

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RAUL CAVILLO, a/k/a "Ra Ra,"
JUAN JIMENEZ, a/k/a "Chinks,"
a/k/a "China Man,"
JOEL NUNEZ, a/k/a "Shorty,"
CARLOS PADILLA, Jr., a/k/a "Little Poppy,"
a/k/a "Lil' Papi," a/k/a "Little Papi,"
PAUL VASQUEZ, a/k/a "Garfield,"
THOMAS MIRELEZ, a/k/a "Tommy Gunns,"
RUBEN PORRAZ, a/k/a "Scrappy,"
EDWARD DELGADO JR., "Deadhand,"
ROY VEGA, a/k/a "Ice,"
FERNANDO CHAVEZ, a/k/a "Fester,"
ISRAEL MATA, a/k/a "Iz,"
RAYMOND VASQUEZ, a/k/a "Phathead,"
a/k/a "Fathead"
GERONIA FORD, a/k/a "Boo Man,"
DEAN TREVINO, a/k/a "Bravo,"
WILLIAM HAYSLETTE, a/k/a "LB"
EDGAR GONZALEZ, a/k/a "E,"
MIGUEL DENAVA, a/k/a "Wacko,"
CARLOS CARTAGENA, a/k/a "Husky,"
ELOY FUENTES, a/k/a "Sin," and
LUIS GOMEZ, a/k/a "Bull"

No.

Violations: Title 18, United
States Code, Sections
922(g), 922(a)(5), 924(c)(1)(A),
1512(b)(3), 1513(b)(2), 1959(a)
and 1962(d) and Title 21,
United States Code, Section
841(a)

UNDER SEAL

COUNT ONE

The SPECIAL JANUARY 2015 GRAND JURY charges:

THE RACKETEERING ENTERPRISE

At various times material to this Indictment:

1. The defendants, and others known and unknown, were members and associates of the "Almighty Latin King Nation" Street Gang, a criminal organization whose members and associates engaged in acts of violence, including murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, intimidation, extortion, witness retaliation and witness tampering, and which operated in the South Side of Chicago and adjoining suburbs, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Latin Kings, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, which enterprise engaged in, and the activities of which affected, interstate and foreign commerce.

3. The Latin Kings enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

STRUCTURE OF THE ENTERPRISE

4. At various times material to this Indictment, the structure of the Latin Kings included, but was not limited to, the following:

a. The Latin Kings were a violent street gang with members across the United States.

b. Within the United States, the Latin Kings were organized by geographical location into "regions." Generally, each Region had a rank structure that included a "Regional Officer" or "Regional Inca," one or more "Regional Enforcers," and one or more "Regional Treasurers." The Regional Inca was the highest authority within the region. The Regional Inca reported to the "Imperial Inca" or to the "Corona," the highest ranking Latin King gang member. Regional Enforcers served to support the Regional Inca, and enforce discipline and adherence by gang members of established Latin King rules and by-laws. Regional Treasurers served to support the Regional Inca, and collect dues from the "chapters" in the region, which were used to support the activities of the region. These regional leadership positions, sometimes referred to as "Nation" positions, were filled with members from the different chapters in that region.

c. Each region was made up of multiple chapters. Each chapter had its own chain of command and was typically named after the city, township, or village, or by a street or streets that ran through the chapter. The leadership of each chapter generally consisted of: a leader of the chapter or "Inca"; a second-in-command or "Cacique"; a "Enforcer" who served to support the Inca and Cacique, as well as enforce discipline and adherence to established rules and laws; a "Treasurer," who was responsible for the gang's finances (including collecting money

for member "dues," purchasing firearms for the gang's use, hiring lawyers for members, and sending money to incarcerated members) and all of whom were in charge of the non-ranking members, or "soldiers," within the chapter.

d. In and around the Chicago area, including Northern Illinois and Northern Indiana, the Latin Kings enterprise was divided into several regions. One of these regions was the "Southeast Region." The general boundaries of the Southeast Region stretched from 82nd Street in Chicago on the north to Kankakee, Illinois on the south to Blue Island, Illinois on the West and to Lake Station, Indiana on the east.

e. In addition to the chapter and regional leadership, the Southeast Region had a "Regional Crown Council," a smaller group of Latin Kings picked by the regional leadership to assist in resolving disputes among chapters.

f. The Southeast Region of the Latin Kings contained over a dozen chapters, which, while they were in the Southeast Region answered to the Southeast Region leadership. Among the chapters included in the Southeast Region were 82nd Street, 88/89th Street, 97th Street, 99th Street, 102nd Street, 104th Street, Bush, Roseland, Blue Island, Dolton, Harvey, four Chicago Heights chapters (Main Street, Wentworth/22nd Street, 24th Street, and 15th Street), Kankakee and Indiana.

