

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Docket No. 25-CR-10058-NMG

v.

PAULA-CABRAL, et. al.,

AFFIDAVIT IN SUPPORT OF DETENTION

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“Gang, if we build a strong shit where you could get touched anywhere, any type of harm can happen to you... and we’re just gonna stay quiet about it? We will run this city.”

“I choose violence” . . . “Na’ yeah, I choose violence.”

- **YORDALI YORRO, A/K/A “OG LOW,”**
Primera of the Lawrence Chapter of the Trinitarios

“What I do know is that, if we end up at the feds, we’re not doing what those Lynn guys are doing, they ratted and they’re free. I’ll be, I’ll be executing people inside there, for real.”

- **JAHIR DAVILA, A/K/A “NANO FINESSE,”**
Discipline of the Lawrence Chapter of the Trinitarios

AFFIDAVIT

I, Special Agent Joseph Shapiro, depose and state under the penalty of perjury that the following is true:

1. My name is Special Agent Joseph Shapiro. I am employed by the U.S. Department of Homeland Security, Homeland Security Investigations (“HSI”). I am participating in an investigation of the Trinitarios Criminal Enterprise (the “Trinitarios”) operating in the North Shore and Merrimack Valley of Massachusetts and elsewhere. HSI agents, FBI agents, DEA agents, ATF agents and Task Force Officers (“TFO”), together with additional federal, state, and local law enforcement partners, are participating in the second phase of Operation Paper Machetes, entitled Never-Green.

A. INTRODUCTION

2. In 2024, we initiated the first phase of Operation Paper Machetes in the aftermath of the Trinitarios committing four murders and a series of attempted murders and shootings in Lynn in 2023. The first phase of the investigation, entitled “Lime-Light,” culminated in the U.S. Attorney’s Office in Boston charging twenty-two leaders and members of the Lynn Chapter of the Trinitarios, including the state leader and state second in command, with RICO conspiracy

involving, *inter alia*, six murders and eleven attempted murders. See <https://www.justice.gov/usao-ma/pr/nearly-two-dozen-trinitarios-gang-members-charged-rico-conspiracy-state-leader-charged>. Federal RICO conspiracy, Hobbs Act robbery, and drug and firearm charges were filed against an additional six Trinitarios members. Phase I of the investigation thus resulted in federal and state charges against twenty-eight leaders, members, and associates of the Lynn Chapter of the Trinitarios. Those cases are listed below.

- a. *United States v. Paula-Cabral, et al.*, Docket No. 25-CR-10058-NMG (14 defendants);
- b. *United States v. Eric Rosario, Rosnel Polanco & Robert Santana*, Docket No. 24-CR-10263-NMG (3 defendants);
- c. *United States v. Ricardo Bratini-Perez*, Docket No. 24-CR-10310-LTS;
- d. *United States v. Elvis Trujillo*, Docket No. 24-CR-10336-NMG;
- e. *United States v. Yeferson Cambar Vallecillo*, Docket No. 24-CR-10335-NMG;
- f. *United States v. Warly Ruiz*, Docket No. 24-CR-10380-NMG;
- g. *United States v. Abel Severino Reyes*, Docket No. 24-CR-10373-NMG;
- h. *United States v. David Garcia*, Docket No. 25-CR-10006-NMG;
- i. *United States v. Tomy Sanchez*, Docket No. 25-CR-10007-NMG;
- j. *United States v. Carlos Ramirez* Docket No. 25-CR-10008-NMG;
- k. *United States v. Wilving Lopez* Docket No. 25-CR-10062 -NMG;
- l. *United States v Leonardo Espinoza*, Docket No. 25-CR-10236-NMG;
- m. *Commonwealth v. Robert Severino*, Essex County Superior Court, Docket No. 2477CR00493.

