

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA****CRIMINAL COVER SHEET**

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. JOSE GARCIA, et al

CASE NUMBER:

CR 21-311 BLF

Is This Case Under Seal?Yes ☒ No**Total Number of Defendants:**1 2-7 ☒ 8 or more**Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**Yes No ☒**Venue (Per Crim. L.R. 18-1):**SF OAK SJ ☒**Is this a potential high-cost case?**Yes No ☒**Is any defendant charged with a death-penalty-eligible crime?**Yes No ☒**Is this a RICO Act gang case?**Yes No ☒**Assigned AUSA****(Lead Attorney):** Kevin Rubino, AUSA'S**Date Submitted:** 8/11/2021**Comments:**

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN JOSE

CR21-311 BLF

UNITED STATES OF AMERICA,

V.

JOSE GARCIA, a.k.a. "Bones,"
JUAN GONZALEZ, a.k.a. "Crazy Indian,"
a.k.a. "Trigger,"
PAUL VALENZUELA, a.k.a. "One Eye,"
CALEB ELLER, a.k.a. "Chuckles,"
a.k.a. "Shank,"
KYLE LEONIS, a.k.a. "Little Green," and
JUAN DOMINGUEZ, a.k.a. "Green Eyes,"
a.k.a. "Nito,"

DEFENDANT(S).

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

INDICTMENT

18 U.S.C. § 1951(a) – Conspiracy to Commit Hobbs Act Robbery;
18 U.S.C. § 1959(a)(5) – Conspiracy to Commit Murder in Aid of Racketeering;
18 U.S.C. § 1959(a)(6) – Conspiracy to Commit Assault with a Dangerous Weapon
and Assault Resulting in Serious Bodily Injury in Aid of Racketeering;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

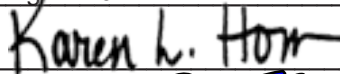
A true bill.

/s/ Foreperson of the Grand Jury.

Foreman

Filed in open court this 12th day of

August 2021.



Clerk

Bail, \$ No Bail - Warrant

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE GARCIA, a.k.a. "Bones,"
JUAN GONZALEZ, a.k.a. "Crazy Indian,"
a.k.a. "Trigger,"
PAUL VALENZUELA, a.k.a. "One Eye,"
CALEB ELLER, a.k.a. "Chuckles,"
a.k.a. "Shank,"
KYLE LEONIS, a.k.a. "Little Green," and
JUAN DOMINGUEZ, a.k.a. "Green Eyes,"
a.k.a. "Nito,"

Defendants.

CASE NO. CR21-311 BLF

VIOLATIONS:

18 U.S.C. § 1951(a) – Conspiracy to Commit Hobbs
Act Robbery;
18 U.S.C. § 1959(a)(5) – Conspiracy to Commit
Murder in Aid of Racketeering;
18 U.S.C. § 1959(a)(6) – Conspiracy to Commit
Assault with a Dangerous Weapon and Assault
Resulting in Serious Bodily Injury in Aid of
Racketeering;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
Forfeiture Allegation

SAN JOSE VENUE

UNDER SEAL

INDICTMENT

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

Introductory Allegations

1. La Nuestra Familia – Spanish for "Our Family" and also known as the "NF" – was a prison gang operating in the California state prison system. The NF was and continues to be composed of a relatively small number of made members. Falling under the NF, and carrying out its will, was the body

oftentimes referred to as the “Northern Structure” (or the “NS”). Under the NS, and subject to NF and NS supervision, were Norteño street gangs established in numerous cities and counties – and in jails and prisons – throughout Northern California and elsewhere.

2. Outside of custodial settings, the NF organized its subordinate groups into established geographic territories called “street regiments.” The city of San Jose and the encompassing Santa Clara County were controlled by one regiment known as the “Santa Clara County Regiment.” Within each street regiment, Norteño street gangs were typically divided into smaller subsets or “hoods” based on the local neighborhoods where their members resided or were actively engaged in gang activity. Each Norteño hood had a name and its members and associates met and worked together to carry out their illegal activities for their own individual benefit, the benefit of their particular Norteño hood, the benefit of Norteños generally, and the benefit of the NF/NS.

