

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Cr. No. 21-10354-WGY(sss)  
 )  
 4. KEIARRI DYETTE, )  
 a/k/a “Kemo,” )  
 Defendant )

GOVERNMENT’S SENTENCING MEMORANDUM

On January 24, 2024, KEIARRI DYETTE, also known as “Kemo,” pleaded guilty to Counts Two, Nine, and Sixteen of the above-captioned third superseding indictment charging him with conspiracy to participate in a racketeering enterprise, in violation of 18 U.S.C. § 1962(d), dealing in firearms without a license, in violation of 18 U.S.C. § 922(a)(1)(A), and conspiracy to distribute cocaine base, in violation of 21 U.S.C. § 846. In the initial version of the Pre-Sentence Report, dated May 20, 2024 (“PSR”), the United States Probation Office determined DYETTE’s total offense level (“TOL”) after acceptance of responsibility was 21. PSR, ¶ 41. With a criminal history category (“CHC”) of I, Probation concluded that DYETTE’s guideline sentencing range (“GSR”) was 37-46 months in prison. PSR, ¶¶ 48, 76.

For the reasons set out below, the government respectfully requests that this Court sentence DYETTE to 46 months in prison and three years of supervised release. In the course of his participation in a deadly criminal enterprise, DYETTE pistol-whipped a gang rival; distributed cocaine and marijuana; and sold multiple firearms to another member of Cameron Street who was in fact a cooperating witness.

The Cameron Street Enterprise. For decades, Boston and surrounding communities have been wracked by murders and other acts of violence committed by and against youths whose families had historical ties to Cape Verde, an island nation off the coast of Portugal. Over time,

different designations have been used to identify different factions but the adversaries have always maintained a roughly consistent geographic area of concentration. One faction is primarily based in Dorchester, in the vicinity of Bowdoin Street, Geneva Avenue, Cameron Street, and Hancock Street. The other faction is based near Uphams Corner on the Dorchester – Roxbury neighborhood line, primarily centered in and around Wendover Street, separated from their Dorchester rivals by Columbia Road, a major Boston thoroughfare.

During a two-year investigation by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) and the Drug Enforcement Administration (“DEA”), agents identified DYETTE as a member of Cameron Street, a criminal enterprise that used violence, threats of violence, and intimidation to preserve, protect, and expand its territory and enhance its prestige, reputation, and position in the community. Agents obtained information about the gang from cooperating witnesses who were themselves associated with Cameron Street. Through the use of consensual recordings, Title III interceptions, search warrants, and evidence seized by state and local law enforcement, agents determined that Cameron Street members possessed, carried, and used firearms to commit murder and assault rivals, especially their chief rival, another Boston gang known as NOB (for Norton, Onley, and Barry Streets, sometimes referred to as Wendover). Agents learned that Cameron Street members distributed controlled substances, committed armed robberies and home invasions, and engaged in human trafficking to generate income for the enterprise. PSR, ¶¶ 11-19.

DYETTE As A Member of Cameron Street. Agents identified DYETTE as a member of Cameron Street through a variety of methods. As noted in the PSR, DYETTE has a tattoo on his neck with the letters “3-1-1-3,” which refer to the third, first, and thirteenth letters of the alphabet (“C,” “A,” “M”). DYETTE has a tattoo featuring the insignia of the Cleveland Indians baseball

team and a tattoo featuring the insignia of the Kansas City Royals (Cameron Street members sometimes refers to themselves as “Killa Cam”):



DYETTE posted images of himself on social media wearing a modified Cincinnati Reds jersey bearing a “C” for Cameron Street and marked with the numbers “3113” and the name “KC Kemo” on the back (agents seized this jersey from DYETTE at his arrest):



DYETTE’s Participation in the Cameron Street Enterprise. During this investigation, agents developed evidence that Cameron Street leader ANTHONY CENTEIO, a/k/a “Wheezy,” and DYETTE assaulted and pistol-whipped two Wendover Street gang members. According to a

recorded call between a cooperating witness (CW-1) and CENTEIO a short time after the incident, CENTEIO and DYETTE observed a senior Wendover gang member recently released from prison (identified in the superseding indictment as Victim No. 9), accompanied by a second Wendover member (Victim No. 10), arrive at Fernandez Liquors, a Cameron Street hangout and drug distribution center located at 81 Hancock Street in Dorchester. On the call, CENTEIO described becoming so furious that the Wendover members would trespass onto Cameron Street territory that CENTEIO jumped out of his vehicle and immediately assaulted Victim No. 9, who ran off. DYETTE then assaulted and repeatedly pistol-whipped Victim No. 10: “Kemo [DYETTE] had the [U/I] to the nigga’s face, pistol-whipping him . . . Niggas spitting on him, Kemo [DYETTE] kept pistol-whipping—bro. It was crazy, bro.” DYETTE admitted pistol-whipping the gang rival to another member of Cameron Street who became a cooperating witness (CW-3). PSR, ¶ 16.