3. Phase II of Operation Paper Machetes, “Never-Green,” has resulted in federal RICO conspiracy, drug, and firearm charges against an additional twenty-nine leaders, members,

and associates of the Lawrence, Haverhill, and Boston Chapters of the Trinitarios. Those cases include:

- a. *United States v. Paula-Cabral, et al.*, Docket No. 25-CR-10058-NMG (Superseding Indictment returned by the Grand Jury on June 4, 2026, adding 26 new defendants to the 14 defendants previously charged);
- b. *United States v. Medina & Peralta*, Docket No. 25-cr-10302-NMG, charging the May 2024 kidnapping of NILBEL VENTURA AMARO (2 defendants);
- c. *United States v. Derek Mercado*, Docket No. 25-cr-10411-NMG, charging possession of an Uzi machine gun (1 defendant);
- d. *United States v. Arias & Garcia*, Docket No. 25-cr-10410-NMG, charging drug and firearm offenses related to the sale of fentanyl in New Hampshire (2 defendants, both also charged in the Superseding Indictment); and
- e. *United States v. Puello & Jenkins*, Docket No. 25-cr-10449-NMG, charging drug and firearm charges related to the recovery of drugs and two firearms from a trap house in Maine (2 defendants, one also charged in the Superseding Indictment).

4. Phase II of the investigation targeted the remaining significant leaders and members of the Trinitarios in Massachusetts, focusing on the numerous acts of violence committed by the gang and the coordinated drug trafficking network that it operated in New Hampshire and Maine. The goals of the investigation were to: (1) solve homicides and shootings; (2) identify and develop evidence against senior leaders who are generally insulated from the street; (3) stop the pipeline of drugs heading north and firearms coming south; and (4) remove the core group of Trinitarios responsible for recruiting new members (including in the high schools) that drive the violence by committing shootings and attacks to earn their initiation.

5. Phase II resulted in the current Superseding Indictment charging twenty-six leaders and members of the Trinitarios with a host of criminal offenses, including those related to: (1) federal RICO conspiracy charges against the leader of the Lawrence Chapter YORDALI YORRO MARTINEZ, A/K/A “OG LOW,” and senior members, JAMES CABRERA, A/K/A

“TRENSITA;” LUIS CRISPIN, A/K/A “YB;” RICHARD PENA, A/K/A “BLADE;” and RIKY MONTILLA, A/K/A “RICO”; (2) five homicides and nineteen attempted murders that the Trinitarios committed over the past decade; and (3) the drug and firearm network operated by the Trinitarios in Massachusetts, New Hampshire, and Maine. In addition to the criminal cases, the investigation has led to the arrests of seven individuals who were present in the United States without legal status and were placed into deportation proceedings.

6. Our investigation has employed numerous techniques to develop evidence against all levels of the remaining leadership and membership of the Trinitarios in the District of Massachusetts. Among the techniques described in this affidavit are consensual recordings of the Trinitarios members and leaders operating in Massachusetts and elsewhere. These recordings include recordings made of the State Supreme of Massachusetts, ENMANUEL PAULA-CABRAL, A/K/A “NELFEW,” prior to his arrest in February 2025, and recordings of the leaders and members of the Lawrence, Haverhill and Boston Chapters of the Trinitarios that remained at large after the February 2025 takedown of the Lynn Chapter.

7. This affidavit includes preliminary transcripts of numerous consensual recordings that were generated over the course of the investigation. Many portions of those recordings were in Spanish and, at times, the recordings included portions that were in English. The recordings were reviewed by trained linguists who transcribed the recordings. The linguists translated Spanish portions into English and transcribed the English portions for the purposes of generating the preliminary transcripts contained in this affidavit. Consequently, the preliminary transcripts set forth in the affidavit only reflect the original English and translated Spanish.

8. The preliminary transcripts have been reviewed by investigators and cooperating witnesses for purposes of identifying the speakers and interpreting slang and other linguistic

idiosyncrasies. The identifications of the speakers in the recordings below reflect identifications made by investigators who are familiar with the voices of the identified Trinitarios through the course of the investigation, cooperating witnesses who were present for the conversations, and through content and context of the recordings, such as when speakers are identified by name.

