

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

No. 11-2982-Goodman

UNITED STATES OF AMERICA

vs.

CHRISTIAN PEREIRA, DANIEL PEREZ,
and SOPHIE PERLMUTTER,

Defendants.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? _____ Yes X No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? _____ Yes X No

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

BY:



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United States District Court

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CHRISTIAN PEREIRA, DANIEL PEREZ, and SOPHIE PERLMUTTER.

CASE NUMBER: 11-2982-Goodman

I, ROBERT J. CHRISTIE, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

Between on or about July 18, 2011, and on or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly and willfully conspire with each other to affect, obstruct, or delay commerce, or the movement of articles in commerce, by robbery, in violation of Title 18, United States Code, Section 1951(a).

Between on or about July 18, 2011, and on or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly and willfully use a facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any State as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, in violation of Title 18, United States Code, Sections 1958(a) and (2).

On or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly possess a firearm in furtherance of a crime of violence, or carry a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

I further state that I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, & Explosives and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Handwritten signature of Robert J. Christie

Stamp: Certified to be a true and correct copy of the document on file. Steven M. Larimore, Clerk, U.S. District Court Southern District of Florida. By [Signature] Deputy Clerk. Date 7-22-11

Sworn to before me, and subscribed in my presence,

July 22, 2011 at Date

JONATHAN GOODMAN UNITED STATES MAGISTRATE JUDGE Name and Title of Judicial Officer

Miami, Florida City and State Signature of Judicial Officer

AFFIDAVIT

Your affiant, Robert Christie, having been duly sworn, states as follows:

1. Your affiant, Detective Robert Christie, has been with the MDPD for twenty-four years. I have been a detective with the MDPD for twenty-four years and spent the last seventeen years assigned to an ATF Task Force called the Street Terror Offender Program (STOP). STOP is a multi-agency task force specializing in the investigation of violent crime associated with the narcotics trade in South Florida. I am cross-designated as a Task Force Officer with ATF. As a TFO with STOP, I am responsible for the investigation of violations of Federal and State narcotics, robbery, and firearms laws. During my twenty four years with MDPD, and especially during my time with ATF, I have participated in hundreds, if not thousands, of drug-related searches and arrests. I have also talked extensively with persons (both subjects, confidential sources, and witnesses) engaged in drug trafficking and through that experience developed a familiarity with the methods and materials used by drug traffickers to carry out their business, including how they obtain controlled substances, transport controlled substances, profit from the sale of controlled substances, and hide those activities from law enforcement. I am also familiar with steps taken by drug dealers to protect themselves from other competitors who may try to force them out of business or steal their drugs and proceeds.

2. The information in this affidavit is known personally to me or has been provided to me by other law enforcement officers. Because the purpose of this affidavit is limited to providing facts sufficient to establish probable cause to find that Christian Pereira, Daniel Perez, and Sophie Perlmutter have violated the crimes identified in the Complaint, this affidavit does not address every fact known to law enforcement about this investigation.

3. On July 18, 2011, your affiant and other investigators received information from a confidential source (CS) that two men had solicited the CS to kill another person. After receiving that information, your affiant met with the CS and saw a text message to the CS's cellular telephone that was consistent with the information provided by the CS. Specifically, the message asked if the CS would be willing to strangle the targeted victim. Service to the CS's cellular telephone is provided by Metro PCS, whose headquarters is located in Texas, and is an instrumentality of interstate and foreign commerce.

4. As part of the investigation, on July 20, 2011, the CS met with Christian Pereira and Daniel Perez wearing a recording device.¹ During that recorded meeting, Pereira and Perez indicated that they wanted to murder a drug dealer that they owed money to and whom they believed was responsible for previously robbing Pereira and his girlfriend. According to the plan which they had already referenced during previously recorded telephone calls with the CS, Pereira and Perez stated that they wanted to deliver approximately \$25,000 in cash that they owed to the targeted drug dealer on Thursday morning (July 21, 2011). Then, they planned for the CS to confront the targeted drug dealer inside the drug dealers' house while Pereira held the targeted dealer up at gunpoint. The men wanted the CS to choke the dealer with a rope until he died and then they would remove the body and clean up the scene. The group (which was to include Pereira's girlfriend, Sophie Perlmutter) would then steal money and drugs from the drug dealers' home and also steal money and drugs from a stash house belonging to the targeted victim at a second location. Pereira and Perez stated they

¹ On the morning of July 21, 2011, the CS had received a text message from Pereira to let him know Pereira was on his way to pick the CS up according to the plan. The CS also spoke with Perez over the cellular telephone and Perez told the CS that Pereira was on his way to pick the CS up.

would give the CS approximately \$50,000 for killing the victim, but later stated they would pay the CS more depending on how much was earned from the robbery. During the conversation, the two men drove the CS to the area of 2450 S.W. 25th Avenue, Miami, Florida, and stated that this was the targeted drug dealer's house.² The conversation ultimately left off with the three men agreeing to meet the following morning (with Sophie Perlmutter) to commit the robbery.

