

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	Criminal No. 21-10354-WGY(s)
)	
v.)	<u>Count One</u> : Possession with Intent to
)	Distribute Cocaine
(1) KENNY ROMERO, a/k/a "KG,")	(21 U.S.C. § 841(a)(1))
(2) ANTHONY CENTEIO, a/k/a "Wheezy,")	
a/k/a "Taliban Wheeze,")	<u>Count Two</u> : Conspiracy to Participate
(3) FELISBERTO LOPES, a/k/a "Phil," a/k/a)	in a Racketeering Enterprise
"CheeB,")	(18 U.S.C. § 1962(d))
(4) KEIARRI DYETTE, a/k/a "Kemo,")	
(5) ERIC CORREIA, a/k/a "Bubba,")	<u>Count Three</u> : Conspiracy to Distribute
(6) PAULO SANTOS, a/k/a "Bucky,")	and to Possess with Intent to
(7) DEVANTE LOPES, a/k/a "D-Lopes,")	Distribute Marijuana
(8) CHAROD TAYLOR, a/k/a "Pachino,")	(21 U.S.C. § 846)
(9) JOSE AFONSECA, a/k/a "Zay,")	
(10) JAMES RODRIGUES, a/k/a "Bummy,")	<u>Count Four</u> : Possession with Intent to
(11) JONATHAN DAROSA, a/k/a "Jeezy,")	Distribute 500 Grams or More of
(12) CLAYTON RODRIGUES, a/k/a "Loo,")	Cocaine and Marijuana
a/k/a "C-Loo,")	(21 U.S.C. §§ 841(a)(1) and
(13) WILTER RODRIGUES, a/k/a "Walt,")	(b)(1)(B)(ii))
a/k/a "Wo-Wo,")	
(14) MICHAEL LOPES, a/k/a "Meech,")	<u>Counts Five, Seven, Ten, Thirteen,</u>
(15) VICTOR NUNEZ, a/k/a "Tito,")	<u>Fourteen, Twenty-One, Thirty-One,</u>
(16) FNU LNU, a/k/a "Smoke,")	<u>and Thirty-Nine</u> : Felon in Possession
(17) JAMAAL DAVIS, a/k/a "Marley,")	of Firearm and Ammunition
(18) MICHAEL NGUYEN, a/k/a "Asian," and)	(18 U.S.C. § 922(g)(1))
(19) STEVE DEPINA, a/k/a "Stizz,")	
)	<u>Counts Six, Nineteen, and Twenty-</u>
Defendants)	<u>Seven</u> : Possession of a Firearm in
)	Furtherance of a Drug Trafficking
)	Offense
)	(18 U.S.C. § 924(c)(1)(A))
)	
)	<u>Count Eight</u> : Possession of a Firearm
)	with an Obliterated Serial Number
)	(21 U.S.C. § 922(k))
)	
)	<u>Counts Nine and Seventeen</u> : Dealing
)	in Firearms Without a License
)	(18 U.S.C. § 922(a)(1)(A))
)	
)	

) Counts Eleven and Twelve:
) Conspiracy to Distribute and to
) Possess with Intent to Distribute
) Cocaine Base and Cocaine
) (21 U.S.C. § 846)
)

) Counts Fifteen and Thirty-Eight:
) Distribution of and Possession with
) Intent to Distribute Cocaine Base
) (21 U.S.C. § 841(a)(1))
)

) Count Sixteen: Conspiracy to
) Distribute and to Possess with Intent
) to Distribute Cocaine Base
) (21 U.S.C. § 846)
)

) Counts Eighteen, Twenty, Twenty-
) Five, Thirty, Thirty-Three, and Thirty-
) Six: Distribution of and Possession
) with Intent to Distribute Cocaine
) (21 U.S.C. § 841(a)(1))
)

) Counts Twenty-Two, Twenty-Three,
) Twenty-Four, and Twenty-Eight:
) Felon in Possession of Firearm
) (18 U.S.C. § 922(g)(1))
)

) Counts Twenty-Six: Possession with
) Intent to Distribute Marijuana
) (21 U.S.C. § 841(a)(1))
)

) Count Twenty-Nine: Distribution of
) and Possession with Intent to
) Distribute Cocaine Base and Cocaine
) (21 U.S.C. § 841(a)(1))
)

) Count Thirty-Two: Distribution of and
) Possession with Intent to Distribute
) Cocaine and Oxycodone
) (21 U.S.C. § 841(a)(1))
)

