

FILED

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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

SAN JOSE DIVISION

CR 24 00226

BLF

THE UNITED STATES OF AMERICA

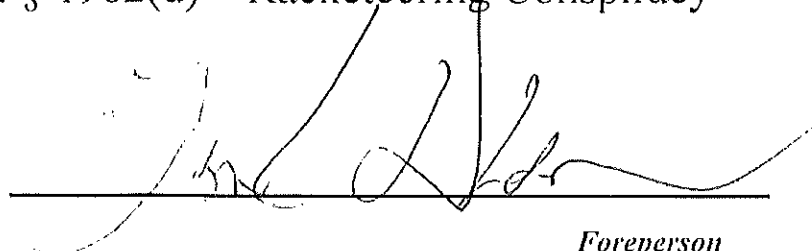
VS

**GIL VASQUEZ aka "Rhino," RIGOBERTO RAMIREZ Jr.
aka "Scooby," SERGIO HERNANDEZ Jr. aka "Mono,"
JUAN ALVAREZ aka "Yogi," BERTIN MEDRANO aka "Dre,"
JOSE MEXICANO aka "Armani," SALVADOR MEXICANO
aka "Jumpshot," RAUL CORONEL SUAREZ aka "Ray,"
GUSTAVO GARCIA aka "Tatis," LORENZO GARCIA Jr.
aka "Chito," and JOSE SALDANA aka "Chepe"**

INDICTMENT

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

A true bill.



Foreperson

Filed in open court this 18 day of April A.D. 2024


United States Magistrate Judge

Bail. \$ no bail arrest warrant as to all defendants.

FILED

APR 18 2024

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

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GIL VASQUEZ aka "Rhino,"
RIGOBERTO RAMIREZ Jr. aka "Scooby,"
SERGIO HERNANDEZ Jr. aka "Mono,"
JUAN ALVAREZ aka "Yogi,"
BERTIN MEDRANO aka "Dre,"
JOSE MEXICANO aka "Armani,"
SALVADOR MEXICANO aka "Jumpshot,"
RAUL CORONEL SUAREZ aka "Ray,"
GUSTAVO GARCIA aka "Tatis,"
LORENZO GARCIA Jr. aka "Chito," and
JOSE SALDANA a/k/a "Chepe"

Defendants.

CASE NO. 24-00226-BLF

VIOLATIONS:

Count One: 18 U.S.C. § 1962(d) – Racketeering
Conspiracy;
18 U.S.C. § 1963 and 28 U.S.C. § 2461(c) – Criminal
Forfeiture

SAN JOSE VENUE

FILED UNDER SEAL

INDICTMENT

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

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 all times relevant to this Indictment, GIL VASQUEZ aka "Rhino," RIGOBERTO
12 RAMIREZ Jr. aka "Scooby," SERGIO HERNANDEZ Jr. aka "Mono," JUAN ALVAREZ aka "Yogi,"
13 BERTIN MEDRANO aka "Dre," JOSE MEXICANO aka "Armani," SALVADOR MEXICANO aka
14 "Jumpshot," RAUL CORONEL SUAREZ aka "Ray," GUSTAVO GARCIA aka "Tatis," LORENZO
15 GARCIA Jr. aka "Chito," and JOSE SALDANA a/k/a "Chepe," were members and associates of the
16 Salinas Acosta Plaza Norteño gang, and therefore members of the Enterprise.

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

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

20 13. Beginning on a date unknown to the Grand Jury, but no later than 2008, and continuing
21 up through and including the present, in the Northern District of California and elsewhere, the
22 defendants,

23 GIL VASQUEZ aka "Rhino,"
24 RIGOBERTO RAMIREZ Jr. aka "Scooby,"
25 SERGIO HERNANDEZ Jr. aka "Mono,"
26 JUAN ALVAREZ aka "Yogi,"
27 BERTIN MEDRANO aka "Dre,"
28 JOSE MEXICANO aka "Armani,"
SALVADOR MEXICANO aka "Jumpshot,"
RAUL CORONEL SUAREZ aka "Ray,"
GUSTAVO GARCIA aka "Tatis,"
LORENZO GARCIA Jr. aka "Chito," and
JOSE SALDANA a/k/a "Chepe"

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 trafficking of controlled substances, in violation of
12 Title 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 1512 and
16 1513, relating to tampering with a witness, victim, or an informant, and relating to retaliating against a
17 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 April 14, 2011, and April 21, 2011, RIGOBERTO RAMIREZ
27 possessed 10 grams of methamphetamine with the intent to distribute it in Salinas, CA.

28 c) On or about July 8, 2014, GIL VASQUEZ and another individual robbed a man

1 of his phone and money at knifepoint in Salinas, CA.