9. This affidavit does not set forth all my knowledge and information learned during this investigation. I have not included each and every fact known to me concerning this investigation. The information set forth in this affidavit is based on knowledge derived from my participation in this investigation and upon information (whether received directly or indirectly) from numerous sources that I believe are reliable, credible and accurate.

B. THE ORIGIN, HISTORY, SYMBOLS, AND SLOGANS OF THE TRINITARIOS

10. The Trinitarios is a transnational criminal organization comprised of thousands of members throughout the United States, the Dominican Republic, various countries in South America and Europe. The organization was originally formed in the 1990s by Dominicans in the New York City jail at Rikers Island who were facing murder charges. The gang was formed to protect Dominicans from other gangs who had large populations in the prison system. While the gang started in the New York prison system, membership rates increased rapidly as members were released from prison and relocated outside of New York and established themselves in local communities.

11. The organization has developed a hierarchical leadership structure with positions that are known to exist at the state and local chapter level. Written literature and documents describe the enterprise, its history, its functions, the operating principles, and the numerous rules and ideals that govern the Trinitarios.

12. The organization was named after three revolutionaries from the Dominican War for Independence. The Trinitarios is ethnically exclusive and largely comprised of first and second-generation Dominican males. The Dominican War for Independence provides an underlying patriotic veneer to the gang's activities. The structure of the gang is historically linked to the nature of the "La Trinitaria" or the Secret Society of the Trinitarians that was used by the Dominican founding fathers to organize the resistance to Haitian occupation that preceded the Dominican War for Independence. Significant years and dates from the Dominican War for Independence provide symbolic meaning to the gang, including 1838, 1844, and February 27.

13. The Trinitarios employ a written "Magna Carta" that defines the structure and rules of the organization. The gang also has a slogan, "Dios, Patria, Libertad," or "DPL", which stands for "God, Country, Liberty," and invokes the Dominican independence movement of the late 19th century. The Trinitarios also use numerous internal symbols, ciphers, and phrases to communicate amongst leadership and membership. The Trinitarios have slogans, symbols, colors and practices that pervade the organization. There is a primary green logo for the Trinitarios that consists of two crossed machetes beneath a shield with the letters "DPL," with the heraldic device and embellishments of "The Green Nation" and "Trinitarios Hasta La Muerte," which, translated from Spanish, means "Trinitarios Until Death."



14. Massachusetts Trinitarios have embraced the above logo and created custom t-shirts bearing this logo and each member's gang name printed in green. Massachusetts Trinitarios wear these shirts to their annual February 27 universal gathering and film a music video where they can be seen on video wearing these custom t-shirts. A discussion of one such music video, still images from it, and other images and videos from February 27 gatherings are set forth later in the original affidavit submitted in February 2025. *See United States v. Paula-Cabral, et al.*, Docket No. 25-CR-10058-NMG at ECF #10-1.

15. Trinitarios gang members also frequently wear the red, blue, and white colors of the Dominican flag. While the patriotic colors symbolize aspects of the gang's historical origins and ostensible patriotic purpose, lime green is the distinctive gang color used to distinguish the Trinitarios from other gangs. Lime green is the recognized color of the Trinitarios and was chosen to designate and separate the gang's colors from other major street gangs, such as the Bloods that

use red and Crips that use blue. The distinctive lime green color is reflected in bandanas and clothing worn by Trinitarios members and in social media postings. Other symbols of the Trinitarios include the sun, the moon, and the stars, the “pineapple” emoji, and the “wolf” emoji. Members of the Trinitarios frequently have tattoos with these symbols and often post these symbols on social media when referring to other gang members or gang activity.

16. Trinitarios also refer to other symbols, such as the Dominican Flag, the years 1838 and 1844 (which are significant years for the Dominican Revolution), and various ciphers, such as “157” (which refers to the first, fifth, and seventh provisions of the Trinitarios’ Magna Carta, which are held as the three most important provisions), and “41612” (which refers to the 4th, 16th and 12th letters of the alphabet, coinciding with “DPL,” i.e., Dios, Patria, and Libertad). Trinitarios frequently obtain tattoos of these symbols and ciphers to demonstrate their allegiance to the gang. Trinitarios members also “flash” the Trinitarios hand signs, with their thumb, index finger, and middle finger extended in recognition of the tripartite slogan of the Trinitarios: Dios, Patria, Libertad – DPL.