) Count Thirty-Four: Possession with
) Intent to Distribute 500 Grams or
) More of Cocaine
) (21 U.S.C. §§ 841(a)(1) and
) (b)(1)(B)(ii))
)

)
) Count Thirty-Five: Felon in
) Possession of Ammunition
) (18 U.S.C. § 922(g)(1))
)
) Count Thirty-Seven: Distribution of
) and Possession with Intent to
) Distribute Marijuana
) (21 U.S.C. § 841(a)(1))
)
) RICO Forfeiture Allegation:
) (18 U.S.C. § 1963(a))
)
) Drug Forfeiture Allegation:
) (21 U.S.C. § 853)
)
) Firearm Forfeiture Allegation:
) (18 U.S.C. § 924(d)(1) and 28 U.S.C.
) § 2461)

SUPERSEDING INDICTMENT

COUNT ONE
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury charges:

On or about August 21, 2021, in Boston, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO
Conspiracy to Participate in a Racketeering Enterprise
(18 U.S.C. § 1962(d))

GENERAL ALLEGATIONS

At all times material to this Superseding Indictment, unless otherwise stated:

The Defendants

1. (1) KENNY ROMERO, a/k/a “KG,” (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,” (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,” (4) KEIARRI DYETTE, a/k/a “Kemo,” (5) ERIC CORREIA, a/k/a “Bubba,” (6) PAULO SANTOS, a/k/a “Bucky,” (7) DEVANTE LOPES, a/k/a “D-Lopes,” (8) CHAROD TAYLOR, a/k/a “Pachino,” (9) JOSE AFONSECA, a/k/a “Zay,” (10) JAMES RODRIGUES, a/k/a “Bummy,” (11) JONATHAN DAROSA, a/k/a “Jeezy,” and (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,” were members or associates of Cameron Street, a violent criminal organization involved in a variety of criminal activities, including murder, assault with intent to murder, conspiracy to commit murder, armed robbery, carjacking, home invasion, drug trafficking, firearms trafficking, and tampering with a witness or informant, in Boston, Brockton, and elsewhere in the District of Massachusetts, among other places.

Background of Cameron Street

2. Over the past three decades, Boston has been plagued by violent crime committed by certain street gangs that, while using different designations over time, have maintained a roughly consistent geographic area of concentration. The group currently known as Cameron Street is based primarily in Dorchester, a neighborhood of Boston, near the intersection of Bowdoin Street and Geneva Avenue. Cameron Street’s main rival is known variously as “NOB,” for “Norton/Olney/Barry” Streets, or more generally as “Wendover” or “Wendover Street,” and is

based on the Dorchester – Roxbury neighborhood line, separated from Cameron Street by Columbia Road, a major Boston thoroughfare.

3. Members of Cameron Street refer to themselves as such or use abbreviations such as “Cam,” “C,” “Camily,” “Killa Cam,” and “Body Bag Boys” to describe the gang. Some members of the gang mark their bodies with distinguishing tattoos or wear logos for sports teams that feature the letter “C,” including the Chicago Cubs or Cincinnati Reds of Major League Baseball or the National Hockey League’s Calgary Flames or Montreal Canadiens. Members of Cameron Street also feature “KC” (from Major League Baseball’s Kansas City Royals), meant to signify “Killa Cam.” Members obtain and display jewelry or other items marked with “3-1-1-3,” which refers to the third, first, and thirteenth letters of the alphabet (“C,” “A,” “M”). Members of Cameron Street use hand signs to signify their membership in the gang, including displaying three fingers (for “C”). Members of Cameron Street regularly post videos or use social media applications to promote Cameron Street, celebrate murders and other violent crimes committed by Cameron Street, and denigrate gang rivals, in particular NOB/Wendover.

4. To protect the power, reputation, and territory of Cameron Street, members were required to use violence, threats of violence, and intimidation. These acts of violence include murder and assault with deadly weapons, often firearms. Cameron Street members maintain and enhance their status in the gang, and the overall reputation of the gang, by participating in such violent acts. Cameron Street members are responsible for assisting one another with obtaining and accessing firearms, forming and maintaining drug trafficking connections, resolving territorial disputes with rival gangs, and providing safe havens for members who are wanted by law enforcement.

