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6 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

7 THE STATE OF WASHINGTON, )  
8 Plaintiff, )  
9 v. ) No. 21-1-02646-2 KNT  
10 FRANCISCO I MONTERO, ) INFORMATION  
11 Defendant. )  
\_\_\_\_\_ )

12 I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the  
13 authority of the State of Washington, do accuse FRANCISCO I MONTERO of the following  
14 crimes, which are of the same or similar character, and which are based on the same conduct or a  
series of acts connected together or constituting parts of a common scheme or plan: **Murder In  
The First Degree, Murder In The First Degree**, committed as follows:

15 Count I Murder In The First Degree

16 That the defendant FRANCISCO I MONTERO in King County, Washington, on or about  
17 March 28, 2018, with premeditated intent to cause the death of another person, did cause the  
death of Elizabeth Juarez, a human being, who died on or about March 28, 2018;

18 Contrary to RCW 9A.32.030(1)(a), and against the peace and dignity of the State of  
Washington.

19 And further do allege the defendant, Francisco I Montero at said time of being armed  
20 with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW  
9.94A.533(3).

21 Count II Murder In The First Degree

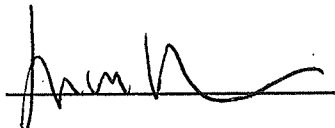
22 That the defendant FRANCISCO I MONTERO in King County, Washington, on or about  
23 March 28, 2018, with premeditated intent to cause the death of another person, did cause the  
death of Eveona Cortez, a human being, who died on or about March 28, 2018;

24  
Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION

1 Contrary to RCW 9A.32.030(1)(a), and against the peace and dignity of the State of  
2 Washington.

3 And further do allege the defendant, Francisco I Montero at said time of being armed  
4 with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW  
5 9.94A.533(3).

6 DANIEL T. SATTERBERG  
7 Prosecuting Attorney

8 By:   
9 Jessica M. Berliner, WSBA #29565  
10 Senior Deputy Prosecuting Attorney  
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1 CAUSE NO.

2 CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

3 That Aaron Thompson is a (n) Detective with the King County Sheriff's  
4 Office and has reviewed the investigation conducted in the King County  
Sheriff's case number (s) C18013940;

5 There is probable cause to believe that Francisco Montero 05/01/1998  
6 committed the crimes (s) of two counts of RCW 9A.32.030 Murder in the First  
Degree.

7 This belief is predicated on the following facts and circumstances:  
8 On 03/28/18 at about 2130 hours, 911 calls began coming in reporting shots  
9 fired at a large apartment complex located at 1101 SW 139 St, Burien WA. The  
10 shooting had taken place near the north end of building # 7. Deputies arrived  
11 and discovered two victims unresponsive on the ground just north of building  
12 #7. These victims were later identified as Eveona Cortez, DOB 2/5/99, and  
13 Elizabeth Juarez, DOB 6/2/04. The girls both had numerous obvious gunshot  
14 wounds. In a large purse located on the ground where the victims had fallen  
was a can of black spray paint. Both girls were transported to Harborview  
Medical Center where they succumbed to their wounds. An autopsy was conducted  
by King County Medical Examiner Dr. Yarid on 03/30/18. Elizabeth had been  
shot twice; once in the back of the head and once in the back of her left  
thigh. Eveona was shot four times; once to the abdomen, once behind her left  
ear and twice in her left leg. The cause and manner of death was determined  
to be homicide by gunshot wounds.

13 At the scene, detectives from the King County Sherriff's Office  
14 collected nineteen fired 9 mm caliber casings and seven fired .45 caliber  
casings.

15 Several witnesses gave varied description of the shooters. Juvenile  
16 witness 1 (JW1) was a friend of the victims and had been with them during  
17 the evening. He/she was walking near them when he/she saw a red laser light  
18 on the wall behind the victims and then heard gunshots. JW 1 only saw one of  
19 the shooters, whom they described as an approximately 6' male with a full  
20 grown, short beard, wearing a dark black or dark blue hoodie and khaki or  
21 gray pants. In a follow-up statement, JW1 clarified that the shooter that  
22 they saw was a Hispanic male with a short goatee.