PURPOSES OF THE ENTERPRISE

5. The purposes of the enterprise included, but were not limited to, the following:

- a. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, intimidation, extortion, witness retaliation and witness tampering, other acts of violence, and drug trafficking;
- b. Promoting and enhancing the enterprise and its members' and associates' activities;
- c. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities;
- d. Seeking to prevent punishment, including criminal punishment, for its leaders, members, and associates, through threats of and by the use of murder, violence and intimidation directed against witnesses, victims, and others;
- e. Enriching the leaders, members, and associates of the enterprise through, among other things, the collection of dues and the use of threats, intimidation, and violence, including, but not limited to, acts of murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, intimidation, extortion, witness retaliation and witness tampering, and other acts of violence;

ROLES IN THE ENTERPRISE

6. At times material to this Indictment:

a. RAUL CAVILLO, a/k/a "Ra-Ra," was at times a Regional Enforcer for the Southeast Region, and, in this role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

b. JUAN JIMENEZ, a/k/a "Chinks," "China Man," was at times a Regional Treasurer for the Southeast Region, and, in this role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings;

c. JOEL NUNEZ, a/k/a "Shorty," was at times a Regional Enforcer for the Southeast Region, and, in this role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

d. CARLOS PADILLA, a/k/a "Little Poppy," a/k/a "Lil' Papi," a/k/a "Little Papi," was at times a Regional Enforcer for the Southeast Region and, in this role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

e. PAUL VASQUEZ, a/k/a "Garfield," was at times the Inca for the 82nd Street Chapter of the Latin Kings within the Southeast Region, and in that

role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

f. RUBEN PORRAZ, a/k/a "Scrappy," was at times the Inca of the 89th Street Chapter of the Latin Kings within the Southeast Region, and in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

g. EDWARD DELGADO, JR., a/k/a "Deadhand," was at times the Inca of the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

h. ROY VEGA, a/k/a "Ice," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

i. FERNANDO CHAVEZ, a/k/a "Fester," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

j. ISRAEL MATA, a/k/a "Iz," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

k. RAYMOND VASQUEZ, a/k/a "Phathead," a/k/a "Fathead," was at times the Cacique of the 97th Street Chapter of the Latin Kings within the Southeast Region, and, in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

l. GERONIA FORD, a/k/a/ "Boo Man," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

m. DEAN TREVINO, a/k/a "Bravo," was at times the Enforcer in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

n. WILLIAM HAYSLETTE, a/k/a "LB," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that

role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

o. EDGAR GONZALEZ, a/k/a/ "E," was at times a soldier in the 97th Street Chapter of the Latin Kings within the Southeast Region, and in that role, under the direction of the leaders of the Latin Kings, participated in and agreed to commit unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

p. MIGUEL DENAVA, a/k/a "Wacko," was at time the Inca of the 99th Street Chapter of the Latin Kings within the Southeast Region, and in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

q. CARLOS CARTAGENA, a/k/a "Husky," was at times the Cacique of the 102nd Street Chapter of the Latin Kings within the Southeast Region, and, in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

r. ELOY FUENTES, a/k/a "Sin," was at time the Inca for the 104th Street Chapter of the Latin Kings within the Southeast Region, and in that role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

s. LUIS GOMEZ, a/k/a "Bull," was at times the Inca for the 97th Street Chapter of the Latin Kings within the Southeast Region and, in this role, oversaw, directed, guided, and participated in the unlawful and other activities in furtherance of the conduct of the affairs of the Latin Kings.

