

SEALED BY ORDER  
OF THE COURT

UNITED STATES DISTRICT COURT

FILED

NORTHERN DISTRICT OF CALIFORNIA

DEC 18 2025

CR 24-00226-BLF

SAN JOSE DIVISION

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

THE UNITED STATES OF AMERICA

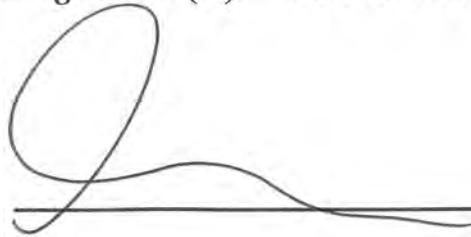
VS

GUSTAVO GARCIA aka "Tatis,"  
LORENZO GARCIA Jr. aka "Chito,"  
BERTIN MEDRANO aka "Dre,"  
JESUS SALDANA a/k/a "D Rose,"  
OSCAR BENITEZ a/k/a "Sideshow,"  
CARLOS GUTIERREZ a/k/a "Black Carlos,"  
JESUS AVALOS FERNANDEZ a/k/a "Chuchin,"  
JOSE AGUILERA a/k/a "Jay," and  
MARCO SANCHEZ a/k/a "Cooks"

SUPERSEDING INDICTMENT

COUNT ONE: 18 U.S.C. § 1962(d) – Racketeering Conspiracy

*A true bill.*



Foreperson

Filed in open court this 18 day of December A.D. 202 5

*Virginia K. DuMarch*

United States Magistrate Judge

*Bail. \$ no bail arrest warrant for (1) J. Saldana, (2) O. Benitez,  
(3) C. Gutierrez, (4) J. Fernandez, (5) J. Aguilera, (6) M. Sanchez  
No process: (7) G. Garcia, (8) L. Garcia, Jr., (9) B. Medrano*

SEALED BY ORDER  
OF THE COURT

FILED

DEC 18 2025

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

CRAIG H. MISSAKIAN (CABN 125202)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 5:24-CR-00226-BLF
Plaintiff,	)	
v.	)	<u>VIOLATIONS:</u>
	)	Count One: 18 U.S.C. § 1962(d) – Racketeering
	)	Conspiracy;
	)	18 U.S.C. § 1963 and 28 U.S.C. § 2461(c) – Criminal
GUSTAVO GARCIA aka “Tatis,”	)	Forfeiture
LORENZO GARCIA Jr. aka “Chito,”	)	
BERTIN MEDRANO aka “Dre,”	)	SAN JOSE VENUE
JESUS SALDANA a/k/a “D Rose,”	)	
OSCAR BENITEZ a/k/a “Sideshow,”	)	<u>FILED UNDER SEAL</u>
CARLOS GUTIERREZ a/k/a “Black Carlos,”	)	
JESUS AVALOS FERNANDEZ a/k/a	)	
“Chuchin,”	)	
JOSE AGUILERA a/k/a “Jay,” and	)	
MARCO SANCHEZ a/k/a “Cooks”	)	
Defendants.	)	

SUPERSEDING INDICTMENT

The Grand Jury charges, with all dates being approximate and all date ranges approximate and inclusive, that at all times relevant to this Superseding Indictment:

Introductory Allegations

1. The Salinas Acosta Plaza Norteños (“SAP”) was a criminal street gang that operated in Salinas, California, which is in the Northern District of California. SAP is a specific clique within the larger collection of Norteño criminal street gangs that operate in the city of Salinas. The Norteños began

SUPERSEDING INDICTMENT

1 to establish a presence in Salinas and Monterey County in the 1970's, aligning with the Nuestra Familia  
2 prison gang and funneling taxes and proceeds from their crimes on the street to Nuestra Familia gang  
3 members in prison. Norteño gang members associate with the color red and the number "14", including  
4 any variations of the number such as "4" and "XIV," the roman numerals for 14. This is significant  
5 because "N" is the 14th letter of the alphabet.

6 2. SAP originated in the 1990's in the Salinas Acosta Plaza apartment complex in Salinas,  
7 which is a collection of townhomes at and around the 900 block of Acosta Plaza. The gang claims this  
8 apartment complex as its territory. SAP commonly uses the letters and numbers "SAP," "A," "P,"  
9 "900" and "914," as well as the color red, to identify itself. SAP members also commonly wear clothing  
10 of the Atlanta Braves, Oakland A's, and/or the Pittsburgh Pirates baseball teams to represent the gang,  
11 given that the symbols of these teams prominently feature the letters "A" and "P." Additionally, Salinas  
12 Acosta Plaza Norteño gang members will often identify themselves as "SAP" or "Sapsters."