3. One important purpose of having established street regiments was to generate money that was then appropriately distributed within the NF and its subordinate organizations. Typically, these financial contributions to the street regiments took the form of monthly “dues” or “contributions” paid by Norteño street gang members and/or taxes on profit from illicit activities such as drug dealing.

4. Within the ranks of Norteños, the commission of violence was often the quickest way for a Norteño street gang member to earn promotion and prestige. Such violence was often directed at rival street gangs, including rival Sureño¹ street gangs, for the purposes of retaliation, in furtherance of their illicit activities, to control and maintain territory, to assert their gang identities, or to respond to a challenge. Norteños also engaged in violence to recruit and influence non-gang members, to gain notoriety and respect, and to dissuade potential witnesses (both members and non-members) from reporting crime(s) or cooperating with law enforcement.

5. Norteños generally also utilized violence or threats of violence to control their own members and associates, to enforce their established rules, and to strike at those who posed a threat to them. A member who committed a minor rule violation could be subject to discipline, such as a minor fine or physical assault. In contrast, a member who committed a major rule violation, such as dropping

¹ Similar to the relationship between the NF and Norteño street gangs, Sureños are subordinate and pledge allegiance to the Mexican Mafia prison gang.

1 out of the gang or cooperating with law enforcement, would be subject to a harsher penalty, including
2 death.

3 6. Outside of violence, Norteños earned promotion and prestige through the commission of
4 criminal activities benefitting the gang and/or by spending time in jail or prison. Norteños committed
5 crimes such as robbery and narcotics trafficking to enrich themselves and the NF. A portion of the
6 proceeds of this illicit activity and monthly “dues” or “contributions” were paid to the regiment for
7 distribution within the NF and its subordinate groups. The commission of the criminal activities
8 (including acts of violence), was often referred to as “putting in work.” The more “work” done by an
9 individual member and/or the more financial benefit provided to the gang, the more favorably such
10 member is looked upon by other Norteños or NF/NS members.

11 7. Norteños identified themselves with the color red and the number “14” in various forms.
12 The number “14” corresponded with the letter “N,” which is the fourteenth letter of the alphabet; the letter
13 “N,” in turn, is a reference to Norteños or the NF. These and related symbols were often displayed by
14 Norteño criminal street gang members in tattoos, graffiti, drawings, hand signs, and on clothing as a way
15 of displaying their affiliation, loyalty, and commitment to the gang.

16 The El Hoyo Palmas Street Gang

17 8. Falling under the NF’s Santa Clara County Regiment was the Norteño street gang known
18 as the El Hoyo Palmas street gang, also known as “EHP.” EHP was a multi-generational Norteño street
19 gang formed in the 1970s. EHP members and associates operated in and around the San Jose area, as well
20 as in various jails/prison facilities.

21 9. Like all Norteño street gangs, EHP paid allegiance to, and often served as foot soldiers for,
22 the NF and its regiment. As such, EHP members committed a wide variety of crimes for the benefit of
23 EHP, as well as for the benefit of Norteños and the NF/NS generally. These crimes included, but were
24 not limited to acts involving murder, robbery, obstruction of justice, witness intimidation, distribution of
25 narcotics, and various firearms offenses. As provided herein, EHP, like other Norteño street gangs,
26 provided money to the Santa Clara County Regiment, through profits from illicit activity and monthly
27 “dues” or “contributions” to the NF.

1 The Racketeering Enterprise: the El Hoyo Palmas Gang

2 10. The El Hoyo Palmas gang, including its leadership, members, and associates, in the
3 Northern District of California, the State of California, and elsewhere, constituted an “enterprise” as
4 defined in Title 18, United States Code, Section 1959(b)(2) (hereinafter “the Enterprise”), that is, a group
5 of individuals associated in fact that was engaged in, and the activities of which affected, interstate and
6 foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a
7 continuing unit for a common purpose of achieving the objectives of the enterprise.