The Racketeering Enterprise

5. Cameron Street, including its members and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affect, interstate and foreign commerce. Cameron Street is an ongoing organization whose members and associates function as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

6. The purposes of Cameron Street include the following:
- a. Preserving, expanding, and protecting the power, territory, and reputation of Cameron Street through the use of violence, threats of violence, and intimidation;
 - b. Establishing control of territory that Cameron Street could use and exploit to benefit the gang;
 - c. Promoting and enhancing Cameron Street and the activities of its members and associates by committing crimes, including, but not limited to, murder, assault with intent to murder, conspiracy to commit murder, drug trafficking, firearms trafficking, and armed robbery;
 - d. Keeping rivals, victims, potential victims, community members, and law enforcement in fear of Cameron Street and its members and associates through violence, threats of violence, and intimidation;
 - e. Confronting and retaliating against rival gangs through the use of violence, threats of violence, and intimidation;
 - f. Enriching members and associates of Cameron Street through, among other things, trafficking in narcotics and firearms;

- g. Assaulting and murdering individuals believed to be cooperating with law enforcement authorities; and
- h. Hindering and obstructing efforts of law enforcement to identify, apprehend, and successfully prosecute offending Cameron Street members.

Means and Methods of the Enterprise

7. Among the means and methods by which Cameron Street members and associates conduct and participate in the conduct of the affairs of the enterprise are the following:
- a. Cameron Street members and associates use violence, threats of violence, and intimidation to preserve, protect, and expand the enterprise's territory and activities and to enhance its prestige, reputation, and position in the community;
 - b. Cameron Street members and associates promote a climate of fear through violence, threats of violence, and intimidation;
 - c. Cameron Street members and associates use violence, threats of violence, and intimidation to discipline and punish members and associates who violate enterprise rules;
 - d. Cameron Street members possess, carry, and use firearms for various reasons, including but not limited to assaulting gang rivals, protecting narcotics and drug proceeds of Cameron Street members, intimidating potential witnesses to Cameron Street's illegal activities, and ensuring the personal safety of members and associates of Cameron Street;
 - e. Cameron Street members and associates use cellular phones, social media applications, and encrypted application-based communication systems to discuss

gang-related business and the use of violence to further the purposes of Cameron Street; and

- f. Cameron Street members and associates distribute and agree to distribute controlled substances and firearms and engage in armed robberies to generate income for the enterprise.

The Racketeering Conspiracy

8. From a date unknown to the Grand Jury, but beginning in and around 2010 and continuing through the present, both dates being approximate and inclusive, in the District of Massachusetts and elsewhere, the defendants,

- (1) KENNY ROMERO, a/k/a “KG,”
- (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”
- (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”
- (4) KEIARRI DYETTE, a/k/a “Kemo,”
- (5) ERIC CORREIA, a/k/a “Bubba,”
- (6) PAULO SANTOS, a/k/a “Bucky,”
- (7) DEVANTE LOPES, a/k/a “D-Lopes,”
- (8) CHAROD TAYLOR, a/k/a “Pachino,”
- (9) JOSE AFONSECA, a/k/a “Zay,”
- (10) JAMES RODRIGUES, a/k/a “Bummy,”
- (11) JONATHAN DAROSA, a/k/a “Jeezy,” and
- (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”

and other persons known and unknown to the Grand Jury, being persons employed by and associated with Cameron Street, which was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity consisting of:

- a. multiple acts involving:
 - i. murder, in violation of Massachusetts General Laws Chapter 265, Sections 1 (murder), 15 (assault with intent to murder), and 18 (armed assault with

intent to murder), and in violation of Massachusetts General Laws Chapter 274, Sections 6 (attempt) and 7 (conspiracy);

ii. robbery, in violation of Massachusetts General Laws Chapter 265, Sections 17 (armed robbery), 19 (unarmed robbery), and 21(A) (carjacking), and in violation of Massachusetts General Laws Chapter 274, Sections 6 (attempt) and 7 (conspiracy); and

b. multiple offenses involving:

i. the manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances, in violation of 21 U.S.C. §§ 846 and 841(a)(1).

c. multiple acts indictable under:

i. 18 U.S.C. § 1951 (interference with commerce by threats or violence); and
ii. 18 U.S.C. § 1952 (relating to racketeering).

9. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

10. In furtherance of the conspiracy, and to effect the object thereof, the defendants,

- (1) KENNY ROMERO, a/k/a “KG,”
- (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”
- (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”
- (4) KEIARRI DYETTE, a/k/a “Kemo,”
- (5) ERIC CORREIA, a/k/a “Bubba,”
- (6) PAULO SANTOS, a/k/a “Bucky,”
- (7) DEVANTE LOPES, a/k/a “D-Lopes,”
- (8) CHAROD TAYLOR, a/k/a “Pachino,”
- (9) JOSE AFONSECA, a/k/a “Zay,”
- (10) JAMES RODRIGUES, a/k/a “Bummy,”

- (11) JONATHAN DAROSA, a/k/a “Jeezy,” and
- (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”

and others known and unknown to the Grand Jury, committed overt acts in the District of Massachusetts and elsewhere, including, but not limited to, the following:

- a. On or about September 30, 2017, (5) ERIC CORREIA, a/k/a “Bubba,” carjacked Victim No. 1, an individual known to the Grand Jury;
- b. On or about October 2, 2017, (5) ERIC CORREIA, a/k/a “Bubba,” used Victim No. 1’s car to attempt to murder Victim No. 2, an individual known to the Grand Jury;
- c. On or about November 8, 2017, (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,” committed an armed robbery and home invasion of Victims Nos. 3 and 4, individuals known to the Grand Jury;
- d. On or about July 4, 2018, (5) ERIC CORREIA, a/k/a “Bubba,” committed an armed robbery of Victim No. 5, an individual known to the Grand Jury;
- e. On or about July 20, 2019, (5) ERIC CORREIA, a/k/a “Bubba,” committed an armed robbery of Victim No. 6, an individual known to the Grand Jury;
- f. On or about December 6, 2019, (6) PAULO SANTOS, a/k/a “Bucky,” committed an unarmed robbery of Victim No. 7, a member of NOB/Wendover and an individual known to the Grand Jury, outside Dorchester District Court, located at 510 Washington Street in Boston, Massachusetts. Later that day, a Cameron Street member posted a video of the unarmed robbery to his Snapchat account, where he celebrated the attack;

g. Beginning on or about November 2019 and continuing to the present, (7) DEVANTE LOPES, a/k/a “D-Lopes,” acquired marijuana from a source of supply based in the Northern District of California for distribution in the District of Massachusetts;

h. On or about February 13, 2020, (6) PAULO SANTOS, a/k/a “Bucky,” was arrested in possession of 500 grams or more of cocaine, marijuana, a Smith and Wesson .38 caliber revolver bearing serial number CPP6673 containing 5 rounds of .38 caliber ammunition, over \$15,000 in U.S. currency, digital scales, and hundreds of bags commonly used to package and sell narcotics in street-level quantities;

i. On or about February 26, 2020, (9) JOSE AFONSECA, a/k/a “Zay,” assaulted Victim No. 8, a Boston Police officer, with a motor vehicle, after Victim No. 8 attempted to arrest AFONSECA for engaging in a suspected hand-to-hand drug sale;

j. On or about October 2, 2020, (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,” was arrested in possession of marijuana packaged for sale, \$584 in U.S. currency, and a Glock 43X 9 millimeter semiautomatic pistol with an obliterated serial number containing ten rounds of 9 millimeter ammunition;

k. On or about February 9, 2021, March 4, 2021, May 18, 2021, January 12, 2022, and March 31, 2022, (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,” distributed cocaine base, a Schedule II controlled substance, and/or cocaine, a Schedule II controlled substance;

l. On or about February 18, 2021, February 25, 2021, April 8, 2021, April 23, 2021, July 8, 2021, and March 24, 2022, (8) CHAROD TAYLOR, a/k/a “Pachino,” distributed cocaine base, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance;

m. On or about April 22, 2021, (4) KEIARRI DYETTE, a/k/a “Kemo,” distributed marijuana, a Schedule I controlled substance;

n. On or about June 21, 2021, (4) KEIARRI DYETTE, a/k/a “Kemo,” attempted to murder Victim Nos. 9 and 10, members of NOB/Wendover and individuals known to the Grand Jury;

o. On or about June 29, 2021, (1) KENNY ROMERO, a/k/a “KG,” distributed marijuana, a Schedule I controlled substance;

p. On or about July 8, 2021, (1) KENNY ROMERO, a/k/a “KG,” distributed cocaine base, a Schedule II controlled substance;

q. On or about August 5, 2021, September 14, 2021, and February 3, 2022, (9) JOSE AFONSECA, a/k/a “Zay,” and (10) JAMES RODRIGUES, a/k/a “Bummy,” distributed cocaine base, a Schedule II controlled substance;

