

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SECRET

The People of the State of California,
Plaintiff,

CASE NO. 25CJCF00287

v.

INDICTMENT

1. JOSE "DUKE", "RASCAL" MARTINEZ aka MARTINES
2. ESTELA "OSA", "MOMS" GUERRERO
3. DANIEL "KALAKAS" GARCIA
4. PHAROAH "BLACKIE" BROOKS
5. DAVID "TOO TALL" FRAYSURE
6. DANIEL "WEASEL" AROCHI-GONZALEZ
7. JACKIE "BOY" TRIPLETT
8. JESSE "TRIGGER" QUINTERO
9. MARCO "MUGSY" LUJAN
10. ANDY DOMINGUEZ
11. ARIEL "CASPER" PEREYRA
12. ANGEL GRAJALES
13. FRANK "JR" RODRIGUEZ
14. JOSE "BENJI" "LIL SPANKY" RODRIGUEZ
15. JESSIE ABDON
16. ARIANNA INOCENTE
17. MICHAEL MEISER
18. SALMA HARO

COUNT 1

The said JOSE "DUKE" TRANCITO MARTINEZ, ESTELA "OSA" GUERRERO, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, JESSE "TRIGGER" QUINTERO and MARCO "MUGSY" LUJAN are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO SELL CONTROLLED SUBSTANCE (HEROIN)**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

A TRUE BILL

Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 16th day of January, 2025

DAVID S. SLAYTON, Executive Officer/Clerk

By _____
Deputy

NATHAN J. HOCHMAN, District Attorney

By _____
Deputy

On or between January 13, 2022 and March 27, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **"RASCAL" MARTINEZ aka MARTINES, ESTELA "OSA" GUERRERO, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, JESSE "TRIGGER" QUINTERO and MARCO "MUGSY" LUJAN** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **SALE/TRANSPORTATION/OFFER TO SELL CONTROLLED SUBSTANCE, TO WIT: HEROIN**, in violation of Section 11352(a) of the Health & Safety Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On or before January 2022, Michael "Mosca" ("Fly") Torres assumed control of an organized criminal enterprise that controls the collection of proceeds of illegal activity within the Los Angeles County jail system. This organization is commonly referred to as the Southside and is controlled by the Mexican Mafia, a prison gang.
2. Between January 1 and March 1, 2022, Estela Guerrero, Jose Martinez, Pharoah Brooks, Rosa Martinez, and other unidentified co-conspirators devised a plan to facilitate the ongoing smuggling of controlled substances into the Los Angeles County jail system to benefit the Mexican Mafia member through the collection of a portion of all quantities of controlled substances smuggled.
3. On January 29, 2022, David "Too Tall" Fraysure called Estela Guerrero and discussed the distribution of the narcotics that was received in his dorm located in Los Angeles County Jail.
 - a. Guerrero told Fraysure that they have something going on. Fraysure asked Guerrero if it is between them two and Guerrero confirmed. Guerrero said that she has him doing something for her but now that he is not there, it touched down and that she instructed him to send it to "79" in the meantime. Guerrero reported that once he gets out of the hole he will do what he can and that Fraysure should keep an eye out because stuff should be coming in. Fraysure said no problem.
4. On or about February 7, 2022, Daniel Garcia called Estela Guerrero.
 - a. Guerrero told Garcia that someone called her again saying that he sent Garcia something and that it's on his way. Garcia indicated he got an "appointment" from MCJ. Guerrero told Garcia that this individual said for Garcia to give him a "touchdown" (notify the individual when Garcia receives the narcotics). Garcia confirmed that he knows how to do it.
 - b. Garcia told Guerrero that one was fourteen and one was five, and that "7...one above" they "shot" Cassanova.
 - c. Garcia asked Guerrero who is two above. Guerrero says that it is Clanton she thinks and then corrects herself and says San Fer. Guerrero told him to get at him. Garcia asked if she is aware that there are all types of appointments. Guerrero said alright. Garcia told her that he is going to reach out to them.

- d. Garcia told Guerrero that the appointment was good and that "one above" sent something, that it's like the same thing but different kind (the floor above Garcia sent him narcotics.) Guerrero asked who sent him that and Garcia responded that B2B sent the big one and Cassanova sent the small one. Guerrero said that this is about it but there should be another one (another unit of narcotics). Guerrero said that everyone is hurting (limited amount of narcotics to sell within the LACJ).
5. On or about February 18, 2022, at approximately 4:33 PM, Daniel Garcia called Estela Guerrero.
 - a. Garcia told Guerrero that he is in possession of "twenty-three" (units of narcotics), but that it was supposed to be "thirty-three". Garcia said that he opened it up and it was all messed up so he put it right (packaged the narcotics correctly). Garcia reported that he is reaching out to them to see what's up. Guerrero said okay and will tell oh boy to call his contact.
6. On or about February 18, 2022, at approximately 9:54 pm, Daniel Garcia called Estela Guerrero.
 - a. Guerrero asked Garcia if he got it all figured out. Garcia said he got the majority of it figured out but Duke said to put everything on hold until he confirmed something. Garcia said that he would call him right now and that if it doesn't add up, they are going to have to donate everything (confiscate all of the narcotics instead of just the tax). Guerrero said exactly. Garcia said that he doesn't have a choice. Guerrero responded, "you already know."
7. On February 25, 2022, Jose Quintero entered Los Angeles County jail with heroin concealed on his person.
8. Between February 25 through 27, 2022, Jose Quintero distributed the substance to other unidentified co-conspirators within the county jail system.
9. On or about February 27, 2022, Pharoah Brooks told Jose Martinez that "a homie" known as "Trigger" from Lincoln Heights (Jose Quintero), had come into the Los Angeles County Jail with four "pedasos" (Spanish slang commonly referring to an ounce of heroin).
 - a. Pharoah Brooks also stated that three of the "pedasos" were for "Fly" (Michael Torres) and one was for "Trigger" (Jose Quintero).
 - b. Pharoah Brooks provided Jose Martinez with a phone number for "Lones" to confirm.
 - c. Pharoah Brooks told Jose Martinez that "Edward" would be used as the codename for "Trigger."
10. On or about February 27, 2022, Jose Martinez told Pharoah Brooks to keep everything on "hold" until he confirmed the narcotics belonged to the Mexican Mafia.
 - a. Martinez told Brooks that "Lones" was texting him back right now and to call him back after count.
11. On or about February 27, 2022, at 10:15 PM, Pharoah Brooks asked Jose Martinez if there was any news for them.

- a. Martinez responded that they were trying to get ahold of everyone and that he would probably have an answer tomorrow. He instructed Brooks to keep everything on hold.
12. On or about February 28, 2022 Pharoah Brooks told Jose Martinez that "they rolled up on that dude Edward" and explained that "they" got him with "one, but three are still there."
 - a. Brooks told Martinez that he is going to have them "forward everything to us" but Martinez interrupted and said, "no, just hold onto it."
 - b. When Brooks asked Martinez if he wanted "them to hold onto it," Martinez instructed him to give it to "ol boy, the other guy that's there with you..."
 - c. Brooks agrees to give it to the co-conspirator Martinez named and Martinez tells him to be safe with "it."
13. On or about March 2, David Fraysure called Jose Martinez. Fraysure told Martinez that his homie "Boy" already declassified and is housed at NCCF 825 and asked for permission to send him some "love" (reference to narcotics) so he could "get back on his feet." Martinez tells Fraysure that is okay.
14. On or about March 3, 2022, Pharoah Brooks called Jose Martinez. Brooks informed Martinez that the one from "Pobre" was a "TD" (touchdown). Martinez understands.
15. On March 18, 2022, David Fraysure called Jose Martinez.
 - a. Martinez asks how much he sent to the homies.
 - b. Fraysure confirms it was "four and three... four shots and three creamers." Martinez says he will look into it and instructs Fraysure to call him back at night.
 - c. Fraysure then tells Martinez "South, five and eights, they were all TD's" (touchdowns). Martinez says this is cool. Fraysure says South was a TD (touchdown) because he took it himself.
16. On March 19, 2022 at 1:17 p.m., David Fraysure called Jose Martinez and asks for an update on "that thing." Martinez says no and that "she" hasn't told him anything. Fraysure asks Martinez if he remembers about the individual he asked about from "the ranch" and says he's in 5400. Martinez confirms that he is over there and states he has a tab and "they" wanted to know if he left owing money. Fraysure says he will call back tonight.
17. On March 19, 2022 at 9:29 p.m., David Fraysure called Jose Martinez. and asked for a update on "oh boy". Martinez then tells Fraysure to "get it all". Fraysure understands and then asked what he is to do with it. Martinez instructs him to "hold onto it."
18. On March 23, 2022. at 4:54 p.m. David Fraysure called Jose Martinez.
 - a. Martinez says that he has talked to "Big Stuff" and asks whether Fraysure has. Fraysure tells Martinez that he has not been in contact with "Big Stuff." Martinez tells Fraysure that one of his homies landed there with "five bags of coffee" (heroin). Martinez tells Fraysure that they will send him "two bags of coffee." Fraysure acknowledges.

- b. Fraysure asks about the "other one", the one with the "four and the three, what's up with that?" Martinez said they are still waiting and to "put it on hold." Fraysure understands and tells Martinez that he is "out of coffee" at the moment. Martinez tells Fraysure to talk to an inmate "downtown". Fraysure understands and states that these issues need to get ran by "you guys first." Martinez agrees. Fraysure asks if he is good to "do my thing?" and Martinez says yes. Martinez stated that he will call people right now to let them know.

19. On March 23, 2022, at 7:50 p.m. David Fraysure calls Daniel Arochi-Gonzalez.

- a. Arochi stated that he shot it to the homies and wasn't sure. Fraysure stated that they "need it by tomorrow." Arochi confirms. Fraysure says that if he can't they need to figure something else out. Arochi stated that he will ask "him" (Jose Martinez). Arochi asks if he spoke to "the homie" and Fraysure says after count but that it is regarding "that" Arochi says okay and after they speak he will hit "that fool up" (Martinez). Fraysure tells Arochi "by tomorrow...if you can."

20. On March 24, 2022, at 4:38 p.m., David Fraysure called Jose Martinez.

- a. Fraysure tells Martinez that he has an issue that he needs to run by him. He says some fool landed there from south, it is the name he texted him earlier and that the individual had fumbled something earlier. Fraysure asked if he wants to reach out to those people and let them know he is right here so they can work something out. The person on the outside says he will call them.
- b. Fraysure said that someone landed with three creamers (methamphetamine) and that the two from Big Shot were a TD (touchdown).

21. On March 27, 2022, at 7:07 p.m., David Fraysure called Jose Martinez

- a. Fraysure reminded Martinez of a call about "three creamers". Fraysure asked Martinez if he knew that fool from Venice and stated that he had the "old man pocket" (the guy from Venice was the shotcaller for that area). Fraysure stated that the person with the "three creamers" landed in his area and Fraysure "broke that off" (Fraysure is advising that he extracted the Mexican Mafia thirds tax) and sent it back.
- b. Fraysure stated that he is now hearing that "moms" wants them to confiscate everything (take the drugs) and Fraysure wanted to confirm with Martinez. Martinez asked what they called the guy from Venice and Fraysure said they called him "Weasel". Martinez said that the drugs were going to be shot back to Fraysure and that "ol boy" (Weasel) would not be getting anything. Fraysure asked if all 3 were going to be sent to him and Martinez responded yes. Fraysure wanted to make sure they were all on the same page because it was serious (to take someone's drugs) and Martinez acknowledged they were on the same page.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 1 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willful failure to register is a crime.”