8 Purposes of the Enterprise

9 11. The purposes of the El Hoyo Palmas Enterprise included the following:

- 10 a. Generating revenue and profits for the Enterprise and the larger NF organization
11 through, among other acts, narcotics trafficking, robbery, and other criminal activities;
12 b. Providing financial support and information to its members and associates;
13 c. Preserving and protecting the power, territory, reputation, and profits of the
14 Enterprise through the use of intimidation, violence, threats of violence, assaults, and acts
15 involving murder;
16 d. Promoting and enhancing the Enterprise and the activities of its members and
17 associates through, among other acts, acts involving murder, narcotics trafficking, robbery,
18 and other criminal activities;
19 e. Keeping rival gang members, potential informants and witnesses against the
20 Enterprise, other victims and potential victims, fellow gang members, and community
21 members in fear of the Enterprise and its members and associates through violence and
22 threats of violence; and
23 f. Protecting the Enterprise’s members and associates who committed crimes by
24 hindering, obstructing, and preventing law enforcement officers from identifying the
25 offenders, apprehending the offenders, and successfully prosecuting and punishing the
26 offenders.

27 Means and Methods of the Enterprise

28 12. Among the means and methods by which the members and associates of the Enterprise

1 conducted and participated in the conduct of the affairs of the Enterprise were the following:

2 a. Members and associates of the Enterprise engaged in illicit activities intended to
3 provide financial benefit to the Enterprise and its members, including distributing
4 controlled substances and controlling the trafficking of narcotics in certain areas of Santa
5 Clara County. Specifically, members of the Enterprise acquired narcotics from suppliers.
6 Members then prepared those narcotics for distribution and sold the narcotics to
7 downstream dealers or directly to customers. Portions of the profits from these narcotics
8 sales were shared with other members and with the Enterprise generally.

9 b. Members and associates of the Enterprise planned and engaged in acts involving
10 robberies of other individuals suspected of trafficking in controlled substances. Such
11 robberies were intended to secure additional profits for the Enterprise in the form of
12 narcotics and currency derived from the sale of narcotics. Members of the Enterprise
13 oftentimes used violence and threats of violence in connection with this activity,
14 conducting armed robberies of targets and threatening targets' lives in order to obtain the
15 narcotics and currency the members sought.

16 c. Members and associates of the Enterprise committed and attempted to commit acts
17 of violence, including acts involving murder, against perceived rival gang members and
18 others to enhance the Enterprise's prestige, maintain the authority and vitality of the
19 Enterprise, increase the status of the Enterprise's members and associates, protect and
20 expand the Enterprise's criminal operations, maintain discipline within its ranks, intimidate
21 and influence members of the community, and prevent cooperation with law enforcement.

22 13. At all relevant times to this Indictment, the Enterprise, through its members and associates,
23 engaged in racketeering activity as defined in 18 U.S.C. § 1959(b)(1) and 1961(1), that is, namely, acts
24 involving robbery, chargeable under California Penal Code Sections 211, 212.5, 213, 21a, 182, 664, and
25 31; offenses involving the distribution of controlled substances, in violation of Title 21, United States
26 Code, Sections 841(a)(1), 843, and 846; and acts and threats involving murder, chargeable under
27 California Penal Code Sections 187, 188, 189, 182, 21a, 31, and 664.

1 COUNT ONE: (18 U.S.C. § 1951(a) – Conspiracy to Commit Hobbs Act Robbery)

2 14. Beginning on a date unknown to the Grand Jury, but since at least September 2018, and
3 continuing through at least October 2018, in the Northern District of California and elsewhere, defendants

4 JOSE GARCIA, a.k.a. “Bones,”
5 JUAN GONZALEZ, a.k.a. “Crazy Indian,” a.k.a. “Trigger,”
6 PAUL VALENZUELA, a.k.a. “One Eye,”
7 CALEB ELLER, a.k.a. “Chuckles,” a.k.a. “Shank,” and
8 KYLE LEONIS, a.k.a. “Little Green,”

9 and others known and unknown to the Grand Jury, knowingly combined, conspired, and agreed together
10 and with one another to commit robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), which would
11 have obstructed, delayed, and affected commerce and the movement of articles and commodities in
12 commerce.

13 All in violation of Title 18, United States Code, Section 1951(a).

14 COUNT TWO: (18 U.S.C. §§ 1959(a)(5) – Conspiracy to Commit Murder in Aid of
15 Racketeering)

16 15. Paragraphs 1 through 13 of this Indictment are realleged and incorporated by reference as
17 though fully set forth herein.