r. On or about August 21, 2021, (1) KENNY ROMERO, a/k/a “KG,” possessed cocaine, a Schedule II controlled substance, with intent to distribute;

s. On or about September 14, 2021, (1) KENNY ROMERO, a/k/a “KG,” distributed cocaine, a Schedule II controlled substance;

t. On or about October 13, 2021, (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,” distributed cocaine, a Schedule II controlled substance;

u. On or about November 9, 2021, (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,” distributed cocaine base, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance;

v. On or about February 7, 2022, (11) JONATHAN DAROSA, a/k/a “Jeezy,” distributed cocaine, a Schedule II controlled substance, and oxycodone, a Schedule II controlled substance;

w. On or about February 26, 2022, (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,” possessed 296 rounds of .45 caliber ammunition, 77 rounds of 5.7x 28 millimeter ammunition, 28 rounds of 10 millimeter ammunition, 20 rounds of .44 Special ammunition, 10 rounds of .380 caliber ammunition, 10 rounds of 9 millimeter ammunition, and 5 rounds of .40 caliber ammunition, and 500 grams or more of cocaine, a Schedule II controlled substance;

x. On or about March 1, 2022, (11) JONATHAN DAROSA, a/k/a “Jeezy,” distributed cocaine, a Schedule II controlled substance; and

y. On or about March 9, 2022, (5) ERIC CORREIA, a/k/a “Bubba,” distributed marijuana, a Schedule I controlled substance.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT THREE

Conspiracy to Distribute and to Possess with Intent to Distribute Marijuana
(21 U.S.C. § 846)

The Grand Jury further charges:

From a time unknown to the Grand Jury, but at least by in or around November 2019 and continuing to the present, in Boston and Quincy in the District of Massachusetts, and San Francisco in the Northern District of California, the defendant,

(7) DEVANTE LOPES, a/k/a “D-Lopes,”

conspired with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

Possession with Intent to Distribute 500 Grams or More of Cocaine and Marijuana
(21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii))

The Grand Jury further charges:

On or about February 13, 2020, in Hingham, in the District of Massachusetts, the
defendant,

(6) PAULO SANTOS, a/k/a “Bucky,”

did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture
and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and
a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled
substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).

COUNT FIVE

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about February 13, 2020, in Hingham, in the District of Massachusetts, the defendant,

(6) PAULO SANTOS, a/k/a “Bucky,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Smith and Wesson .38 caliber revolver bearing serial number CPP6673 containing 5 rounds of .38 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

Possession of a Firearm in Furtherance of a Drug Trafficking Offense
(18 U.S.C. § 924(c)(1)(A))

The Grand Jury further charges:

On or about February 13, 2020, in Hingham, in the District of Massachusetts, the defendant,

(6) PAULO SANTOS, a/k/a “Bucky,”

did knowingly possess a firearm, to wit: a .38 caliber revolver bearing serial number CPP6673 containing 5 rounds of .38 caliber ammunition, in furtherance of a drug trafficking crime, to wit: possession with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii), as charged in Count Four of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about September 1, 2020, in Boston, in the District of Massachusetts, the defendant,

(2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Heckler & Koch Model VP-9 9 millimeter semiautomatic pistol, bearing serial number 224-156477 containing ten rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

Possession of a Firearm with an Obliterated Serial Number
(18 U.S.C. § 922(k))

The Grand Jury further charges:

On or about October 2, 2020, in Taunton, in the District of Massachusetts, the defendant,

(12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”

knowingly possessed a firearm, that is, a Glock Model 43X 9 millimeter semiautomatic pistol, that had been shipped and transported in interstate commerce, from which the manufacturer’s serial number had been removed, altered, and obliterated.

All in violation of Title 18, United States Code, Section 922(k).

COUNT NINE

Dealing in Firearms Without a License
(18 U.S.C. § 922(a)(1)(A))

The Grand Jury further charges:

From a time unknown to the Grand Jury, but from at least in or about December 2020 and continuing until in or about September 2021, in Boston, in the District of Massachusetts, the defendant,

(4) KEIARRI DYETTE, a/k/a “Kemo,”

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms without a license, including the following:

- (a) a Bersa Model Mini Firestorm .40 caliber semiautomatic pistol bearing serial number 534407 and twenty-nine rounds of .40 caliber ammunition, and
- (b) a Taurus model PT-1911 .45 caliber semiautomatic pistol bearing serial number NAT 47983 and seven rounds of .45 caliber ammunition.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TEN

