

CMM:MEF/PGS
F. #2025R00160/2026R00426

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

- against -

DAVID ORELLANA-ALEMAN,
also known as "Tenebroso,"
NOEL PORTILLO-ROMERO,
also known as "Discreto,"
CRUZ EDUARDO
SANCHEZ-GUTIERREZ,
also known as "Escriper," "Poison"
and "Bellaco,"
GERVIN VINICIO BARRERA-PEREZ,
also known as "Cazador," "Chapin"
and "Trece,"
RANDY CARDENAS,
also known as "Agresor,"
"Majin Bu" and "Eclipso,"
HENRRY JOSUE VILLATORO-SANTOS,
also known as "Samurai,"
EDWIN CHAVEZ-GARAY,
also known as "Spooky" and
"Cruger," and
JAIRO DIAZ-GAMEZ,
also known as "Cameleon" and
"Anonimo,"

Defendants.

-----X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Superseding Indictment, unless otherwise indicated:

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★ JUL 30 2026 ★

LONG ISLAND OFFICE

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 25-209 (S-2) (GRB)
(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
924(j)(1), 1512(k), 1959(a)(1),
1959(a)(5), 1962(c), 1962(d), 1963, 2
and 3551 et seq.; T. 21, U.S.C., §§ 846,
841(b)(1)(C) and 841(b)(1)(D))

The Enterprise

1. La Mara Salvatrucha, also known as the MS-13, (hereinafter the "MS-13" or the "Enterprise"), was a transnational criminal organization with members located throughout Long Island, New York, Queens, New York and elsewhere. Members and associates of the MS-13 have engaged in acts of violence, including acts involving murder, robbery and assault, as well as other criminal activity, including narcotics trafficking, extortion, witness tampering and witness retaliation.

2. The defendants DAVID ORELLANA-ALEMAN, also known as "Tenebroso," NOEL PORTILLO-ROMERO, also known as "Discreto," CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as "Escriper," "Poison" and "Bellaco," GERVIN VINICIO BARRERA-PEREZ, also known as "Cazador," "Chapin" and "Trece," RANDY CARDENAS, also known as "Agresor," "Majin Bu" and "Eclipse," HENRRY JOSUE VILLATORO-SANTOS, also known as "Samurai," EDWIN CHAVEZ-GARAY, also known as "Spooky" and "Cruger," and JAIRO DIAZ-GAMEZ, also known as "Cameleon" and "Anonimo," were members and associates of the MS-13.

3. The MS-13, including its leadership, membership and associates, constituted an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. The Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

4. The purposes of the Enterprise included the following:
 - a. promoting and enhancing the prestige, reputation and position of the Enterprise with respect to rival criminal organizations;
 - b. preserving and protecting the power, territory and criminal ventures of the Enterprise through the use of intimidation, threats of violence and acts of violence, including assault and murder;
 - c. keeping victims and rivals in fear of the Enterprise and its members and associates;
 - d. enriching the members and associates of the Enterprise through criminal activity, including robbery, extortion and narcotics trafficking;
 - e. concealing the activities of the Enterprise from law enforcement;and
 - f. ensuring discipline within the Enterprise and compliance with the Enterprise's rules by members and associates through threats of violence and acts of violence.

Means and Methods of the Enterprise

5. Among the means and methods by which the members and associates of the Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:
 - a. members and associates of the MS-13 committed, attempted to commit, conspired to commit and threatened to commit acts of violence, including murder, robbery, kidnapping and assault, to enhance the Enterprise's prestige and protect and expand the Enterprise's criminal operations;

b. members and associates of the MS-13 used and threatened to use physical violence against various individuals, including members of rival criminal organizations and MS-13 members who violated the Enterprise's rules;

c. members and associates of the MS-13 used, attempted to use and conspired to use robbery, extortion and narcotics trafficking as means of obtaining money; and

d. members and associates of the MS-13 used, attempted to use and conspired to use firearms in furtherance of the Enterprise.

COUNT ONE
(Racketeering)

6. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between January 2016 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants DAVID ORELLANA-ALEMAN, also known as "Tenebroso," NOEL PORTILLO-ROMERO, also known as "Discreto," CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as "Escriper," "Poison" and "Bellaco," GERVIN VINICIO BARRERA-PEREZ, also known as "Cazador," "Chapin" and "Trece," RANDY CARDENAS, also known as "Agresor," "Majin Bu" and "Eclipso," HENRRY JOSUE VILLATORO-SANTOS, also known as "Samurai," EDWIN CHAVEZ-GARAY, also known as "Spooky" and "Cruger," and JAIRO DIAZ-GAMEZ, also known as "Cameleon" and "Anonimo," together with others, each being a person employed by and associated with the MS-13, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conduct and participate, directly and indirectly, in the conduct of the affairs of the MS-13 through a pattern of racketeering activity, as defined by

Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of the racketeering acts set forth below.