18 16. In or about October 2018, in the Northern District of California and elsewhere, for the
19 purpose of gaining entrance to and maintaining and increasing position in the El Hoyo Palmas, an
20 enterprise engaged in racketeering activity, defendants

21 JOSE GARCIA, a.k.a. “Bones,”
22 JUAN GONZALEZ, a.k.a. “Crazy Indian,” a.k.a. “Trigger,”
23 PAUL VALENZUELA, a.k.a. “One Eye,”
24 KYLE LEONIS, a.k.a. “Little Green,” and
25 JUAN DOMINGUEZ, a.k.a. “Green Eyes,” a.k.a. “Nito,”

26 and others known and unknown to the Grand Jury, knowingly combined, conspired, and agreed together
27 and with one another to commit the murder of Victim-1, in violation of California Penal Code Sections
28 182, 187, 188, and 189 .

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

1 COUNT THREE: (18 U.S.C. §§ 1959(a)(6) – Conspiracy to Commit Assault with a Dangerous
2 Weapon and Assault Resulting in Serious Bodily Injury in Aid of Racketeering)

3 17. Paragraphs 1 through 13 of this Indictment are realleged and incorporated by reference as
4 though fully set forth herein.

5 18. In or about October 2018, in the Northern District of California and elsewhere, for the
6 purpose of gaining entrance to and maintaining and increasing position in the El Hoyo Palmas, an
7 enterprise engaged in racketeering activity, defendants

8 JOSE GARCIA, a.k.a. “Bones,”
9 JUAN GONZALEZ, a.k.a. “Crazy Indian,” a.k.a. “Trigger,”
10 PAUL VALENZUELA, a.k.a. “One Eye,”
11 KYLE LEONIS, a.k.a. “Little Green,” and
JUAN DOMINGUEZ, a.k.a. “Green Eyes,” a.k.a. “Nito,”

12 and others known and unknown to the Grand Jury, knowingly combined, conspired, and agreed and with
13 one another to commit assault with a dangerous weapon and assault resulting in serious bodily injury, in
14 violation of California Penal Code Sections 182 and 245, against Victim-1.

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

16 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

17 The allegations contained in this Indictment are re-alleged and incorporated by reference for the
18 purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title
19 28, United States Code, Section 2461(c).

20 Upon conviction of the offense set forth in Count One of this Indictment, the defendants,

21 JOSE GARCIA, a.k.a. “Bones,”
22 JUAN GONZALEZ, a.k.a. “Crazy Indian,” a.k.a. “Trigger,”
23 PAUL VALENZUELA, a.k.a. “One Eye,”
24 CALEB ELLER, a.k.a. “Chuckles,” a.k.a. “Shank,” and
KYLE LEONIS, a.k.a. “Little Green,”

25 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title
26 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived
27 from proceeds traceable to such offense.

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

- 1 a. cannot be located upon exercise of due diligence;
2 b. has been transferred or sold to, or deposited with, a third party;
3 c. has been placed beyond the jurisdiction of the court;
4 d. has been substantially diminished in value; or
5 e. has been commingled with other property which cannot be divided without
6 difficulty,

7 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
8 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

9 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code,
10 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

11
12 DATED: August 12, 2021

A TRUE BILL

13
14 /s/ Foreperson
15 FOREPERSON

16
17 STEPHANIE M. HINDS
Acting United States Attorney

18
19 /s/ Kevin Rubino
KEVIN RUBINO
20 Assistant United States Attorney

21 DAVID L. JAFFE
22 Chief, Organized Crime and Gang Section

23
24 /s/ Rebecca R. Dunnan /s/ Christina Taylor
REBECCA R. DUNNAN
25 CHRISTINA TAYLOR
26 Trial Attorneys
27
28

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

JOSE GARCIA, aka "Bones," et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JOSE GARCIA, aka "Bones," et al.,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count One: 18 U.S.C. § 1951(a) - Hobbs Act Robbery

Count Two: 18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder

Count Three: 18 U.S.C. § 1959(a)(6) - Conspiracy to Commit Assault

Date: 08/12/2021
Issuing officer's signatureCity and state: San Francisco, CAHon. Joseph C. Spero, Chief U.S. Magistrate Judge
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature_____
Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: JOSE GARCIA

