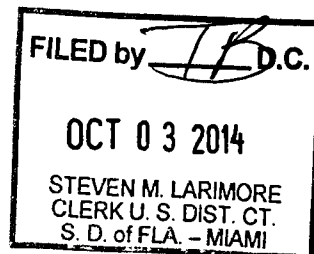


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 14-CR-20017-WILLIAMS(s)(s)

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 853
18 U.S.C. § 1959(a)(3)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(e)(1)
18 U.S.C. § 924(a)(1)(D)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(d)(1)



Sealed

UNITED STATES OF AMERICA

v.

MAURIN CHACON,
a/k/a "Tiny," a/k/a "Peludo," a/k/a "Yung Patron,"
CHRISTOPHER ALTAMIRANO,
a/k/a "Tango," a/k/a "Peter Baitz,"
RODOLFO PORTELA,
a/k/a "Papo L. Desperado,"
DAYAAN ZERQUERA,
a/k/a "Dsbf BMT Kid,"
RAYMOND MOORE,
a/k/a "Flaco," a/k/a "Dinero Banks," a/k/a "Young Gunna,"
ALIOTH SALAS,
a/k/a "Ali,"
LUIS SALAS,
a/k/a "Chico Black,"
JOSEPH THOMPSON,
a/k/a "Joe,"
CARLOS TINOCO,
a/k/a "C-Lo,"
CHRISTIAN RAMIREZ,
a/k/a "Joker,"
JAMES DIXON,
a/k/a "Smoke,"
STEVEN CASTRO,
a/k/a "YM Stevo,"
DWIGHT FORTE,
JAY ANTHONY FLORES,
a/k/a "Jay Gambino,"
JOEL DIAZ,

**a/k/a “Borie,” a/k/a “El Paisa,” and a/k/a “Buom Clock,”
FERNANDO ROBERTO DARCE,
a/k/a “Bonesz,” and
MARIO BALBOA ,**

Defendants.

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

Conspiracy to Possess a Controlled Substance with Intent to Distribute

From at least as early as in or around January 2011, and continuing to the date of this Second Superseding Indictment, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”
CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”
RODOLFO PORTELA,
a/k/a “Papo L. Desperado,”
DAYAAN ZERQUERA,
a/k/a “Dsbf BMT Kid,”
RAYMOND MOORE,
a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”
ALIOTH SALAS,
a/k/a “Ali,”
LUIS SALAS,
a/k/a “Chico Black,”
JOSEPH THOMPSON,
a/k/a “Joe,”
CARLOS TINOCO
a/k/a “C-Lo,”
CHRISTIAN RAMIREZ,
a/k/a “Joker,”
JAMES DIXON,
a/k/a “Smoke,”
STEVEN CASTRO,
a/k/a “YM Stevo,”
DWIGHT FORTE,**

**JAY ANTHONY FLORES,
a/k/a “Jay Gambino,”
JOEL DIAZ,
a/k/a “Borie,” a/k/a “El Paisa,” and a/k/a “Buom Clock,”
FERNANDO ROBERTO DARCE,
a/k/a “Bonesz,” and
MARIO BALBOA,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to possess with intent to distribute a 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.

With respect to each defendant, the controlled substance involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is two hundred eighty grams (280) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine,” in violation of Title 21, United States Code, Section 841(b)(1)(A)(iii).

With respect to each defendant, the controlled substance involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

With respect to each defendant, the controlled substance involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethcathinone, also known as “MDMC,” also known as “methydone,” also known as 3,4-Methylenedioxy-N-methylcathinone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

Possession of a Firearm by a Convicted Felon

On or about July 26, 2013, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**RODOLFO PORTELA,
a/k/a "Papo L. Desperado,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

COUNT 3

Possession of a Firearm by a Convicted Felon

On or about November 18, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RODOLFO PORTELA,
a/k/a "Papo L. Desperado,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

COUNT 4

Possession of a Controlled Substance with Intent to Distribute

On or about November 18, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RODOLFO PORTELA,
a/k/a "Papo L. Desperado,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 5
Firearm Possession in Furtherance of a Drug Trafficking Crime

On or about November 18, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron” and
RODOLFO PORTELA,
a/k/a “Papo L. Desperado,”

did knowingly possess a firearm in furtherance of a drug trafficking crime, an offense for which the defendants may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 4 of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 6
Violent Crime in Aid of Racketeering Activity