18 Witness S.S. told detectives that after hearing gunshots, she looked  
19 out her second-floor window and saw two suspects running from the direction  
20 of the shooting towards 12th Avenue SW. She described one suspect as a tall,  
21 6'2", African American male with a skinny face and a skinny nose, wearing a  
22 black hoodie and jeans, holding a handgun with a laser on it. (She said that  
the laser was not pointing but that she saw a red tip on the gun.) She  
described the second suspect as a shorter, 5'11", Latino male, wearing a  
white beanie, gray hoodie and shorts, possibly knee length jean shorts. She  
stated that they were initially walking west then picked up their pace and  
started running westbound.

23 Witness K. A. was outside her apartment near 12 AVE SW at the time of  
24 the shooting. She heard approximately 9 shots fired and then saw two men run  
25 and get into a silver four door car that she believed to be a Mercedes with a  
license plate that started with the letter "A." As the men got into the car,  
she heard one of them yell "Go!" She believed that the car was running and  
that there was a person in the driver's seat. K. A. described one man as a  
Black male, wearing a dark hoody and long, baggy shorts. She was not able to  
provide a description of the second suspect.

Certification for Determination  
of Probable Cause

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1 While processing the scene, detectives noticed that there was a lot of  
2 gang graffiti or "tagging" in or near the apartment complex. For instance,  
3 the south and west walls of the Buena market, which borders the apartment  
4 complex and is in close proximity to where the victims were shot, were  
5 covered with gang related graffiti including "ULK," (with the UL x'd out),  
6 "Serio Killa" (with Serio x'd out), and "SSL lil ox3." I know from my  
7 extensive gang training and numerous gang investigations, that the tag "SSL  
8 lil ox3" is claiming membership in South Side Locos ("SSL"), a Sureno street  
9 gang. I also know from my training and experience, as well as direct  
10 communications with admitted gang members, that the tag "ULK" with the UL x'd  
11 out means "United Lokotes Killer," and the crossing out of the "UL" portion  
12 shows disrespect to United Lokotes ("UL"), a known Sureno street gang, and is  
13 a considered a threat. Likewise, "Serio Killa" (Serio x'd out) is a threat  
14 against "Serio," the moniker of (S) Francisco Montero, 5/1/98, a known UL.  
15 Throughout this investigation, detectives learned that both victims were  
16 associated with known street gangs. Eveona Cortez was associated with  
17 Callejones Escondidos Surenos ("CES") and was known by the moniker "Esa  
18 Dowxer." Elizabeth Juarez was associated with South Side Locos ("SSL") and  
19 was known by the moniker "Lil Oxe." During the two years prior to the girls'  
20 murders, there were numerous shootings and murders stemming from agang war  
21 between the UL street gang and a coalition of other Sureno Hispanic street  
gangs to include, but not limited to SSL and CES.

22 Detectives learned that (S) Francisco Montero was living at the  
23 apartment complex with his girlfriend, Melony Flores, in building #9-101, at  
24 the time of the murders. In addition to the tagging noted above, detectives  
25 found that the hallway inside the north entrance to building 9 (the hallway  
to access apartment #9-101) was tagged with "ULK" and the south wall of  
building 5, which is visible from building 9, was also tagged with "ULK". A  
friend of victim Juarez, Juvenile Witness 2 (JW2) confirmed to detectives  
that Juarez had been tagging up the apartment complex for about a month prior  
to the shootings and that she had specifically been targeting Montero and the  
ULs with the tagging and had tagged the hallway of building 9 after learning  
that Montero was living there. (There is no indication that victim Cortez was  
involved in the tagging.)

Shortly before the murders, victim Juarez was live streaming on  
Facebook. She and others, were hanging out in and around the apartment  
complex drinking, talking and playing music. During the course of livestream,  
victim Juarez identified herself as "Lil Oxe" and displayed the SSL and the  
crossed out UL taggings.