RACKETEERING ACT ONE

(Conspiracy to Murder and Murder of Miguel Garcia-Moran)

8. The defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, committed the following acts, either one of which alone constitutes Racketeering Act One:

A. Conspiracy to Murder Miguel Garcia-Moran

9. In or about February 2016, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, did knowingly and intentionally conspire to cause the death of Miguel Garcia-Moran, in violation of New York Penal Law Sections 125.25(1) and 105.15.

B. Murder of Miguel Garcia-Moran

10. On or about February 19, 2016, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, with intent to cause the death of another person, to wit: Miguel Garcia-Moran, did knowingly and intentionally cause his death, in violation of New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT TWO

(Conspiracy to Murder and Murder of Carlos Lemus Interiano)

11. The defendants GERVIN VINICIO BARRERA-PEREZ, EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, committed the following acts, either one of which alone constitutes Racketeering Act Two:

A. Conspiracy to Murder Carlos Lemus Interiano

12. In or about August 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants GERVIN VINICIO BARRERA-PEREZ, EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, did knowingly and intentionally conspire to cause the death of Carlos Lemus Interiano, in violation of New York Penal Law Sections 125.25(1) and 105.15.

B. Murder of Carlos Lemus Interiano

13. On or about August 19, 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, with intent to cause the death of another person, to wit: Carlos Lemus Interiano, did knowingly and intentionally cause his death, in violation of New York Penal Law Sections 125.25(1) and 20.00, Maryland Code, Criminal Law Sections 2-201, 2-204, 2-205, 2-206, 1-201, and 1-202, and the Common Law of Maryland, punishable pursuant to Maryland Code, Criminal Law Sections 1-201, 1-202, 2-201, 2-204, 2-205, and 2-206.

RACKETEERING ACT THREE

(Conspiracy to Obstruct Justice – Lemus Interiano Murder)

14. In or about August 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, did knowingly and intentionally conspire to (a) corruptly alter, destroy, mutilate and conceal one or more objects, to wit: a cellular telephone and wallet, with the intent to impair the objects' integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New

York, contrary to Title 18, United States Code, Section 1512(c)(2), in violation of Title 18, United States Code, Section 1512(k).

RACKETEERING ACT FOUR

(Conspiracy to Murder and Murder of Yoneli Ramos-Moreno)

15. The defendants DAVID ORELLANA-ALEMAN, NOEL PORTILLO-ROMERO and CRUZ EDUARDO SANCHEZ-GUTIERREZ, together with others, committed the following acts, either one of which alone constitutes Racketeering Act Four:

A. Conspiracy to Murder Yoneli Ramos-Moreno

16. In or about October 2023, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN, NOEL PORTILLO-ROMERO and CRUZ EDUARDO SANCHEZ-GUTIERREZ, together with others, did knowingly and intentionally conspire to cause the death of Yoneli Ramos-Moreno, in violation of New York Penal Law Sections 125.25(1) and 105.15.

B. Murder of Yoneli Ramos-Moreno

17. On or about October 28, 2023, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN, NOEL PORTILLO-ROMERO and CRUZ EDUARDO SANCHEZ-GUTIERREZ, together with others, with intent to cause the death of another person, to wit: Yoneli Ramos-Moreno, did knowingly and intentionally cause his death, in violation of New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT FIVE

(Conspiracy to Obstruct Justice – Ramos-Moreno Murder)

18. In or about October 2023, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO and CRUZ EDUARDO SANCHEZ-GUTIERREZ, together with others, did knowingly and intentionally conspire to (a) corruptly alter, destroy, mutilate and conceal one or more objects, to wit: a cellular telephone and a rope,

with the intent to impair the objects' integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(2), in violation of Title 18, United States Code, Section 1512(k).