13 3. "SAP" and "900" (and their variations) are commonly, though not universally, displayed  
14 by SAP members in tattoos, graffiti, drawings, hand signs, on clothing, and in photos, rap videos, and  
15 social media posts as a way of displaying their affiliation, loyalty, and commitment to the gang.  
16 Additionally, some SAP members have admitted their gang membership to law enforcement, on social  
17 media, or in the court system.

18 4. The primary rivals of SAP are Sureño criminal street gang members. The rivalry  
19 between Norteño and Sureño gang members in the city of Salinas has resulted in numerous acts of  
20 violence, including murders, attempted murders, shootings, and assaults. Additionally, SAP members  
21 very often target victims who they perceive to be Sureño gang members but who are not actually gang-  
22 affiliated, which has led to several murders and attempted murders of non-gang-affiliated victims.

23 5. There are typically about 50 active members of SAP at any given time. They have a  
24 leadership structure, where a designated "channel" is responsible for overseeing the activities of the  
25 gang and communicating with Nuestra Familia leadership. Aspiring SAP members may be encouraged  
26 or required to put in "work," including to engage in shootings, robberies, drug sales, or other criminal  
27 conduct in order to gain entry into the gang. Historically, there is a formal initiation process into the  
28 gang where a prospective member is "jumped in" by getting beaten by a group of members. SAP

1 members gain admission, earn status and respect, and rise in rank by committing criminal acts that  
2 benefit the gang and/or by spending time in jail or prison for the same. SAP members engage in acts of  
3 violence, including acts involving murder and assault, against their rivals and, at times, fellow Norteño-  
4 affiliated gang members who have allegedly violated the gang's rules. SAP members also traffic in  
5 controlled substances and illegally possess and traffic firearms. Violence is often the quickest way to  
6 gain admission and/or status for the individual gang member. Members are also expected to pay dues to  
7 the gang, with greater dues required of those members who traffic in controlled substances. The dues  
8 are used, in part, to pay tribute to the Nuestra Familia and to acquire firearms for distribution,  
9 possession, and use by SAP members.

10 6. SAP members meet and work together to carry out illegal activities for the benefit of  
11 SAP members and its membership, and also to benefit, more generally, the Norteños and the Nuestra  
12 Familia. SAP members fight with other street gangs for control of territory from which they conduct  
13 drug trafficking and other crimes, and recruit and intimidate non-gang members. SAP members engage  
14 in acts of violence and intimidation to control illegal activities, to claim or maintain established territory,  
15 to retaliate against a rival gang or suspected rival gang member, to earn notoriety and respect, to  
16 dissuade potential victims and witnesses from reporting crime or cooperating with law enforcement, to  
17 discipline fellow gang members, and to send a message to others that they are strong, powerful, and not  
18 to be provoked.

19 7. SAP members are expected to protect and uphold its power, territory, and profits by using  
20 violence, threats of violence, and intimidation against rival gang members and against members of the  
21 public. Through these acts, SAP members maintain a reputation of violence, thereby keeping rivals and  
22 members of the public in fear of the gang, discouraging cooperation with law enforcement regarding the  
23 gang's criminal activities, and accumulating more power, territory, members, and profits over time.

#### 24 The Racketeering Enterprise

25 8. The Salinas Acosta Plaza Norteño gang (SAP), including its leadership, members, and  
26 associates, in the Northern District of California, constituted an "enterprise" as defined in Title 18,  
27 United States Code, Section 1961(4), that is, a group of individuals associated in fact, which is engaged  
28 in, and the activities of which affect, interstate and foreign commerce. SAP, also referred to herein as

1 the Enterprise, constituted an ongoing organization whose members and associates function as a  
2 continuing unit for a common purpose of achieving the objectives of the Enterprise.