17. Aspects of the “secret society” from the Dominican Revolution were incorporated into the Trinitarios organization and its operations. For example, when members are initiated into the gang, the initiation takes place during a formal ceremony that occurs yearly on or around February 27, which is Dominican Independence Day. New initiates swear an oath to the organization and secrecy. The new initiates are also provided with their “paperwork” documenting their membership and through which they can prove their membership to others in the organization. During this ceremony, the new initiates are also provided with their beaded necklaces signifying their full membership in the gang.

18. Members are generally initiated into the gang after a period of observation or probation. Members often are inducted following the completion of a “mission,” which is generally a substantial act of violence such as a shooting. Upon induction a member is provided with their beaded necklace that is placed on their neck by the ranking member presiding over the initiation ceremony. These beads are ceremonial but extremely significant – they denote membership and certain color beads also designate the individual holding a leadership position. Only Trinitarios members who have been initiated into the gang may wear beaded necklaces. The wearing of a necklace by an individual who is not part of the gang would subject them to violence.

19. Necklaces primarily comprised of green beads signify the Primera, or First in command; blue beads signify the Segundo or Second in command; red beads signify the Tercera or Third in command; and white beads signify the Disciplina or Disciplinarian. The historical purposes of these distinctive beaded necklaces are to designate and visually identify the members and leaders of the organization, without each member needing to know their name or have them identify themselves as being a member or holding a certain position. Numerous visual depictions of the Defendants charged in this case wearing these beaded necklaces, including leadership beads, are set forth below in this Affidavit. Each inductee into the organization has a “440,” which is the individual who brings them into the gang and who can verify a member’s status if questioned. The role of induction is significant and is derived from the organization’s revolutionary allusions. The name “La Trinitaria” alludes to the recruitment method in which each member has the mission of recruiting three additional members.

20. According to documents obtained by investigators during the investigation, the Trinitarios are a hierarchical organization and its members adhere to a code of conduct. At least one example of this written code was recovered during the investigation from the cellular phone

of the former State Leader, ENMANUEL PAULA-CABRAL, A/K/A “MANNY,” A/K/A “NELFEW,” A/K/A “FEW,” A/K/A “GORDO.” The investigation has since recovered multiple additional copies.

C. THE STRUCTURE AND INFLUENCE OF THE TRINITARIOS ENTERPRISE

21. The Trinitarios enterprise is hierarchical, with a top-down structure in each individual state and in each individual Chapter. Documents concerning the Trinitarios organization reference a “Central Command” of the Trinitarios that investigators know is based in the Dominican Republic. Our investigation has developed extensive physical, digital, and documentary evidence related to the Trinitarios enterprise, including, its operations, its structure, its rules and policies, and its symbols and literature.

22. According to sources of information developed during the investigation, the Trinitarios are highly structured and hierarchical. Locally, there is a “Supreme,” who is the head of all Trinitarios in Massachusetts, and responsible for all activities of the Trinitarios in the state, and who coordinates with other state leaders and communicates with the leadership of the Trinitarios in the Dominican Republic. Below the Supreme, there is the “flag,” which is the second in command within the state.

23. Within each state, there are multiple Chapters that are geographically centered in certain cities. Each individual Chapter has a “Cabinet” of leaders, consisting of: a “#1,” or Primera, who is the leader of the Chapter; a “#2,” or Segundo, who is second in command; a “#3,” or Tercera, who is third in command; and other positions, such as the “Disciplina,” who is responsible for ensuring discipline among the membership; and the “Seguridad,” who is responsible for maintaining security of the chapter, serves as the enforcer against threats, and holds firearms at meeting. The Supreme of Massachusetts also determines the status of Chapters in the state, opens

and closes Chapters, and appoints and removes people in leadership. The Supreme of Massachusetts is responsible for the Trinitarios Chapter operating in Manchester, New Hampshire, and the Trinitarios located in Maine, where the gang operates a lucrative drug trade.