5. On the morning of July 21, 2011, Pereira and his girlfriend (Sophie Perlmutter) traveled with the CS in a car toward the residence where the murder was going to take place. While in the car, the men and girlfriend discussed the marijuana and money that they expected to find in the targeted residence. They were stopped by police and arrested, at which time their car was searched. Items of evidentiary value recovered from the car included, but were not necessarily limited to: one .45 caliber Kahr semi-automatic pistol, one magazine containing six bullets, pairs of gloves, plastic tarps, and chemical cleaners. There was also a large quantity of cash.

6. During this time frame, the other subject, Perez, was seen by police driving near the 2450 S.W. 25th Avenue address. Perez went to a store, where the CS stated they intended to meet Perez to gather for the planned crimes. When police approached Perez at the Publix, a foot chase ensued and Perez was apprehended after a struggle during which he attempted to throw his cellular phone in a drain. Perez's car was searched after officers observed a yellow rope sticking out of a

² The CS incorrectly described the house by text message as being 2450 S.W. 25th "Street", rather than the true address of 2450 S.W. 25th "Avenue". The CS stated, however, that the address had a beware of dog sign on the fence and that it had a Grey Infiniti parked in front. Officers have checked both the address at 2450 S.W. 25th Street and 2450 S.W. 25th Avenue and determined the actual address is 2450 S.W. 25th Avenue, rather than Street, because there is a beware of dog sign and had a Grey Infiniti in front of the Avenue address, not the Street address. Your affiant has also reviewed the relevant portion of the recording and heard one of the two subjects state that the target address was located on 25th Avenue.

backpack on the front right passenger seat. Inside the car, officers recovered Zanex, Ecstasy, and marijuana.

7. During a post-*Miranda* statement Pereira admitted that he was going to rob S.C. of drugs and money, but that they were not really going to kill S.C.. Pereira admitted purchasing marijuana on multiple occasions from S.C. in the past and stated that S.C. received the marijuana that S.C. sold from California.

8. In a post-*Miranda* statement, Sophie Perlmutter confessed to participating in the conspiracy to rob and murder S.C.. Perlmutter stated that she, Pereira, Perez, and the CS had agreed to make S.C. disappear, that is, to kill S.C.. Perlmutter stated that according to the plan, the CS was the person who was supposed to actually strangle and kill S.C.. Perlmutter stated that the group would remove money and drugs from S.C.'s residence and S.C.'s Brickell stash house after S.C.'s murder. Perlmutter stated that her intended role in the murder was to act as a lookout. Perlmutter stated that if they had to shoot S.C.. during the crime, she would also help clean up the blood. Perlmutter stated that the gun recovered from the car had been previously purchased by her for Pereira using his money, because he was a convicted felon. According to the group's plan, Pereira was supposed to use the gun during the robbery. According to Perlmutter, after the murder, while the CS and Pereira dealt with the body, Perlmutter and Perez would go to the victim's stash house on Brickell and steal money and drugs which would be divided among the group. Perlmutter stated the tarps in the car, were intended to wrap the body and that she and Pereira had purchased the tarps together for that purpose.

9. On July 21, 2011, investigators searched S.C.'s residence and Brickell apartment. At both the residence and apartment, investigators recovered distribution quantities of marijuana,

packaging materials, cash, drug ledgers, and other items consistent with the sale of marijuana. S.C. admitted to being a marijuana trafficker and obtaining the marijuana that he sold from California.

10. Based on the events described above, all of which occurred in Miami-Dade County, your affiant respectfully submits that there is probable cause to believe that Pereira, Perez, and Perlmutter have committed the following federal offenses:

a. Between on or about July 18, 2011, and on or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly and willfully conspire with each other to affect, obstruct, or delay commerce, or the movement of articles in commerce, by robbery, in violation of Title 18, United States Code, Section 1951(a).

b. Between on or about July 18, 2011, and on or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly and willfully use a facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any State as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, in violation of Title 18, United States Code, Sections 1958(a) and (2).

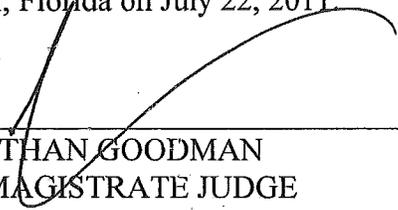
c. On or about July 21, 2011, in Miami Dade County, in the Southern District of Florida, Christian Pereira, Daniel Perez, and Sophie Perlmutter did knowingly possess a firearm

in furtherance of a crime of violence, or carry a firearm during and in relation to a crime of violence,
in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

YOUR AFFIANT SAYS NOTHING FURTHER


ROBERT J. CHRISTIE, DETECTIVE/TFO
MIAMI DADE POLICE DEPARTMENT/ATF

Sworn and subscribed to before me in
Miami, Florida on July 22, 2011



JONATHAN GOODMAN
U.S. MAGISTRATE JUDGE

Certified to be a true and
correct copy of the document on file
Steven M. Larimore, Clerk
U.S. District Court
Southern District of Florida
By  Deputy Clerk
Date 7-22-11