At various times relevant to this Second Superseding Indictment, MAURIN CHACON, a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,” CHRISTOPHER ALTAMIRANO, a/k/a “Tango,” a/k/a “Peter Baitz,” RODOLFO PORTELA, a/k/a “Papo L. Desperado,” DAYAAN ZERQUERA, a/k/a “Dsbf BMT Kid,” RAYMOND MOORE, a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,” ALIOTH SALAS, a/k/a “Ali,” LUIS SALAS, a/k/a “Chico Black,” ANGEL MARTINEZ, a/k/a “Telly,” a/k/a “Tboy,” JOSEPH THOMPSON, a/k/a “Joe,” CARLOS TINOCO, a/k/a “C-Lo,” CHRISTIAN RAMIREZ, a/k/a “Joker,” JAMES DIXON,

a/k/a “Smoke,” STEVEN CASTRO, a/k/a “YM Stevo,” DWIGHT FORTE, JAY ANTHONY FLORES, a/k/a “Jay Gambino,” JOEL DIAZ, a/k/a “Borie,” a/k/a “El Paisa,” a/k/a “Buom Clock,” FERNANDO ROBERTO DARCE, a/k/a “Bonesz,” MARIO BALBOA, NADIM GUZMAN, KEVIN DIAZ, and MIGUEL RODRIGUEZ, a/k/a “Fat Boy,” a/k/a “Barba,” and others known and unknown to the Grand Jury, were members and associates of “the Big Money Team” (hereinafter the “BMT”), a criminal organization whose members and associates engaged in acts of violence, including robbery, assault, prostitution, obstruction of justice and distribution of controlled substances, and which operated principally in Miami-Dade County, Florida, in the Southern District of Florida.

1. The BMT, including its leadership, membership, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. The purposes of the enterprise included the following:

- a. Enriching the members and associates of the enterprise through, among other things, robbery, prostitution, and distribution of controlled substances.
- b. Preserving and protecting the power, territory, and profits of the enterprise through the use of assault, obstruction of justice, intimidation, violence, and threats of violence.
- c. Promoting and enhancing the enterprise and its members’ and associates’ activities, and

d. Keeping victims and witnesses in fear of the enterprise and in fear of its members and associates through threats of violence and violence.

3. The above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts and threats involving robbery and dealing in controlled substances in violation of Florida Statutes, and acts involving narcotics trafficking in violation of 21 U.S.C. §§ 841 and 846.

4. On or about November 20, 2013, in Miami-Dade County, in the Southern District of Florida, for the purpose of gaining entrance to and maintaining and increasing position in the BMT, an enterprise engaged in racketeering activity, the defendants,

**MAURIN CHACON,
a/k/a “Yung Patron,”
CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”
JOSEPH THOMPSON,
a/k/a “Joe,” and
DWIGHT FORTE,**

with other persons known and unknown to the Grand Jury, did knowingly and unlawfully assault M.O., S.A., D.R., and P.L. with a dangerous weapon in violation of Florida Statutes Section 784.021(1)(a), all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 7
Possession of a Firearm in Furtherance of a Crime of Violence

On or about November 20, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MAURIN CHACON,
a/k/a “Yung Patron,”
CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”
JOSEPH THOMPSON,**

**a/k/a “Joe,” and
DWIGHT FORTE,**

did knowingly use and carry a firearm during and in relation to a crime of violence, and did knowingly possess said firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959(a)(3), as set forth in Count 6 of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

Pursuant to Title 18, United States Code, Section 924(c)(1)(A)(iii), it is further alleged that the firearm was discharged.

**COUNT 8
Possession of a Controlled Substance with Intent to Distribute**

On or about November 21, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”
JOSEPH THOMPSON,
a/k/a “Joe,”
CARLOS TINOCO
a/k/a “C-Lo,”
JOEL DIAZ,
a/k/a “Borie,” a/k/a “El Paisa,” and a/k/a “Buom Clock,” and
DWIGHT FORTE,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 9
Firearm Possession in Furtherance of a Drug Trafficking Crime

On or about November 21, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”
JOSEPH THOMPSON,
a/k/a “Joe,”
CARLOS TINOCO
a/k/a “C-Lo,”
JOEL DIAZ,
a/k/a “Borie,” a/k/a “El Paisa,” and a/k/a “Buom Clock,” and
DWIGHT FORTE,

did knowingly possess a firearm in furtherance of a drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 8 of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 10
Possession of a Controlled Substance with Intent to Distribute

On or about November 22, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

RAYMOND MOORE,
a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 11

Possession of a Controlled Substance with Intent to Distribute

On or about December 6, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RAYMOND MOORE,
a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 12

Possession of a Controlled Substance with Intent to Distribute

On or about December 13, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 13

Possession of a Controlled Substance with Intent to Distribute

On or about December 17, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 14

Possession of a Controlled Substance with Intent to Distribute

On or about January 9, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 15

Possession of a Controlled Substance with Intent to Distribute

On or about January 16, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 16

Possession of a Controlled Substance with Intent to Distribute

On or about January 23, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 17

Possession of a Controlled Substance with Intent to Distribute

On or about January 28, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a “Tango,” a/k/a “Peter Baitz,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 18

Possession of a Controlled Substance with Intent to Distribute

On or about February 5, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethcathinone, also known as “MDMC,” also known as “methydone,” also known as 3,4-Methylenedioxy-N-methylcathinone.