* * * * *

COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, JESSE “TRIGGER” QUINTERO and MARCO “MUGSY” LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG-SALE OF A CONTROLLED SUBSTANCE (HEROIN)**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 13, 2022 and March 27, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, JESSE “TRIGGER” QUINTERO and MARCO “MUGSY” LUJAN** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **SALE/TRANSPORTATION /OFFER TO SELL CONTROLLED SUBSTANCE**, within the meaning of Health & Safety Code Section 11352(a), by members of that street gang.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 2 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT EXTORTION** in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 13, 2022 and August 31, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **EXTORTION**, in violation of Section 518/519 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On or before January 2022, Michael “Mosca” (“Fly”) Torres assumed control of an organized criminal enterprise that controls the collection of proceeds of illegal activity within the Los Angeles County jail system. This organization is commonly referred to as the Southside and is controlled by the Mexican Mafia, a prison gang.
2. Between January 2022 and August 2022, Michael Torres, Estela “Osa” Guerrero, Jose “Duke” Martinez, and Rosa Martinez and other unidentified co-conspirators devised a plan to facilitate the ongoing smuggling of controlled substances into the Los Angeles County jail system to benefit Michael Torres through the collection of a portion of all quantities of controlled substances smuggled.
3. Between January and February 2022, Estela Guerrero discussed with David “Too Tall” Fraysure, an inmate housed in the North County Correctional Facility, Daniel Garcia an inmate housed in the North County Correctional Facility (NCCF) and other unidentified co-conspirators where the proceeds from the narcotics smuggling in should be distributed within the Los Angeles County jail system.
4. On January 13, 2022, Estela Guerrero instructed David Fraysure to send the proceeds of narcotics to the homie from Rockwood who was “one above” Fraysure.
5. On January 18, 2022, at about 12:34 PM, an unidentified co-conspirator housed at NCCF (aka “Green Eyes”) reported to Estela Guerrero, that co-conspirator “Scrappy” reported that “Kristina” (Rosa Kristina Martinez) had “picked it up” yesterday.

6. On January 18, 2022, Guerrero told "Green Eyes" that the money was being sent late. "Green Eyes" offered to send the money directly to a Cash App Account, but Guerrero indicated that she needed to ask her "old man" because they did not want to leave "a paper trail."
 - a. Guerrero gave "Green Eyes" permission to use whoever he felt comfortable with to deliver the money.
7. On or about January 18, 2022, Guerrero discussed with "Green Eyes" where to send the "birthday cards." Guerrero told "Green Eyes" that "her boy is there right now" (Jose Martinez) and to send it to "8" (referring to NCCF 800 housing unit). At around 7 PM, Guerrero told "Green Eyes" that it was a "touchdown."
8. On January 29, 2022, David "Too Tall" Fraysure called Estela Guerrero.
 - a. Fraysure reported to Guerrero that one of the homies in his dorm received some "oranges" (narcotics) from "downtown" (Men's Central Jail) from his homeboy.
 - b. Fraysure reported that it was "one" full one and "twenty-nine cut up singles." Fraysure stated that it seemed like the fool in the county was trying to be discreet about it.
 - c. Guerrero told Fraysure that's not cool, that she's already sent word down there regarding that and that they're finding out some bullshit.
 - d. Fraysure reported that his homebody will text her the name of the person the narcotics came from.
 - e. Guerrero told Fraysure to go ahead and grab that and to "break him off" (the mafia's portion of narcotics) what amount Fraysure thinks is convenient for him.
 - f. Guerrero asked Fraysure if this individual told Fraysure or if he found out about the narcotics.
 - g. Fraysure told Guerrero that the individual brought it to his attention and showed him the letter and everything with it. Guerrero said ok and asked Fraysure to send it to her.
9. Guerrero told Fraysure that they (Guerrero and Martinez) have something going on. Fraysure asked Guerrero if it is between them two and Guerrero confirmed. Guerrero said that she has him (Martinez) doing something for her but now that he is not there, it touched down and that she instructed him to send it to "79" in the meantime.
10. Guerrero reported that once he (Martinez) gets out of the hole he will do what he can and that Fraysure should keep an eye out because stuff should be coming in. Fraysure said no problem.
11. On or before Jose Martinez's release on February 2, 2022, Jose Martinez and unidentified co-conspirators agreed that Pharoah "Blackie" Brooks would take over his role as the shotcaller in the 800 block of NCCF.

12. On February 1, 2022, David Fraysure checked in with Estela Guerrero regarding a "homie from Pacas" sending "a homie from San Fer" nine units of narcotics. They were claiming that Michael "Fly" Torres was aware of everything and that they did not need to pay the tax.
 - a. In order to confirm this, Guerrero agreed that Fraysure would send her their names via text message so that he did not have to say their names over the phone.
13. On February 4, 2022, Estela Guerrero told David Fraysure to let "ol' boy over there" do what he has to do and that he has instructions on what to do. Guerrero told Fraysure that the amount he had was chump change and to be on the lookout to receive more narcotics.
14. On February 7, 2022, Daniel "Kalakas" Garcia reported to Estela Guerrero the collection of narcotics proceeds from various inmates. Guerrero reported that everyone is hurting (there was a limited amount of narcotics to sell within the IACJ).
15. On February 18, 2022, at approximately 4:33 PM, Daniel Garcia called Estela Guerrero reporting that he received less narcotics than he was supposed to.
 - a. Garcia told Guerrero that he is in possession of "twenty-three" (units of narcotics), but that it was supposed to be "thirty-three". Garcia reported that he is reaching out to them to see what's up.
16. On February 18, 2022, at approximately 9:54 pm, Daniel Garcia called Estela Guerrero and reported that "Duke" (Jose Martinez) said to put everything on hold until he confirmed something.
 - a. Garcia told Guerrero that if it doesn't add up, they are going to have to donate everything (confiscate all of the narcotics instead of just the tax).
17. On February 26, 2022, Jose Martinez discussed with Pharoah Brooks who would deliver the money to Martinez.
 - a. Martinez instructed Brooks that whoever is "helping" should have money collected from the "whole floor" and that those people are then to "pull it out" (withdraw the money) and then meet with "the person".
18. On February 26, 2022, Pharoah Brooks reported to Jose Martinez that they were dealing with a "ticket" from Billy Rey from Flores and that he owed money for a certain amount of days.
 - a. Brooks told Martinez that he spoke to Billy Rey about future discipline if he did not send the money.
 - b. Martinez told Brooks that he would get an answer for him.
19. On or about March 1, 2022, Jose Martinez and Pharoah Brooks discussed whether Martinez received the right amount of money for the narcotics collection for the weeks that Martinez had been out of custody.
 - a. Martinez reported "You guys are behind though". Martinez and Brooks then discussed how the narcotics collected should be distributed in the jail.

20. On March 1, 2022, Jose Martinez told Pharoah Brooks that "they" were asking for an accounting of the proceeds gained from the kitty scheme; "your guys logs, every piso" and instructed Brooks to send those to Daniel Garcia.
21. Between March 1 and March 2, 2022, David Fraysure gave an accounting of proceeds gained from the kitty scheme to Daniel Garcia as requested.
22. On or about March 2, 2022, David Fraysure called Jose Martinez. Fraysure told Martinez that he had already sent "the logs" to "ol boy" as Martinez had requested.
23. On or about March 3, 2022, Pharoah Brooks and/or an unidentified co-conspirator spoke to "K" (Daniel Garcia). Garcia instructed them to "forward all, all the grocery (narcotics) money" to Jose Martinez.
24. On March 3, 2022, Martinez and Brooks discussed where to send the money and to keep logs on anything that has to do with narcotics and the weekly kitty.
25. On March 12, 2022, Pharoah Brooks called Jose Martinez to report that the "grocery (narcotics) money" and "this weekly (kitty)" was to be delivered to him that night.
26. On March 12, 2022, Pharoah Brooks and Jose Martinez discuss "Chilo" from Pasadena Villa Boys. Brooks stated that on the streets, "Chilo" got caught with two of them, that his house was raided and that he is in for double murder. Martinez tells Brooks to tell Chilo that he better come up with something (to make up for what he lost). Brooks stated that he will inform Martinez of his response.
27. On March 27, 2022, at 6:02 p.m., Jose Martinez instructed David Fraysure to let him know when Chile/Chele from Pasadena Villa Boys arrives in the facility.
28. On March 28, 2022, Jose Martinez and met with Daniel Arochi-Gonzalez. On David Fraysure's instructions, Arochi-Gonzalez asked Jose Martinez for the name of the individual from Villa Boys that Martinez had talked to him about.
29. On March 28, 2022, Daniel Arochi-Gonzalez reported to David Fraysure that the individual's name was C-H-I and ends with "L-E" (Chile from Pasadena Villa Boys). David Fraysure told Daniel Arochi-Gonzalez to send a message to Jose Martinez that Chile is located at 813 (NCCF Module 813).
30. On March 30, 2022, at 5:14 p.m., David Fraysure called Daniel Arochi-Gonzalez and told him that law enforcement raided the residence of "the fool that I been going to" (Jose Martinez).
 - a. Fraysure asked what was taken and Arochi-Gonzalez said that "I don't know, like, whatever you had right there.
 - b. Arochi-Gonzalez said that "ol girl" asked that Fraysure not reach out to her right now (presumably due to law enforcement scrutiny.)

- c. Fraysure said he understood. Arochi-Gonzalez said that someone within the jail would reach out to him. Arochi-Gonzalez said to let everyone know just in case. He said it starts with an "F" and that they might be going to get them all. Fraysure said he understood and not to trip
31. On August 2, 2022, Jackie "Boy" Triplett called Rosa Martinez to "check in" and confirmed that he was supposed to call her on Tuesdays. Triplett asked if Rosa had gotten the five (\$500) and she confirmed that she had but that she could not talk about that right now.
 32. On August 2, 2022, Triplett and Rosa Martinez discussed who Triplett had working for him.
 33. On August 5, 2022, Jackie Triplett confirmed with Rosa Martinez whether everything is still going to the homie. She says that is correct.
 34. On August 9 and August 23, 2022, Rosa Martinez confirmed with Jackie Triplett that she had received the payments and that everything was good.
 35. On August 23, 2022, Triplett and Rosa Martinez discussed who he is to contact to find out what his homie (David Fraysure) had "out there" so he "could take care of it for him."
 - a. Triplett told her that he had already contacted the "guys at the pole" (reference to NCCF North Facility) who did not get back to him.
 - b. Rosa Martinez tells him to wait and have his girlfriend remind her tomorrow.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 3 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willful failure to register is a crime."

