

1 ERIC GRANT
United States Attorney
2 ELLIOT WONG
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

FILED
Oct 02, 2025
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

5 Attorneys for Plaintiff
6 United States of America

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ANIBAL HERNANDEZ SANTANA,
15 Defendant.

CASE NO. 2:25-cr-0230 DAD
18 U.S.C. §§ 922(q)(3)(A) & 924(a)(4) – Discharge
of a firearm within a school zone;
18 U.S.C. §§ 922(q)(2)(A) & 924(a)(4) – Possession
of a firearm within a school zone (2 counts);
47 U.S.C. § 333 – Interference with a radio
communication station; 18 U.S.C. § 924(d)(1) and
28 U.S.C. § 2461(c) – Criminal Forfeiture

16
17 INDICTMENT

18 COUNT ONE: [18 U.S.C. §§ 922(q)(3)(A) & 924(a)(4) – Discharge of a Firearm Within a School Zone]

19 The Grand Jury charges: T H A T

20 ANIBAL HERNANDEZ SANTANA,

21 defendant herein, on or about September 18, 2025, in the State and Eastern District of California, did
22 knowingly and with reckless disregard for the safety of another discharge a firearm, that is, a
23 subcompact 9mm handgun, that had moved in interstate commerce, within a distance of 1,000 feet of the
24 grounds of the Arthur A. Benjamin Health Professions High School and the Leataata Floyd Elementary
25 School, a place that the defendant knew and had reasonable cause to believe was a school zone, in
26 violation of Title 18, United States Code, Sections 922(q)(3)(A) and 924(a)(4).

27 ///

28 ///

1 COUNT TWO: [18 U.S.C. §§ 922(q)(2)(A) & 924(a)(4) – Possession of a Firearm Within a School
2 Zone]

3 The Grand Jury further charges: T H A T

4 ANIBAL HERNANDEZ SANTANA,

5 defendant herein, on or about September 18, 2025, in the State and Eastern District of California, did
6 knowingly possess a firearm, that is, a subcompact 9mm handgun, that had moved in interstate
7 commerce, within a distance of 1,000 feet of the grounds of Arthur A. Benjamin Health Professions
8 High School and the Leataata Floyd Elementary School, a place that the defendant knew and had
9 reasonable cause to believe was a school zone, in violation of Title 18, United States Code, Sections
10 922(q)(2)(A) and 924(a)(4).

11 COUNT THREE: [18 U.S.C. §§ 922(q)(2)(A) & 924(a)(4) – Possession of a Firearm Within a School
12 Zone]

13 The Grand Jury further charges: T H A T

14 ANIBAL HERNANDEZ SANTANA,

15 defendant herein, on or about September 19, 2025, in the State and Eastern District of California, did
16 knowingly possess a firearm, that is, a subcompact 9mm handgun, that had moved in interstate
17 commerce, within a distance of 1,000 feet of the grounds of Arthur A. Benjamin Health Professions
18 High School and the Leataata Floyd Elementary School, a place that the defendant knew and had
19 reasonable cause to believe was a school zone, in violation of Title 18, United States Code, Sections
20 922(q)(2)(A) and 924(a)(4).

21 COUNT FOUR: [47 U.S.C. § 333 – Interference with a Radio Communication Station]

22 The Grand Jury further charges: T H A T

23 ANIBAL HERNANDEZ SANTANA,

24 defendant herein, on or about September 19, 2025, in the State and Eastern District of California, did
25 willfully and maliciously interfere with and cause interference to any radio communications of KXTV,
26 LLC, d.b.a. ABC 10 and ABC 10 News, a station licensed and authorized by and under Title 47 of the
27 United States Code, in violation of Title 47, United States Code, Section 333.

28 ///

1 FORFEITURE ALLEGATION: [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

2 1. Upon conviction of one or more of the offenses alleged in Counts One through Three of
3 this Indictment, defendant ANIBAL HERNANDEZ SANTANA shall forfeit to the United States
4 pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section
5 2461(c), any firearms and ammunition involved in or used in the knowing or willful commission of the
6 offenses.

7 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
8 through Three of this Indictment, for which defendant is convicted:

- 9 a. cannot be located upon the exercise of due diligence;
10 b. has been transferred or sold to, or deposited with, a third party;
11 c. has been placed beyond the jurisdiction of the Court;
12 d. has been substantially diminished in value; or
13 e. has been commingled with other property which cannot be divided without
14 difficulty;

15 it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to
16 seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

17
18 A TRUE BILL.

19
20 **/s/ Signature on file w/AUSA**
21 **FOREPERSON**

21 ERIC GRANT

22 ERIC GRANT
23 United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ANIBAL HERNANDEZ SANTANA

INDICTMENT

VIOLATION(S): 18 U.S.C. §§ 922(q)(3)(A) & 924(a)(4) – Discharge of a firearm within a school zone;
18 U.S.C. §§ 922(q)(2)(A) & 924(a)(4) – Possession of a firearm within a school zone (2 counts);
47 U.S.C. § 333 – Interference with a radio communication station;
18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 2nd *day*

of October *, A.D. 20* 25

/s/ J. Murphy

Clerk.

Bail, \$ **NO PROCESS NECESSARY**

Chi Soo Kim

CHISOO KIM
UNITED STATES MAGISTRATE JUDGE

United States v. ANIBAL HERNANDEZ SANTANA
Penalties for Indictment

Defendant

ANIBAL HERNANDEZ SANTANA

COUNT 1:

VIOLATION: 18 U.S.C. §§ 922(q)(3)(A) & 924(a)(4) – Discharge of a firearm within a school zone

PENALTIES: A maximum of up to five years imprisonment, which shall not run concurrently with any other term of imprisonment imposed under any other provision of law;
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of up to two years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 2 & 3:

VIOLATION: 18 U.S.C. §§ 922(q)(2)(A) & 924(a)(4) – Possession of a firearm within a school zone

PENALTIES: A maximum of up to five years imprisonment, which shall not run concurrently with any other term of imprisonment imposed under any other provision of law;
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of up to two years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 4:

VIOLATION: 47 U.S.C. § 333 – Interference with a radio communications station

PENALTIES: A maximum of up to one year imprisonment;
Fine of up to \$10,000; or both fine and imprisonment;
Supervised release of up to one year

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

APPLICABLE SECTIONS: 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document