On April 5, 2018, pursuant to a judicially authorized search warrant,  
the apartment that Montero and Flores were living in was searched. In the  
room that the two shared, detectives located a large revolver, a Springfield  
XD 9mm magazine, multiple calibers of loose ammunition to include .45 caliber  
live rounds and writings that confirmed Montero's gang affiliation. Also  
located in a drawer along with men's clothing items was a laser sight for a  
handgun.

After the search, detectives read Montero his rights and interviewed  
him. Montero told detectives that he had been at a park with Flores in  
Federal Way at the time of the murders and that he had then spent the night  
with Flores at his mom's house in Federal Way. Montero admitted that he was  
living with Flores at the apartments but denied knowing either victim or ever  
having had contact with either of them other than seeing victim Juarez on  
social media. He acknowledged that he had seen the tagging at the complex  
that was directed at him but said he would not waste his time on someone that  
young.

Flores was also interviewed and gave the same story about her  
whereabouts the night of the murders. However, both Montero's mother and

1 Flores' mother refuted Montero's alibi. Montero's mother, witness Leticia  
2 Montero stated that she had not seen Montero for some time prior to the  
3 murders but that they had all gone to dinner in Federal Way the day after the  
4 murders occurred. Melony Flores' mother, witness Ana Dominguez, who resides  
5 in apartment #9-101, told detectives that Flores was home all night on the  
6 night of the murders and that she did not see Montero that night, nor was he  
7 at the apartment the next morning after the murders, March 29, 2018.

8 Pursuant to a judicially authorized search warrant, Flores' call detail  
9 records were obtained and both Montero's and Flores' phones were searched.  
10 Flores' phone records confirmed that she was home in her apartment at the  
11 time of the murders. Evidence from her cell phone also showed that she had  
12 communicated and exchanged pictures with Montero a short time after the  
13 murders, which shows that they were not at the same location in the hours  
14 surrounding the murders. When confronted with this fact during a follow-up  
15 interview, Flores admitted that she had lied and was not with Montero the  
16 night of the murders. She stated the story they both told was her idea  
17 because she was afraid the police would suspect Montero of killing the girls.

18 In their phones, detectives located multiple photos and videos of  
19 Montero with firearms in the days around the murder, including a handgun  
20 equipped with a red laser. On Montero's phone, detectives located a video  
21 that Montero appeared to have recorded of himself at the memorial for the two  
22 dead girls a few days after their death. In the video Montero films the  
23 memorial, which is filled with flowers, candles and cards, and states, "Man,  
24 shows the repercussions when you fucking with a G man, you already know what  
25 it is, UL..." From a review of his Snapchat account, it appears that Montero  
later sent this video to a group of his friends and UL associates.

Judicially authorized warrants were also executed on Snapchat and  
Facebook accounts for Montero, Flores, and several of their associates. From  
Facebook records, detectives obtained messages sent to and from friends of  
Montero shortly before and after the murder. For instance, using Montero's  
own Facebook account, Flores sent a message to Jose Bedolla, 6/17/96, at 8:46  
pm, less than an hour before the murders, asking if he was with Montero and  
telling him to let Montero know that "the SSLs" were in front of her house.  
Bedolla responded that he had just called Montero and that Montero was with  
another UL associate. Shortly after 9:00 pm, Bedolla asks Flores "Where are  
they exactly" and "You sure they ssl cause I think there gonna go slide rn."  
At 9:08 pm, Flores replies "Yeah I saw lil one right there." Flores and  
Bedolla continue to discuss who is outside, whether it is male or females and  
how many people are there.

At 9:16 pm Bedolla messaged Flores telling her to call the UL associate  
and that he thought that the associate was still with Montero. At 9:20 pm,  
Flores responds that they did not answer. The shootings occur roughly ten  
minutes later. At 12:59 am, Bedolla sends Montero's account a picture of  
Juarez with "RIP Lil One" written on it. Montero's account responds by saying  
"Fuck that bitch." It is unclear whether Flores or Montero is accessing the  
account at that point.