3 Purposes of the Enterprise

4 9. The purposes of the SAP Enterprise included the following:

- 5 a) Preserving and protecting the power, territory, reputation, and profits of the  
6 Enterprise through the use of acts involving murder, intimidation, violence, threats of violence, and  
7 assaults;
- 8 b) Promoting and enhancing the Enterprise and the activities of its members and  
9 associates through acts involving murder, robbery, narcotics trafficking, firearms trafficking, and other  
10 criminal activities;
- 11 c) Keeping rival gang members, potential informants and witnesses against the  
12 Enterprise, other victims and potential victims, fellow gang members, former gang members, and  
13 community members in fear of the Enterprise and its members and associates through violence, threats  
14 of violence, and acts of vandalism;
- 15 d) Providing the Enterprise's leadership, members, and associates with financial  
16 support; and
- 17 e) Protecting the Enterprise's members and associates who committed crimes by  
18 hindering, obstructing, and preventing law enforcement officers from identifying the offenders,  
19 apprehending the offenders, and successfully prosecuting and punishing the offenders.

20 Means and Methods of the Enterprise

21 10. The means and methods by which members and associates of SAP Enterprise conducted  
22 and participated in the conduct of the affairs of Enterprise included, but were not limited to the  
23 following:

- 24 a) Members and associates of SAP agreed that acts of violence, including acts  
25 involving murder, assaults, and other acts of violence would be committed by members and associates  
26 of SAP against rival gang members and others when it furthered the status and goals of the Enterprise.  
27 Specifically, SAP members and associates armed themselves with firearms and agreed to "hunt" and kill  
28 rival gang members. SAP members and associates also targeted individuals viewed as traitors to the

1 Enterprise and anyone else who disrespected or was perceived to challenge the authority or interests of  
2 the Enterprise and its members and associates. Such violence was in service of the Enterprise in that it  
3 reinforced the Enterprise's status and sent a message to its own members and associates, and to rival  
4 criminal organizations, that the Enterprise was not to be challenged;

5           b) Members and associates of SAP protected and expanded the Enterprise's criminal  
6 operation by committing, attempting, and threatening to commit acts of violence. Such acts and threats  
7 of violence and intimidation also promoted a climate of fear, promoted the authority of Enterprise  
8 members, and helped insulate its members from prosecution for the criminal actions of the Enterprise by  
9 discouraging others from reporting the actions to law enforcement;

10           c) Members and associates discussed the membership and its rules; the status of  
11 members and associates, including whether they have been arrested or incarcerated; disciplining  
12 members or associates for violating Enterprise rules; coordinating and concealing criminal activity from  
13 law enforcement; plans and agreements regarding the commission of futures crimes, as well as ways to  
14 conceal those crimes; and using violence and threats of violence, implicit or otherwise, to deter  
15 members, associates, victims and witnesses from reporting on the crimes of the Enterprise and its  
16 members and associates;

17           d) Members and associates of SAP further agreed that members and associates of the  
18 Enterprise would engage in illicit activities intended to provide financial benefit to the Enterprise and its  
19 members, including committing acts involving robbery, trafficking controlled substances, and  
20 trafficking firearms in certain areas of Salinas and Monterey County. The purchase and transportation  
21 of controlled substances and firearms, at times, occurred in areas outside of the Northern District of  
22 California and outside of the State of California. Specifically, members and associates of the Enterprise  
23 acquired controlled substances from suppliers, transported those controlled substances, and sold the  
24 controlled substances. At times, portions of the profits from these drug sales were paid to the Enterprise  
25 as "dues," which funds were then used to acquire firearms for Enterprise members to use in acts of  
26 violence. Profitability from trafficking in controlled substances and firearms increased one's status in  
27 the Enterprise;

e) Members and associates of SAP used landline telephones, mobile telephones, text messaging, email, social media applications, in-person conversations, and other modes of communication to plan and commit crimes on behalf of the Enterprise, including acts involving murder, trafficking controlled substances, illegal possession and trafficking of firearms, robbery, assault, and other crimes, and to conceal these criminal activities by obstructing justice, threatening or intimidating witnesses, and other means;

f) Members and associates of SAP also sought to raise the gang's public profile and promote its influence by posting photographs and videos on social media of gang members displaying gang signs, and by vandalizing public and private property with gang graffiti.

### The Defendants

11. At times relevant to this Superseding Indictment, GUSTAVO GARCIA a/k/a "Tatis," LORENZO GARCIA Jr. a/k/a "Chito," BERTIN MEDRANO a/k/a "Dre," JESUS SALDANA a/k/a "D Rose," OSCAR BENITEZ a/k/a "Sideshow," CARLOS GUTIERREZ a/k/a "Black Carlos," JESUS AVALOS FERNANDEZ a/k/a "Chuchin," JOSE AGUILERA a/k/a "Jay," and MARCO SANCHEZ a/k/a "Cooks" were members and associates of the Salinas Acosta Plaza Norteño gang, and therefore members of the Enterprise.