RACKETEERING ACT SIX

(Conspiracy to Murder and Murder of Carlos Lopez-Lopez)

19. The defendants NOEL PORTILLO-ROMERO, GERVIN VINICIO BARRERA-PEREZ, RANDY CARDENAS, HENRRY JOSUE VILLATORO-SANTOS, EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, committed the following acts, either one of which alone constitutes Racketeering Act Six:

A. Conspiracy to Murder Carlos Lopez-Lopez

20. In or about and between November 2023 and March 3, 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, GERVIN VINICIO BARRERA-PEREZ, RANDY CARDENAS, HENRRY JOSUE VILLATORO-SANTOS, EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, did knowingly and intentionally conspire to cause the death of Carlos Lopez-Lopez, in violation of New York Penal Law Sections 125.25(1) and 105.15.

B. Murder of Carlos Lopez-Lopez

21. On or about March 3, 2025, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, RANDY CARDENAS and HENRRY JOSUE VILLATORO-SANTOS, together with others, with intent to cause the death of another

person, to wit: Carlos Lopez-Lopez, did knowingly and intentionally cause his death, in violation of New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT SEVEN
(Conspiracy to Murder Jane Doe)

22. In or about and between November 2024 and March 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO and HENRRY JOSUE VILLATORO-SANTOS, together with others, did knowingly and intentionally conspire to cause the death of Jane Doe, an individual whose identity is known to the Grand Jury, in violation of New York Penal Law Sections 125.25(1) and 105.15.

RACKETEERING ACT EIGHT
(Conspiracy to Obstruct Justice – Lopez-Lopez Murder)

23. In or about March 2025, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO and RANDY CARDENAS, together with others, did knowingly and intentionally conspire to (a) corruptly alter, destroy, mutilate and conceal one or more objects, to wit: a cellular telephone, clothing, a baseball bat and car keys, with the intent to impair the objects' integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(2), in violation of Title 18, United States Code, Section 1512(k).

RACKETEERING ACT NINE

(Conspiracy to Distribute Cocaine and Marijuana – Vegas Clique)

24. In or about and between January 2016 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (b) a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), in violation of Title 21, United States Code, Section 846.

RACKETEERING ACT TEN

(Conspiracy to Distribute Cocaine – Carlington Clique)

25. In or about and between January 2020 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO and RANDY CARDENAS, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), in violation of Title 21, United States Code, Section 846.

RACKETEERING ACT ELEVEN

(Conspiracy to Distribute Cocaine and Marijuana – Hollywood Clique)

26. In or about and between January 2023 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN and CRUZ EDUARDO

SANCHEZ-GUTIERREZ, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (b) a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), in violation of Title 21, United States Code, Section 846.

RACKETEERING ACT TWELVE

(Conspiracy to Distribute Cocaine and Marijuana – Huntington Clique)

27. In or about and between January 2023 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GERVIN VINICIO BARRERA-PEREZ, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (b) a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), in violation of Title 21, United States Code, Section 846.

(Title 18, United States Code, Sections 1962(c), 1963 and 3551 et seq.)

COUNT TWO

(Racketeering Conspiracy)

28. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

29. In or about and between January 2016 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants DAVID ORELLANA-ALEMAN, also known as "Tenebroso," NOEL PORTILLO-ROMERO, also known as "Discreto," CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as "Escriper," "Poison" and "Bellaco," GERVIN VINICIO BARRERA-PEREZ, also known as "Cazador," "Chapin" and "Trece," RANDY CARDENAS, also known as "Agresor," "Majin Bu" and "Eclipso," HENRRY JOSUE VILLATORO-SANTOS, also known as "Samurai," EDWIN CHAVEZ-GARAY, also known as "Spooky" and "Cruger," and JAIRO DIAZ-GAMEZ, also known as "Cameleon" and "Anonimo," together with others, each being a person employed by and associated with the MS-13, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the MS-13 enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

30. The pattern of racketeering activity through which defendants DAVID ORELLANA-ALEMAN, NOEL PORTILLO-ROMERO, CRUZ EDUARDO SANCHEZ-GUTIERREZ, GERVIN VINICIO BARRERA-PEREZ, RANDY CARDENAS, HENRRY JOSUE VILLATORO-SANTOS, EDWIN CHAVEZ-GARAY and JAIRO DIAZ-GAMEZ, together with others, agreed to conduct and participate, directly and indirectly, in the conduct of the affairs of the MS-13 enterprise consisted of the racketeering acts set forth in paragraphs eight through 27 of this Superseding Indictment, as Racketeering Acts One through Twelve, which are realleged and incorporated as if fully set forth in this paragraph. It was 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.

(Title 18, United States Code, Sections 1962(d), 1963 and 3551 et seq.)