Known aliases: Bones

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 08/11/1988

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 434665KC6

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

JUAN GONZALEZ, a.k.a. "Crazy Indian,"
a.k.a. "Trigger" et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JUAN GONZALEZ, a.k.a. "Crazy Indian," a.k.a. "Trigger" et al.,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count One: 18 U.S.C. § 1951(a) - Hobbs Act Robbery

Count Two: 18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder

Count Three: 18 U.S.C. § 1959(a)(6) - Conspiracy to Commit Assault

Date: 08/12/2021
Issuing officer's signatureCity and state: San Francisco, CAHon. Joseph C. Spero, Chief U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature_____
Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: JUAN GONZALEZ

Known aliases: Crazy Indian and Trigger

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 07/23/1973

Social Security number: 657-03-5847

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 172960DB3

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

PAUL VALENZUELA, a.k.a. "One Eye" et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) PAUL VALENZUELA, a.k.a. "One Eye" et al.,
 who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count One: 18 U.S.C. § 1951(a) - Hobbs Act Robbery

Count Two: 18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder

Count Three: 18 U.S.C. § 1959(a)(6) - Conspiracy to Commit Assault

Date: 08/12/2021

*Issuing officer's signature*City and state: San Francisco, CAHon. Joseph C. Spero, Chief U.S. Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: PAUL VALENZUELA

Known aliases: One Eye

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 10/28/1979

Social Security number: 559-59-2068

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 208239TC3

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

CALEB ELLER, a.k.a. "Chuckles,"
a.k.a. "Shank" et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) CALEB ELLER, a.k.a. "Chuckles" a.k.a. "Shank" et al.,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count One: 18 U.S.C. § 1951(a) - Hobbs Act Robbery

Date: 08/12/2021



Issuing officer's signature

City and state: San Francisco, CA

Hon. Joseph C. Spero, Chief U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: CALEB ELLER

Known aliases: Chuckles, and Shank

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 08/08/1988

Social Security number: 603-58-8563

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 760768RC8

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

KYLE LEONIS, a.k.a. "Little Green" et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) KYLE LEONIS, a.k.a. "Little Green" et al.,
 who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count One: 18 U.S.C. § 1951(a) - Hobbs Act Robbery

Count Two: 18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder

Count Three: 18 U.S.C. § 1959(a)(6) - Conspiracy to Commit Assault

Date: 08/12/2021

Issuing officer's signature
City and state: San Francisco, CAHon. Joseph C. Spero, Chief U.S. Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: KYLE LEONIS

Known aliases: Little Green

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 09/17/1994

Social Security number: 612-76-4717

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 106499TD5

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

JUAN DOMINGUEZ, a.k.a. "Green Eyes" a.k.a.
"Nito" et al.

Case No. CR21-311 BLF

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

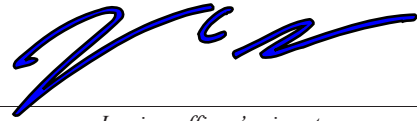
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JUAN DOMINGUEZ, a.k.a. "Green Eyes" a.k.a. "Nito" et al.,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count Two: 18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder

Count Three: 18 U.S.C. § 1959(a)(6) - Conspiracy to Commit Assault

Date: 08/12/2021

Issuing officer's signature

City and state: San Francisco, CAHon. Joseph C. Spero, Chief U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: JUAN DOMINGUEZ

Known aliases: Green Eyes, and Nito

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 01/02/1983

Social Security number: 565-73-3331

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: 823560XB0

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

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

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)
 Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)
 Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached.

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

NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

DEFENDANT - U.S.▶ JOSE GARCIA, a.k.a. "Bones"

DISTRICT COURT NUMBER
 CR21-311 BLF

PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

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

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 ▶ N/A

2) ☐ Is a3) ☐ Is of**IS IN**4) ☐ On5) ☐ On6) ☐ Awaiting trial on other charges

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

Has detainer ☐ Yes
 been filed? ☐ 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

FILED

Aug 12 2021

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

☐ 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:

U.S. v. JOSE GARCIA, AKA “BONES,” ET AL.

Penalty Sheet Attachment

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

- 20 years imprisonment (18 U.S.C. § 1951(a))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))
- forfeiture

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

- 10 years (18 U.S.C. § 1959(a)(5))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

- 3 years (18 U.S.C. § 1959(a)(6))
- 1 year supervised release (18 U.S.C. § 3583(b)(3))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

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

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)
 Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)
 Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached.