### COUNT ONE: (18 U.S.C. § 1962(d) – Racketeering Conspiracy)

12. Paragraphs 1 through 11 of this Superseding Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

13. Beginning on a date unknown to the Grand Jury, but no later than 2009, and continuing up through and including the date of this Superseding Indictment, in the Northern District of California and elsewhere, the defendants,

GUSTAVO GARCIA aka "Tatis,"  
 LORENZO GARCIA Jr. aka "Chito,"  
 BERTIN MEDRANO aka "Dre,"  
 JESUS SALDANA a/k/a "D Rose,"  
 OSCAR BENITEZ a/k/a "Sideshow,"  
 CARLOS GUTIERREZ a/k/a "Black Carlos,"  
 JESUS AVALOS FERNANDEZ a/k/a "Chuchin,"  
 JOSE AGUILERA a/k/a "Jay," and  
 MARCO SANCHEZ a/k/a "Cooks"

1 together with other individuals known and unknown, each being a person employed by and associated  
 2 with SAP, an Enterprise engaged in, and the activities of which affected, interstate and foreign  
 3 commerce, unlawfully, knowingly, and willfully conspired to violate Title 18, United States Code,  
 4 Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs  
 5 of the SAP Enterprise through a pattern of racketeering activity, as defined in Title 18, United States  
 6 Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- 7 a) multiple acts involving murder, chargeable under California Penal Code Sections  
 8 187, 188, 189, 182, 31, 21a, 664, and 653f(b);
- 9 b) multiple acts involving robbery, chargeable under California Penal Code Sections  
 10 211, 212, 212.5, 182, 664, 31, and 21a;
- 11 c) multiple offenses involving dealing in controlled substances, in violation of Title  
 12 21, United States Code, Sections 841(a)(1) and 846;
- 13 d) multiple acts indictable under Title 18, United States Code, Section 933, relating  
 14 to trafficking in firearms; and
- 15 e) multiple acts indictable under Title 18, United States Code, Sections 1503, 1512,  
 16 and 1513, relating to obstruction of justice, tampering with a witness, victim, or an informant, and  
 17 relating to retaliating against a witness, victim, or an informant, respectively.

18 14. It was a part of the conspiracy that each defendant agreed that a conspirator would  
 19 commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

#### 20 Overt Acts in Furtherance of the Racketeering Conspiracy

21 15. During and in furtherance of the racketeering conspiracy, and to affect the object thereof,  
 22 the defendants, other members and associates of the SAP Enterprise, and others known and unknown,  
 23 committed the following acts:

- 24 a) On or about August 24, 2009, LORENZO GARCIA and other Enterprise  
 25 members robbed a street vendor of his money in Salinas, CA.
- 26 b) On or about July 8, 2014, an Enterprise member and another individual robbed a  
 27 man of his phone and money at knifepoint in Salinas, CA.

1 c) On or about July 19, 2014, LORENZO GARCIA and GUSTAVO GARCIA  
2 murdered a perceived rival gang member by shooting him in a rival gang-affiliated neighborhood in  
3 Salinas, CA.

4 d) On or about May 16, 2015, Enterprise members murdered a perceived rival gang  
5 associate by shooting her in Acosta Plaza in Salinas, CA.

6 e) On or about August 20, 2015, an Enterprise member robbed a man of his  
7 marijuana and money at gunpoint in or around Monterey, CA.

8 f) On or about February 25, 2016, an Enterprise member and another individual  
9 attempted to murder a perceived rival gang member by shooting him at a residence in Salinas, CA.

10 g) On or about April 6, 2016, Enterprise members murdered a perceived rival gang  
11 associate by shooting him in Acosta Plaza in Salinas, CA.

12 h) On or about February 10, 2017, JESUS AVALOS FERNANDEZ and GUSTAVO  
13 GARCIA robbed a grocery store in Salinas, CA.

14 i) On or about September 12, 2017, JESUS AVALOS FERNANDEZ attempted to  
15 murder a perceived rival gang member by shooting him in Salinas, CA.

16 j) On or about September 22, 2017, JESUS AVALOS FERNANDEZ, GUSTAVO  
17 GARCIA, and another Enterprise member robbed a grocery store in Salinas, CA.