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about January 22, 2021, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Jimenez Arms JA Nine 9 millimeter semiautomatic pistol bearing serial number 194691 containing eleven rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine
(21 U.S.C. § 846)

The Grand Jury further charges:

From a time unknown to the Grand Jury, but from at least on or about February 9, 2021, and continuing until the present, in Boston, Braintree, and Weymouth in the District of Massachusetts, and Pawtucket, in the District of Rhode Island, the defendants,

(2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,” and
(14) MICHAEL LOPES, a/k/a “Meech,”

conspired with each other and other persons known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWELVE

Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine
(21 U.S.C. § 846)

The Grand Jury further charges:

From a time unknown to the Grand Jury, but from at least on or about February 18, 2021, and continuing until the present, in Boston and Everett, in the District of Massachusetts, the defendants,

(8) CHAROD TAYLOR, a/k/a “Pachino,” and
(15) VICTOR NUNEZ, a/k/a “Tito,”

conspired with each other and other persons known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT THIRTEEN

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about February 23, 2021, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Heckler & Koch Model P30 .40 caliber semiautomatic pistol bearing serial number 219-019841 containing thirteen rounds of .40 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN
Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about April 8, 2021, in Boston, in the District of Massachusetts, the defendant,

(11) JONATHAN DAROSA, a/k/a “Jeezy,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Taurus Model PT111 9 millimeter semiautomatic pistol bearing serial number TYA56216 containing twelve rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIFTEEN

Distribution of and Possession with Intent to Distribute Cocaine Base
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about July 8, 2021, in Quincy, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base
(21 U.S.C. § 846)

The Grand Jury further charges:

From a time unknown to the Grand Jury, but from at least in or about August 2021 and continuing until the present, in Somerville and elsewhere in the District of Massachusetts, the defendants,

(9) JOSE AFONSECA, a/k/a “Zay,”
(10) JAMES RODRIGUES, a/k/a “Bummy,”
(13) WILTER RODRIGUES, a/k/a “Walt,” a/k/a “Wo-Wo,” and
(16) FNU LNU, a/k/a “Smoke,”

conspired with each other and other persons known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT SEVENTEEN
Dealing in Firearms Without a License
(18 U.S.C. § 922(a)(1)(A))

The Grand Jury further charges that:

In or about August 2021, in Randolph, Somerville, and elsewhere in the District of Massachusetts, the defendant,

(9) JOSE AFONSECA, a/ka “Zay,”

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms without a license, including the following:

- (a) a Girsan Model Regard MC 9 millimeter semiautomatic pistol bearing serial number T6368-20A10137 containing twenty rounds of 9 millimeter ammunition, and
- (b) a Smith and Wesson model SD40 VE .40 caliber semiautomatic pistol bearing serial number FWR1879 containing eleven rounds of .40 caliber ammunition.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT EIGHTEEN

Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about September 7, 2021, in Boston, in the District of Massachusetts, the defendant,

(17) JAMAAL DAVIS, a/k/a “Marley,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETEEN

Possession of a Firearm in Furtherance of a Drug Trafficking Offense
(18 U.S.C. § 924(c)(1)(A))

The Grand Jury further charges:

On or about September 7, 2021, in Boston, in the District of Massachusetts, the defendant,

(17) JAMAAL DAVIS, a/k/a “Marley,”

did knowingly possess a firearm, to wit: a Glock 9 millimeter semiautomatic pistol bearing serial number BPPP357, in furtherance of a drug trafficking crime, to wit: distribution of and possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Eighteen of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWENTY

Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about September 14, 2021, in Boston, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE
Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about September 21, 2021, in Boston, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Bersa .380 caliber semiautomatic pistol bearing serial number K64838 containing six rounds of .380 caliber ammunition and a Girsan Regard MC 9 millimeter semiautomatic pistol bearing serial number T6368A00774 containing seven rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-TWO
Felon in Possession of Firearm
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about October 8, 2021, in Cambridge, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, a Glock 45 9 millimeter semiautomatic pistol bearing serial number BTUP608.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-THREE
Felon in Possession of Firearm
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about October 13, 2021, in Boston, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, a Smith and Wesson .44 caliber revolver bearing serial number 5X391 and a F.N. Herstal 9 millimeter semiautomatic pistol bearing serial number 46557.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-FOUR
Felon in Possession of Firearm
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about October 13, 2021, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, a Ruger Model SR9C 9 millimeter semiautomatic pistol with an obliterated serial number.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-FIVE

Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about October 13, 2021, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

Possession with Intent to Distribute Marijuana
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about October 14, 2021, in Boston, in the District of Massachusetts, the defendant,

(18) MICHAEL NGUYEN, a/k/a “Asian,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Offense
(18 U.S.C. § 924(c)(1)(A))

The Grand Jury further charges:

On or about October 14, 2021, in Boston, in the District of Massachusetts, the defendant,

(18) MICHAEL NGUYEN, a/k/a “Asian,”

did knowingly possess a firearm, to wit: a Glock 48 9 millimeter semiautomatic pistol bearing serial number BLUP876 containing eleven rounds of 9 millimeter ammunition, in furtherance of a drug trafficking crime, to wit: possession with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Twenty-Six of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWENTY-EIGHT
Felon in Possession of Firearm
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about October 27, 2021, in Somerville, in the District of Massachusetts, the defendant,

(1) KENNY ROMERO, a/k/a “KG,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, a SCCY model CPX-2 9 millimeter semiautomatic pistol bearing serial number C077414, a Ruger model EC9s 9 millimeter semiautomatic pistol bearing serial number 458-59438, and a Windham Weaponry model WW-15 .233 rifle bearing serial number WW137377.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-NINE

Distribution of and Possession with Intent to Distribute Cocaine Base and Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about November 9, 2021, in Braintree, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about January 12, 2022, in Boston, in the District of Massachusetts, the defendant,

(17) JAMAAL DAVIS, a/k/a “Marley,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-ONE
Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about January 30, 2022, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Kel-Tec Model P11 9 millimeter semiautomatic pistol with an obliterated serial number containing ten rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-TWO

Distribution of and Possession with Intent to Distribute Cocaine and Oxycodone
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about February 7, 2022, in Boston, in the District of Massachusetts, the defendant,

(11) JONATHAN DAROSA, a/k/a “Jeezy,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-THREE

Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about February 10, 2022, in Norwood, in the District of Massachusetts, the defendant,

(19) STEVE DEPINA, a/k/a “Stizz,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-FOUR

Possession with Intent to Distribute 500 Grams or More of Cocaine
(21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii))

The Grand Jury further charges:

On or about February 26, 2022, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).

Before defendant (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,” committed the offense charged in this count, the defendant was convicted of violating Massachusetts General Laws Chapter 265, Section 15A, aggravated assault and battery with a dangerous weapon causing serious bodily injury (see *Commonwealth v. Felisberto Lopes*, Docket No. SUCR 2009-11145), a serious violent felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT THIRTY-FIVE
Felon in Possession of Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about February 26, 2022, in Boston, in the District of Massachusetts, the defendant,

(3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, ammunition, that is: 296 rounds of .45 caliber ammunition, 77 rounds of 5.7x 28 millimeter ammunition, 28 rounds of 10 millimeter ammunition, 20 rounds of .44 Special ammunition, 10 rounds of .380 caliber ammunition, 10 rounds of 9 millimeter ammunition, and 5 rounds of .40 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-SIX
Distribution of and Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about March 1, 2022, in Boston, in the District of Massachusetts, the defendant,

(11) JONATHAN DAROSA, a/k/a “Jeezy,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-SEVEN

Distribution of and Possession with Intent to Distribute Marijuana
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about March 9, 2022, in Boston, in the District of Massachusetts, the defendant,

(5) ERIC CORREIA, a/k/a “Bubba,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-EIGHT

Distribution of and Possession with Intent to Distribute Cocaine Base
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about March 9, 2022, in Norwood, in the District of Massachusetts, the defendant,

(19) STEVE DEPINA, a/k/a “Stizz,”

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-NINE

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about March 9, 2022, in Norwood, in the District of Massachusetts, the defendant,

(19) STEVE DEPINA, a/k/a “Stizz,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Tanfoglio Model EAA9 9 millimeter semiautomatic pistol bearing serial number AE03741 containing sixteen rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

RICO FORFEITURE ALLEGATION
(18 U.S.C. § 1963)

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1962, set forth in Count Two, the defendants,

- (1) KENNY ROMERO, a/k/a “KG,”
- (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”
- (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”
- (4) KEIARRI DYETTE, a/k/a “Kemo,”
- (5) ERIC CORREIA, a/k/a “Bubba,”
- (6) PAULO SANTOS, a/k/a “Bucky,”
- (7) DEVANTE LOPES, a/k/a “D-Lopes,”
- (8) CHAROD TAYLOR, a/k/a “Pachino,”
- (9) JOSE AFONSECA, a/k/a “Zay,”
- (10) JAMES RODRIGUES, a/k/a “Bummy,”
- (11) JONATHAN DAROSA, a/k/a “Jeezy,” and
- (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”

shall forfeit to the United States pursuant to Title 18, United States Code, Section 1963:

- (a) any interest acquired or maintained in violation of Title 18, United States Code, Section 1962;
- (b) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise established, operated, controlled, conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and
- (c) any property constituting, or derived from, any proceeds obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962.