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

NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

DEFENDANT - U.S.

JUAN GONZALEZ, a.k.a. "Crazy Indian,"
 a.k.a. "Triqger" et al.

DISTRICT COURT NUMBER

CR21-311 BLF

PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

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

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 N/A

2) ☐ Is3) ☐ Is**IS**4) ☐ C5) ☐ C6) ☐ Awaiting trial on other charges

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

Has detainer ☐ Yes
 been filed? ☐ 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

FILED

Aug 12 2021

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

☐ 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:

U.S. v. JUAN GONZALEZ, A.K.A. "CRAZY INDIAN"
A.K.A. "TRIGGER" *ET AL.*

Penalty Sheet Attachment

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

- 20 years imprisonment (18 U.S.C. § 1951(a))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))
- forfeiture

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

- 10 years (18 U.S.C. § 1959(a)(5))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

- 3 years (18 U.S.C. § 1959(a)(6))
- 1 year supervised release (18 U.S.C. § 3583(b)(3))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

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

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)
 Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)
 Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached.

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

NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

DEFENDANT - U.S.

▶ PAUL VALENZUELA, a.k.a. "One Eye"

DISTRICT COURT NUMBER
 CR21-311 BLF

PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

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

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 ▶ N/A

2) ☐ Is3) ☐ Is**IS II**4) ☐ Or5) ☐ Or6) ☐ Av

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

Has detainer ☐ Yes
 been filed? ☐ 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

FILED

Aug 12 2021

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

☐ 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:

Date/Time: Before Judge:

Comments:

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

U.S. v. PAUL VALENZUELA, A.K.A. "ONE EYE" ET AL.

Penalty Sheet Attachment

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

- 20 years imprisonment (18 U.S.C. § 1951(a))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))
- forfeiture

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

- 10 years (18 U.S.C. § 1959(a)(5))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

- 3 years (18 U.S.C. § 1959(a)(6))
- 1 year supervised release (18 U.S.C. § 3583(b)(3))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

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

PENALTY: See attached.

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

 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION
DEFENDANT - U.S.

▶ CALEB ELLER, a.k.a. "Chuckles," a.k.a. "Shank"

 DISTRICT COURT NUMBER
 CR21-311 BLF
PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Kevin Rubino
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 ▶ N/A

2) ☐ I3) ☐ I**IS**4) ☐ I5) ☐ I

- 6)
- ☐
- Awaiting trial on other charges

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

 Has detainer ☐ Yes
 been filed? ☐ 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:

Date/Time: Before Judge:

Comments:

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

U.S. v. CALEB ELLER, A.K.A. "CHUCKLES" A.K.A. "SHANK" *ET AL.*

Penalty Sheet Attachment

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

- 20 years imprisonment (18 U.S.C. § 1951(a))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))
- forfeiture

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)
 Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)
 Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached.

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

 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION
DEFENDANT - U.S.
 KYLE LEONIS, a.k.a. "Little Green"

DISTRICT COURT NUMBER

CR21-311 BLF

PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Kevin Rubino
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  N/A
2) ☐ Is a3) ☐ Is on**IS IN**4) ☐ On5) ☐ On6) ☐ Awaiting trial on other charges

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

 Has detainer ☐ Yes
 been filed? ☐ 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

FILED

Aug 12 2021

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

☐ 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:

U.S. v. KYLE LEONIS, A.K.A. "LITTLE GREEN," ET AL.

Penalty Sheet Attachment

Count One: 18 U.S.C. § 1951(a) (Hobbs Act Robbery)

- 20 years imprisonment (18 U.S.C. § 1951(a))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))
- forfeiture

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

- 10 years (18 U.S.C. § 1959(a)(5))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

- 3 years (18 U.S.C. § 1959(a)(6))
- 1 year supervised release (18 U.S.C. § 3583(b)(3))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

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

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached.

