

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

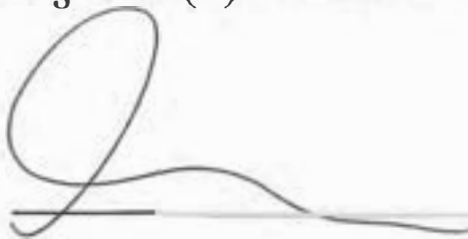
VS

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. 2025

Virginia K. DeWoe

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,)	VIOLATIONS:
)	Count One: 18 U.S.C. § 1962(d) – Racketeering
v.)	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,”)	FILED UNDER SEAL
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;

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

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

10 The Defendants

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

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

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

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

23 GUSTAVO GARCIA aka "Tatis,"
 24 LORENZO GARCIA Jr. aka "Chito,"
 25 BERTIN MEDRANO aka "Dre,"
 26 JESUS SALDANA a/k/a "D Rose,"
 27 OSCAR BENITEZ a/k/a "Sideshow,"
 28 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,"

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

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

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

6 18. The allegations contained in paragraphs 1 through 17 of this Superseding Indictment are
7 hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture
8 pursuant to Title 18, United States Code, Section 1963, and Title 28, United States Code, Section
9 2461(c).

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

12 GUSTAVO GARCIA aka "Tatis,"
13 LORENZO GARCIA Jr. aka "Chito,"
14 BERTIN MEDRANO aka "Dre,"
15 JESUS SALDANA a/k/a "D Rose,"
16 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"

17 shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1963(a),
18 (1) any interest they have acquired or maintained in violation of Section 1962 of Title 18 of the United
19 States Code; (2) any interest in, security of, claim against, or property or contractual right of any kind
20 affording a source of influence over, any enterprise which they have established, operated, controlled,
21 conducted, or participated in the conduct of, in violation of Section 1962 of Title 18 of the United States
22 Code; and (3) any property constituting or derived from any proceeds which they obtained directly or
23 indirectly from racketeering activity, in violation of Title 18, United States Code, Section 1962,
24 including but not limited to a forfeiture money judgment, relating to the offenses alleged in Count One,
25 pursuant to Title 18, United States Code, Section 1963, and Title 28, United States Code, Section
26 2461(c).

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

28 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

15

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 (& 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

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

BERTIN MEDRANO aka "Dre"

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 & 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:

15

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 (& 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 prosecution 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 & 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

110

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

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
SEALED BY ORDER
OF THE COURT

FILED

DEC 18 2025

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

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.

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 & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

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

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

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

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

110

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

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING

 Name of District Court, and/or U.S. Magistrate's location
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION
 FILED
 DEC 18 2025
 Δ12

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:
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 ☐ 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:

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

Date/Time: Before Judge:

Comments:

Δ12

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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 (& 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

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

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

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

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

Defendant Address:

Date/Time: Before Judge:

Comments:

Name of District Court, and/or U.S. District 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

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 & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

14

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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 (& 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

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

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* ☒ WARRANTBail 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:

15

AO 257 (Rev. 5/78)

Δ16

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.

JOSE AGUILERA a/k/a "Jay"

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

1) ☐ Has not been arrested, pending outcome this proceeding. 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

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount: No bail

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

Date/Time:

Before Judge:

Comments:

Δ16

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 (& 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
 Monterey County Jail

Has detainer been filed? ☐ Yes ☒ No

If "Yes" give date filed

DATE OF ARREST
 10/07/2025

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

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

Defendant Address:

Date/Time: Before Judge:

Comments:

Δ17