RACKETEERING CONSPIRACY

7. Beginning no later than in or around 2011, and continuing through the present, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAUL CAVILLO, a/k/a "Ra Ra,"
JUAN JIMENEZ, a/k/a "Chinks,"
a/k/a "China Man,"
JOEL NUNEZ, a/k/a "Shorty,"
CARLOS PADILLA, Jr., a/k/a "Little Poppy,"
a/k/a "Lil' Papi," a/k/a "Little Papi,"
PAUL VASQUEZ, a/k/a "Garfield,"
RUBEN PORRAZ, a/k/a "Scrappy,"
EDWARD DELGADO JR., "Deadhand,"
ROY VEGA, a/k/a "Ice,"
FERNANDO CHAVEZ, a/k/a "Fester,"
ISRAEL MATA, a/k/a "Iz,"
RAYMOND VASQUEZ, a/k/a "Phathead," a/k/a "Fathead"
GERONIA FORD, a/k/a "Boo Man,"
DEAN TREVINO, a/k/a "Bravo,"
WILLIAM HAYSLETTE, a/k/a "LB"
EDGAR GONZALEZ, a/k/a "E,"
MIGUEL DENAVA, a/k/a "Wacko,"
CARLOS CARTAGENA, a/k/a "Husky,"
ELOY FUENTES, a/k/a "Sin," and
LUIS GOMEZ, a/k/a "Bull,"

defendants herein, and others known and unknown to the Grand Jury, being persons employed by and associated with the Latin Kings, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce,

knowingly conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity consisting of:

multiple acts, indictable under the following provisions:

- a. Title 18, United States, Code, Section 1512 (witness tampering);
- b. Title 18, United States Code Section 1513 (witness retaliation);

and multiple acts involving murder and extortion in violation of:

- a. Title 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1, 5/8-2(a) and (c)(3), 5/8-4, and 5/9-1; and
- b. Title 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-2 and 5/12-6.

8. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

MEANS AND METHODS OF THE CONSPIRACY

9. It was further part of the conspiracy that the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise included the following:

- a. Defendants and their associates operated and conducted their affairs through a series of laws and policies, some of which were codified in a "manifesto" or "constitution";

b. Defendants and their associates initiated members through the practice of causing them to endure physical assaults conducted by members of the enterprise at various gang-related gatherings;

c. Defendants and their associates employed and used gang-related terminology, symbols, color schemes, and gestures;

d. Defendants and their associates attended meetings at which they discussed, planned, and otherwise engaged in criminal activity, including murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, intimidation, extortion, witness retaliation, and witness tampering;

e. To enforce discipline and the rules of the enterprise, defendants and their associates engaged in a system of "violations," in which the defendants and others attempted to murder, conspired to murder, and physically beat, extort and threaten those members of the enterprise who violated the rules, questioned authority, or posed a threat to the leaders or purpose of the enterprise;

f. To perpetuate the enterprise and to maintain and extend their power, defendants and their associates committed illegal acts, including, but not limited to, murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, intimidation, witness retaliation, and witness tampering, against individuals who posed a threat to the enterprise or jeopardized its operations, including rival gang members and witnesses to the illegal activities of the enterprise;

g. To perpetuate the enterprise and to maintain and extend their power, gang leadership issued standing orders to members of the enterprise, including orders sometimes referred to as "KOS" or "SOS" orders. SOS orders could consist of an order to either "shoot on sight" (meaning shoot to kill the victim) or "smash on sight" (meaning beat the victim) which were issued for rival gang members and members of the enterprise who were no longer in good standing. KOS orders—or "kill on sight"—were orders issued against Latin King members who cooperated with law enforcement or committed other serious offenses. Gang leadership also issued orders for members to conduct "security" in the neighborhood, which required members to protect the area controlled by the gang and to shoot on sight at any rival gang members;

h. Defendants and their associates operated and conducted their affairs, in part, through a dues, or "box," system in which the members of the enterprise and their associates paid requisite dues to their chapters, which, in turn, provided a portion of the chapter dues to the Region, which the enterprise used for Latin King purposes such as to bail Latin Kings out of jail, to send money to incarcerated Latin Kings, to hire attorneys for incarcerated Latin Kings, provide payments to family members of deceased Latin Kings, and to purchase firearms for use by the chapters in the Southeast Region;

i. Defendants and their associates used multiple cellular telephones and disposable cellular telephones to communicate with one another concerning and during the commission of the enterprise's illegal activities;

j. Defendants and their associates obtained, used, carried, possessed, brandished, and discharged firearms in connection with the enterprise's illegal activities, including, but not limited to, murder, attempted murder, and assault with a dangerous weapon;