From the Snapchat account of Fray Martin Garcia, another known UL  
associate, detectives located a video that appeared to be filmed the morning  
after the murders showing Montero waving around a black handgun with an  
extended magazine and a laser mounted under the barrel.

The fired casings recovered from the scene were processed for prints  
and DNA. Montero's DNA was located on the 9mm casings.

Prior to these murders, Montero had been convicted of Tampering with a  
Witness, a felony that rendered him ineligible to possess a firearm. He has  
subsequently been convicted for Murder in the Second Degree for the shooting  
death of rival gang member Erasmo Plata in April of 2017.

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Under penalty of perjury under the laws of the State of Washington,  
I certify that the foregoing is true and correct. Signed and dated by me  
this 28 day of June, 2021, at SeaTac, Washington.

*Dt. A. Thompson* #65909  
Dt. A. Thompson  
KCSO / MAJOR CRIMES UNIT

Certification for Determination  
of Probable Cause

Prosecuting Attorney  
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1  
2 CAUSE NO. 21-1-02646-2 KNT

3 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR  
4 CONDITIONS OF RELEASE

5 The State incorporates by reference the Certification for Determination of Probable  
6 Cause prepared by Detective Aaron Thompson of the King County Sheriff's Office for case  
7 number C18013940.

8 The State respectfully requests that bail be denied pursuant to Washington Constitution,  
9 Art. I, Section 20<sup>1</sup>. There was no first appearance in this matter as the defendant is currently in  
10 the custody of the Department of Corrections serving a sentence for Murder in the Second  
11 Degree under KC Cause #18-C-03197-1. Given the defendant's unrepentant and repeated  
12 murders of perceived rival gang members, no bail is appropriate in this matter. In the alternative,  
13 the State asks that bail be set in the amount of \$5,000,000.

14 In April of 2017, the defendant and four of his associates conspired to kill Erasmo Plata  
15 in direct retaliation for the shooting of a fellow gang member. They collectively agreed to seek  
16 out rival gang members for retaliation and specifically discussed the current location of rivals  
17 and inquired as to the availability of guns and cars. The defendant and two others then gunned  
18 Plata down. On the day following Plata's death, the defendant boasted about the murder and he  
19 and his co-conspirators made plans for at least one additional shooting. Rival gang member (and  
20 a suspect in the murder of their friend) Alondra Garcia-Garcia was then shot in the head using  
21 the same three handguns that were used in the shooting of Plata less than 24 hours before. The

22  
23 <sup>1</sup> "Bail may be denied for offenses punishable by the possibility of life in prison upon a showing by clear and  
24 convincing evidence of a propensity for violence that creates a substantial likelihood of danger to the community or  
any persons."

1  
2 Certification for Determination of Probable Cause for that case is attached and incorporated into  
3 this request that no bail be allowed.

4 A year later, Montero again conspired with others to murder perceived rival gang  
5 members, this time gunning down two young girls, apparently for the mere offense of  
6 disrespectful graffiti. Again, he showed no remorse and filmed himself gleefully celebrating one  
7 of the victim's deaths. (It appears that victim Juarez was his primary target and that he and his  
8 accomplices simply did not care who else they murdered.) It is clear that this defendant has no  
9 regard for other humans and presents an extreme danger to the community.

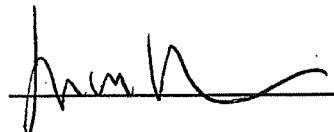
10 In addition to Murder in the Second Degree, the defendant has a prior conviction for  
11 Tampering with a Witness under KC Cause #17-1-06604-1. That conviction is based on the  
12 defendant's attempts to have a juvenile co-defendant take responsibility for a gun that had been  
13 found in the defendant's car after witnesses reported a shooting. He also has two convictions for  
14 Assault in the Fourth Degree under KC Cause # 17-1-06604-1. One of those assaults occurred  
15 after he was in custody. According to the Certification for Determination of Probable Cause from  
16 the Department of Adult and Juvenile Detention, a rival gang member was assigned to the same  
17 unit in the jail as Montero. Almost as soon as the rival entered the unit, and without any  
18 provocation, Montero took off his jail slippers and proceeded to repeatedly punch the victim  
19 before picking him up and throwing him on the ground. Montero was released from jail on these  
20 offenses less than two months before he committed these murders.

