

IN THE CIRCUIT COURT OF THE SIXTEENTH JUDICIAL CIRCUIT  
KANE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,  
AND THE CITY OF ELGIN,

Plaintiff,

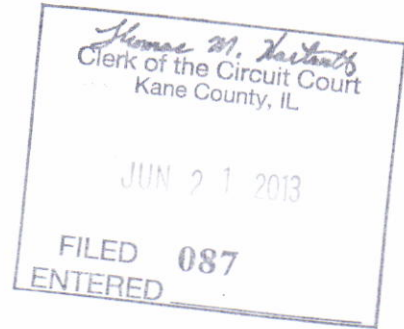
vs.

THE MANIAC LATIN DISCIPLES, KARL F.  
BONILLA, ALEXANDER L. BOTTI, VICTOR A.  
BOTTI, REGGIE CORTEZ, JOSE COVARRUBIAS, JR.,  
MIGUEL COVARRUBIAS, RAUL GALLARDO,  
JOSEPH M. GARCIA, VICTOR L. GONZALEZ,  
MATTHEW A. MIRANDA, JESSE J. ORIZABA,  
LUIS ORIZABA, JOSE M. PELLOT, ALBERTO A.  
PRADO, MARIO A. PRADO, ADAN  
SANDOVAL, EXAVIE P. STIVALET, SCOTTIE T.  
RASAVADY, JONATHON RAMIREZ, VICTOR N.  
RIVERA, MODESTO ROSALES, ROBERT A.  
TRUJILLO, JAIME ZARATE, LLOYD S. VEAL,  
JOSE M. VILLAGOMEZ, AND UNKNOWN MANIAC  
LATIN DISCIPLE GANG MEMBERS

Defendants.

'13 CH 1526

No. 13 CH



David Akemann

**COMPLAINT IN CHANCERY FOR INJUNCTION AND DAMAGES**

NOW COME the PEOPLE OF THE STATE OF ILLINOIS and THE CITY OF ELGIN, complaining of the Defendant, THE MANIAC LATIN DISCIPLES, and the individually named and unnamed Defendants set forth above, pursuant to the Illinois Streetgang Terrorism Omnibus Prevention Act, 740 ILCS 145/1 *et seq.*, and state in this Verified Complaint as follows:

1. Joseph McMahon is the State's Attorney of Kane County, and pursuant to his authority, including the authority provided under Illinois Compiled Statutes, Chapter 740, Section 147/1 5(c), institutes this complaint on behalf of the PEOPLE OF THE STATE OF ILLINOIS and THE CITY OF ELGIN.

**NOTICE**

BY ORDER OF COURT THIS CASE IS HEREBY SET FOR CASE MANAGEMENT CONFERENCE BEFORE THE ABOVE NAMED JUDGE ON 10.8, AT 9:30 A.M. P.M. FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR AN ORDER OF DEFAULT BEING ENTERED.

2. The Defendant, THE MANIAC LATIN DISCIPLES, is a streetgang as defined by law, in that:

- (a) all named and unnamed Defendants are known to associate with each other by and through the Maniac Latin Disciples organization; and
- (b) the Maniac Latin Disciples consists of a combination, confederation, alliance, network, conspiracy, understanding, or other conjoining, in law or in fact, of three or more individuals; and
- (c) the Maniac Latin Disciples have an established hierarchical organizational structure; and
- (d) through its membership, members, through the agency of any member, and agents, the Maniac Latin Disciples engage in a course or pattern of criminal activity; and
- (e) members of the Maniac Latin Disciples organization associate or represent their association through the use of gang related nicknames, displaying gang signs or other gang related gesticulations, gang clothing, gang colors, gang graffiti, and exhibiting tattoos, gang symbols, shouting gang slogans, or other indicia of membership, and utilize common names, secret signal or code, creed, belief, structure, leadership or command structure, common method of operation or criminal enterprise, concentration or specialty, initiation rites, geographical or territorial situs or boundary or locations, or unifying marks, manor, protocol, or method of expressing or indicating membership; and
- (f) by and through their association with the Maniac Latin Disciples, in whose name, for whose benefit, on whose behalf, or under whose authority the act was committed and whose members engage in a course or pattern of criminal activity and gang related criminal activity including felonies, murders, shootings, aggravated batteries, unlawful possession of and unlawful use of weapons, unlawful possession of and delivery of controlled substances and cannabis, criminal defacement of property, and other conduct injurious to the PEOPLE OF THE STATE OF ILLINOIS and THE CITY OF ELGIN.

3. Upon information and belief, the following individual Defendants are members of the Maniac Latin Disciples streetgang: Karl F. Bonilla, Alexander L. Botti, Victor A. Botti, Reggie Cortez, Jose Covarrubias, Jr., Miguel Covarrubias, Raul Gallardo, Joseph M. Garcia, Victor L. Gonzalez, Matthew A. Miranda, Jesse J. Orizaba, Luis Orizaba, Jose M. Pellot, Alberto A. Prado, Mario A. Prado, Adan Sandoval, Exavie P. Stivalet, Scottie T. Rasavady, Jonathon Ramirez, Victor N. Rivera, Modesto Rosales, Robert A. Trujillo, Jaime Zarate, Lloyd S. Veal, and Jose M. Villagomez.