about May 12, 2014, in Los Angeles County, within the Central District of California, defendant FRANCISCO FARIAS, also known as "Bones," knowingly used and carried a firearm, namely, a semi-automatic handgun, during and in relation to, and possessed that firearm in furtherance of, at least one of the following crimes of violence:

1. Conspiracy Against Civil Rights, in violation of Title 18, United States Code, Section 241, as charged in Count One of the Indictment;

2. Violent Crime in Aid of Racketeering, namely, assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(3), as charged in Count Two of the Indictment;

3. Violent Crime in Aid of Racketeering, namely, attempt to commit assault with a deadly weapon, in violation of Title 18, United States Code, Section 1959(a)(6), as charged in Count Three of the Indictment;

4. Interference with Housing Rights by Force, in violation of Title 42, United States Code, Section 3631, as charged in Count Four of the Indictment;

5. Conspiracy to Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(h), as charged in Count Six of the Indictment; and

6. Use Fire and Carry Explosive to Commit a Federal Felony, in violation of Title 18, United States Code, Section 844(n), as charged in Count Seven of the Indictment.

COUNT TEN

[18 U.S.C. § 1001(a)(2)]

On or about June 23, 2015, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the government of the United States, namely, the Federal Bureau of Investigation ("FBI"), defendant EDWIN FELIX, also known as "Boogie" ("FELIX"), willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation, in that defendant FELIX falsely stated that he did not use the gang

///

moniker "Boogie," during an interview with an FBI Special Agent. In fact, as defendant FELIX then knew, defendant FELIX used the gang moniker "Boogie."

A TRUE BILL

/S/

Foreperson

EILEEN M. DECKER
United States Attorney

LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

BRANDON D. FOX
Assistant United States Attorney
Chief, Public Corruption & Civil Rights Section

MACK E. JENKINS
Assistant United States Attorney
Public Corruption & Civil Rights Section

DOUGLAS M. MILLER
Assistant United States Attorney
Public Corruption & Civil Rights Section

PATRICIA A. SUMNER
Trial Attorney
Department of Justice, Civil Rights Division