24. These leadership positions are responsible for recruiting new members, providing discipline to members in violation of Trinitarios directives, and collecting money into a communal account called a “Fundo,” or “Quota,” which is used to support illegal operations and provide money for incarcerated Trinitarios members and their families. All members are required to provide money for the Fundo or Quota. This money is frequently generated through the importation and sale of illegal narcotics and firearms, as well as robberies, and other criminal activity, such as package thefts, identity theft, and check and credit fraud.

25. The Trinitarios have recently undertaken steps to insulate leadership in a number of ways: first, by concealing the identities of the leaders and status of members except on a need-to-know basis and, second, by employing “flags” or cutouts who stand in the place of leadership and deliver orders on their behalf. The use of cutouts enables leaders to deliver orders while preventing line members from identifying the leader or directly attributing orders (for example, to retaliate or commit violence) to the actual leader, creating a layer of plausible deniability and insulation.

26. In addition to universal meetings which all members attend, individual Chapters of the Trinitarios hold their own meetings, referred to as an “11.” During these meetings, numerous points of business for the organization are typically discussed, including the status of the Chapter, developments regarding ongoing violence and rivalries, recent violent missions conducted by members, and the means of generating illicit income. Leaders and line members of the Chapter discuss these topics, give speeches and toasts, and engage in coordinated chants.

27. The Trinitarios criminal enterprise and its members use violence to intimidate and kill rival gang members, and claim territory and neighborhoods for Trinitarios business, such as drug trafficking. Historically, there have been a number of Trinitarios prosecutions in New York. Trinitarios members and individual “sets” or Chapters of the Trinitarios have been charged with numerous murders over the years. These include the murder of a teenage boy with a machete in a convenience store that was captured on video.¹ Federal prosecutions by the U.S. Attorney’s Office for the Southern District of New York include: the Bronx Trinitarios Gang or “BTG” Set,² the “Sunset Trinitarios” Set,³ the Own Every Dollar or “OED” Set,⁴ and the Trinitarios criminal enterprise as a whole.⁵ These historical New York cases include allegations of multiple murders committed by members of the Trinitarios enterprise.

28. In 2014, the former national leader of the Trinitarios, Leonides Sierra, a/k/a “Junior” or “Junito,” was convicted in the Southern District of New York of RICO conspiracy for offenses committed while serving a New York state prison sentence for murder. While in state

¹ Thirteen Trinitarios were charged with participating in this murder to varying degrees. See Crane-Newman, Molly; McShane, Larry (14 June 2019). "Verdict in Lesandro 'Junior' Guzman-Feliz trial: All five defendants found guilty of first-degree murder in case that broke city's heart". New York Daily News. Tribune Publishing Company, retrieved 14 June 2019; and see *Trinitarios Gang Member Pleads Guilty To Fatal Stabbing Of Lesandro "Junior" Guzman-Feliz*, Bronx District Attorney, Press Release Dec. 13, 2022, available at <https://www.bronxda.nyc.gov/downloads/pdf/pr/2022/111-2022%20trinitarios-gang-member-pleads-guilty-junior-fatal-stabbing-bronx.pdf> (retrieved January 21, 2025).

² See *United States v. Sierra, et al.*, Docket No. 11-CR-1032 (S.D.N.Y.), and <https://www.justice.gov/archive/usao/nys/pressreleases/December12/TrinitariosTkdownII.html>.

³ See *United States v. Santana, et al.* Docket No. 20-CR-022 (S.D.N.Y.), and <https://www.justice.gov/usao-sdny/pr/leader-sunset-trinitarios-sentenced-life-prison-racketeering-including-ordering>.