COUNT THREE

(Conspiracy to Murder Miguel Garcia-Moran)

31. At all times relevant to this Superseding Indictment, the MS-13, as more fully described in paragraphs one through five, which are realleged and incorporated as if fully set forth in this paragraph, including its leadership, membership and associates, constituted an “enterprise” as defined in Section 1959(b)(2) of Title 18, United States Code, that is, a group of individuals associated in fact that 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.

32. At all times relevant to this Superseding Indictment, the MS-13, through its leaders, 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 and threats involving murder, extortion and robbery, that are chargeable under New York Penal Law and punishable by imprisonment for more than one year, acts indictable under Title 18, United States Code, Sections 1512 (relating to tampering with a witness, victim or informant) and 1513 (relating to retaliating against a witness, victim or informant), and offenses involving narcotics trafficking, punishable under Title 21, United States Code, Sections 841 and 846.

33. In or about February 2016, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others,

for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally conspire to murder Miguel Garcia-Moran, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT FOUR
(Murder of Miguel Garcia-Moran)

34. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

35. On or about February 19, 2016, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Miguel Garcia-Moran, in violation of New York Penal Law Sections 125.25(1) and 20.00.

(Title 18, United States Code, Sections 1959(a)(1), 2 and 3551 et seq.)

COUNT FIVE
(Conspiracy to Murder Carlos Lemus Interiano)

36. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

37. In or about August 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants GERVIN VINICIO BARRERA-PEREZ, also known as “Cazador,” “Chapin” and “Trece,” EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly

and intentionally conspire to murder Carlos Lemus Interiano, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT SIX
(Murder of Carlos Lemus Interiano)

38. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

39. On or about August 19, 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, with intent to cause the death of another person, to wit: Carlos Lemus Interiano, did knowingly and intentionally cause his death, in violation of New York Penal Law Sections 125.25(1) and 20.00, Maryland Code, Criminal Law Sections 2-201, 2-204, 2-205, 2-206, 1-201, and 1-202, and the Common Law of Maryland, punishable pursuant to Maryland Code, Criminal Law Sections 1-201, 1-202, 2-201, 2-204, 2-205, and 2-206.

(Title 18, United States Code, Sections 1959(a)(1), 2 and 3551 et seq.)

COUNT SEVEN
(Brandishing and Discharge of a Firearm during Crime of Violence:
Carlos Lemus Interiano Murder)

40. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

41. On or about August 19, 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, did knowingly and intentionally use and carry a firearm during

and in relation to one or more crimes of violence, to wit: the crimes charged in Counts One and Six, and did knowingly and intentionally possess a firearm in furtherance of such crimes of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT EIGHT

(Causing the Death of Carlos Lemus Interiano Through the Use of a Firearm)

42. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

43. On or about August 19, 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon,” and “Anonimo,” together with others, in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the crime charged in Count Seven, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was a murder as defined in Title 18, United States Code, Section 1111(a), in that the defendants, together with others, with malice aforethought, did unlawfully kill Carlos Lemus Interiano willfully, deliberately, maliciously and with premeditation.

(Title 18, United States Code, Sections 924(j)(1), 2 and 3551 et seq.)

COUNT NINE

(Conspiracy to Obstruct Justice – Lemus Interiano Murder)

44. In or about August 2023, within the Eastern District of New York, the District of Maryland and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, did knowingly and intentionally conspire to (a) corruptly alter,

destroy, mutilate and conceal one or more objects, to wit: a cellular telephone and wallet, with the intent to impair the objects' integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(2).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

COUNT TEN

(Conspiracy to Murder Yoneli Ramos-Moreno)

45. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

46. In or about October 2023, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN, also known as "Tenebroso," NOEL PORTILLO-ROMERO, also known as "Discreto," and CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as "Escriper," "Poison" and "Bellaco," together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally conspire to murder Yoneli Ramos-Moreno, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT ELEVEN

(Murder of Yoneli Ramos-Moreno)

47. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

48. On or about October 28, 2023, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN, also known as "Tenebroso,"

NOEL PORTILLO-ROMERO, also known as “Discreto,” and CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as “Escriper,” “Poison” and “Bellaco,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Yoneli Ramos-Moreno, in violation of New York Penal Law Sections 125.25(1) and 20.00.

(Title 18, United States Code, Sections 1959(a)(1), 2 and 3551 et seq.)