2 d) On or about July 19, 2014, GUSTAVO GARCIA and LORENZO GARCIA
3 murdered a man perceived to be associated with a rival gang by shooting him near his residence in
4 Salinas, CA.

5 e) On or about August 20, 2015, JUAN ALVAREZ robbed a man of his marijuana
6 and money at gunpoint in or around Monterey, CA.

7 f) On or about February 25, 2016, GIL VASQUEZ and another individual attempted
8 to murder a man perceived to be associated with a rival gang by shooting him at a residence in Salinas,
9 CA.

10 g) On or about August 16, 2019, BERTIN MEDRANO possessed approximately
11 133 grams of marijuana with the intent to distribute it in Salinas, CA.

12 h) On or about December 19, 2019, Enterprise members murdered a man perceived
13 to be associated with a rival gang by shooting him in his vehicle on a street in Salinas, CA.

14 i) On or about May 1, 2020, Enterprise members murdered a transient man and
15 attempted to murder two other transient men by shooting them near Carr Lake in Salinas, CA.

16 j) On or about September 20, 2020, Enterprise members murdered a transient man
17 and attempted to murder another transient man perceived to be associated with a rival gang by shooting
18 them near Carr Lake in Salinas, CA.

19 k) On or about March 23, 2021, Enterprise members murdered a transient man
20 perceived to be associated with a rival gang by shooting him near Carr Lake in Salinas, CA.

21 l) On or about April 27, 2021, BERTIN MEDRANO, SALVADOR MEXICANO,
22 and other Enterprise members robbed a man perceived to be associated with a rival gang of his gold
23 chain after assaulting him at a mall in Salinas, CA.

24 m) On or about May 13, 2021, JOSE MEXICANO possessed approximately 85
25 fentanyl-laced counterfeit oxycodone pills (aka "M30" pills) with the intent to distribute them in Salinas,
26 CA.

27 n) Between approximately April 2022 and October 2023, JOSE MEXICANO
28 distributed "M30" pills and cocaine in Salinas, CA.

1 o) On or about November 28, 2022, SALVADOR MEXICANO possessed
2 approximately 14.8 grams of cocaine and several baggies of marijuana with the intent to distribute them
3 in or around Marina, CA.

4 p) On or about December 14, 2022, SERGIO HERNANDEZ possessed "M30" pills
5 and cocaine with the intent to distribute them in Salinas, CA.

6 q) Between approximately January 2020 and continuing through the present date,
7 GIL VASQUEZ, RIGOBERTO RAMIREZ, SERGIO HERNANDEZ, JUAN ALVAREZ, JOSE
8 MEXICANO, SALVADOR MEXICANO, and other Enterprise members collected gang dues from
9 Enterprise members in order to pay the Nuestra Familia, purchase firearms and drugs for the Enterprise,
10 and/or pay bail for incarcerated members and associates in or around Salinas, CA.

11 r) Between approximately July 2022 and April 2024, JUAN ALVAREZ, SERGIO
12 HERNANDEZ, JOSE MEXICANO, RAUL CORONEL SUAREZ, and other Enterprise members and
13 associates trafficked firearms knowing their use, carrying, or possession would constitute a felony in or
14 around Salinas, CA.

15 s) On or about January 23, 2023, Enterprise members shot at perceived associates of
16 a rival gang after shouting words to the effect of "Plaza boys" in Salinas, CA.

17 t) On or about January 29, 2023, JOSE SALDANA possessed cocaine,
18 methamphetamine, and "M30" pills with the intent to distribute them in Salinas, CA.

19 u) On or about February 26, 2023, an Enterprise member attempted to murder a man
20 outside of a residence in Salinas, CA.

21 v) On or about March 19, 2023, Enterprise members robbed a juvenile perceived to
22 be a member of a rival gang of his gold necklace at gunpoint in Salinas, CA.

23 w) On or about April 3, 2023, Enterprise members fired eight gunshots at the
24 apartment of a man perceived to be associated with a rival gang in Salinas, CA. The Enterprise
25 member(s) shouted words to the effect of "Acosta Plaza" and fired from a white BMW sedan.

26 x) On or about April 6, 2023, GUSTAVO GARCIA possessed approximately 400
27 "M30" pills and cocaine with the intent to distribute the controlled substances in Salinas, CA.

28 y) On or about April 26, 2023, Enterprise members attempted to murder a man

1 perceived to have dropped out of the Enterprise as he walked through SAP territory by shooting him in
2 Salinas, CA.

3 z) On or about May 20, 2023, Enterprise members murdered a man perceived to be
4 associated with a rival gang by shooting him in Salinas, CA. A woman was also paralyzed after one of
5 the bullets from the shooting traveled through the wall of her apartment and struck her in the spine.