⁴ See *United States v. Nunez, et al.*, Docket No. 22-CR-293 (S.D.N.Y.), and <https://www.justice.gov/usao-sdny/pr/sixteen-members-own-every-dollar-gang-charged-manhattan-federal-court-racketeering-and>.

⁵ See *United States v. Jones, et al.*, Docket No. 22-CR-505 (S.D.N.Y.), <https://www.justice.gov/usao-sdny/pr/trinitarios-gang-leader-sentenced-life-prison-murdering-confidential-informant>.

prison, Sierra organized a central committee to convey his orders to the street and conspired to murder an individual who refused to acknowledge his position as Supreme Leader.⁶

D. THE MASSACHUSETTS TRINITARIOS

29. Our investigation identified Chapters of the Trinitarios in Lawrence, Lynn, Boston, and Haverhill. Since the arrest of PAULA-CABRAL and other leaders of the Lynn Chapter, cooperating witnesses have reported that the Lynn Chapter has been suspended by order of the Trinitarios leaders (referred to as “Generals”) in the Dominican Republic. There are also multiple Trinitarios Chapters in Massachusetts correctional facilities, including the Essex County House of Corrections – Middleton; Souza-Baranowski Correctional Center; and Massachusetts Correctional Institution – Shirley. Trinitarios members within each Chapter are instructed to dominate their communities by intimidating rival gangs, establish control over certain neighborhoods, and stand out in areas to claim the locations where the Trinitarios reside and frequent as their territory.

30. The known territory of the Lawrence Chapter is in the area of the 700 block of the Essex Street housing projects in Lawrence. The Gangster Disciples (the “GDs”) and Shotgun Crips (the “Crips”) are the rival gangs of the Lawrence Chapter of the Trinitarios. In 2019, a prior federal investigation, called *Operation Emerald Crush*, targeted members of the Lawrence Chapter of the Trinitarios for drug and firearm offenses. See *United States v. Emilio Rodriguez, et al.*, Docket No. 19-CR-10430-LTS, ECF #12 (Affidavit Filed in Support of Detention).⁷ Since that

⁶ See “National Leader Of “Trinitarios” Gang Sentenced In Manhattan Federal Court To 19 Years In Prison,” U.S. Attorney’s Office for Southern District of New York, Press Release (July 24, 2014), available <https://www.justice.gov/usao-sdny/pr/national-leader-trinitarios-gang-sentenced-manhattan-federal-court-19-years-prison> (retrieved on January 21, 2025).

⁷ As part of that case, twenty-one members of the Lawrence Chapter of the Trinitarios were charged in state and federal court. Historical acts of violence committed by members of the Lawrence Chapter are discussed in the detention affidavit for that case.

investigation, the Lawrence Chapter has continued to expand and its members and leaders have committed numerous violent offenses.

31. On March 4, 2024, the Haverhill Chapter of the Trinitarios was formally opened by PAULA-CABRAL during a universal meeting held in a hotel in Tewksbury, Massachusetts. Multiple cooperating witnesses working with federal law enforcement have described this meeting. The cooperating witnesses described PAULA-CABRAL declaring the opening of the Haverhill Chapter, naming its leadership, and blessing multiple members into the Trinitarios during a formal initiation ceremony. To open a Chapter, PAULA-CABRAL was required to obtain approval from the Generals in the Dominican Republic. Following the 2025 arrests of the Lynn and State Leadership, the Haverhill Chapter has effectively reported to the Lawrence Chapter leader, YORDALI YORRO, A/K/A “OG LOW.” Investigators have identified multiple members of the Haverhill Chapter and several have been charged in this federal investigation, including JUSTANE GARCIA, RICHARD PENA, ABIGAIL ARIAS and HECTOR MOTA. Our investigation has assessed that, in light of YORRO’s significance to the operating structure of the remaining Trinitarios, and his influence and seniority in the gang, he is operating essentially as the State Supreme for Massachusetts.

32. Rivalries between the Trinitarios and other gangs in Massachusetts develop through personal enmity and disrespect between members of the rival gangs (either in person or over the internet), and competition over drug territory and customers and violent acts, such as robberies, shootings and murders, that have been committed by the gangs against each other in the past. As noted below, and throughout this affidavit, these rivalries have become deadly and Trinitarios gang members have committed multiple murders over the past ten (10) years.