18 k) On or about February 19, 2018, JESUS AVALOS FERNANDEZ and another  
19 Enterprise member robbed a family of their vehicle and phones in Salinas, CA.

20 l) On or about February 17, 2019, Enterprise members attempted to murder a  
21 perceived rival gang member by shooting at him in Salinas, CA.

22 m) On or about August 16, 2019, BERTIN MEDRANO possessed controlled  
23 substances (including but not limited to marijuana) with the intent to distribute them in or around  
24 Salinas, CA.

25 n) On or about December 19, 2019, Enterprise members murdered a perceived rival  
26 gang member by shooting him near Acosta Plaza in Salinas, CA.

27 o) Between approximately January 2020 and continuing through the present date,  
28 Enterprise members collected gang dues from other Enterprise members in order to pay the Nuestra

1 Familia, purchase firearms and drugs for the Enterprise, and/or pay bail for incarcerated members and  
2 associates in or around Salinas, CA.

3 p) On or about May 1, 2020, Enterprise members murdered a man and attempted to  
4 murder two other men by shooting them near Acosta Plaza in Salinas, CA.

5 q) On or about April 6, 2020, JOSE AGUILERA and another Enterprise member  
6 attempted to murder a perceived rival gang member by shooting him in Salinas, CA.

7 r) On or about September 20, 2020, Enterprise members murdered a man and  
8 attempted to murder another man by shooting them near Acosta Plaza in Salinas, CA.

9 s) On or about March 23, 2021, Enterprise members murdered a man by shooting  
10 him near Acosta Plaza in Salinas, CA.

11 t) On or about April 27, 2021, JESUS SALDANA, BERTIN MEDRANO, and other  
12 Enterprise members robbed a perceived rival gang member while assaulting him at a mall in Salinas,  
13 CA.

14 u) On or about May 13, 2021, an Enterprise member possessed controlled substances  
15 (including but not limited to fentanyl) with the intent to distribute them in or around Salinas, CA.

16 v) Between approximately July 2022 and May 2024, MARCO SANCHEZ trafficked  
17 controlled substances (including but not limited to cocaine) in or around Salinas, CA.

18 w) Between approximately July 2022 and November 2022, OSCAR BENITEZ  
19 trafficked controlled substances (including but not limited to fentanyl) in or around Salinas, CA.

20 x) On or about November 28, 2022, an Enterprise member possessed controlled  
21 substances (including but not limited to cocaine and marijuana) with the intent to distribute them in or  
22 around Salinas, CA.

23 y) On or about December 5, 2022, JESUS SALDANA and other Enterprise  
24 members shot at a residence in Acosta Plaza in Salinas, CA, because they believed the residents had  
25 contacted the police.

26 z) On or about December 14, 2022, an Enterprise member possessed controlled  
27 substances (including but not limited to fentanyl and cocaine) with the intent to distribute them in or  
28 around Salinas, CA.

1           aa)     On or about January 23, 2023, JESUS SALDANA and another Enterprise  
2 member attempted to murder perceived rival gang members in a rival gang-affiliated neighborhood in  
3 Salinas, CA.

4           bb)     On or about January 29, 2023, an Enterprise member possessed controlled  
5 substances (including but not limited to cocaine, methamphetamine, and fentanyl) with the intent to  
6 distribute them in or around Salinas, CA.

7           cc)     Between approximately January 2023 and May 2023, JESUS SALDANA  
8 trafficked firearms knowing their use, carrying, or possession would constitute a felony in or around  
9 Salinas, CA.

10          dd)     Between approximately January 2023 and August 2023, JESUS SALDANA  
11 trafficked controlled substances (including but not limited to cocaine and methamphetamine) in or  
12 around Salinas, CA.

13          ee)     On or about March 19, 2023, Enterprise members robbed a perceived rival gang  
14 associate of his gold necklace at gunpoint in Acosta Plaza in Salinas, CA.

15          ff)     On or about March 19, 2023, OSCAR BENITEZ trafficked controlled substances  
16 (including but not limited to fentanyl) in or around Salinas, CA.

17          gg)     On or about March 20, 2023, Enterprise members attempted to murder a man by  
18 shooting him near Acosta Plaza in Salinas, CA.

19          hh)     On or about April 3, 2023, Enterprise members attempted to murder a perceived  
20 rival gang member by shooting at his residence in Salinas, CA.