2. If any of the property described in Paragraph 2, above, as being forfeitable pursuant to Title 18, United States Code, Section 1963(a), as a result of any act and omission of the defendants --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of this Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 2.

All pursuant to Title 18, United States Code, Section 1963.

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Sections 841 and 846, set forth in Counts One, Three, Four, Eleven through Twelve, Fifteen through Sixteen, Eighteen, Twenty, Twenty-Five through Twenty-Six, Twenty-Nine through Thirty, Thirty-Two through Thirty-Four, and Thirty-Six through Thirty-Eight, the defendants:

- (1) KENNY ROMERO, a/k/a “KG,”
- (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”
- (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”
- (4) KEIARRI DYETTE, a/k/a “Kemo,”
- (5) ERIC CORREIA, a/k/a “Bubba,”
- (6) PAULO SANTOS, a/k/a “Bucky,”
- (7) DEVANTE LOPES, a/k/a “D-Lopes,”
- (8) CHAROD TAYLOR, a/k/a “Pachino,”
- (9) JOSE AFONSECA, a/k/a “Zay,”
- (10) JAMES RODRIGUES, a/k/a “Bummy,”
- (11) JONATHAN DAROSA, a/k/a “Jeezy,”
- (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”
- (13) WILTER RODRIGUES, a/k/a “Walt,” a/k/a “Wo-Wo,”
- (14) MICHAEL LOPES, a/k/a “Meech,”
- (15) VICTOR NUNEZ, a/k/a “Tito,”
- (16) FNU LNU, a/k/a “Smoke,”
- (17) JAMAAL DAVIS, a/k/a “Marley,”
- (18) MICHAEL NGUYEN, a/k/a “Asian,” and
- (19) STEVE DEPINA, a/k/a “Stizz”

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

FIREARMS FORFEITURE ALLEGATION
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

1. Upon conviction of one or more offenses in violation of Title 18, United States Code, Sections 922 and 924, set forth in Counts Five through Ten, Thirteen through Fourteen, Seventeen, Nineteen, Twenty-One through Twenty-Four, Twenty-Seven through Twenty-Eight, Thirty-One, Thirty-Five, and Thirty-Nine, the defendants:

- (1) KENNY ROMERO, a/k/a “KG,”
- (2) ANTHONY CENTEIO, a/k/a “Wheezy,” a/k/a “Taliban Wheeze,”
- (3) FELISBERTO LOPES, a/k/a “Phil,” a/k/a “CheeB,”
- (4) KEIARRI DYETTE, a/k/a “Kemo,”
- (6) PAULO SANTOS, a/k/a “Bucky,”
- (9) JOSE AFONSECA, a/k/a “Zay,”
- (11) JONATHAN DAROSA, a/k/a “Jeezy,”
- (12) CLAYTON RODRIGUES, a/k/a “Loo,” a/k/a “C-Loo,”
- (17) JAMAAL DAVIS, a/k/a “Marley,” and
- (18) MICHAEL NGUYEN, a/k/a “Asian,”
- (19) STEVE DEPINA, a/k/a “Stizz,”

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in, or used in, any knowing commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

- (a) a Smith and Wesson .38 caliber revolver bearing serial number CPP6673 containing 5 rounds of .38 caliber ammunition;
- (b) a Glock Model 43X 9 millimeter semiautomatic pistol with an obliterated serial number; and
- (c) a Glock 48 9 millimeter semiautomatic pistol bearing serial number BLUP876 containing eleven rounds of 9 millimeter ammunition.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of any of the defendants --

- (a) cannot be located upon the exercise of due diligence;

- (a) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated in Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

By:



CHRISTOPHER POHL
ASSISTANT U.S. ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: April 14, 2022

Returned into the District Court by the Grand Jurors and filed.

/s/ Lisa Belpedio at 12:47 pm
DEPUTY CLERK