33. The Trinitarios recruit new members extensively from communities of both legal immigrants and illegal aliens from the Dominican Republic. To ingratiate themselves to potential new members, the Trinitarios use their common Spanish language and culture, appearance of prosperity and brotherhood, and appeals to Dominican patriotism. The Trinitarios frequently recruit juveniles at local high schools in Lawrence and Lynn. The Trinitarios generally appeal to the young males of Dominican background, while the rival gangs target other ethnicities.

34. Young members of the Lynn Chapter, for example, were called the “menores” and would undergo a multi-year process prior to becoming full members of the Trinitarios. The “menores” were tasked with lesser roles during many of the recent violent “missions” undertaken by the Trinitarios, including standing lookout during a shooting, holding or concealing weapons on behalf of full members, and transporting weapons after their use in shootings. The “menores” were required to engage in fist fights with rival gang members that were the same age or stature. Our investigation has led to the recovery of multiple videos depicting numerous fights and beatings taking place among high-school age Trinitarios targeting other students in high schools in Lynn and Lawrence. Many such videos appear to take place on school grounds or just outside school grounds immediately after school release.

E. THE TRINITARIOS USE OF MUSIC VIDEOS AND SOCIAL MEDIA

35. Like many violent street gangs, the Trinitarios endeavor to project power over the internet and social media through the creation, marketing and promotion of music and music videos featuring their members. The music videos depict members of the gang holding and carrying firearms, and the lyrics contain boasts about their proclivity for violence, the scope of their successful drug distribution operations, and other money-making criminal endeavors. In the music videos, the Trinitarios pageantry, imagery and symbolism is seen in full effect. The

Trinitarios depicted in the videos wear Trinitarios colors and clothing. The paraphernalia and symbols associated with the Trinitarios organization are visible, and members display gang signs, weapons, cash and other items designed to evoke a simultaneous sense of dangerousness and prosperity.

36. The Trinitarios frequently use music videos as warnings and threats to rival gangs. The music videos sometimes depict entire groups of Trinitarios members associating and affiliating with each other while wearing and displaying Trinitarios clothing, beads, and other symbols. The music videos thus reflect the current standing and affiliation within the Trinitarios organization because only members would be present for such gatherings. Similarly, the uninitiated would not be permitted to wear the regalia and symbols of the gang in the presence of other members. The lyrics of the videos also reveal the Trinitarios' current rivalries with other gangs. Given the numerous incidents of violence and drug distribution that have been recorded on video during the investigation, the music videos are frequently boastful admissions of federal racketeering activity.

F. COOPERATING WITNESSES

37. This affidavit refers to information provided, and recordings generated by cooperating witnesses during the course of the investigation. Throughout this investigation, information provided by each cooperating witness has been corroborated through a variety of investigative techniques, including: consensual recordings generated by the cooperating witnesses; comparison of the information to information received from other cooperating witnesses and confidential informants; corroboration of the information through review of data extracted from cellular phones; review of location information for cellular phones utilized by the Trinitarios members; review of data obtained from social media accounts, including Instagram and Snapchat

utilized by the Trinitarios; and review of police reports, forensic information and investigative files for the various shootings, robberies, murders and other crimes that were independently investigated by the local police and state police independently from the federal investigation. Based on this corroboration and the overall federal investigation, I believe that the information provided by each of the cooperating witnesses is accurate, credible, reliable and trustworthy. I know the identity of each of the cooperating witnesses and am withholding that information to protect their safety and that of their respective families.

II. THE LAWRENCE CHAPTER OF THE TRINITARIOS

38. The Lawrence Chapter of the Trinitarios consists of dozens of members. YORDALI YORRO, A/K/A “OG LOW,” is the leader or Primera of the Lawrence Chapter. The Lawrence Chapter contains a host of senior members, typically referred to as “big homies” or “OGs,” who have many years of active participation in the gang and its crimes.