21          ii)     On or about April 6, 2023, GUSTAVO GARCIA possessed controlled substances  
22 (including but not limited to cocaine and fentanyl) with the intent to distribute them in or around Salinas,  
23 CA.

24          jj)     On or about April 26, 2023, Enterprise members attempted to murder a perceived  
25 Norteño gang dropout by shooting him in Acosta Plaza in Salinas, CA.

26          kk)     On or about May 20, 2023, Enterprise members murdered a perceived rival gang  
27 member by shooting him near Acosta Plaza in Salinas, CA.

1 ll) In or around June 2023, an Enterprise member solicited the murder of a perceived  
2 rival gang member in Salinas, CA.

3 mm) On or about June 24, 2023, MARCO SANCHEZ attempted to murder a man by  
4 firing his gun and assaulting him during a drug sale dispute in Acosta Plaza in Salinas, CA.

5 nn) On or about July 16, 2023, an Enterprise member possessed controlled substances  
6 (including but not limited to methamphetamine and cocaine) with the intent to distribute them in and  
7 around Salinas, CA.

8 oo) In July and August 2023, Enterprise members attempted to intimidate and  
9 retaliate against Acosta Plaza residents, who they believed had contacted the police, by firebombing  
10 their residence with Molotov cocktails and vandalizing it with graffiti like "SAP," "rata" (rat), and  
11 "snitch fat f\*\*\*."

12 pp) On or about August 19, 2023, an Enterprise member murdered a man by shooting  
13 him in Salinas, CA.

14 qq) On or about September 27, 2023, LORENZO GARCIA possessed controlled  
15 substances (including but not limited to methamphetamine and fentanyl) with the intent to distribute  
16 them in or around Salinas, CA.

17 rr) On or about September 29, 2023, an Enterprise member robbed a residence and  
18 then a gas station of their money at gunpoint in Salinas, CA.

19 ss) On or about October 13, 2023, an Enterprise member robbed a clothing store of  
20 its money at gunpoint near Acosta Plaza in Salinas, CA.

21 tt) On or about December 2, 2023, Enterprise members murdered a perceived  
22 Norteño gang dropout by shooting him in Acosta Plaza in Salinas, CA.

23 uu) On or about December 30, 2023, Enterprise members murdered a man by  
24 shooting him near Acosta Plaza in Salinas, CA.

25 vv) On or about January 18, 2024, law enforcement recovered 97 handguns, shotguns,  
26 and rifles from a suspected gang stash house in Acosta Plaza in Salinas, CA.

ww) Between approximately January 2024 and February 2024, CARLOS GUTIERREZ trafficked controlled substances (including but not limited to cocaine) in or around Salinas, CA.

xx) On or about March 2024, OSCAR BENITEZ attempted to obstruct, influence, or impede an official proceeding by warning other Enterprise members about the federal racketeering indictment returned in this case on April 18, 2024.

yy) On or about April 22, 2024, an Enterprise member attempted to murder a perceived rival gang member by shooting at him near Acosta Plaza in Salinas, CA.

zz) On or about January 9, 2025, CARLOS GUTIERREZ and another Enterprise associate robbed a customer at a gas station in Salinas, CA.

aaa) Between approximately January 2025 and April 2025, JESUS SALDANA trafficked controlled substances (including but not limited to cocaine and methamphetamine) in or around Salinas, CA.

#### NOTICE OF SPECIAL SENTENCING FACTORS

*As part of their agreement to conduct and participate in the conduct of the affairs of the SAP enterprise through a pattern of racketeering activity, the following defendants committed the following acts:*

##### Number 1: July 19, 2014 Murder of Victim-1

16. On or about July 19, 2014, in the Northern District of California, the defendant, LORENZO GARCIA Jr. a/k/a "Chito," with others known and unknown, each aided and abetted by the other, did unlawfully, willfully, and intentionally, with deliberation and premeditation, and with malice aforethought, kill Victim-1, in violation of California Penal Code, Sections 187, 188, 189, and 31.

##### Number 2: January 23, 2023 Attempted Murder of Victim-2 and Victim-3

17. On or about January 23, 2023, in the Northern District of California, the defendant, JESUS SALDANA a/k/a "D Rose,"

with others known and unknown, each aided and abetted by the other, did unlawfully, willfully, and intentionally, with deliberation and premeditation, and with malice aforethought, attempt to kill Victim-2 and Victim-3, in violation of California Penal Code Sections 187, 188, 189, 21a, 31, and 664.