k. Defendants and their associates managed the procurement, transfer, use, maintenance, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect their territory, personnel, and operations, and to deter, eliminate, and retaliate against competitors, rival criminal organizations and persons, and individuals suspected of cooperating with law enforcement;

l. Defendants and their associates concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the enterprise, and used coded language and other techniques and other means to avoid detection and apprehension by law enforcement and otherwise to provide security to members and associates of the enterprise; and

m. Defendants and their associates concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the

enterprise, by requiring members to be searched for recording devices and prohibiting the possession of certain items before and during gang meetings;

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

COUNT TWO

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs One through Six of Count One of the Indictment are incorporated here.

2. At times relevant to this Indictment, the Latin Kings, including its leadership, membership, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The Latin King enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At times relevant to this Indictment, the Latin Kings, through its leadership, membership and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts indictable under Title 18, United States Code, Section 1512 (witness tampering), Title 18, United States Code, Section 1513 (witness retaliation), and offenses involving murder and extortion in violation of the law of the State of Illinois.

4. On or about May 15, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

WILLIAM HAYSLETTE, a/k/a "LB," and
GERONIA FORD, a/k/a "Boo Man,"

defendants herein, and others known and unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit assault with a dangerous weapon and assault resulting in serious bodily injury upon an individual, namely, Victim 1, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/12-3.05(a)(1));

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT THREE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs One through Three of Count Two are incorporated here.
2. On or about June 24, 2012, at Burnham, in the Northern District of Illinois, Eastern Division,

RAUL CAVILLO, a/k/a "Ra Ra,"

defendant herein, and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit assault with a dangerous weapon and assault resulting in serious bodily injury upon an individual, namely Victim 2, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Section 5/5-1, 5/5-2, 5/12-3.05(a)(1));

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT FOUR

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs One through Three of Count Two are incorporated here.
2. On or about December 2, 2012, at Burnham, in the Northern District of Illinois, Eastern Division,

FERNANDO CHAVEZ, a/k/a "Fester."
ISRAEL MATA, a/k/a "Iz,"
RAYMOND VASQUEZ, a/k/a "Phathead," and
EDGAR GONZALEZ, a/k/a "E,"

defendants herein, and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit assault with a dangerous weapon and assault resulting in serious bodily injury upon an individual, namely Victim 3, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/12-3.05(a)(1));

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT FIVE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs One through Three of Count Two are incorporated here.
2. On or about July 5, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

ROY VEGA, a/k/a "Ice,"

defendant herein, and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder an individual, namely Victim 4, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-4, 5/9-1);

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

COUNT SIX

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs One through Three of Count Two are incorporated here.
2. On or about July 5, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

ROY VEGA, a/k/a "Ice,"

defendant herein, and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise engaged in racketeering activity, did knowingly and intentionally commit assault with a dangerous weapon and assault resulting in serious bodily injury upon an individual, namely Victim 4, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Section 5/5-1, 5/5-2, 5/12-3.05(e)(1), 5/24-1.2(a)(2));

In violation of Title 18, United States Code, Section 1959(a)(3).

COUNT SEVEN

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about July 5, 2014, at Chicago, in the Northern District of Illinois,
Eastern Division,

ROY VEGA, a/k/a "Ice,"

defendant herein, knowingly used, carried, brandished, and discharged a firearm,
during and in relation to a crime of violence for which he may be prosecuted in a
court of the United States, namely, in violation of Title 18, United States Code,
Sections 1959(a)(3) and (a)(5), as charged in Counts Five and Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT EIGHT

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about July 12, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

EDWARD DELGADO, a/k/a "Deadhand,"

defendant herein, knowingly engaged in conduct that caused bodily injury to another person, with intent to retaliate against that individual for information relating to the commission and possible commission of a Federal offense given by that individual to a law enforcement officer;

In violation of Title 18, United States Code, Sections 1513(b)(2) and 2.

COUNT NINE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

Between on or about August 14, 2014 and on or about August 15, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

JOEL NUNEZ, a/k/a "Shorty,"
CARLOS PADILLA, Jr., a/k/a "Little Poppy," a/k/a "Lil' Papi," a/k/a "Little Papi,
and ROY VEGA, a/k/a "Ice,"

defendants herein, did knowingly use intimidation, threaten, and corruptly persuade another person, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense;

In violation of Title 18, United States Code, Sections 1512(b)(3) and 2.