21 Given the defendant's brutal course of conduct and disregard for human life, no bail is  
22 justified in this matter pursuant to Art. I, Section 20 and CrR 2.2(b)(2)(ii) as the defendant  
23 clearly presents a substantial likelihood of danger to the entire community.



1  
2 The State also requests that he be ordered to have no contact with the families of  
3 Elizabeth Juarez and Eveona Cortez.  
4  
5

6 Signed and dated by me this 28th day of June, 2021.  
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11 Jessica M. Berliner, WSBA #29565  
12 Senior Deputy Prosecuting Attorney  
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1 CAUSE NO.

2 CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

3 That Aaron Thompson is a(n) Detective with the King County Sheriff's  
4 Office and has reviewed the investigation conducted in the King County  
Sheriff's case number(s) C18017282;

5 There is probable cause to believe that Francisco Montero 05/01/1998,  
6 Sergio Salgado 11/11/2000, Ismael Martinez 08/28/2000, Fray-Martin Garcia  
7 09/23/1999, Jesus Terrazas-Avalos 12/27/1999 committed the crime(s) of RCW  
8 9A.28.040.3.a Conspiracy to commit Murder in the First degree, two counts.  
9 This belief is predicated on the following facts and circumstances:

10 The United Lokotes (UL) and the Varrio Locos (VL) are criminal street gangs  
11 actively operating in King County. Through extensive prior investigations  
12 into a variety of criminal offenses including assaults, robberies and  
13 unlawful possession of a firearm cases, the King County Sheriff's Office has  
14 become familiar with each of the gangs and their respective  
15 members/associates. The defendants in this case, Francisco Montero aka  
16 "Serio" (5/1/98), Fray-Martin Garcia aka "Danger" (9/23/99), Sergio Salgado-  
17 Vanata aka "Listo" (11/11/00), Jesus Terrazas-Avalos aka "Oso" (12/27/99) and  
18 Ismael M Martinez aka "Wicked" (08/28/2000) are UL members.

19 Since early 2017, the ULs and VLs have engaged in a violent and deadly feud.  
20 After a number of incidents over the first few months of 2017, the gun  
21 violence spiked between these gangs. On April 11 and April 12, 2017, there  
22 were three separate shootings, in which two people were killed and a third  
23 was wounded by a gunshot to the head.

24 On April 11, 2017, known UL member/associate Arturo Marcial Alvarez was shot  
25 and killed at approximately 1620 hours on Pacific Highway South in Federal  
Way, Washington. (Later, known VL gang members/associates, Miguel Bejar,  
Antonio Inda, and Alondra Garcia-Garcia were charged with the murder of  
Arturo Marcial Alvarez).

Immediately after Alvarez's death, the defendants, his fellow UL gang  
members, began planning lethal retaliation. Approximately eight hours after  
the killing of Alvarez, at approximately 0030 hours on April 12, 2017, VL  
gang member/associate Erasmo Plata was shot to death outside a Burien,  
Washington convenience store. Later that same day, on April 12, 2017, at  
approximately 2336 hours, Alondra Garcia-Garcia (the driver of the van used  
to kill Alvarez) suffered a graze wound to her head from a flurry of gun  
shots.

Subsequent police investigation has revealed that the violent death of Plata  
and the attempted murder of Garcia-Garcia were in retaliation for the