All in violation of Title 18, United States Code, Section 1962(d).

FORFEITURE ALLEGATION: (18 U.S.C. § 1963 and 28 U.S.C. § 2461(c))

18. The allegations contained in paragraphs 1 through 17 of this Superseding Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963, and Title 28, United States Code, Section 2461(c).

19. Upon conviction of the offense alleged in Count One of the Superseding Indictment, the defendants,

GUSTAVO GARCIA aka "Tatis,"  
LORENZO GARCIA Jr. aka "Chito,"  
BERTIN MEDRANO aka "Dre,"  
JESUS SALDANA a/k/a "D Rose,"  
OSCAR BENITEZ a/k/a "Sideshow,"  
CARLOS GUTIERREZ a/k/a "Black Carlos,"  
JESUS AVALOS FERNANDEZ a/k/a "Chuchin,"  
JOSE AGUILERA a/k/a "Jay," and  
MARCO SANCHEZ a/k/a "Cooks"

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1963(a), (1) any interest they have acquired or maintained in violation of Section 1962 of Title 18 of the United States Code; (2) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which they have established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962 of Title 18 of the United States Code; and (3) any property constituting or derived from any proceeds which they obtained directly or indirectly from racketeering activity, in violation of Title 18, United States Code, Section 1962, including but not limited to a forfeiture money judgment, relating to the offenses alleged in Count One, pursuant to Title 18, United States Code, Section 1963, and Title 28, United States Code, Section 2461(c).

If any of the property described above, as a result of any act or omission of the defendants:

a) Cannot be located upon the exercise of due diligence;

- b) Has been transferred or sold to, or deposited with, a third party;
- c) Has been placed beyond the jurisdiction of the court;
- d) Has been substantially diminished in value; or
- e) Has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Sections 1963(m) and 2253(b), Title 21, United States Code, Section 853(p), and by Title 28, United States Code, Section 2461(c).

DATED: December 18, 2025

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON

CRAIG H. MISSAKIAN  
United States Attorney

/s/  
\_\_\_\_\_  
GEORGE O. HAGEMAN  
JARED S. BUSZIN  
Assistant United States Attorneys

A5

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT

☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) — Racketeering Conspiracy

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: 20 yrs imprisonment  
\$250,000 fine  
3 years supervised release  
\$100 special assessment  
Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CLERK, U.S. DISTRICT COURT

NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

DEFENDANT - U.S.

BERTIN MEDRANO aka "Dre"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

☐ U.S. ATTORNEY ☐ DEFENSE

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

George Hageman; Jared Buszin

## DEFENDANT

### IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges  
2) ☐ Is a Fugitive  
3) ☐ Is on Bail or Release from (show District)

### IS IN CUSTODY

- 4) ☒ On this charge  
5) ☐ On another conviction } ☐ Federal ☐ State  
6) ☐ Awaiting trial on other charges  
If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or...if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

A5

19

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) -- Racketeering Conspiracy

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: 20 years imprisonment  
 \$250,000 fine  
 3 years supervised release  
 \$100 special assessment  
 Forfeiture

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

George Hageman; Jared Buszin

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

DEFENDANT - U.S.

CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA  
 SAN JOSE OFFICE

GUSTAVO GARCIA aka "Tatis"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## DEFENDANT

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

4) ☒ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

19

10

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) - Racketeering Conspiracy

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

 PENALTY: Life imprisonment  
 \$250,000 fine  
 5 years supervised release  
 \$100 special assessment  
 Forfeiture

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

George Hageman; Jared Buszin

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

 CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA  
 SAN JOSE OFFICE

DEFENDANT - U.S.

LORENZO GARCIA Jr. aka "Chito"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## DEFENDANT

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges
- 
- 2)
- ☐
- Is a Fugitive
- 
- 3)
- ☐
- Is on Bail or Release from (show District)

## IS IN CUSTODY

- 4)
- ☒
- On this charge
- 
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
- 
- 6)
- ☐
- Awaiting trial on other charges
- 
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

10

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☒ SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION  
DEC 18 2025

## OFFENSE CHARGED

18 U.S.C. 1962(d) - Racketeering Conspiracy

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: Life imprisonment  
\$250,000 fine  
5 years supervised release  
\$100 special assessment  
Forfeiture

DEFENDANT - U.S.

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

JESUS SALDANA a/k/a "D Rose"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW  
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE  
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person  
Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) George Hageman; Jared Buszin

## DEFENDANT

### IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

### IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

13

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) - Racketeering Conspiracy

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

 PENALTY: 20 yrs imprisonment  
 \$250,000 fine  
 3 years supervised release  
 \$100 special assessment  
 Forfeiture

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

 FILED  
 DEC 18 2025

DEFENDANT - U.S.

 CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA  
 SAN JOSE OFFICE

OSCAR BENITEZ a/k/a "Sideshow"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

 SHOW  
 DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

 MAGISTRATE  
 CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.  
 Attorney (if assigned)

George Hageman; Jared Buszin

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges
- 
- 2)
- ☐
- Is a Fugitive
- 
- 3)
- ☐
- Is on Bail or Release from (show District)

## IS IN CUSTODY

- 4)
- ☐
- On this charge
- 
- 5)
- ☒
- On another conviction }
- ☒
- Federal
- ☐
- State
- 
- 6)
- ☐
- Awaiting trial on other charges
- 
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

 DATE OF  
 ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

 DATE TRANSFERRED  
 TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

13

124

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT

☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) -- Racketeering Conspiracy

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: 20 yrs imprisonment  
\$250,000 fine  
3 years supervised release  
\$100 special assessment  
Forfeiture

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

George Hageman; Jared Buszin

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

CARLOS GUTIERREZ a/k/a "Black Carlos"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## DEFENDANT

### IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

### IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☒ On another conviction } ☐ Federal ☒ State
- 6) ☐ Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

124

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☒ SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. 1962(d) – Racketeering Conspiracy ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

**PENALTY:** 20 yrs imprisonment  
\$250,000 fine  
3 years supervised release  
\$100 special assessment  
Forfeiture

**FILED**  
Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION DEC 18 2025

**DEFENDANT - U.S.** CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE  
JESUS AVALOS FERNANDEZ a/k/a "Chuchin"  
DISTRICT COURT NUMBER  
5:24-CR-00226-BLF

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
☐ U.S. ATTORNEY ☐ DEFENSE } SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under }

**DEFENDANT**

**IS NOT IN CUSTODY**  
Has not been arrested, pending outcome this proceeding.  
1) ☐ If not detained give date any prior summons was served on above charges  
2) ☐ Is a Fugitive  
3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**  
4) ☐ On this charge  
5) ☒ On another conviction } ☐ Federal ☒ State  
6) ☐ Awaiting trial on other charges  
If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes } If "Yes" give date filed  
☐ No }  
DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not  
DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

Name and Office of Person Furnishing Information on this form Craig H. Missakian  
☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) George Hageman; Jared Buszin

☐ This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**  
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT  
If Summons, complete following:  
☐ Arraignment ☐ Initial Appearance  
Defendant Address:  
Date/Time: Before Judge:

Bail Amount: No bail

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Comments:

AO 257 (Rev. 6/78)

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) - Racketeering Conspiracy

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ FelonyPENALTY: 20 yrs imprisonment  
\$250,000 fine  
3 years supervised release  
\$100 special assessment  
Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

DEFENDANT - U.S.

JOSE AGUILERA a/k/a "Jay"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW  
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE  
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

George Hageman; Jared Buszin

## DEFENDANT

## IS NOT IN CUSTODY

1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

4) ☐ On this charge5) ☒ On another conviction☐ Federal ☒ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☒ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. 1962(d) - Racketeering Conspiracy

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: 20 yrs imprisonment  
 \$250,000 fine  
 3 years supervised release  
 \$100 special assessment  
 Forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**FILED**  
 DEC 18 2025

DEFENDANT - U.S.

CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA  
 SAN JOSE OFFICE

MARCO SANCHEZ a/k/a "Cooks"

DISTRICT COURT NUMBER

5:24-CR-00226-BLF

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court,  
 give name of court

☐ this person/proceeding is transferred from another district  
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on motion  
 of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW  
 DOCKET NO.

☐ this prosecution relates to a  
 pending case involving this same  
 defendant

MAGISTRATE  
 CASE NO.

☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding this  
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form Craig H. Missakian

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.  
 Attorney (if assigned)

George Hageman; Jared Buszin

## DEFENDANT

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior  
 summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☒ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution  
 Monterey County Jail

Has detainer ☐ Yes  
 been filed? ☒ No

If "Yes"  
 give date  
 filed

DATE OF  
 ARREST

Month/Day/Year  
 10/07/2025

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
 TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or  
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

**Δ17**