6 aa) In or around June 2023, RIGOBERTO RAMIREZ and other Enterprise members
7 solicited the murder of a man perceived to be associated with a rival gang in Salinas, CA.

8 bb) Between approximately June 2023 and September 2023, JUAN ALVAREZ
9 possessed marijuana and other controlled substances with the intent to distribute them in Salinas, CA.

10 cc) On or about June 24, 2023, an Enterprise member fired a gunshot at an individual
11 during a drug sale dispute in Salinas, CA; the victim suffered a facial injury.

12 dd) On or about July 16, 2023, RAUL CORONEL SUAREZ possessed
13 methamphetamine and cocaine with the intent to distribute them in Salinas, CA.

14 ee) In July 2023 and August 2023, Enterprise members firebombed an apartment in
15 Salinas, CA, with Molotov cocktails, and then wrote "SAP," "rata" (rat), and "snitch fat f****" in graffiti
16 inside the same apartment after the firebombing was reported to police.

17 ff) On or about September 27, 2023, LORENZO GARCIA possessed
18 methamphetamine and "M30" pills with the intent to distribute them in Salinas, CA.

19 gg) On or about September 29, 2023, an Enterprise member robbed a home and then a
20 gas station of their money at gunpoint in Salinas, CA.

21 hh) On or about October 13, 2023, an Enterprise member robbed a clothing store of
22 its money at gunpoint in Salinas, CA.

23 ii) On or about December 2, 2023, RAUL CORONEL SUAREZ and JOSE
24 SALDANA and another Enterprise member murdered a man perceived to have dropped out of the
25 Enterprise by shooting him in Salinas, CA.

26 jj) On or about December 31, 2023, an Enterprise member murdered a man by
27 shooting him in the head and chest in Salinas, CA.

28 kk) On or about January 18, 2024, law enforcement recovered 97 handguns, shotguns,

1 and rifles from a suspected gang stash house in Enterprise territory in Salinas, CA.

2 NOTICE OF SPECIAL SENTENCING FACTORS

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

4 16. On or about July 19, 2014, in the Northern District of California, the defendants,

5 GUSTAVO GARCIA aka "Tatis," and
6 LORENZO GARCIA Jr. aka "Chito,"

7 with others known and unknown, each aided and abetted by the other, did unlawfully, willfully, and
8 intentionally, with deliberation and premeditation, and with malice aforethought, kill Victim-1, in
9 violation of California Penal Code Sections 187, 188, 189, and 31.

10 Number 2: December 2, 2023 Murder of Victim-2

11 17. On or about December 2, 2023, in the Northern District of California, the defendants,

12 RAUL CORONEL SUAREZ aka "Ray," and
13 JOSE SALDANA a/k/a "Chepe"

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

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

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

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

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

23 GIL VASQUEZ aka "Rhino,"
24 RIGOBERTO RAMIREZ Jr. aka "Scooby,"
25 SERGIO HERNANDEZ Jr. aka "Mono,"
26 JUAN ALVAREZ aka "Yogi,"
27 BERTIN MEDRANO aka "Dre,"
28 JOSE MEXICANO aka "Armani,"
SALVADOR MEXICANO aka "Jumpshot,"
RAUL CORONEL SUAREZ aka "Ray,"
GUSTAVO GARCIA aka "Tatis,"
LORENZO GARCIA Jr. aka "Chito," and
JOSE SALDANA a/k/a "Chepe"

1 shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1963(a),
2 (1) any interest they have acquired or maintained in violation of Section 1962 of Title 18 of the United
3 States Code; (2) any interest in, security of, claim against, or property or contractual right of any kind
4 affording a source of influence over, any enterprise which they have established, operated, controlled,
5 conducted, or participated in the conduct of, in violation of Section 1962 of Title 18 of the United States
6 Code; and (3) any property constituting or derived from any proceeds which they obtained directly or
7 indirectly from racketeering activity, in violation of Title 18, United States Code, Section 1962,
8 including but not limited to a forfeiture money judgment, relating to the offenses alleged in Count One,
9 pursuant to Title 18, United States Code, Section 1963, and Title 28, United States Code, Section
10 2461(c).

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

- 12 a) Cannot be located upon the exercise of due diligence;
13 b) Has been transferred or sold to, or deposited with, a third party;
14 c) Has been placed beyond the jurisdiction of the court;
15 d) Has been substantially diminished in value; or
16 e) Has been commingled with other property which cannot be divided without difficulty;

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

20 DATED: April 18, 2024

A TRUE BILL.

FOREPERSON

24 ISMAIL J. RAMSEY
25 United States Attorney

26 /s/
27 LEIF DAUTCH
28 GEORGE O. HAGEMAN
AMANI S. FLOYD
Assistant United States Attorneys

INDICTMENT

