

FILED	
CLERK, U.S. DISTRICT COURT	
07/02/2025	
CENTRAL DISTRICT OF CALIFORNIA	
BY: _____	DVE DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2025 Grand Jury

UNITED STATES OF AMERICA,

CR No. 2:25-cr-00548-SRM

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 371: Conspiracy; 18 U.S.C. § 2(a): Aiding and Abetting]

ALEJANDRO THEODORO ORELLANA,

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 371, 2(a) ]

A. OBJECT OF THE CONSPIRACY

1. Beginning on a date unknown to the Grand Jury but no later than June 9, 2025, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEJANDRO THEODORO ORELLANA ("ORELLANA"), two unindicted coconspirators ("Unindicted Coconspirator 1" and "Unindicted Coconspirator 2"), and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to aid and abet other individuals in the commission and attempted commission of an act to obstruct, impede, and interfere

1 with a law enforcement officer, that is, Los Angeles Police  
2 Department officers and Los Angeles County Sheriff's Department  
3 deputies, lawfully engaged in the lawful performance of their  
4 official duties, incident to and during the commission of a civil  
5 disorder which in any way and degree obstructed, delayed, and  
6 adversely affected commerce and the movement of any article and  
7 commodity in commerce and the conduct and performance of any  
8 federally protected function, in violation of Title 18, United States  
9 Code, Section 231(a)(3).

10 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE

11 ACCOMPLISHED

12 2. The object of the conspiracy was to be accomplished in  
13 substance as follows:

14 a. Defendant ORELLANA, Unindicted Coconspirator 1, and  
15 Unindicted Coconspirator 2 would procure Uvex brand Bionic Face  
16 Shields advertised as designed to protect from chemical splashes and  
17 flying debris.

18 b. Defendant ORELLANA, Unindicted Coconspirator 1, and  
19 Unindicted Coconspirator 2, would transport the Uvex brand Bionic  
20 Face Shields in defendant ORELLANA's Ford F-150 pickup truck to an  
21 area in Downtown Los Angeles in which individuals were protesting and  
22 in which a civil disorder, as defined in Title 18, United States  
23 Code, Section 232(1), was occurring and was expected to occur.

24 c. Defendant ORELLANA, Unindicted Coconspirator 1, and  
25 Unindicted Coconspirator 2, would give out the Uvex brand Bionic Face  
26 Shields to other individuals who committed acts and would later  
27 commit and attempt to commit acts to obstruct, impede, and interfere

1 with law enforcement officers lawfully engaged in the lawful  
2 performance of their official duties.

3 C. OVERT ACTS

4 3. On or about the following dates, in furtherance of the  
5 conspiracy and to accomplish its object, defendant ORELLANA,  
6 Unindicted Coconspirator 1, and Unindicted Coconspirator 2, and  
7 others, committed various overt acts within the Central District of  
8 California and elsewhere, including, but not limited to, the  
9 following:

10 Overt Act No. 1: On June 9, 2025, Unindicted Coconspirator 1  
11 procured Uvex brand Bionic Face Shields that were to be delivered to  
12 Unindicted Coconspirator 1, Unindicted Coconspirator 2, and defendant  
13 ORELLANA later that day in an area near downtown Los Angeles.

14 Overt Act No. 2: On June 9, 2025, at approximately 4:20 p.m.,  
15 defendant ORELLANA drove his Ford F-150 pickup truck to East Los  
16 Angeles to meet Unindicted Coconspirator 1, Unindicted Coconspirator  
17 2, and others to pick up the Uvex brand Bionic Face Shields.

18 Overt Act No. 3: On June 9, 2025, Unindicted Coconspirator 1,  
19 Unindicted Coconspirator 2, and others, loaded the Uvex brand Bionic  
20 Face Shields into the passenger seats and pickup bed of defendant  
21 ORELLANA's Ford F-150 pickup truck.

22 Overt Act No. 4: On June 9, 2025, at approximately 4:53 p.m.,  
23 defendant ORELLANA, Unindicted Coconspirator 1, and Unindicted  
24 Coconspirator 2 drove to the intersection of North Los Angeles Street  
25 and 1<sup>st</sup> Street, adjacent to the United States federal building located  
26 at 100 N. Los Angeles Street in Los Angeles, California, where groups  
27 of individuals were protesting and where an unlawful assembly had  
28 previously been declared by the Los Angeles Police Department.

Overt Act No. 5: On June 9, 2025, after defendant ORELLANA, Unindicted Coconspirator 1, and Unindicted Coconspirator 2 arrived at the intersection of North Los Angeles Street and 1<sup>st</sup> Street, Unindicted Coconspirator 1 and Unindicted Coconspirator 2 distributed the Uvex brand bionic face shields and other items to individuals within the crowd of protestors.

A TRUE BILL

/s/

Foreperson

BILAL A. ESSAYLI  
United States Attorney

JENNIFER L. WAIER  
First Assistant United States Attorney