In addition to this act of violence, agents determined that DYETTE was extensively involved in distributing cocaine and marijuana. On April 15, 2022, the day of the Cameron Street arrests, agents arrested a co-defendant, JOSE AFONSECA, in his apartment and executed a search warrant there. Agents seized 398 grams of cocaine from AFONSECA’s bedroom, along with packaging materials, two hydraulic presses, a digital scale, a cell phone, and \$14,986 in U.S. currency. A search of AFONSECA’s cell phone revealed a lengthy March 2022 exchange between AFONSECA and DYETTE (saved in AFONSECA’s phone as “Kemo KC”) which showed that DYETTE distributed cocaine for AFONSECA for several weeks while AFONSECA was away. The messages included images of cocaine packaged for sales, directions from AFONSECA to DYETTE telling DYETTE to sell to his customers, as well as discussions of quantities and prices for the sales and meeting locations for the deliveries. AFONSECA told DYETTE to sell cocaine for a price of \$250 for 3.5 grams of cocaine and DYETTE would keep \$50 of the \$250 (20%).

In addition to the assault with a firearm and cocaine trafficking, agents utilized CW-1 to make videotaped controlled purchases of firearms and marijuana from DYETTE. On September 1, 2020, agents used CW-1 to purchase a 9 millimeter semiautomatic pistol and ten rounds of 9 millimeter ammunition from CENTEIO for \$2,000. CENTEIO arrived at the meeting location in a car with DYETTE before CENTEIO got out of his car, entered CW-1's car, and sold CW-1 the firearm. Thereafter, DYETTE sold CW-1 firearms and marijuana directly:

- December 3, 2020: Bersa Model Mini Firestorm .40 caliber semiautomatic pistol bearing serial number 534407 and twenty-nine rounds of .40 caliber ammunition in exchange for \$1,400, South Bay Shopping Mall;
- April 22, 2021: Approximately 124 grams or one-quarter pound of marijuana in exchange for \$600, South Bay Shopping Mall;
- May 4, 2021: Taurus model PT-1911 .45 caliber semiautomatic pistol bearing serial number NAT 47983 and seven rounds of .45 caliber ammunition in exchange for \$900, South Bay Shopping Mall.

In addition to these direct sales, agents intercepted a cellular telephone and Snapchat account for DYETTE for two months that showed DYETTE was engaged in daily sales of marijuana and also engaged in other firearm sales.

Argument. DYETTE's arrest on the Cameron Street indictment presents him with an inflection point. On the one hand, a 46 month sentence is a substantial prison sentence, particularly in light of DYETTE's criminal history. On the other hand, the evidence gathered during the investigation showed DYETTE to be fully committed to the success of the Cameron Street enterprise. DYETTE personally committed an act of violence with a firearm; was a close confidant of the gang's leader, CENTEIO; was a day-in, day-out drug trafficker; and regularly acquired and sold illegal firearms. The possession, distribution, and use of illegal firearms fuels the "epidemic of handgun violence in communities within this district," including neighborhoods in Boston and Brockton impacted by the cycle of violence attributable to the Cameron Street / NOB feud. See

United States v. Politano, 522 F.3d 69, 71-72 (1st Cir. 2008). DYETTE’s possession and sale of firearms “directly facilitate[d] crimes of violence” and “indirectly facilitate[d] other crimes, including drug offenses.” Id. at 72. DYETTE day-in, day-out drug trafficking activity of multiple controlled substances produced substantial income and helped fund Cameron Street. Taken together, these facts support the imposition of a sentence at the high end of the guidelines.

Conclusion. The government’s 46 month recommendation serves the goals of 18 U.S.C. § 3553(a). The recommended sentence achieves general deterrence, in that it effectively communicates the real-world consequences of joining criminal conspiracies like Cameron Street. A high-end guideline sentence will specifically deter DYETTE, promote respect for the law, and most importantly, serve to protect the public from DYETTE.

For the reasons set out above, the government respectfully requests that this Court sentence KEIARRI DYETTE to a total of 46 months in prison and three years of supervised release.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Christopher Pohl  
Christopher Pohl  
Charles Dell’Anno  
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 7, 2024.

/s/ Christopher Pohl  
Christopher Pohl  
Assistant U.S. Attorney