Certification for Determination  
of Probable Cause

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1 intentional murder of Alvarez. After Alvarez's death, the defendants used  
2 Facebook messenger to coordinate their efforts to kill rival VL gang members  
3 and announced their intent to kill any VL member they encountered.  
4 Participants of this conspiracy effectuated their plan by killing Plata and  
5 attempting to kill Garcia-Garcia, and then boasted about their conduct.  
6 The UL members involved in this conspiracy to kill any VL member included  
7 defendants Francisco Montero, Fray-Martin Garcia , Sergio Salgado-Vanata,  
8 Jesus Terrazas-Avalos and Ismael Martinez. Each of the above listed  
9 individuals has been documented as UL member by the King County Sheriff's  
10 Office through various different means to include self-identification to law  
11 enforcement or through Facebook. For example, Montero and Martinez explicitly  
12 state that they are members of UL on their Facebook pages and Terrazas-  
13 Arevalos can be seen in pictures holding a firearm in one hand and flashing a  
14 UL gang sign in the other. Additionally, Montero, Garcia and Salgado-Vanata  
15 each have "UL 13" or "13" tattooed in the same place on their hands.

9  
10 Following Plata's murder and the attempted murder of Garcia-Garcia, and  
11 pursuant to a search warrant, detectives obtained and reviewed records for  
12 Facebook accounts that were confirmed to belong to each of the five UL member  
13 defendants. Facebook users can exchange private messages on Facebook with  
14 other users. These messages are sent to the recipient's "Inbox" on Facebook  
15 as well as to the Facebook Messenger app which allows users to communicate  
16 with each other in a variety of ways, including through text messaging and  
17 voice calls. The records obtained by the detectives include private "group  
18 chats," in which each of the listed members participated via text message.  
19 On April 11, 2017, the defendants participated in a UL gang Facebook group  
20 chat that began before the killing of Alvarez, and continued through the  
21 shooting of Garcia-Garcia on April 12, 2017. As members of this group chat,  
22 each would have received, in text message form, any message sent by any other  
23 member of the group chat and each would have had the ability to post/send  
24 their own messages/texts in the group chat.

17  
18 On April 11, 2017, before the murder of Alvarez, UL member/ associates  
19 Montero, Terrazas-Avalos, and Martinez, and others posted messages in which  
20 they conspired and agreed to shoot rivals. Montero specifically limited  
21 participation in the group chat to "shooters only." . (Note: ULs are  
22 Sureños. Sureños and Norteño are arch rivals. As a result, Sureños will  
23 often "cross out" (replace) the letter "N" with an "X" in print as way to  
24 show disrespect towards Norteño.)

21  
22 During this group chat, participants learned that a 19 year old man had been  
23 killed in Federal Way and became concerned that the person was fellow UL  
24 member/associate Alvarez. Even prior to confirming that it was Alvarez,  
25 Montero, Salgado-Vanata, and Garcia posted messages in which they agreed to  
participate in seeking revenge by shooting rival gang members. This agreement  
incorporated logistical planning; including determining which UL

Certification for Determination  
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1 members/associates had guns and access to cars, and where they believed ULs were located.

2 When the participants of the UL Facebook group chat learned that the young man killed in Federal Way was in fact Alvarez, the plan to exact revenge continued with urgency. Montero, Garcia, Terrazas-Avalos, and Salgado-Vanata expressly reiterated their willingness to participate in the agreement to seek revenge by shooting VL members. The men discussed securing the use of vehicles that they could use to drive in search of targets. Terrazas-Avalos offered to drive in his mother's car to effectuate the plan; Montero, and Garcia asked him to pick them up.

6 Approximately two hours after UL members asked Terrazas-Avalos to pick them up, VL member Erasmo Plata was slain. Surveillance video shows Plata standing behind an AM/PM store alone. Three people wearing dark clothing can be seen on surveillance video getting out of a car, walking up behind the AM/PM, and unleashing multiple shots at Plata; however, the shooters cannot be identified by the video. The three shooters then returned to the waiting car, still occupied by a driver and at least one other individual (who opened a rear door for the three gunmen), and the group then fled the scene. Responding police found, in the area where the shooters stood while shooting, twenty-three .45 caliber shell casings (fired from two separate guns) and five .22 caliber shell casings. Review of the surveillance video revealed that the car that the gunmen arrived in and fled in bears strong similarities to a 2003 Honda Accord that was registered to the mother of Terrazas-Avalos, including appearing to be the same make and model, dark in color, and has both a spoiler and a sunroof.