COUNT TEN

The SPECIAL JANUARY 2015 GRAND JURY further charges:

Between on or about July 4, 2015 and on or about July 8, 2015, at Chicago, in the Northern District of Illinois, Eastern Division,

EDWARD DELGADO, a/k/a "Deadhand," and
FERNANDO CHAVEZ, a/k/a "Fester,"

defendants herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a Smith & Wesson, .38 caliber pistol bearing serial number DAZ8991, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about October 25, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAUL VASQUEZ, a/k/a "Garfield," and
THOMAS MIRELEZ, a/k/a "Tommy Gunns,"

defendants herein, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did trade a firearm, that is, a loaded Intratec Tec-DC9, 9mm caliber semi-automatic pistol bearing serial number D054512, to Individual A, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that Individual A was not then residing in the State of Illinois, the State in which defendant was residing at the time of the trade of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(5) and 2.

COUNT TWELVE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about March 25, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDWARD DELGADO, a/k/a "Deadhand,"

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a loaded Taurus PT738, .380 caliber semi-automatic pistol bearing serial number 55093C, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTEEN

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about April 24, 2014, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDWARD DELGADO, a/k/a "Deadhand,"

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity of a mixture and substance containing a detectable amount of
cocaine, a Schedule II Controlled Substance;

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

FORFEITURE ALLEGATION ONE

The SPECIAL JANUARY 2015 GRAND JURY further alleges:

1. The allegations of Count One of this Indictment are incorporated here for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 1963.

2. As a result of their violation of Title 18, United States Code, Section 1962(d), as alleged in the foregoing Indictment,

RAUL CAVILLO, a/k/a "Ra Ra,"
JUAN JIMENEZ, a/k/a "Chinks,"
a/k/a "China Man,"
JOEL NUNEZ, a/k/a "Shorty,"
CARLOS PADILLA, Jr., a/k/a "Little Poppy,"
a/k/a "Li'l Papi," a/k/a "Little Papi,"
PAUL VASQUEZ, a/k/a "Garfield,"
RUBEN PORRAZ, a/k/a "Scrappy,"
EDWARD DELGADO JR., "Deadhand,"
ROY VEGA, a/k/a "Ice,"
FERNANDO CHAVEZ, a/k/a "Fester,"
ISRAEL MATA, a/k/a "Iz,"
RAYMOND VASQUEZ, a/k/a "Phathead," a/k/a "Fathead"
GERONIA FORD, a/k/a "Boo Man,"
DEAN TREVINO, a/k/a "Bravo,"
WILLIAM HAYSLETTE, a/k/a "LB"
EDGAR GONZALEZ, a/k/a "E,"
MIGUEL DENAVA, a/k/a "Wacko,"
CARLOS CARTAGENA, a/k/a "Husky,"
ELOY FUENTES, a/k/a "Sin," and
LUIS GOMEZ, a/k/a "Bull,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), any interest acquired or maintained in violation of Section 1962; any interest in, security of, claim against,

or property or contractual right of any kind affording a source of influence over, any enterprise which the person has established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Section 1962.

3. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), 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 to, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value;
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 18, United States Code, Section 1963(m).

FORFEITURE ALLEGATION TWO

The SPECIAL JANUARY 2015 GRAND JURY further alleges:

1. The allegations of Counts Ten and Eleven of this Indictment are incorporated herein for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in Counts Ten, Eleven and Twelve of this Indictment, defendants EDWARD DELGADO, also known as "Deadhand," FERNANDO CHAVEZ, also known as "Fester," PAUL VASQUEZ, a/k/a "Garfield," and THOMAS MIRELEZ, a/k/a "Tommy Gunns," shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

3. The property to be forfeited includes, but is not limited to:

- one Smith & Wesson, .38 caliber pistol bearing serial number DAZ8991;
- one loaded Intratec Tec-DC9, 9mm caliber semi-automatic pistol bearing serial number D054512;
- one loaded Taurus PT738, .380 caliber semi-automatic pistol bearing serial number 55093C.

A TRUE BILL:

F O R E P E R S O N

UNITED STATES ATTORNEY