* * * * *

COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES**, **ESTELA "OSA" GUERRERO**, **DANIEL "KALAKAS" GARCIA**, **PHAROAH "BLACKIE" BROOKS**, **DAVID "TOO TALL" FRAYSURE**, **DANIEL "WEASEL" AROCHI-GONZALEZ**, **JACKIE "BOY" TRIPLETT**, and **MARCO "MUGSY" LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 13, 2022 and March 27, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **EXTORTION**, within the meaning of Penal Code Sections 518/519, by members of that street gang.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(4) as to Count 4 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members and cause the sentencing to be pursuant to section 186.22(b)(4).

“NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).”

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EXTORTION**, in violation of **Penal Code Sections 518/519**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 13, 2022 and August 31, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** extorted property and other consideration from Los Angeles County Inmates, by means of force and threat such as is mentioned in Section 519.

It is further alleged pursuant to Penal Code section 186.22(b)(4) as to Count 5 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members and cause the sentencing to be pursuant to section 186.22(b)(4).

“NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).”

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT EXTORTION** in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 13, 2022 and August 31, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, DANIEL “KALAKAS” GARCIA, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, and MARCO “MUGSY” LUJAN** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **EXTORTION**, in violation of Section 518/519 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On or before January 2022, Michael “Mosca” (“Fly”) Torres assumed control of an organized criminal enterprise that controls the collection of proceeds of illegal activity within the Los Angeles County jail system. This organization is commonly referred to as the Southside and is controlled by the Mexican Mafia, a prison gang.
2. Between January 2022 and August 2022, Michael Torres, Estela “Osa” Guerrero, Jose “Duke” Martinez, and Rosa Martinez and other unidentified co-conspirators devised a plan to facilitate the ongoing smuggling of controlled substances into the Los Angeles County jail system to benefit Michael Torres through the collection of a portion of all quantities of controlled substances smuggled.
3. Between January and February 2022, Estela Guerrero discussed with David “Too Tall” Fraysure, an inmate housed in the North County Correctional Facility, Daniel Garcia an inmate housed in the North County Correctional Facility (NCCF) and other unidentified co-conspirators where the proceeds from the narcotics smuggling in should be distributed within the Los Angeles County jail system.

4. On January 13, 2022, Estela Guerrero instructed David Fraysure to send the proceeds of narcotics to the homie from Rockwood who was "one above" Fraysure.
5. On January 18, 2022, at about 12:34 PM, an unidentified co-conspirator housed at NCCF (aka "Green Eyes") reported to Estela Guerrero, that co-conspirator "Scrappy" reported that "Kristina" (Rosa Kristina Martinez) had "picked it up" yesterday.
6. On January 18, 2022, Guerrero told "Green Eyes" that the money was being sent late. "Green Eyes" offered to send the money directly to a Cash App Account, but Guerrero indicated that she needed to ask her "old man" because they did not want to leave "a paper trail."
 - a. Guerrero gave "Green Eyes" permission to use whoever he felt comfortable with to deliver the money.
7. On or about January 18, 2022, Guerrero discussed with "Green Eyes" where to send the "birthday cards." Guerrero told "Green Eyes" that "her boy is there right now" (Jose Martinez) and to send it to "8" (referring to NCCF 800 housing unit). At around 7 PM, Guerrero told "Green Eyes" that it was a "touchdown."
8. On January 29, 2022, David "Too Tall" Fraysure called Estela Guerrero.
 - a. Fraysure reported to Guerrero that one of the homies in his dorm received some "oranges" (narcotics) from "downtown" (Men's Central Jail) from his homeboy.
 - b. Fraysure reported that it was "one" full one and "twenty-nine cut up singles." Fraysure stated that it seemed like the fool in the county was trying to be discreet about it.
 - c. Guerrero told Fraysure that's not cool, that she's already sent word down there regarding that and that they're finding out some bullshit.
 - d. Fraysure reported that his homeboy will text her the name of the person the narcotics came from.
 - e. Guerrero told Fraysure to go ahead and grab that and to "break him off" (the mafia's portion of narcotics) what amount Fraysure thinks is convenient for him.
 - f. Guerrero asked Fraysure if this individual told Fraysure or if he found out about the narcotics.
 - g. Fraysure told Guerrero that the individual brought it to his attention and showed him the letter and everything with it. Guerrero said ok and asked Fraysure to send it to her.
9. Guerrero told Fraysure that they (Guerrero and Martinez) have something going on. Fraysure asked Guerrero if it is between them two and Guerrero confirmed. Guerrero said that she has him (Martinez) doing something for her but now that he is not there, it touched down and that she instructed him to send it to "79" in the meantime.
10. Guerrero reported that once he (Martinez) gets out of the hole he will do what he can and that Fraysure should keep an eye out because stuff should be coming in. Fraysure said no problem.

11. On or before Jose Martinez's release on February 2, 2022, Jose Martinez and unidentified co-conspirators agreed that Pharoah "Blackie" Brooks would take over his role as the shotcaller in the 800 block of NCCF.
12. On February 1, 2022, David Fraysure checked in with Estela Guerrero regarding a "homie from Pacas" sending "a homie from San Fer" nine units of narcotics. They were claiming that Michael "Fly" Torres was aware of everything and that they did not need to pay the tax.
 - a. In order to confirm this, Guerrero agreed that Fraysure would send her their names via text message so that he did not have to say their names over the phone.
13. On February 4, 2022, Estela Guerrero told David Fraysure to let "oh boy over there" do what he has to do and that he has instructions on what to do. Guerrero told Fraysure that the amount he had was chump change and to be on the lookout to receive more narcotics.
14. On February 7, 2022, Daniel "Kalakas" Garcia reported to Estela Guerrero the collection of narcotics proceeds from various inmates. Guerrero reported that everyone is hurting (there was a limited amount of narcotics to sell within the LACJ).
15. On February 18, 2022 at approximately 4:33 PM, Daniel Garcia called Estela Guerrero reporting that he received less narcotics than he was supposed to.
 - a. Garcia told Guerrero that he is in possession of "twenty-three" (units of narcotics), but that it was supposed to be "thirty-three". Garcia reported that he is reaching out to them to see what's up.
16. On February 18, 2022, at approximately 9:54 pm, Daniel Garcia called Estela Guerrero and reported that "Duke" (Jose Martinez) said to put everything on hold until he confirmed something.
 - a. Garcia told Guerrero that if it doesn't add up, they are going to have to donate everything (confiscate all of the narcotics instead of just the tax).
17. On February 26, 2022, Jose Martinez discussed with Pharoah Brooks who would deliver the money to Martinez.
 - a. Martinez instructed Brooks that whoever is "helping" should have money collected from the "whole floor" and that those people are then to "pull it out" (withdraw the money) and then meet with "the person".
18. On February 26, 2022, Pharoah Brooks reported to Jose Martinez that they were dealing with a "ticket" from Billy Rey from Flores and that he owed money for a certain amount of days.
 - a. Brooks told Martinez that he spoke to Billy Rey about future discipline if he did not send the money.
 - b. Martinez told Brooks that he would get an answer for him.
19. On or about March 1, 2022, Jose Martinez and Pharoah Brooks discussed whether Martinez received the right amount of money for the narcotics collection for the weeks that Martinez had been out of custody.

- a. Martinez reported "You guys are behind though". Martinez and Brooks then discussed how the narcotics collected should be distributed in the jail.
20. On March 1, 2022, Jose Martinez told Pharoah Brooks that "they" were asking for an accounting of the proceeds gained from the kitty scheme; "your guys logs, every piso" and instructed Brooks to send those to Daniel Garcia.
21. Between March 1 and March 2, 2022, David Fraysure gave an accounting of proceeds gained from the kitty scheme to Daniel Garcia as requested.
22. On or about March 2, 2022, David Fraysure called Jose Martinez. Fraysure told Martinez that he had already sent "the logs" to "old boy" as Martinez had requested.
23. On or about March 3, 2022, Pharoah Brooks and/or an unidentified co-conspirator spoke to "K" (Daniel Garcia). Garcia instructed them to "forward all, all the grocery (narcotics) money" to Jose Martinez.
24. On March 3, 2022, Martinez and Brooks discussed where to send the money and to keep logs on anything that has to do with narcotics and the weekly kitty.
25. On March 12, 2022, Pharoah Brooks called Jose Martinez to report that the "grocery (narcotics) money" and "this weekly (kitty)" was to be delivered to him that night.
26. On March 12, 2022, Pharoah Brooks and Jose Martinez discuss "Chilo" from Pasadena Villa Boys. Brooks stated that on the streets, "Chilo" got caught with two of them, that his house was raided and that he is in for double murder. Martinez tells Brooks to tell Chilo that he better come up with something (to make up for what he lost). Brooks stated that he will inform Martinez of his response.
27. On March 27, 2022, at 6:02 p.m., Jose Martinez instructed David Fraysure to let him know when Chile/Chele from Pasadena Villa Boys arrives in the facility.
28. On March 28, 2022, Jose Martinez and met with Daniel Arochi-Gonzalez. On David Fraysure's instructions, Arochi-Gonzalez asked Jose Martinez for the name of the individual from Villa Boys that Martinez had talked to him about.
29. On March 28, 2022, Daniel Arochi-Gonzalez reported to David Fraysure that the individual's name was C-H-I and ends with "L-E" (Chile from Pasadena Villa Boys). David Fraysure told Daniel Arochi-Gonzalez to send a message to Jose Martinez that Chile is located at 813 (NCCF Module 813).
30. On March 30, 2022, at 5:14 p.m., David Fraysure called Daniel Arochi-Gonzalez and told him that law enforcement raided the residence of "the fool that I been going to" (Jose Martinez).
 - a. Fraysure asked what was taken and Arochi-Gonzalez said that "I don't know, like, whatever you had right there.
 - b. Arochi-Gonzalez said that "ol girl" asked that Fraysure not reach out to her right now (presumably due to law enforcement scrutiny.)

- c. Fraysure said he understood. Arochi-Gonzalez said that someone within the jail would reach out to him. Arochi-Gonzalez said to let everyone know just in case. He said it starts with an "F" and that they might be going to get them all. Fraysure said he understood and not to trip
31. On August 2, 2022, Jackie "Boy" Triplett called Rosa Martinez to "check in" and confirmed that he was supposed to call her on Tuesdays. Triplett asked if Rosa had gotten the five (\$500) and she confirmed that she had but that she could not talk about that right now.
 32. On August 2, 2022, Triplett and Rosa Martinez discussed who Triplett had working for him.
 33. On August 5, 2022, Jackie Triplett confirmed with Rosa Martinez whether everything is still going to the homie. She says that is correct.
 34. On August 9 and August 23, 2022, Rosa Martinez confirmed with Jackie Triplett that she had received the payments and that everything was good.
 35. On August 23, 2022, Triplett and Rosa Martinez discussed who he is to contact to find out what his homie (David Fraysure) had "out there" so he "could take care of it for him."
 - a. Triplett told her that he had already contacted the "guys at the pole" (reference to NCCF North Facility) who did not get back to him.
 - b. Rosa Martinez tells him to wait and have his girlfriend remind her tomorrow.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 6 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28). 85

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the **JOSE DUKE**", "**RASCAL**" **MARTINEZ AKA MARTINES, ESTELA "OSA" GUERRERO, DANIEL "KALAKAS" GARCIA, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, and MARCO "MUGSY" LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 13, 2022 and August 31, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, ESTELA "OSA" GUERRERO, DANIEL "KALAKAS" GARCIA, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, and MARCO "MUGSY" LUJAN** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **EXTORTION**, within the meaning of Penal Code Sections 518/519, by members of that street gang.

"NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(4) as to Count 7 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members and cause the sentencing to be pursuant to section 186.22(b)(4).

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 8

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, ESTELA "OSA" GUERRERO, DANIEL "KALAKAS" GARCIA, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, and MARCO "MUGSY" LUJAN** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EXTORTION**, in violation of **Penal Code Sections 518/519**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 13, 2022 and August 31, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, ESTELA "OSA" GUERRERO, DANIEL "KALAKAS" GARCIA, PHAROAH "BLACKIE" BROOKS, DAVID "TOO TALL" FRAYSURE, DANIEL "WEASEL" AROCHI-GONZALEZ, JACKIE "BOY" TRIPLETT, and MARCO "MUGSY" LUJAN** extorted property and other consideration from Los Angeles County Inmates, by means of force and threat such as is mentioned in Section 519.

It is further alleged pursuant to Penal Code section 186.22(b)(4) as to Count 8 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members and cause the sentencing to be pursuant to section 186.22(b)(4).

“NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).”

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 9

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, MARCO “MUGSY” LUJAN, ANDY DOMINGUEZ, ARIEL “CASPER” PEREYRA and ANGEL GRAJALES** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY** in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 1, 2022 and March 6, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, DANIEL “WEASEL” AROCHI-GONZALEZ, JACKIE “BOY” TRIPLETT, MARCO “MUGSY” LUJAN, ANDY DOMINGUEZ, ARIEL “CASPER” PEREYRA, and ANGEL GRAJALES** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **ASSAULT WITH FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in violation of Section 245(a)(4) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On or before January 2022, an unidentified Mexican Mafia member assumed control of an organized criminal enterprise that controls the collection of proceeds of illegal activity within the Los Angeles County jail system. This organization is commonly referred to as the Southside and is controlled by the Mexican Mafia, a prison gang.
2. Between January 2022 and August of 2022, Michael Torres and co-conspirators participated in a scheme to assault inmates who failed to follow the rules of the Mexican Mafia.
3. On or about Friday, January 21, 2022, David “Too Tall” Fraysure called Estela Guerrero.
 - a. Fraysure asked if Guerrero knows someone from Little Valley that was in the “one up”. Fraysure told Guerrero that he “wiggged out” about two weeks ago. Fraysure told Guerrero that “Duke” reached out to him on Wednesday and said that when he landed, he admitted to wiggging out. Fraysure reported that he gave him what he had coming, “three times” (an assault).

- b. Fraysure told Guerrero that on Wednesday, Duke told him to reach out to Guerrero as soon as he landed, but by the time Duke had gotten in contact with him, he had taken care of it. Guerrero stated that this was fine.
 - c. Fraysure told Guerrero that he just wanted to let her know so that they were on the same page. Guerrero said as long as Fraysure knows what the protocol is.
 - d. Fraysure told Guerrero that he got at that fool and told him if it happens again, they won't take it lightly. Fraysure explained that this individual understood that it wouldn't happen again. Guerrero asked if he was really young? Fraysure reported that he is probably in his late 20s. Guerrero stated that he is going to have to learn. Fraysure told Guerrero that he just wanted to let her know so they were on the same page.
4. On or about February 26, 2022, Pharoah Brooks told Jose Martinez that an individual known as "Midget" (Mario Bustamante from El Monte Flores) was heard "politicking" to another homie "Italiano" about things he shouldn't be talking about.
- a. Italiano was speaking with Bustamante. They were trying to have Brooks and Bueno "turn over whatever we [had]."
 - b. Brooks then told Martinez that he wanted to approach "Midget" and "send them on their way".
 - c. Martinez told Brooks to call him back and that he would inquire about the situation.
 - d. Brooks told Martinez that Midget is claiming that he is owed something by S from Paramount.
 - e. Martinez told Brooks that he will speak with "Midget's" "loved one" (a reference to his Mexican Mafia member sponsor) about what Midget is claiming and to wait for him to receive a response before he confronts "Midget."
5. On or about February 26, 2022 at approximately 4:40 p.m., Pharoah Brooks called Jose Martinez. Brooks told Martinez that they were dealing with a "ticket" from Billy Rey from Flores and that he owed money for a certain amount of days. Brooks told Martinez that he spoke to Billy Rey about future discipline if he did not send the money.
6. On or about February 26, 2022, Pharoah Brooks called Jose Martinez at approximately 11:39 PM.
- a. Brooks tells Martinez that in regards to "that fool", Ol' girl" stated that if he continues, to "do what you gotta do." Brooks indicated that he understood.
 - b. Martinez stated, at the same time, he doesn't want this to backfire. Brooks stated that he was supposed to bail out at some point in the week and that the problem is he is having loose conversations.
 - c. Martinez confirms that if "he" continues opening his mouth to "do what you gotta do." Brooks indicated understanding.

7. On or about March 3, 2022, Pharoah Brooks told Jose Martinez that they had a dilemma involving an individual named Mikey from Florence (Michael Nunez). Brooks stated that he was claiming to be a "brother" (a Mexican mafia member). Brooks asked if Martinez wants to "run a make on that" (check into the validity of the claim by Nunez). Martinez confirmed that he will and asked if he is housed in NCCF. Brooks told him he was and stated that he will have his nephew contact Martinez over the weekend.
8. On or about March 4, 2022, Marco Lujan placed a call to Jose Martinez. Martinez told Lujan that "Uncle" (the Mexican Mafia member) said yes, to go ahead and proceed, and to only give them "one".
 - a. Lujan asked for further direction from Martinez and who would volunteer to conduct the assault.
 - b. Lujan expressed to Martinez that he just follows orders and is "there" for Martinez (to assist with Mexican Mafia related matters).
 - c. Lujan asked Martinez if he was told about an inmate named "Mikey from Florencia" (Michael Nunez). Martinez told Lujan that he had been told about the individual. Lujan asked for an update because he had already checked with people regarding Nunez being a Mexican Mafia member and determined that Nunez was not a Mexican Mafia member.
 - d. Martinez told Lujan that he "does not exist".
 - e. Lujan then told Martinez "Ok. We are going to take him out."
 - f. Martinez responded "You guys know what is correct."
 - g. Lujan said that he was waiting to hear from the "homie" in charge because someone reported to him what Nunez had been saying but his answers were not adding up.
 - h. Lujan asked Martinez "do we give them one or what?"
 - i. Martinez told Lujan to "send them one right there."
 - j. Lujan then asked for further instruction by asking "only one thirty-nine each" and if they "should give it to them or or should I wait?"
 - k. Martinez stated "Yes" and that "whenever you see the guy is good there...it's up to you, you understand me." Lujan then told Martinez that he was going to proceed and thanked Martinez.
9. At about midnight on March 6, 2022, inmates Ariel Pereyra, Angel Grajales and Andy Dominguez assaulted Michael Nunez on the second floor of Dorm 817.
 - a. Inmate Ariel Pereyra hid between the bunk beds.
 - b. Inmate Pereyra lunged towards Nunez and punched him directly in the face with his right fist.
 - c. Inmates Angel Grajales and Andy Dominguez joined in the assault while Nunez was on the ground and attempting to shield his face with his arms.
 - d. Inmates Angel Grajales and Andy Dominguez repeatedly punched Nunez in the face and body.

- e. Inmates Pereyra, Grajales, and/or Dominguez dragged Nunez approximately 10-15 feet to an area with more space and continued to assault Nunez.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 9 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 10

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, JACKIE “BOY” TRIPLETT, MARCO “MUGSY” LUJAN, ANDY DOMINGUEZ, ARIEL “CASPER” PEREYRA and ANGEL GRAJALES** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between March 3, 2022 and March 6, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **“RASCAL” MARTINEZ AKA MARTINES, ESTELA “OSA” GUERRERO, PHAROAH “BLACKIE” BROOKS, DAVID “TOO TALL” FRAYSURE, JACKIE “BOY” TRIPLETT, MARCO “MUGSY” LUJAN, ANDY DOMINGUEZ, ARIEL “CASPER” PEREYRA and ANGEL GRAJALES** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **ASSAULT BY MEANS OF FORCE LIKELY TO CAUSE GREAT BODILY INJURY**, within the meaning of Penal Code Sections 245(a)(4), by members of that street gang.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 10 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

It is further alleged that in the commission and attempted commission of the above offense, the said **ANDY DOMINGUEZ, ARIEL "CASPER" PEREYRA and ANGEL GRAJALES**, personally inflicted great bodily injury upon **MICHAEL NUNEZ**, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense, within the meaning of Penal Code Section 11927(c)(8) and a violent felony within the meaning of Penal Code Section 667.5(c)(8).

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COUNT 11

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **JOSE DUKE**", "**RASCAL**" **MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS, MARCO "MUGSY" LUJAN, ANDY DOMINGUEZ, ARIEL "CASPER" PEREYRA and ANGEL GRAJALES** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY**, in violation of **Penal Code Section 245(a)(4)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between March 3, 2022 and March 6, 2022, in the County of Los Angeles, the said **JOSE DUKE**", "**RASCAL**" **MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS, MARCO "MUGSY" LUJAN, ANDY DOMINGUEZ, ARIEL "CASPER" PEREYRA and ANGEL GRAJALES** did committed an assault on the person of Michael Nunez by means of force likely to produce great bodily injury.

"NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 11 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

It is further alleged that in the commission and attempted commission of the above offense, the said **ANDY DOMINGUEZ, ARIEL "CASPER" PEREYRA and ANGEL GRAJALES**, personally inflicted great bodily injury upon **MICHAEL NUNEZ**, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense, within the meaning of Penal Code Section 11927(c)(8) and a violent felony within the meaning of Penal Code Section 667.5(c)(8).

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COUNT 12

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS and JESSE "TRIGGER" QUINTERO** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between February 25, 2022 and February 28, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS and JESSE "TRIGGER" QUINTERO** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, within the meaning of Penal Code Sections 4573.9(a), by members of that street gang.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 12 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 13

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS and JESSE "TRIGGER" QUINTERO** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 4573.9(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between February 25, 2022 and February 28, 2022, in the County of Los Angeles, the said **JOSE DUKE**, **"RASCAL" MARTINEZ AKA MARTINES, PHAROAH "BLACKIE" BROOKS and JESSE "TRIGGER" QUINTERO** who did willfully and deliberately sell, furnish, administer or give away a controlled substance, to wit: methamphetamine, to a prisoner held in North County Correctional Facility

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 13 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 14

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE”, “RASCAL” MARTINEZ AKA MARTINES** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE**, in violation of **Health & Safety Code Section 11378(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 30, 2022, in the County of Los Angeles, the said **JOSE DUKE”, “RASCAL” MARTINEZ AKA MARTINES** did unlawfully possess for purpose of sale a controlled substance, to wit, methamphetamine.

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COUNT 15

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE”, “RASCAL” MARTINEZ AKA MARTINES** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **POSSESSION OF A FIREARM BY A FELON**, in violation of **Penal Code Section 29800(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 30, 2022, in the County of Los Angeles, the said **JOSE DUKE”, “RASCAL” MARTINEZ AKA MARTINES** did unlawfully own, purchase, receive, possess, and have custody and control of a firearm, to wit, P380 handgun, the said defendants having been convicted of a felony under the laws of the United States, the state of California and any other state, government and county:

<u>Court Case No.</u>	<u>Code Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 246	04/29/2021	Los Angeles	CA	Superior
BA457265	PC 273.5	09/07/2017	Los Angeles	CA	Superior
BA428508	PC 273.5	02/11/2015	Los Angeles	CA	Superior
BA413169	PC 29800(a)(1)	12/04/2013	Los Angeles	CA	Superior
BA397673	HS 11377(a)	06/05/2012	Los Angeles	CA	Superior
BA391980	HS 11379(a)	06/13/2012	Los Angeles	CA	Superior
BA334707	PC 12031(a)(1)	02/28/2008	Los Angeles	CA	Superior

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 16

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**”, “**RASCAL**” **MARTINEZ AKA MARTINES** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL POSSESSION OF AMMUNITION-PROHIBITED BY PRIOR CONVICTION**, in violation of **Penal Code Section 30305(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 30, 2022, in the County of Los Angeles, the said **JOSE DUKE**”, “**RASCAL**” **MARTINEZ AKA MARTINES** did own, possess, and have under his control, ammunition and reloaded ammunition, and is prohibited from owning and possession a firearm for having been previously convicted of the following offense(s):

<u>Court Case No.</u>	<u>Code Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 246	04/29/2021	Los Angeles	CA	Superior
BA457265	PC 273.5	09/07/2017	Los Angeles	CA	Superior
BA428508	PC 273.5	02/11/2015	Los Angeles	CA	Superior
BA413169	PC 29800(a)(1)	12/04/2013	Los Angeles	CA	Superior
BA397673	HS 11377(a)	06/05/2012	Los Angeles	CA	Superior
BA391980	HS 11379(a)	06/13/2012	Los Angeles	CA	Superior
BA334707	PC 12031(a)(1)	02/28/2008	Los Angeles	CA	Superior

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 17

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **JOSE DUKE**”, “**RASCAL**” **MARTINEZ AKA MARTINES** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **UNLAWFUL POSSESSION OF AMMUNITION-PROHIBITED BY PRIOR CONVICTION**, in violation of **Penal Code Section 30305(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 30, 2022, in the County of Los Angeles, the said **JOSE DUKE**”, “**RASCAL**” **MARTINEZ AKA MARTINES** did own, possess, and have under his control, ammunition and reloaded ammunition, and is prohibited from owning and possession a firearm for having been previously convicted of the following offense(s):

<u>Court Case No.</u>	<u>Code Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 246	04/29/2021	Los Angeles	CA	Superior
BA457265	PC 273.5	09/07/2017	Los Angeles	CA	Superior
BA428508	PC 273.5	02/11/2015	Los Angeles	CA	Superior
BA413169	PC 29800(a)(1)	12/04/2013	Los Angeles	CA	Superior
BA397673	HS 11377(a)	06/05/2012	Los Angeles	CA	Superior
BA391980	HS 11379(a)	06/13/2012	Los Angeles	CA	Superior
BA334707	PC 12031(a)(1)	02/28/2008	Los Angeles	CA	Superior

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 18

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **ESTELA “OSA” GUERRERO, JACKIE “BOY” TRIPLETT, FRANK RODRIGUEZ, JOSE RODRIGUEZ, MICHAEL MEISER and ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 16, 2024 and February 20, 2024, in the County of Los Angeles, the said **ESTELA “OSA” GUERRERO, JACKIE “BOY” TRIPLETT, FRANK RODRIGUEZ, JOSE RODRIGUEZ, MICHAEL MEISER and ARIANNA INOCENTE** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of Section 4573.9(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On February 16, 2024, at 2230 hours and at 2333 hours, Triplett spoke to Guerrero over ITMS.
 - a. Guerrero indicated that she had met with the narcotics supplier.
 - b. Triplett asked if she knew who it was, and Guerrero stated that she did, referring to the narcotics supplier as “old boy’s brother (referring to Frank Rodriguez, the brother of Jose Rodriguez, a high-ranking Mexican Mafia shotcaller within the LACJ housed in the same facility as Triplett.
 - c. In coded language, Guerrero asked Triplett what she was supposed to do with the drugs. Triplett said he would tell Guerrero the following day at an in-person visit.
2. On February 17, 2024, Guerrero had an in-person visit with Triplett.

3. On February 17, 2024, at 2318 hours, Triplett spoke to Guerrero over ITMS.
 - a. This call occurred after their visit.
 - b. During the call, in coded language, Guerrero stated that she went to check the location of a possible narcotics drop.
 - c. Guerrero stated she knew which one it was and said it would be good if "he" (the person picking up the narcotics) pumped gas on pump 1 or 3.
 - d. Guerrero described the gas pumps as being across from the air pump.
 - e. Triplett asked if Guerrero had looked at the drugs, referring to them in coded language as "clothes." Guerrero stated she had not looked at them.
4. On February 18, 2024, over several calls, Triplett and Guerrero discussed finding an individual who would be responsible for transporting the drugs to the drop location.
 - a. They also discussed, in coded language, that the transporting car would be a royal blue, Honda, "chick car."
5. On February 20, 2024, at 1012 hours, Triplett called Guerrero over ITMS. During the call, Guerrero indicated the female that would be transporting the drugs had left to the drop location.
6. On February 20, 2024, at approximately 1228 hours, Triplett can be seen on LACJ video footage talking to Deputy Michael Meiser at the front of Dorm 718, through the bars for about 1-2 minutes.
7. On February 20, 2024, at 1231 hours, Triplett called Guerrero over ITMS and immediately indicated that the narcotics drop did not happen.
 - a. Guerrero stated that the female was there and did not see anyone (referring to the person that was supposed to pick up the drugs).
 - b. Triplett said, "those people" (referring to the person who was supposed to pick up the drugs) were saying the same thing (stating that the female who was supposed to drop off the drugs) was not there. Triplett said "she" (referring to the person picking up the drugs) would go back out there, but not for nothing.
 - c. Triplett said "the lady" (referring to the individual picking up the drugs in coded language) would go back out (to pick up the drugs), but it needed to be done quickly.
 - d. Triplett stated his person was 5-10 minutes from the narcotics drop location. Triplett then vaguely described the individual picking up the drugs as being similar to his "homie" "Largo," but older, possibly late 30's or early 40's.

8. On February 20, 2024, at approximately 1242 hours, Deputy Meiser can be seen on LACJ video speaking to Triplett at the front of Dorm 718, through the bars. Triplett and Deputy Meiser speak for approximately 3 minutes.
9. On February 20, 2024, at 1242 hours, Triplett called Guerrero over ITMS. Guerrero stated that the people who were supposed to drop off the narcotics were now near Dodger Stadium.
 - a. Triplett indicated his contact (the person picking up the drugs) would not wait that long.
 - b. Triplett said that Guerrero was not "understanding," that he did not have direct communication, and that he would get put "on the spot" and expected to give an answer, and that he did not have a "back and forth" (appearing to insinuate that he was possibly speaking to someone in-person.)
10. On February 20, 2024, at 1251 hours, Triplett called Guerrero over ITMS. During the call Guerrero said the people dropping off the narcotics would be heading back but would not be at the location for 40 minutes.
 - a. Triplett said he told the person picking up the drugs it would be 30 minutes
 - b. Triplett then went on to tell Guerrero that the person picking up the drugs had a "side job." and might be wearing a "costume."
11. On February 20, 2024, at approximately 1308 hours, Deputy Meiser can be observed on LACJ video system speaking to Triplett to the front of Dorm 718, through the bars.
12. On February 20, 2024, at approximately 1328 hours, Deputy Meiser can be observed leaving the main lobby of North County Correctional Facility ("NCCF")
13. On February 20, 2024, at approximately 1339 hours, Deputy Meiser can be observed on LACJ video system driving out of the NCCF main gate.
14. On February 20, 2024, at approximately 1431 hours, Deputy Meiser can be observed on LACJ video system arriving back at the main gate to NCCF.
15. On February 20, 2024, at approximately 1439 hours, Deputy Meiser can be observed on LACJ video system entering the main lobby of NCCF.
16. On February 20, 2024, at approximately 1443 hours, Deputy Meiser can be observed on LACJ video system speaking to Triplett for approximately at the front of Dorm 718, through the bars.
17. On February 20, 2024, at 1452 hours, Triplett called Guerrero over ITMS. During the call, they both indicated that the narcotics drop did not occur, and in coded language Triplett told Guerrero to get all the drugs back.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 18 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 19

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **ESTELA “OSA” GUERRERO, JACKIE “BOY” TRIPLETT, FRANK RODRIGUEZ, MICHAEL MEISER and ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between February 16, 2022 and February 20, 2024, in the County of Los Angeles, the said **ESTELA “OSA” GUERRERO, JACKIE “BOY” TRIPLETT, FRANK RODRIGUEZ, MICHAEL MEISER and ARIANNA INOCENTE** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **ATTEMPTED NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, within the meaning of Penal Code Sections 664/4573.9(a), by members of that street gang.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 19 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 20

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, AND MICHAEL MEISER** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **ATTEMPTED NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Sections 664/4573.9(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 16, 2024 and February 20, 2024, in the County of Los Angeles, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, AND MICHAEL MEISER** did unlawfully attempt to have a **Non-Inmate Furnish a Controlled Substance to a Person in Custody**, in violation of **Penal Code Sections 664/4573.9(a)**.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 20 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 21

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, JOSE RODRIGUEZ, MICHAEL MEISER, JESSE ABDON and ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 27, 2024 and February 28, 2024, in the County of Los Angeles, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, JOSE RODRIGUEZ, MICHAEL MEISER, JESSE ABDON and ARIANNA INOCENTE** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Non-inmate Furnishing Controlled Substance to a Person in Custody, in violation of sections PC 182/PC 4573.9(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On February 27, 2024, at 1912 hours, Triplett called Guerrero over ITMS. During the call, in coded language, Triplett and Guerrero talked about acquiring drugs. As they were talking about amounts of money to send, Triplett told Guerrero to hold on.
2. On February 27, 2024 at about 1912 hours, Triplett can be seen leaving the phone and going to the front of Dorm 718 and talking to Deputy Meiser through the bars. Triplett and Deputy Meiser appear to speak for 6 minutes, and then Triplett returns to the phone.
3. On February 27, 2024, at about 1912 hours, when Triplett returned to the phone, he tells Guerrero in coded language that the “lady” was going to pick up “tickets to the Dodgers game” (coded language to referring to picking up drugs).
 - a. Triplett also indicated to Guerrero that “tickets to the Dodgers game” would be the coded language used.
4. On February 27, 2024, at 2304 hours, Triplett called Guerrero over ITMS. During the call, Guerrero stated she just left from meeting with “primo” (referring to Frank Rodriguez, the drug supplier).
 - a. Guerrero said the “white Jordans” (coded language consistent with methamphetamine) were sold to her for 27, and the “black Jordans (coded language consistent with heroin)” was sold to her for 25 (\$2,500).
 - b. Guerrero said she was heading back and would see how the drugs had been packaged.
 - c. Guerrero said she went and bought more “chips.”
 - d. Triplett asked if Guerrero was going to put chips on top, so it looked like chips
 - e. Guerrero said yes, and Triplett asked what color the lid was and if it had foil.
 - f. Guerrero eventually says it has a clear lid and then foil.
5. On February 28, 2024, at 1126 hours, Triplett called Guerrero over ITMS. Guerrero asked what was going on.
 - a. Triplett asked what time it was, and Guerrero said it was 11:27am.
 - b. Triplett said everything was fine and to not worry. Guerrero said it was good she did not get paranoid, because “juras” (police officers) were at the meeting location. Triplett said not to worry, it was a spot that officers liked to go.
 - c. Approximately 5 minutes into the call, Guerrero said she heard from the female dropping the drugs off and indicated the transaction had been completed.

6. On February 28, 2024 at approximately 1139 hours, Deputy Meiser can be seen on LACJ video entering the main gate to NCCF.
7. On February 28, 2024, via LACJ video:
 - a. At approximately 1158 hours, Deputy Meiser and another deputy arrived at security gate V-14 at NCCF in a black and white radio car.
 - b. Deputy Meiser can be observed removing 2 plastic bags from the trunk of the vehicle, carrying them into the NCCF facility, and entering the Operations Safe Jails (“OSJ”) office.
 - c. Within a minute after arrival at the OSJ office, Deputy Meiser and the other deputy exited the OSJ office carrying computers which they placed into the trunk of the black and white radio car.
 - d. Deputy Meiser then takes a backpack out of the trunk and walks to the NCCF Inmate Processing Area (“IPA”) sallyport.
 - e. Deputy Meiser then walked into the OSJ office with the backpack.
 - f. Approximately 1 minute later, Deputy Meiser and the other deputy exit the office and walked to the black and white patrol vehicle.
 - g. Less than 10 minutes later, Deputy Meiser walked into the main lobby of NCCF.
 - h. Deputy Meiser then filled out some paperwork next to the Watch Sergeant’s office and then walked to Dorm 718 where he spoke to Triplett at the front of the dorm, through the bars, at approximately 1238 hours.
 - i. At approximately 1604 hours, Deputy Meiser can be observed entering the OSJ office and exiting about 30 minutes later, at approximately 1637 hours, with a yellow inmate property bag, inmate bedroll, and “fish kits” (new inmate arrival bags containing soap, toothpaste, toothbrush, etc).
 - j. Deputy Meiser can be observed walking to Dorm 718, where he handed the yellow inmate property bag to Triplett through the slider at approximately 1639 hours. Triplett took the bag and walked upstairs to his bunk.
8. On February 28, 2024, via LACJ video:
 - a. At 1842 hours, Deputy Meiser can be observed returning to Dorm 718.
 - b. He removes Triplett and another inmate (identified as Joseph Lopez).
 - c. Deputy Meiser is then observed escorting Triplett and Lopez, along with 2 other inmates, to the 610 Dayroom.

- i. One of the other inmates is inmate Jesse Abdon, booking number 6104868.
 - d. Triplett can be seen taking unknown items from his pants/boxers and handing it to the inmates in the dayroom.
9. On February 28, 2024, at 2239 hours, Triplett called Guerrero over ITMS. Triplett thanked Guerrero, saying he appreciated her. Guerrero said it was Triplett's "time to shine." They agreed to speak more at visiting.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 21 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willful failure to register is a crime."

* * * * *

COUNT 22

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, MICHAEL MEISER, and ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between February 27, 2024 and February 28, 2024, in the County of Los Angeles, the said **ESTELA "OSA" GUERRERO, JACKIE "BOY" TRIPLETT, FRANK RODRIGUEZ, MICHAEL MEISER, and ARIANNA INOCENTE** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, within the meaning of Penal Code Section 4573.9(a), by members of that street gang.

"NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 22 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 23

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **FRANK RODRIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER and ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 4573.9**, a Felony, committed prior to the finding of this Indictment. and as follows:

On and between February 27, 2024 and February 28, 2024, in the County of Los Angeles, the said **FRANK RODRIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER and ARIANNA INOCENTE** did unlawfully have a **Non-Inmate Furnish a Controlled Substance to a Person in Custody, in violation of Penal Code Section 4573.9(a)**, a felony.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 23 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 24

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **FRANK RODRIGUEZ, JOSE RODRIGUEZ, ESTELA GUERRERO, JACKIE “BOY” TRIPLETT, MICHAEL MEISER, JESSE ABDON, ARIANNA INOCENTE and SALMA HARO** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment. and as follows:

On and between April 24, 2024 and April 30, 2024, in the County of Los Angeles, the said **FRANK RODRIGUEZ, JOSE RODRIGUEZ, ESTELA GUERRERO, JACKIE “BOY” TRIPLETT, MICHAEL MEISER, JESSE ABDON, ARIANNA INOCENTE, AND SALMA HARO** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Non-inmate Furnishing Controlled Substance to a Person in Custody, in violation of sections PC 182/PC 4573.9(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. April 23, 2024 at 19:32 hours., LACJ Inmate Jessie Abdon made an ITMS call to Arianna Inocente. During the call, Abdon said that he might have someone go “drop something off” to her the following day. Abdon stressed to Inocente that she was only to hold the item and he would provide more instruction when they met in person. Abdon again warned Inocente not to touch “it.” Abdon told Inocente to keep “it” safe, to put “it” somewhere she felt was safe where no one could touch it except for her. Abdon said “they” would be going to her house, and Inocente acknowledged. Inocente and Abdon then talked about Inocente’s friend, “Salma.” Inocente said that “Salma” was about 23 years old, skinny, and tall (describing Salma Haro’s characteristics).
2. On April 26, 2024, at 1303 hours, Jose Rodriguez called Frank Rodriguez over ITMS. In the call, Jose told Frank he needed “barbitas to help him by giving something to a girl.
3. On April 27, 2024, Arianna Inocente had an in-person visit with inmate Jessie Abdon at LACJ.
4. On April 27, 2024, at 0927 hours, Jose Rodriguez called Frank Rodriguez over ITMS. During the call, Jose reminded Frank about meeting the girl and Frank said he would do it that day. Jose said he wanted the “stuff” to be done the same way because it was for one of the “Oros.”
5. On April 28, 2024, at 0808 hours, 1220 hours, and 1612 hours, Jose Rodriguez called Frank Rodriguez over ITMS. During each of these calls, Jose discussed the drug transaction, in coded language, and reiterated how the transaction needed to occur on “Tuesday” at approximately 9:00am.
6. On Monday, April 29, 2024, at 0917 hours, 1136 hours, and 2138 hours, Jose Rodriguez called Frank Rodriguez over ITMS. During each of these calls, Jose discussed the “Tuesday” meeting.
 - a. Jose told Frank that the transaction was not being done in the normal way, and that they were not using someone who was “going away.” Jose said it was a better way.
7. On April 30, 2024, at 0705 hours and 0707 hours, Jose Rodriguez called Frank Rodriguez over ITMS. During the calls, Frank said he was on his way to square it up with the girls.
8. On April 30, 2024, deputies conducted surveillance of Deputy Meiser and observed the following:
 - a. Deputy Meiser left his residence in Lancaster and drove his vehicle (a white BMW) to a gas station located at 27549 The Old Road, Valencia, CA. This gas station is located approximately 3 miles from the NCCF jail facility.
 - b. Deputy Meiser entered the store, purchased a water bottle and returned to his car.

- c. At approximately 0929 hours, Deputy Meiser drove his vehicle and parked (backed in) directly next to a red Chevrolet SUV, with CA plate 9GXE611.
 - d. This red Chevrolet was backed into a parking stall located next to the air pump and directly across from gas pumps 1 and 3.
 - e. Deputy Meiser left his car, walked to the rear and opened the trunk.
 - f. After leaving the trunk open, Deputy Meiser walked to the driver's side window of the red Chevrolet where a female in the car handed Deputy Meiser a white plastic grocery bag.
 - g. Deputy Meiser took the bag and placed it into the trunk of his car. He then closed the trunk, got into his car, and left the parking lot at approximately 0930 hours.
 - h. After departing the area, Deputy Meiser drove in a manner which prevented continued physical surveillance.
9. On April 30, 2024, approximately one hour after leaving the gas station, Deputy Meiser was observed exiting the front passenger seat of a Chevrolet pickup truck at the NCCF parking lot.
- a. Deputy Meiser was then seen carrying a backpack to a black and white radio car, assigned exclusively for use by OSJ deputies.
 - b. Deputy Meiser opened the trunk, placed the backpack inside, and then appeared to manipulate the contents of the backpack for approximately one minute.
 - c. Deputy Meiser then removed the backpack from the trunk, closed the trunk, and walked to the NCCF gymnasium.
 - d. The backpack contained a white grocery bag containing two Pringles containers with an approximate combined amount of one pound of black tar heroin.
10. On April 30, 2024, after leaving the trunk of the OSJ patrol car, Deputy Meiser meets with two co-conspirators in Dorm 618. (This is the same Dorm where Jose Rodriguez is housed.)
- a. One of the co-conspirators is inmate Jesse Abdon.

“NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 24 that, with the exception of defendant Salma Haro, the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 25

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **FRANK RODRIGUEZ, JOSE RODRIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER, JESSE ABDON, ARIANNA INOCENTE AND SALMA HARO** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PARTICIPATION IN A CRIMINAL STREET GANG**, in violation of **Penal Code Section 182.5**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2024 and April 30, 2024, in the County of Los Angeles, the said **FRANK RODRIGUEZ, JOSE RORIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER, JESSE ABDON, ARIANNA INOCENTE AND SALMA HARO** did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and/or benefit from felonious criminal conduct, to wit, **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, within the meaning of Penal Code Section 4573.9(a), by members of that street gang.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 25 that, with the exception of defendant Salma Haro, the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

COUNT 26

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **FRANK RODRIGUEZ, JOSE RODRIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER, JESSE ABDON, AND ARIANNA INOCENTE** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **NON-INMATE FURNISHING CONTROLLED SUBSTANCE TO A PERSON IN CUSTODY**, in violation of **Penal Code Section 4573.9(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2024 and April 30, 2024, in the County of Los Angeles, the said **FRANK RODRIGUEZ, JOSE RODRIGUEZ, ESTELA GUERRERO, JACKIE TRIPLETT, MICHAEL MEISER, JESSE ABDON, AND ARIANNA INOCENTE** did unlawfully have a **Non-Inmate Furnish a Controlled Substance to a Person in Custody**, in violation of **Penal Code Section 4573.9(a)**, a felony.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 26 that, with the exception of defendant Salma Haro, the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 the defendant, JOSE TRANCITO MARTINEZ had been convicted of the following serious and/or violent felony , as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 2460	4/29/2021	Los Angeles	CA	Superior

NOTICE: Prison custody time for the above offense is to be served in state prison based upon you having a prior conviction for a serious felony defined in Penal Code section 1192.7(c) and/or violent felony defined in Penal Code section 667.5(c), or a requirement to register as a sex offender pursuant to Chapter 5.5 (commencing with Penal Code section 290) of Title 9 of Part 1, within the meaning of Penal Code section 1170(h).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 that said defendant(s), JOSE TRANCITO MARTINEZ, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 2460	4/29/2021	Los Angeles	CA	Superior
BA457265	PC 273.5	09/07/2017	Los Angeles	CA	Superior
BA428508	PC 273.5	02/11/2015	Los Angeles	CA	Superior
BA413169	PC 29800(a)(1)	12/04/2013	Los Angeles	CA	Superior
BA397673	HS 11377(A)	06/05/2012	Los Angeles	CA	Superior
BA391980	HS 11379(A)	06/13/2012	Los Angeles	CA	Superior
BA334707	PC 12031(a)(1)	02/28/2008	Los Angeles	CA	Superior

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 the defendant, JOSE TRANCITO MARTINEZ has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA483737	PC 2460	4/29/2021	Los Angeles	CA	Superior
BA457265	PC 273.5	09/07/2017	Los Angeles	CA	Superior
BA428508	PC 273.5	02/11/2015	Los Angeles	CA	Superior
BA413169	PC 29800(a)(1)	12/04/2013	Los Angeles	CA	Superior
BA397673	HS 11377(A)	06/05/2012	Los Angeles	CA	Superior
BA391980	HS 11379(A)	06/13/2012	Los Angeles	CA	Superior
BA334707	PC 12031(a)(1)	02/28/2008	Los Angeles	CA	Superior

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It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 the defendant, PHAROAH BROOKS had been convicted of the following serious and/or violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and

is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA181205	PC 2110	5/24/1999	Los Angeles	CA	Superior

NOTICE: Prison custody time for the above offense is to be served in state prison based upon you having a prior conviction for a serious felony defined in Penal Code section 1192.7(c) and/or violent felony defined in Penal Code section 667.5(c), or a requirement to register as a sex offender pursuant to Chapter 5.5 (commencing with Penal Code section 290) of Title 9 of Part 1, within the meaning of Penal Code section 1170(h).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 1, 12 and 13 that said defendant(s), PHAROAH BROOKS, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
MF014535A	PC 245(a)(1)	01/13/1997	Los Angeles	CA	Superior
BA181205	PC 211	05/24/1999	Los Angeles	CA	Superior
LA049804	HS 11377	11/10/2005	Los Angeles	CA	Superior
BA359965	PC 12021(a)(1)	09/22/2009	Los Angeles	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27660	PC 4502(a)	12/06/2012	Kern	CA	Superior
DF013570A	PC 4573.6	06/08/2018	Kern	CA	Superior
BA474783	PC 29800(a)(1)	05/29/2019	Los Angeles	CA	Superior

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 the defendant, PHAROAH BROOKS has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
MF014535A	PC 245(a)(1)	01/13/1997	Los Angeles	CA	Superior
BA181205	PC 211	05/24/1999	Los Angeles	CA	Superior
LA049804	HS 11377	11/10/2005	Los Angeles	CA	Superior
BA359965	PC 12021(a)(1)	09/22/2009	Los Angeles	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27149	PC 4573.6	12/06/2012	Kern	CA	Superior
JCF27660	PC 4502(a)	12/06/2012	Kern	CA	Superior
BA474783	PC 29800(a)(1)	05/29/2019	Los Angeles	CA	Superior

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It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 that said defendant, DAVID FRAYSURE, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
TA148918	PC 187(a)	12/20/22	Los Angeles	CA	Superior

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 that said defendant, DAVID FRAYSURE, has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
TA148918	PC 187(a)	12/20/22	Los Angeles	CA	Superior

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It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 that said defendant, DANIEL AROCHI GONZALEZ, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
TA153187	PC 25850(a)	10/01/2020	Los Angeles	CA	Superior

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It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 18,19, 20, 21, 22 and 23 the defendant, JACKIE TRIPLETT had been convicted of the following serious and/or violent felonies , as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
SA065703	PC 245(a)(1)	04/01/2008	Los Angeles	CA	Superior
MA040763	PC 2110	4/28/2008	Los Angeles	CA	Superior

NOTICE: Prison custody time for the above offense is to be served in state prison based upon you having a prior conviction for a serious felony defined in Penal Code section 1192.7(c) and/or violent felony defined in Penal Code section 667.5(c), or a requirement to register as a sex offender pursuant to Chapter 5.5 (commencing with Penal Code section 290) of Title 9 of Part 1, within the meaning of Penal Code section 1170(h).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 18,19, 20, 21, 22 and 23 that said defendant, JACKIE TRIPLETT, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
NA113097	PC 192(a)	06/21/2022	Los Angeles	CA	Superior
TA148826	VC 10851(a)	06/11/2019	Los Angeles	CA	Superior
SA097283	VC 10851(a)	02/14/2018	Los Angeles	CA	Superior
MA073075	HS 11377	09/28/2018	Los Angeles	CA	Superior
SA089725	PC 245(a)(4)	02/19/2015	Los Angeles	CA	Superior
MA045701	PC 666	05/19/2009	Los Angeles	CA	Superior
SA065703	PC 245(a)(1)	04/01/2008	Los Angeles	CA	Superior
MA040763	PC 211	04/28/2008	Los Angeles	CA	Superior

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, and 15 that the defendant(s), JACKIE TRIPLETT has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
NA113097	PC 192(a)	06/21/2022	Los Angeles	CA	Superior
TA148826	VC 10851(a)	06/11/2019	Los Angeles	CA	Superior
SA097283	VC 10851(a)	02/14/2018	Los Angeles	CA	Superior
MA073075	HS 11377	09/28/2018	Los Angeles	CA	Superior
SA089725	PC 245(a)(4)	02/19/2015	Los Angeles	CA	Superior
MA045701	PC 666	05/19/2009	Los Angeles	CA	Superior
SA065703	PC 245(a)(1)	04/01/2008	Los Angeles	CA	Superior
MA040763	PC 211	04/28/2008	Los Angeles	CA	Superior

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It is further alleged that prior to the commission of that offense or offenses alleged in Counts 1, 2, 12 and 13 the defendant, JESSE QUINTERO had been convicted of the following serious and/or violent felonies, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
TA152839	PC 136.1(b)(1)	02/25/2022	Los Angeles	CA	Superior

NOTICE: Prison custody time for the above offense is to be served in state prison based upon you having a prior conviction for a serious felony defined in Penal Code section 1192.7(c) and/or violent felony defined in Penal Code section 667.5(c), or a requirement to register as a sex offender pursuant to Chapter 5.5 (commencing with Penal Code section 290) of Title 9 of Part 1, within the meaning of Penal Code section 1170(h).

It is further alleged as to count(s) Counts 1, 2, 12 and 13 said defendant(s), JESSE QUINTERO, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA186111	VC 2800.2	08/03/1999	Los Angeles	CA	Superior
PA034602	PC 4573.6	12/07/1999	Los Angeles	CA	Superior
BA258110	VC 10851(a)	01/22/2004	Los Angeles	CA	Superior
BA297892	PC 12031(a)(1)	03/23/2006	Los Angeles	CA	Superior
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
TA152839	PC 136.1(b)(1)	02/25/2022	Los Angeles	CA	Superior

It is further alleged as to count(s) 1, 2, 12 and 13 that the defendant(s), JESSE QUINTERO has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA186111	VC 2800.2	08/03/1999	Los Angeles	CA	Superior
PA034602	PC 4573.6	12/07/1999	Los Angeles	CA	Superior

BA258110	VC 10851(a)	01/22/2004	Los Angeles	CA	Superior
BA297892	PC 12031(a)(1)	03/23/2006	Los Angeles	CA	Superior
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
KA074339	PC 211	07/19/2006	Los Angeles	CA	Superior
TA152839	PC 136.1(b)(1)	02/25/2022	Los Angeles	CA	Superior

* * * * *

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 that said defendant, MARCO LUJAN, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA192578	VC 10851(a)	10/21/1999	Los Angeles	CA	Superior
BA192727	PC 12025(A)(2)	01/26/2000	Los Angeles	CA	Superior
NO38037048	18 USC 922(g)(1)/924	05/23/2006	Clark	NV	Federal District
VA117157	PC 12021(a)(1)	10/30/2010	Los Angeles	CA	Superior
KA122152	PC 246.3(a)	11/02/2020	Los Angeles	CA	Superior

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 that said defendant, MARCO LUJAN has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA192578	VC 10851(a)	10/21/1999	Los Angeles	CA	Superior
BA192727	PC 12025(A)(2)	01/26/2000	Los Angeles	CA	Superior
NO38037048	18 USC 922(g)(1)/924	05/23/2006	Clark	NV	Fed. Dist Court
VA117157	PC 12021(a)(1)	10/30/2010	Los Angeles	CA	Superior
KA122152	PC 246.3(a)	11/02/2020	Los Angeles	CA	Superior

* * * * *

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 9, 10, and 11, the defendant, ANDY DOMINGUEZ had been convicted of the following serious and/or violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA129422	PC 245(a)(1)	09/23/2013	Los Angeles	CA	Superior

NOTICE: Prison custody time for the above offense is to be served in state prison based upon you having a prior conviction for a serious felony defined in Penal Code section 1192.7(c) and/or violent felony defined in Penal Code section 667.5(c), or a requirement to register as a sex offender pursuant to Chapter 5.5 (commencing with Penal Code section 290) of Title 9 of Part 1, within the meaning of Penal Code section 1170(h).

It is further alleged as to count(s) 9, 10, and 11 that said defendant, ANDY DOMINGUEZ, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA129422	PC 245(a)(1)	09/23/2013	Los Angeles	CA	Superior
VA145006	PC 487(d)(1)	09/27/2017	Los Angeles	CA	Superior

PA089398	PC 4573.5	10/04/2017	Los Angeles	CA	Superior
TA152421	PC 205	06/28/2022	Los Angeles	CA	Superior

It is further alleged as to count(s)) 9, 10, and 11 that said defendant, ANDY DOMINGUEZ has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA129422	PC 245(a)(1)	09/23/2013	Los Angeles	CA	Superior
VA145006	PC 487(d)(1)	09/27/2017	Los Angeles	CA	Superior
PA089398	PC 4573.5	10/04/2017	Los Angeles	CA	Superior
TA152421	PC 205	06/28/2022	Los Angeles	CA	Superior

* * * * *

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, and 15 that said defendant(s), DANIEL JOSEPH GARCIA, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA091153	PC 12020(a)(1)	10/04/2005	Los Angeles	CA	Superior
VA116733	PC 12316(b)(1)	09/03/2010	Los Angeles	CA	Superior
VA122451	PC 12021(A)(1)	11/23/2011	Los Angeles	CA	Superior
VA127392	HS 11377(a)	11/09/2012	Los Angeles	CA	Superior
VA129520	PC 29800(a)(1)	07/01/2013	Los Angeles	CA	Superior
VA129520	HS 11378(a)(1)	07/01/2013	Los Angeles	CA	Superior
VA129520	PC 69	07/01/2013	Los Angeles	CA	Superior
PA09712702	PC 4573.6	09/22/2022	Los Angeles	CA	Superior
VA142897	PC 187(a)	05/15/2023	Los Angeles	CA	Superior

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, and 15 that said defendant(s), DANIEL JOSEPH GARCIA has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA091153	PC 12020(a)(1)	10/04/2005	Los Angeles	CA	Superior
VA116733	PC 12316(b)(1)	09/03/2010	Los Angeles	CA	Superior
VA122451	PC 12021(A)(1)	11/23/2011	Los Angeles	CA	Superior
VA127392	HS 11377(a)	11/09/2012	Los Angeles	CA	Superior
VA129520	PC 29800(a)(1)	07/01/2013	Los Angeles	CA	Superior
VA129520	HS 11378(a)(1)	07/01/2013	Los Angeles	CA	Superior
VA129520	PC 69	07/01/2013	Los Angeles	CA	Superior
PA09712702	PC 4573.6	09/22/2022	Los Angeles	CA	Superior
VA142897	PC 187(a)	05/15/2023	Los Angeles	CA	Superior

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It is further alleged as to count(s) 7, 8 and 10 that said defendant, ARIEL PEREYRA, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA145580	PC 245(a)(4)	11/20/2017	Los Angeles	CA	Superior

VA157174	PC 29800(a)(1)	03/02/2022	Los Angeles	CA	Superior
VA158149	PC 29800(a)(1)	04/22/2022	Los Angeles	CA	Superior

It is further alleged as to count(s) 7, 8 and 10 that said defendant, ARIEL PEREYRA, has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
VA145580	PC 245(a)(4)	11/20/2017	Los Angeles	CA	Superior
VA157174	PC 29800(a)(1)	03/02/2022	Los Angeles	CA	Superior
VA158149	PC 29800(a)(1)	04/22/2022	Los Angeles	CA	Superior

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16 that the manner in which the defendant(s), ANDY DOMINGUEZ, PHAROAH BROOKS, DAVID FRAYSURE, ROSA CRISTINA MARTINEZ, JOSE TRANCITO MARTINEZ, DANIEL JOSEPH GARCIA, ARIEL PEREYRA, JESSE QUINTERO, DANIEL AROCHI GONZALEZ, ANGEL GRAJALES, JACKIE TRIPLETT, MARCO LUJAN and ESTELA GUERRERO carried out the above offense(s) indicate(s) planning, sophistication, and professionalism, within the meaning of California Rules of Court Rule 4.421(a)(8).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and 15 that the defendant(s), ANDY DOMINGUEZ, PHAROAH BROOKS, JOSE TRANCITO MARTINEZ, ARIEL PEREYRA, ANGEL GRAJALES and MARCO LUJAN engaged in violent conduct in committing the above offense(s) that indicates a serious danger to society, within the meaning of California Rules of Court Rule 4.421(b)(1).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, and 15 that the defendant(s), DANIEL AROCHI GONZALEZ has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
TA153187	PC 25850(a)	10/01/2020	Los Angeles	CA	Superior

* * * * *

It is further alleged that prior to the commission of that offense or offenses alleged in Counts 9, 10, and 11, the defendant, ANGEL GRAJALES had been convicted of the following serious and/or violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
FSB19001834	PC 422	02/26/2021	San Bernardino	CA	Superior
PA094692	PC 245(a)(1)	01/07/2021	Los Angeles	CA	Superior

It is further alleged as to count(s) 9, 10, and 11 that said defendant, ANGEL GRAJALES, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA076947	PC 487(d)(1)	01/21/2014	Los Angeles	CA	Superior
PA084315	VC 10851(a)	10/02/2015	Los Angeles	CA	Superior
FSB19001834	PC 422	02/26/2021	San Bernardino	CA	Superior
PA094692	PC 245(a)(1)	01/07/2021	Los Angeles	CA	Superior

It is further alleged as to count(s) 9, 10, and 11 that said defendant, ANGEL GRAJALES, has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA076947	PC 487(d)(1)	01/21/2014	Los Angeles	CA	Superior
PA084315	VC 10851(a)	10/02/2015	Los Angeles	CA	Superior
FSB19001834	PC 422	02/26/2021	San Bernardino	CA	Superior
PA094692	PC 245(a)(1)	01/07/2021	Los Angeles	CA	Superior

* * * * *

It is further alleged as to counts 19, 20, 21, 22, 23, 24, 25 and 26 that said defendant, JOSE RODRIGUEZ, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA040523	PC 245(a)(1)	03/05/2002	Los Angeles	CA	Superior
PA043316	HS 11352(a)	07/23/2003	Los Angeles	CA	Superior
PA064947	VC 2800.2(a)	01/06/2010	Los Angeles	CA	Superior
PA080171	HS 1377(a)	07/21/2014	Los Angeles	CA	Superior
PA087944	PC 187(a)	11/05/2024	Los Angeles	CA	Superior

It is further alleged as to count(s) 19, 20, 21, 22, 23, 24, 25, and 26 that the defendant, JOSE RODRIGUEZ has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA040523	PC 245(a)(1)	03/05/2002	Los Angeles	CA	Superior
PA043316	HS 11352(a)	07/23/2003	Los Angeles	CA	Superior
PA064947	VC 2800.2(a)	01/06/2010	Los Angeles	CA	Superior
PA080171	HS 1377(a)	07/21/2014	Los Angeles	CA	Superior
PA087944	PC 187(a)	11/05/2024	Los Angeles	CA	Superior

* * * * *

It is further alleged as to counts 19, 20, 21, 22, 23, 24, 25 and 26 that said defendant, FRANK RODRIGUEZ, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA071764	HS 11379	11/02/2011	Los Angeles	CA	Superior
PA071764	PC 12025(a)(1)	11/02/2011	Los Angeles	CA	Superior

It is further alleged as to count(s) 19, 20, 21, 22, 23, 24, 25, and 26 that the defendant, FRANK RODRIGUEZ has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
PA071764	HS 11379	11/02/2011	Los Angeles	CA	Superior
PA071764	PC 12025(a)(1)	11/02/2011	Los Angeles	CA	Superior

* * * * *

It is further alleged as to count(s) 21, 22, 23, 24, 25, and 26 that said defendant, JESSIE ABDON, was convicted of the following felonies, within the meaning of Penal Code section 1203(e)(4):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
YA102829	PC 187(a)	06/17/2024	Los Angeles CA	CA	Superior

It is further alleged as to count(s) 21, 22, 23, 24, 25, and 26 that said defendant, JESSIE ABDON has served a prior term in prison and county jail term under Penal Code section 1170(h), within the meaning of California Rules of Court Rule 4.421(b)(3), to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
YA102829	PC 187(a)	06/17/2024	Los Angeles CA	CA	Superior

* * * * *

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, 19, 20, 21, 22, 23, 24, 25, and 26 that the manner in which the defendant(s), JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, DANIEL AROCHI GONZALEZ, JACKIE TRIPLETT, MARCO LUJAN, ANDY DOMINGUEZ, ANGEL GRAJALES, ARIEL PEREYRA, JESSE QUINTERO, JOSE RODRIGUEZ, FRANK RODRIGUEZ, MICHAEL MEISER, JESSIE ABDON, and ARIANA INOCENTE carried out the above offense(s) indicate(s) planning, sophistication, and professionalism, within the meaning of California Rules of Court Rule 4.421(a)(8).

It is further alleged as to count(s) 9, 10, and 11 that the manner in which the defendant(s), JOSE TRANCITO MARTINEZ, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, MARCO LUJAN, ANDY DOMINGUEZ, ANGEL GRAJALES and ARIEL PEREYRA, indicates the crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness, within the meaning of California Rules of Court Rule of 4.421(a)(1).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, 19, 20, 21, 22, 23, 24, 25, and 26 that the manner in which the defendant(s), JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, JACKIE TRIPLETT, MARCO LUJAN, MICHAEL MEISER and JOSE RODRIGUEZ, indicates the targets induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission, within the meaning of California Rules of Court Rule of 4.421(a)(4).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, and 26 that the manner in which the defendant(s), JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, DANIEL AROCHI GONZALEZ, JACKIE TRIPLETT, MARCO LUJAN, JESSE QUINTERO, JOSE RODRIGUEZ, FRANK RODRIGUEZ, MICHAEL MEISER, JESSIE ABDON, and ARIANA INOCENTE indicates the crime involved a large quantity of contraband, within the meaning of California Rules of Court Rule of 4.421(a)(10).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, and 26 that the manner in which the defendant(s), JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL

JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, DANIEL AROCHI GONZALEZ, JACKIE TRIPLETT, MARCO LUJAN, ANDY DOMINGUEZ, JOSE RODRIGUEZ, FRANK RODRIGUEZ, AND MICHAEL MEISER indicates the defendant took advantage of a position of trust or confidence to commit the offense, within the meaning of California Rules of Court Rule of 4.421(a)(11)

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, 19, 20, 21, 22, 23, 24, 25, and 26, that the targets JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, DANIEL AROCHI GONZALEZ, JACKIE TRIPLETT, MARCO LUJAN, ANDY DOMINGUEZ, ARIEL PEREYRA, JESSE QUINTERO, and JOSE RODRIGUEZ, engaged in violent conduct in committing the above offense(s) that indicates a serious danger to society, within the meaning of California Rules of Court Rule 4.421(b)(1).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, and 26 that the targets JOSE TRANCITO MARTINEZ, ESTELA GUERRERO, DANIEL JOSEPH GARCIA, PHAROAH BROOKS, DAVID FRAYSURE, DANIEL AROCHI GONZALEZ, JACKIE TRIPLETT, MARCO LUJAN, ANDY DOMINGUEZ, ARIEL PEREYRA, JESSE QUINTERO, JESSIE ABDON, prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness, within the meaning of California Rules of Court Rule 4.421(b)(2).

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California*, (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

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WITNESS LIST

- 1. DEVON PATRICK SELF**
- 2. RACHEL L. REDMOND**
- 3. MOISES MONTES**
- 4. JOSEPH EDWARD TALAMANTEZ**
- 5. JASON WRICE**
- 6. JASON LEACH**
- 7. RODGER BALLESTEROS**
- 8. RONNIE BORGES**
- 9. TAMMY L. KLEIN**
- 10. KYLE BLAKE JOYNER**
- 11. BYRON ROBERT TURNER**
- 12. LOPEZ MUNOZ**

<u>DEFENDANT</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>BAIL</u>
1. JOSE "DUKE", "RASCAL" MARTINEZ aka MARTINES		\$200,000	
2. ESTELA "OSA", "MOMS" GUERRERO		\$140,000	
3. DANIEL "KALAKAS" GARCIA		\$200,000	
4. PHAROAH "BLACKIE" BROOKS		\$200,000	
5. DAVID "TOO TALL" FRAYSURE		\$200,000	
6. DANIEL "WEASEL" AROCHI-GONZALEZ		\$200,000	
7. JACKIE "BOY" TRIPLETT		\$250,000	
8. JESSE "TRIGGER" QUINTERO		\$250,000	
9. MARCO "MUGSY" LUJAN		\$150,000	
10. ANDY DOMINGUEZ		\$205,000	
11. ARIEL "CASPER" PEREYRA		\$155,000	
12. ANGEL GRAJALES		\$255,000	
13. FRANK "JR" RODRIGUEZ		\$125,000	
14. JOSE "BENJI" "LIL SPANKY" RODRIGUEZ		\$125,000	
15. JESSE ABDON		\$165,000	
16. ARIANNA INOCENTE		\$90,000	
17. MICHAEL MEISER		\$90,000	
18. SALMA HARO		\$50,000	