14 On April 12, 2017, within 24 hours of Plata's murder, Montero used Facebook to send messages in which he boasted about participating in the killing of a rival gang member and having avenged his fellow UL Alvarez's murder. The messages include Montero stating, "...we just got one of the VLs last night" and "We did a MF [motherfucker] dirty." Similarly, Martinez also Facebook messaged an apparent confession: "That was my boy that got lit up i handled it already."

18 Later during the day of April 12, 2017, the Facebook chat group that included Montero, Garcia, Salgado-Vanatta, Terrazas-Avalos, Martinez, and other UL members/associates continued. The group began to plan for another retaliatory strike, this time in the South Park neighborhood. This conversation included Garcia telling his fellow UL member's "let's go duck huntin tonight." Montero responded "We did last night." Montero also noted, "We sending shots everyday for travi." (Alvarez's street name was Travieso or Travi). Montero, Garcia, and Martinez discussed logistics, such as securing a car and determining which other UL members could join in executing the plan, or expressed a desire and willingness to participate in the plan. Salgado-Vanata informed the group where he believed the rival green van was located.

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Certification for Determination  
of Probable Cause

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1 Later on April 12, 2017, Montero said in the UL group Facebook chat, as part  
2 of a broader conversation regarding a plan to get revenge on rivals, "Let's  
3 go to SP I'm trying to catch another duck." (SP is a reference to the South  
Park neighborhood of Seattle). Garcia and Martinez each specifically agreed  
to participate.

4 Shortly before midnight on April 12, 2017, Alondra Garcia-Garcia was in her  
5 parked green minivan in South Park. This minivan was the vehicle used by the  
VL gang members/associates when they gunned down Alvarez the previous day.  
6 As Garcia-Garcia sat inside the vehicle outside a home, at least 29 rounds  
were unleashed at her. Garcia-Garcia was fortunate to escape with only a  
7 grazing wound to her head by a passing bullet. Responding officers recovered  
twenty-two .45 caliber shell casings (fired from two separate guns) and seven  
8 .22 caliber shell casings. Ballistics testing later determined that the shell  
casings were fired from the same three weapons that had caused Plata's death  
9 less than twenty-four hours earlier. Garcia-Garica did not provide a  
description of the shooters.

10 During the execution of a search warrant on April 5, 2018, of the apartment  
Montero was living in, related to a separate criminal investigation, several  
11 documents written by Montero were recovered by law enforcement. It is clear  
that these documents were written by Montero as they were located in his  
12 personal belongings and because the author refers to himself "Serio,"  
Montero's self-admitted gang name. One of these writings includes an  
13 admission to the killing of Plata and the shooting of Garcia-Garcia. This  
writing is titled "Me [Montero], Oso [Terrazas-Avalos], & Wiked [Martinez]."  
14 It reads in part: For Travieso[Alvarez] we went on a mission. I asked the  
homie, you good on ammunition? He said simon 45<sup>th</sup> with 16 rounds is enough for  
15 the competition. We slide through theyre barrio [Spanish for neighborhood]  
and caught one slipping. Hop out the carro & gave his ass the business. All  
16 black, masked up ain't no telling our descriptions. All there is, in my gang  
are killas so you know we aint missing. Next day that bitch got grazed on the  
17 head. Then she started snitching. She gave justice to justice to my homie  
Travi. For all my Lokos we catching them body's..."

18 Based on the foregoing, there is probable cause to believe that on April 11-  
19 12, 2017, UL members/associates Francisco Montero, Fray-Martin Garcia, Sergio  
Salgado-Vanata, Jesus Terrazas-Avalos, and Ismael Martinez, conspired to  
20 intentionally, and with premeditation, murder members of the Varrio Locos  
street gang, and took one or more substantial steps in furtherance of their  
21 agreement.

22 Under penalty of perjury under the laws of the State of Washington,  
I certify that the foregoing is true and correct. Signed and dated  
23 By me this 26 day of April, 2018, at \_\_\_\_\_, Washington.

24  
25 Signature: 

Certification for Determination  
of Probable Cause

Prosecuting Attorney  
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