COUNT 19

Possession of a Controlled Substance with Intent to Distribute

On or about February 6, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,” and
RAYMOND MOORE,
a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 20

Possession of a Controlled Substance with Intent to Distribute

On or about February 18, 2014, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron” and
RAYMOND MOORE,**

a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 21

Possession of a Controlled Substance with Intent to Distribute

On or about February 19, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 22

Possession of a Controlled Substance with Intent to Distribute

On or about February 25, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 23
Possession of a Firearm by a Convicted Felon

On or about February 25, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 24
Possession of a Controlled Substance with Intent to Distribute

On or about March 25, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

RAYMOND MOORE,
a/k/a “Flaco,” a/k/a “Dinero Banks,” a/k/a “Young Gunna,”

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 25

Possession of a Controlled Substance with Intent to Distribute

On or about April 1, 2014, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**JAMES DIXON
a/k/a “Smoke,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 26

Possession of a Controlled Substance with Intent to Distribute

On or about April 3, 2014, in Miami-Dade County, in the Southern District of Florida,
the defendants,

**DAYAAN ZERQUERA,
a/k/a “Dsbf BMT Kid,” and
CHRISTIAN RAMIREZ,
a/k/a “Joker,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack cocaine.”

COUNT 27

Firearm Possession by a Convicted Felon

On or about April 3, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**DAYAAN ZERQUERA,
a/k/a “Dsbf BMT Kid,”**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 28

Firearm Possession in Furtherance of a Drug Trafficking Crime

On or about April 3, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MAURIN CHACON,
a/k/a “Tiny,” a/k/a “Peludo,” a/k/a “Yung Patron,”
DAYAAN ZERQUERA,
a/k/a “Dsbf BMT Kid,” and
CHRISTIAN RAMIREZ,
a/k/a “Joker,”**

did knowingly possess a firearm in furtherance of a drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 26 of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 29

Possession of a Controlled Substance with Intent to Distribute

On or about May 1, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a "Tango," a/k/a "Peter Baitz,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 30

Possession of a Controlled Substance with Intent to Distribute

On or about May 2, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MAURIN CHACON,
a/k/a "Tiny," a/k/a "Peludo," a/k/a "Yung Patron"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 31

Possession of a Controlled Substance with Intent to Distribute

On or about May 2, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a "Tango," a/k/a "Peter Baitz,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 32

Possession of a Controlled Substance with Intent to Distribute

On or about May 8, 2014, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHRISTOPHER ALTAMIRANO,
a/k/a "Tango," a/k/a "Peter Baitz,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 33
Carjacking

On or about May 31, 2014, in Miami-Dade County, in the Southern District of Florida,
the defendant,

LUIS SALAS,
a/k/a “Chico Black,”

with the intent to cause death and serious bodily harm, did take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, that is, a 2002 Nissan Altima, from the person and presence of another, that is, “J.M.,” “M.M.” and “J.P.” by force and violence, and by intimidation, in violation of Title 18, United States Code, Sections 2119(1) and 2.

FORFEITURE ALLEGATIONS

A. The allegations of Counts 1 through 33 of this Second Superseding Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest.

B. Upon conviction of any violation of Title 21, United States Code, Section 841(a)(1) or 846 alleged in this Second Superseding Indictment, the defendants shall forfeit to the United States all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, pursuant to Title 21, United States Code, Section 853(a).

C. Upon conviction of any violation of Title 18, United States Code, Section 922(g)(1) or 924(c) alleged in this Second Superseding Indictment, the defendants shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such

violation, pursuant to Title 18, United States Code, Section 924(d)(1), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 28, United States Code, Section 2461(c), Title 18 United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

fr W. A. Ferrer, Chief, Criminal Division
WIFREDO A. FERRER
UNITED STATES ATTORNEY

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IGNACIO J. VÁZQUEZ, JR.
ASSISTANT UNITED STATES ATTORNEY