

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

AHMED ALTOREI,
a/k/a "AK," and
SAMUEL BAUTISTA,
a/k/a "Sammy,"

Defendants.

SEALED INDICTMENT

23 Cr. ____

23 CRIM 407

COUNT ONE
(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

Overview of the Conspiracy

1. From at least in or about May 2018 through at least in or about August 2023, in the Southern District of New York and elsewhere, AHMED ALTOREI, a/k/a "AK," and SAMUEL BAUTISTA, a/k/a "Sammy," the defendants, and others known and unknown, formed a drug-trafficking organization (the "DTO") that, among other things, sought to dominate the distribution of cocaine base, in a form commonly known as "crack," in the vicinity of 2860 Grand Concourse in the Bronx, New York. To assert control there, the members of the DTO, including the defendants, possessed firearms, which they were prepared to, and did, use against rival drug dealers. Specifically, on or about January 19, 2022, members of the DTO, including the defendants, were involved in a street shooting that targeted a rival drug dealer within what they claimed as their territory but resulted in a bystander, an 11-month old baby girl who was sitting in a parked car with her mother, being shot in the face.

Statutory Allegations

2. From at least in or about May 2018 through at least in or about August 2023, in the Southern District of New York and elsewhere, AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

3. It was a part and an object of the conspiracy that AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substances involved in the offense were (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly referred to as “crack,” in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

5. From at least in or about May 2018 through at least in or about August 2023, in the Southern District of New York and elsewhere, AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count One of this Indictment, knowingly used and carried firearms, and in furtherance

of such crime, possessed firearms, and aided and abetted the use, carrying, and possession of firearms, some of which were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii), and 2.)

COUNT THREE
(Possession of Ammunition After a Felony Conviction)

The Grand Jury further charges:

6. On or about January 19, 2022, in the Southern District of New York and elsewhere, AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the defendants, knowing BAUTISTA had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, two .380 caliber PMC cartridge casings, and the ammunition was in and affecting commerce, and aided and abetted the same.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

FORFEITURE ALLEGATION

7. As a result of committing the offense alleged in Count One of this Indictment, AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the defendants, 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 obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

8. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, AHMED ALTOREI, a/k/a “AK,” and SAMUEL BAUTISTA, a/k/a “Sammy,” the

defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of AHMED ALTOREI, a/k/a "AK," and SAMUEL BAUTISTA, a/k/a "Sammy," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)




DAMIAN WILLIAMS
United States Attorney