COUNT TWELVE

(Conspiracy to Obstruct Justice – Ramos-Moreno Murder)

49. In or about October 2023, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” and CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as “Escriper,” “Poison” and “Bellaco,” together with others, did knowingly and intentionally conspire to (a) corruptly alter, destroy, mutilate and conceal one or more objects, to wit: a cellular telephone and a rope, with the intent to impair the objects’ integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(2).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

COUNT THIRTEEN

(Conspiracy to Murder Carlos Lopez-Lopez)

50. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

51. In or about and between November 2023 and March 3, 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” GERVIN VINICIO BARRERA-PEREZ, also known as “Cazador,” “Chapin” and “Trece,” RANDY CARDENAS, also known as “Agresor,” “Majin Bu” and “Eclipso,” HENRRY JOSUE VILLATORO-SANTOS, also known as “Samurai,” EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally conspire to murder Carlos Lopez-Lopez, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT FOURTEEN
(Conspiracy to Murder Jane Doe)

52. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

53. In or about and between November 2024 and March 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” and HENRRY JOSUE VILLATORO-SANTOS, also known as “Samurai,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally conspire to murder Jane Doe, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT FIFTEEN
(Murder of Carlos Lopez-Lopez)

54. The allegations contained in paragraphs one through five, 31 and 32 are realleged and incorporated as if fully set forth in this paragraph.

55. On or about March 3, 2025, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” RANDY CARDENAS, also known as “Agresor,” “Majin Bu” and “Eclipso,” and HENRRY JOSUE VILLATORO-SANTOS, also known as “Samurai,” together with others, for the purpose of gaining entrance to and maintaining and increasing position in the MS-13, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Carlos Lopez-Lopez, in violation of New York Penal Law Sections 125.25(1) and 20.00.

(Title 18, United States Code, Sections 1959(a)(1), 2 and 3551 et seq.)

COUNT SIXTEEN
(Conspiracy to Obstruct Justice – Lopez-Lopez Murder)

56. In or about October 2023, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” and RANDY CARDENAS, also known as “Agresor,” “Majin Bu” and “Eclipso,” together with others, did knowingly and intentionally conspire to (a) corruptly alter, destroy, mutilate and conceal one or more objects, to wit: a cellular telephone, clothing, a baseball bat, and car keys, with the intent to impair the objects’ integrity and availability for use in an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(1); and (b) corruptly obstruct, influence and impede an official proceeding, to wit: a Federal Grand Jury investigation in the Eastern District of New York, contrary to Title 18, United States Code, Section 1512(c)(2).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

COUNT SEVENTEEN

(Conspiracy to Distribute Cocaine and Marijuana – Vegas Clique)

57. In or about and between January 2016 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants EDWIN CHAVEZ-GARAY, also known as “Spooky” and “Cruger,” and JAIRO DIAZ-GAMEZ, also known as “Cameleon” and “Anonimo,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(C) and 841(b)(1)(D); Title 18, United States Code, Sections 3551 et seq.)

COUNT EIGHTEEN

(Conspiracy to Distribute Cocaine – Carlington Clique)

58. In or about and between January 2020 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOEL PORTILLO-ROMERO, also known as “Discreto,” and RANDY CARDENAS, also known as “Agresor,” “Majin Bu” and “Eclipso,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, for remuneration, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT NINETEEN

(Conspiracy to Distribute Cocaine and Marijuana – Hollywood Clique)

59. In or about and between January 2023 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DAVID ORELLANA-ALEMAN, also known as “Tenebroso,” and CRUZ EDUARDO SANCHEZ-GUTIERREZ, also known as “Escriper,” “Poison” and “Bellaco,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(C) and 841(b)(1)(D); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY

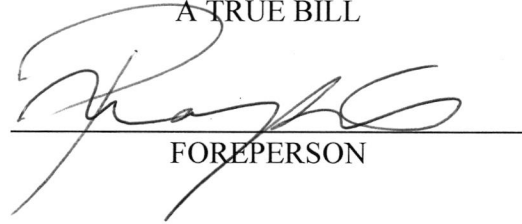
(Conspiracy to Distribute Cocaine and Marijuana – Huntington Clique)

60. In or about and between January 2023 and the date of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GERVIN VINICIO BARRERA-PEREZ, also known as “Cazador,” “Chapin” and “Trece,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing cocaine, a Schedule II controlled substance; and (b) a

substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Sections 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(C) and 841(b)(1)(D); Title 18, United States Code, Sections 3551 et seq.)

A TRUE BILL

A handwritten signature in black ink, appearing to be "Ralph", is written over a horizontal line. Below the line, the word "FOREPERSON" is printed in capital letters.

FOREPERSON

By David Pittluck, Assistant U.S. Attorney
JOSEPH NOCELLA, JR.
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK