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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
January 2020 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PAUL GARY WALLACE,  
aka "Doc,"  
"Lil Doc,"  
"Lil Doc Thone,"  
"Bill,"  
"Uncle Bill," and  
"Still Bill,"  
  
Defendant.

CR No. 2:20-cr-00293-PA

I N D I C T M E N T

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 924(c)(1)(A)(ii), (iii), (j)(1): Use and Carry a Firearm During and in Relation to, and Possess a Firearm in Furtherance of, a Crime of Violence, Resulting in Death]

The Grand Jury charges:

GENERAL ALLEGATIONS

At times relevant to this Indictment:

A. THE ENTERPRISE

1. Defendant PAUL GARY WALLACE, also known as "Doc," "Lil Doc," "Lil Doc Thone," "Bill," "Uncle Bill," and "Still Bill," and others known and unknown to the Grand Jury, were members and associates of an organization engaged in, among other things, trafficking and conspiracy to traffic in narcotics and controlled

1 substances, and acts involving murder, robbery, extortion, and  
2 witness intimidation. This organization, known as the "East Coast  
3 Crips" ("ECC"), operated in the Central District of California and  
4 elsewhere. The ECC, including its leaders, members, and associates,  
5 constituted an "enterprise," as defined by Title 18, United States  
6 Code, Section 1961(4), that is, a group of individuals associated in  
7 fact. The ECC engaged in, and its activities affected, interstate  
8 and foreign commerce. The East Coast Crips constituted an ongoing  
9 organization whose members functioned as a continuing unit for a  
10 common purpose of achieving the objectives of the enterprise.

11 B. BACKGROUND OF THE RACKETEERING ENTERPRISE

12 2. The ECC gang was a violent street gang that claimed a large  
13 portion of South Los Angeles, from approximately 1st Street to 190th  
14 Street, between the 110 Freeway and Central Avenue. The ECC gang  
15 existed since the late 1970s and was composed of smaller groups known  
16 as "sets." Thirteen primary sets of the ECC (1, 59, 62, 66, 68, 69,  
17 76, 89, 97, Q102, 118, 190, 1200), with a total combined membership  
18 of more than approximately 850 members, operated in and around the  
19 Los Angeles area. The "sets" operated under the umbrella rules of  
20 the ECC.

21 3. The ECC gang's sets controlled territories throughout the  
22 city and tended to operate within those areas on a day-to-day basis.  
23 All of those entities, however, claimed membership in, and respected  
24 the overarching and encompassing parent gang of, the ECC. Often each  
25 set of the ECC would sell drugs and conduct robberies and other  
26 crimes with members of their respective sets in and around their  
27 turf, but would also intermingle with other members from the various  
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1 ECC sets. The 62, 66, 68, and 69 sets of ECC were collectively  
2 referred to as the "6 Pacc."

3 4. The ECC gang most commonly aligned with the Rollin' Crips  
4 sets, Neighborhood Crips sets, and some motorcycle clubs, such as the  
5 Deuces and Sin City Disciples. The ECC associated with several  
6 smaller gangs such as the 71 and 74 Hustlers, Drugs N Alcohol, and  
7 multiple Gangster Crips sets.

8 5. The ECC gang had long-standing rivalries with certain other  
9 gangs. In particular, the ECC most commonly fought with Hoover  
10 Criminals and Hoover Crips sets, Main Street Crips, Broadway Gangster  
11 Crips, Mad Swan Bloods, Pueblo Bishop Bloods, Avalon Park Bloods, and  
12 Florencia 13.

13 6. The ECC gang regularly engaged in a variety of violent  
14 crimes including assaults, robberies, home invasion burglaries, bank  
15 robberies, firearms violations, narcotics distribution and sales,  
16 witness intimidation, extortion, and murder. Members of the gang  
17 also engaged in vandalism, prostitution, vehicle theft, and identity  
18 theft. The sales of illegal narcotics (most commonly powder cocaine,  
19 crack cocaine, and marijuana), as well as robberies and home invasion  
20 burglaries (known as "floccing"), provided the primary source of  
21 illicit income for the ECC gang and its members.

22 7. ECC members frequently "tagged" graffiti to mark their  
23 territory. ECC members commonly got tattoos of symbols of the ECC  
24 gang including the letters "E" and "C" or "EC" or "ECC" to represent  
25 "East Coast Crips," "N" and "H" to represent "Neighborhood Crips,"  
26 "ES" to represent "East Side," the corresponding numbers of the ECC  
27 set in which they claimed membership (such as 62, 69, 97, 118, etc.),  
28 "BK" to represent "Bloods Killer" and "FK" or "Flower Killer" to

1 represent "Florencia 13 Killer," depictions of devils and skulls,  
2 depictions of the 110 Freeway sign, and depictions of stacks of  
3 money, money bags, and dollar symbols.

4 8. The ECC gang was loosely structured with a range of  
5 ranks/roles, including "OGs" (Original Gangsters) and "Big Homies,"  
6 as well as "YGs" (Young Gangsters). "OGs" and "Big Homies" had  
7 respect and authority in the gang, provided leadership, direction,  
8 and guidance to the younger members, could order gang meetings,  
9 shootings, and internal discipline, and often provided the supply,  
10 connections, and locations to sell and stash narcotics and firearms  
11 for the gang, such as small businesses and houses or apartment units.  
12 "YGs" generally carried out the day-to-day operations of the gang by  
13 way of intimidation, armed protection of their neighborhood and drug  
14 territory from rivals, conducting robberies, burglaries, and fraud  
15 schemes, retaliatory shootings, transportation and sales of narcotics  
16 and firearms, and the operation of gang hangout and stash locations.  
17 The ECC "YGs" were also referred to as "Foot Soldiers," "Thugs,"  
18 "Shooters/Gunners," "Dope Boys" and "Floccers."

19 9. ECC maintained a presence within jails and prisons within  
20 California. Within the jails and prisons in California, ECC members  
21 banded together to carry out acts of violence against individuals who  
22 were believed to be cooperating with law enforcement, to protect  
23 against rivals gangs, and to control the distribution of narcotics  
24 within the jails and prisons. To accomplish these goals, ECC members  
25 frequently maintained weapons within the jails for the purposes of  
26 protection and for use in assaults against individuals believed to be  
27 cooperating.

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1 C. PURPOSES OF THE ENTERPRISE

2 10. The purposes of the ECC enterprise included, but were not  
3 limited to, the following:

4 a. Enriching members and associates of the ECC through  
5 the control of and participation in the distribution of narcotics  
6 within ECC territory, extortion, as well as through engaging in armed  
7 robberies of local citizens, businesses, and banks;

8 b. Preserving, promoting, and protecting the power,  
9 territory, and profits of the ECC and its members and associates;

10 c. Exposing and punishing ECC members and associates who  
11 were perceived to have violated ECC codes of conduct;

12 d. Maintaining ECC control and authority over its  
13 territory, often through threats, intimidation and acts of violence  
14 committed against local residents and rival gangs; and

15 e. Violently retaliating against rival gang members or  
16 perceived outsiders who challenged ECC authority.

17 D. THE MEANS AND METHODS OF THE ENTERPRISE

18 11. The means and methods by which members and associates  
19 conducted and participated in the conduct of the affairs of the ECC  
20 included the following:

21 a. Members and associates of the ECC gang committed, and  
22 conspired, attempted, and threatened to commit acts of violence to  
23 protect and expand the enterprise's criminal operation, including  
24 assaults, murders, acts of intimidation, and threats of violence  
25 directed against rival gang members and witnesses in criminal cases,  
26 and to violently discipline insubordinate members of the enterprise.

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1           b. Members and associates of the ECC gang maintained  
2 firearms and ammunition for use in gang-related violence and for  
3 protection against rivals.

4           c. Members and associates of the ECC gang promoted a  
5 climate of fear, through acts of violence and threats to commit acts  
6 of violence.

7           d. Members and associates of the ECC gang engaged in drug  
8 trafficking, gun trafficking, and extortion as a means to generate  
9 income.

10           e. Members and associates of the ECC gang frequently  
11 engaged in the aforementioned criminal activity in the presence of  
12 other ECC gang members and/or associates in order to enhance the gang  
13 status of those directly conducting the criminal acts. Members and  
14 associates of the ECC gang would provide instructions to the junior  
15 members committing crimes in their presence, would ensure the  
16 criminal acts were completed, and would provide verification to other  
17 ECC gang members that the crimes occurred.

COUNT ONE

[18 U.S.C. § 1962(d)]

Paragraphs 1 through 11 of the General Allegations are re-alleged and incorporated here.

A. THE RACKETEERING CONSPIRACY

1. Beginning on a date unknown, and continuing to on or about July 16, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant PAUL GARY WALLACE, also known as "Doc," "Lil Doc," "Lil Doc Thone," "Bill," "Uncle Bill," and "Still Bill," and others known and unknown to the Grand Jury, being persons employed by and associated with the ECC, an enterprise which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. Multiple acts involving murder, in violation of California Penal Code Sections 21a, 31, 182, 187, 188, 189, and 664;

b. Multiple acts involving extortion, in violation of California Penal Code Sections 21a, 31, 182, 518, 519 and 664;

c. Multiple offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and

d. Multiple acts indictable under Title 18, United States Code, Section 1512, relating to tampering with a witness, victim, or informant.

1           2.     It was a further part of the conspiracy that defendant  
2 WALLACE agreed that a conspirator would commit at least two acts of  
3 racketeering in the conduct of the affairs of the enterprise.

4 B.     MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
5         ACCOMPLISHED

6           The object of the conspiracy was to be accomplished in substance  
7 as follows:

8           1.     Defendant WALLACE, who as of July 16, 2020, had been a  
9 senior leader of the ECC for approximately 30 years, and who, during  
10 relevant times, was the most influential member of the 6 Pacc of the  
11 ECC, would commit murder and conspire and attempt to commit murder in  
12 order to enhance the violent reputation of the ECC gang, to enhance  
13 his status within the gang, to retaliate against rival gang members,  
14 and to enforce discipline within the gang.

15           2.     Defendant WALLACE would protect the gang's territory from  
16 rivals by carrying firearms and using violence, such as robberies,  
17 acts of intimidation, assaults, and shootings against the gang's  
18 rivals.

19           3.     Defendant WALLACE would sell drugs within the ECC gang's  
20 territory.

21           4.     Defendant WALLACE would maintain firearms and ammunition  
22 for his own use and to provide to other ECC members.

23           5.     Defendant WALLACE would obtain weapons within the jails for  
24 use against rivals.

25           6.     Defendant WALLACE would identify individuals who were  
26 cooperating against law enforcement and sanction violence against  
27 them.

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1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish the object  
3 and purposes of the conspiracy, on or about the following dates,  
4 defendant WALLACE, and other members and associates of the ECC,  
5 committed and caused to be committed various overt acts within the  
6 Central District of California, and elsewhere, including, but not  
7 limited to, the following:

8 Overt Act No. 1: In the late 1970s, defendant WALLACE was  
9 initiated into the 69th Street set of the ECC with the gang moniker  
10 "Lil Doc Thone."

11 Overt Act No. 2: On or about February 12, 1989, within ECC  
12 territory, defendant WALLACE possessed cocaine for sale.

13 Overt Act No. 3: On or about October 21, 1996, while in the  
14 custody of the California Department of Corrections, defendant  
15 WALLACE possessed a weapon, namely, an approximately 6-inch long  
16 dagger fashioned out of a piece of a table saw.

17 Overt Act No. 4: On or about March 17, 2000, within ECC  
18 territory, defendant WALLACE carried a loaded firearm.

19 Overt Act No. 5: On or about February 9, 2003, within ECC  
20 territory, defendant WALLACE using a handgun, shot and murdered R.P.,  
21 an ECC gang member who publicly disrespected defendant WALLACE.

22 Overt Act No. 6: On or about July 26, 2006, within rival gang  
23 territory, defendant WALLACE possessed a loaded semi-automatic .380  
24 caliber pistol.

25 Overt Act No. 7: On or about January 23, 2009, within ECC  
26 territory, defendant WALLACE possessed six rounds of .38 caliber  
27 ammunition that he intended to provide to another ECC gang member.  
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1        Overt Act No. 8:        On or about September 25, 2011, within ECC  
2 territory, defendant WALLACE possessed .22 grams of cocaine.

3        Overt Act No. 9:        On or about November 13, 2014, defendant  
4 WALLACE drove a co-conspirator to R.B.'s residence in a white  
5 Cadillac Escalade, within rival gang territory, and provided the co-  
6 conspirator with a 7.62 caliber Norinco AKM-47S assault rifle, which  
7 the co-conspirator used to murder R.B.

8        Overt Act No. 10:        On or about November 13, 2014, defendant  
9 WALLACE told a cooperating witness, "We just knocked the fool Red  
10 down," in reference to the murder of R.B.

11        Overt Act No. 11:        On or about July 24, 2015, within a vehicle  
12 defendant WALLACE had rented, located near defendant WALLACE's  
13 residence, within ECC territory, defendant WALLACE possessed the 7.62  
14 caliber Norinco AKM-47S assault rifle, which was loaded with 13  
15 rounds of assorted ammunition and had been used to murder R.B.

16        Overt Act No. 12:        On or about February 5, 2016, at defendant  
17 WALLACE's residence, within ECC territory, defendant WALLACE  
18 possessed a CZ model 75 BD Police 9 mm caliber pistol, bearing serial  
19 number BF876; a Beretta unknown model 7.65 mm caliber pistol, bearing  
20 serial number 561440; seven rounds of 9 mm Luger caliber ammunition;  
21 15 rounds of .38 caliber ammunition; approximately 621 gross grams of  
22 marijuana; and several pills of ecstasy, including pills that  
23 defendant WALLACE had attempted to flush down the toilet.

24        Overt Act No. 13:        On or about February 9, 2016, from a  
25 telephone within the Metropolitan Detention Center in Los Angeles,  
26 California, using coded language, defendant WALLACE discussed the  
27 extortion of a marijuana dispensary within ECC territory and the  
28 payment to defendant WALLACE of a portion of those proceeds.

1        Overt Act No. 14:    On or about February 10, 2016, from a  
2 telephone within the Metropolitan Detention Center, using coded  
3 language, defendant WALLACE told a co-conspirator that another ECC  
4 member would be "taking over everything" for defendant WALLACE while  
5 defendant WALLACE was in custody.

6        Overt Act No. 15:    On or about February 11, 2016, from a  
7 telephone within the Metropolitan Detention Center, using coded  
8 language, defendant WALLACE told a co-conspirator the identity of an  
9 ECC member who was cooperating with law enforcement.

10       Overt Act No. 16:    On or about February 12, 2016, from a  
11 telephone within the Metropolitan Detention Center, using coded  
12 language, defendant WALLACE discussed the extortion of a marijuana  
13 dispensary within ECC territory and the payment to defendant WALLACE  
14 of a portion of those proceeds.

15       Overt Act No. 17:    On or about February 14, 2016, from a  
16 telephone within the Metropolitan Detention Center, using coded  
17 language, defendant WALLACE discussed with the owner of a marijuana  
18 dispensary in ECC territory the payment of proceeds to defendant  
19 WALLACE and the ECC member who would handle the collection while  
20 defendant WALLACE remained in custody.

21       Overt Act No. 18:    On or about February 14, 2016, from a  
22 telephone within the Metropolitan Detention Center, using coded  
23 language, defendant WALLACE discussed with co-conspirators the  
24 extortion of a marijuana dispensary within ECC territory.

25       Overt Act No. 19:    On or about March 17, 2016, from a telephone  
26 within the Metropolitan Detention Center, using coded language,  
27 defendant WALLACE told a co-conspirator that the assault rifle which  
28 defendant WALLACE possessed in a rented vehicle was used in a murder.

1        Overt Act No. 20:    On or about April 26, 2016, from a telephone  
2 within the Metropolitan Detention Center, using coded language,  
3 defendant WALLACE told a co-conspirator that the assault rifle which  
4 defendant WALLACE possessed in a rented vehicle was used in a murder.

5        Overt Act No. 21:    On or about December 15, 2016, from a  
6 telephone within the Metropolitan Detention Center, using coded  
7 language, defendant WALLACE told a co-conspirator, "Cuz, I'm so hot  
8 man, Cuz . . . I was out there from 1st St. to 109, those niggas man,  
9 out of the way of me, Cuz," a reference to defendant WALLACE's  
10 position of power and influence within the ECC and over 10 ECC sets,  
11 including the 6 Pacc.

12       Overt Act No. 22:    On or about December 28, 2016, from a  
13 telephone within the Metropolitan Detention Center, using coded  
14 language, defendant WALLACE told a co-conspirator that "Any nigga get  
15 at me like that up in here or out there, nigga. I'm gonna burn with  
16 a knife up in here and I'm gonna burn him with bullets out  
17 there . . . That's the real."

18       Overt Act No. 23:    On or about March 25, 2018, within the  
19 Metropolitan Detention Center, defendant WALLACE and a co-  
20 conspirator, who was a more junior member of ECC, possessed a  
21 homemade knife that had been sharpened.

22       Overt Act No. 24:    On or before April 18, 2018, within the  
23 Metropolitan Detention Center, a co-conspirator stole "protective  
24 order" documents to prove to defendant WALLACE that a senior member  
25 of ECC was cooperating with law enforcement against the co-  
26 conspirator, so that defendant WALLACE would approve of an assault  
27 against the senior member of the ECC.

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1        Overt Act No. 25:    On or about April 18, 2018, within the  
2 Metropolitan Detention Center, defendant WALLACE discussed with the  
3 co-conspirator the plan for an assault against the senior member of  
4 ECC who was cooperating with law enforcement against the co-  
5 conspirator.

6        Overt Act No. 26:    In or about November 2019, in an interview  
7 about ECC, defendant WALLACE stated "I'm killing, I'm going to hell,  
8 He said you [U/I] shall not kill, I done kill . . . I done kill few  
9 motherfuckers, so I know I'm going to hell," and, in referring to a  
10 rival gang member, said "he was killing like a motherfucker like  
11 me . . . and I'm like damn, they putting in work, they got murders  
12 under their belt like a motherfucker, I got murders under my."

13 D.    NOTICE OF SPECIAL SENTENCING ALLEGATIONS

14        The Grand Jury further alleges that:

15        1.    On or about February 9, 2003, in Los Angeles County, within  
16 the Central District of California, defendant WALLACE and others  
17 known and unknown, aiding and abetting one another, willfully,  
18 deliberately, with premeditation and malice aforethought, killed  
19 victim R.P., in violation of California Penal Code Sections 31, 187,  
20 188, and 189.

21        2.    On or about November 13, 2014, in Los Angeles County,  
22 within the Central District of California, defendant WALLACE and  
23 others known and unknown, aiding and abetting one another, willfully,  
24 deliberately, with premeditation and malice aforethought, killed  
25 victim R.B., in violation of California Penal Code Sections 31, 187,  
26 188, and 189.

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COUNT TWO

[18 U.S.C. §§ 924(c)(1)(A)(ii), (iii), (j)(i), 2(a)]

On or about November 13, 2014, in Los Angeles County, within the Central District of California, defendant PAUL GARY WALLACE, also known as "Doc," "Lil Doc," "Lil Doc Thone," "Bill," "Uncle Bill," and "Still Bill," and others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly used, carried, brandished, and discharged a firearm, namely, a Norinco AKM-47S 7.62 caliber assault rifle, bearing serial number M001856, during and in relation to, and possessed that firearm in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, namely, murder in aid of racketeering activity, in violation of Title 18, United States Code, Section 1959(a)(1).

In the course of discharging this firearm, and through the use of this firearm, defendant WALLACE, and others known and unknown to the Grand Jury, each aiding and abetting the other, caused the death of R.B., a death that constituted a murder, as defined in Title 18, United States Code, Section 1111(a).

NOTICE OF SPECIAL FINDINGS

The allegations of Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

As to Count Two, defendant PAUL GARY WALLACE:

1. Was 18 years of age or older at the time of the offense (18 U.S.C. § 3591(a));

2. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant of the offense, and R.B. died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C));

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1           3. Defendant WALLACE in the commission of the offense  
2 knowingly created a grave risk of death to one or more persons in  
3 addition to the victim of the offense, namely, to R.B. (18 U.S.C.  
4 § 3592(c)(5)).

7                                 A TRUE BILL

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10                                 \_\_\_\_\_  
Foreperson

11 NICOLA T. HANNA  
12 United States Attorney

13 *Brandon Fox*

14 BRANDON D. FOX  
15 Assistant United States Attorney  
16 Chief, Criminal Division

17 JOANNA M. CURTIS  
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