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

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S

▶ JUAN DOMINGUEZ, a.k.a. "Green Eyes" a.k.a. "Nito"

DISTRICT COURT NUMBER

CR21-311 BLF

PROCEEDING

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

FBI

☐ 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 Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

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

Kevin Rubino

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 ▶ N/A

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release

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

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

☐ 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:

Date/Time: Before Judge:

Comments:

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

U.S. v. JUAN DOMINGUEZ, A.K.A. "GREEN EYES" A.K.A. "NITO" *ET AL.*

Penalty Sheet Attachment

Count Two: 18 U.S.C. § 1959(a)(5) (Conspiracy to Commit Murder)

- 10 years (18 U.S.C. § 1959(a)(5))
- 3 years supervised release (18 U.S.C. § 3583(b)(2))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

Count Three: 18 U.S.C. § 1959(a)(6) (Conspiracy to Commit Assault)

- 3 years (18 U.S.C. § 1959(a)(6))
- 1 year supervised release (18 U.S.C. § 3583(b)(3))
- \$250,000 fine (18 U.S.C. § 3571(b)(3))
- \$100 special assessment (18 U.S.C. § 3013(a)(2)(A))

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	NO.: CR21-311 BLF
)	
Plaintiff,)	MOTION TO SEAL DOCKET
)	
v.)	UNDER SEAL
)	
JOSE GARCIA, a.k.a. "Bones,")	
JUAN GONZALEZ, a.k.a. "Crazy Indian,")	
a.k.a. "Trigger,")	
PAUL VALENZUELA, a.k.a. "One Eye,")	
CALEB ELLER, a.k.a. "Chuckles,")	
a.k.a. "Shank,")	
KYLE LEONIS, a.k.a. "Little Green," and)	
JUAN DOMINGUEZ, a.k.a. "Green Eyes,")	
a.k.a. "Nito,")	
)	
Defendants.)	

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 The United States, by and through its counsel, Assistant United States Attorneys Karen
2 Kreuzkamp and Kevin Rubino and Trial Attorneys Christina Taylor and Rebecca Dunnan, moves this
3 Court for an order sealing this case, including the entire docket and all documents filed in this case.
4 Disclosure of any part of the docket or any documents filed in this case would seriously jeopardize the
5 arrest of the defendants and the progress of this ongoing investigation that is neither public nor known to
6 the defendants or their unidentified co-conspirators.

7 Accordingly, the United States requests that the Court seal the entire docket and all documents
8 filed in this case, except that the Clerk of Court shall provide copies of sealed documents filed in this
9 case to employees of the United States Attorney's Office. The United States further requests that the
10 United States Attorney's Office be permitted to share these documents with the FBI and otherwise as
11 necessary to comply with its discovery obligations.

12
13 DATED: August 12, 2021

STEPHANIE M. HINDS
Acting United States Attorney

14
15 /s/Karen Kreuzkamp
KAREN KREUZKAMP
16 KEVIN RUBINO
Assistant United States Attorneys

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18 DAVID L. JAFFE
19 Chief, Organized Crime and Gang Section

20 /s/Christina Taylor
21 /s/Rebecca Dunnan
CHRISTINA TAYLOR
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FILED

Aug 12 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,) NO.: CR21-311 BLF
)
Plaintiff,) ~~[PROPOSED]~~ SEALING ORDER
)
v.) **UNDER SEAL**
)
JOSE GARCIA, a.k.a. "Bones,")
JUAN GONZALEZ, a.k.a. "Crazy Indian,")
a.k.a. "Trigger,")
PAUL VALENZUELA, a.k.a. "One Eye,")
CALEB ELLER, a.k.a. "Chuckles,")
a.k.a. "Shank,")
KYLE LEONIS, a.k.a. "Little Green," and)
JUAN DOMINGUEZ, a.k.a. "Green Eyes,")
a.k.a. "Nito,")
)
Defendants.)

1 Upon motion of the United States and good cause having been shown, IT IS HEREBY
2 ORDERED that this case, including the entire docket in this case and all documents filed in this case,
3 shall be sealed until further order of the Court, except that the Clerk of Court shall provide copies of
4 sealed documents filed in this case to employees of the United States Attorney's Office.

5 The United States Attorney's Office is permitted to share these documents with the FBI and
6 otherwise as necessary to comply with its discovery obligations.

7
8 IT IS SO ORDERED.

9 DATED: 8/12/2021



HON. JOSEPH C. SPERO
Chief United States Magistrate Judge