39. Leaders and members of the Lawrence Chapter of the Trinitarios charged with federal offenses include the following:

- a. YORDALI YORRO, A/K/A “OG LOW,” (“YORRO”) the Primera or leader of the Lawrence Chapter;
- b. JAMES CABRERA, A/K/A “TRENSITA,” (“CABRERA”)
- c. LUIS CRISPIN, A/K/A “YB,” (“CRISPIN”);
- d. ANGEL CASTILLO-GARCIA, A/K/A “CHAPPA” (“CASTILLO”);
- e. JERVIS ALMANZAR, A/K/A “JB,” (“ALMANZAR”);
- f. ABIGAIL ARIAS GONZALEZ, A/K/A “BESTIA,” (“ARIAS”);
- g. RIKY MONTILLA, A/K/A “RICO,” (“MONTILLA”);
- h. JEREMY FELIX, A/K/A “PEPE,” (“FELIX”);
- i. JOSE MARTINEZ, A/K/A “JAY KILLA,” (“MARTINEZ”);
- j. OSVIALIS SERRANO, A/K/A “OG O,” A/K/A “OG PABLO” (“SERRANO”);
- k. JAYDEN MUNIZ, A/K/A “ANUELITO,” (“MUNIZ”);
- l. GEOVANE FERNANDES, A/K/A “SPOOKY,” (“FERNANDES”);

- m. JAHIR DAVILA, A/K/A “NANO FINESSE,” (“DAVILA”);
- n. ENRIQUE DURAN, A/K/A “JEFE E,” (“DURAN”);
- o. YANUEL MEJIA, A/K/A “NANO PROBLEMA,” (“MEJIA”);
- p. LUIS FERNANDEZ LOPEZ, A/K/A “PICHULO,” (“LOPEZ”);
- q. XAVIER PUELLO, A/K/A “BODEGA,” (“PUELLO”);
- r. RODDERITH PERALTA, A/K/A “MAGO,” (“PERALTA”);⁸
- s. JOSE MERCADO, A/K/A “PUNTO EFFECTIVO,” (“MERCADO”);⁹ and
- t. DEREK MERCADO, A/K/A “DELI,” A/K/A “DELI THE DEMON.”¹⁰

40. The following photograph depicts a group of Trinitarios in Lawrence flashing gang signs, holding green bandannas (referred to as flags), and taking over a local gas station in October 2025 for a music video that was being filmed.



⁸ RODDERITH PERALTA was charged separately for a May 2024 kidnapping of a Trinitarios associate. See *United States v. Medina & Peralta*, Docket No. 25-cr-10302-NMG. This case remains pending.

⁹ JOSE MERCADO has been charged in the District of Connecticut with robbery offenses. See *United States v. Jose Mercado, et al.*, Docket No. 25-cr-00144-SVN (D.Conn.).

¹⁰ DEREK MERCADO was prosecuted separately for possession of an UZI machinegun. See *United States v. Derek Mercado*, Docket No. 25-cr-10411-NMG.

41. The following photograph depicts a group of Trinitarios from the Lawrence and Haverhill Chapters on August 18, 2024, at the Dominican Festival in Boston, Massachusetts. The Trinitarios are wearing the gang's signature beaded necklaces and making the gang's signs with their hands. From left are the following: RIKY MONTILLA, A/K/A "RICO," JUSTANE GARCIA, A/K/A "JAY BILLZ," and to the far right, JERVIS ALMANZAR, A/K/A "JB."



42. The following two photographs depict senior members of the Lawrence Chapter of the Trinitarios: YORRO, CABRERA, CRISPIN, DURAN and ARIAS.



From left: YORRO, ARIAS, CABRERA, CRISPIN and DURAN



From left: CABRERA, DURAN, YORRO, CRISPIN and ARIAS

A. YORDALI YORRO, A/K/A “OG LOW”

43. YORDALI YORRO MARTINEZ, A/K/A “OG LOW,” (dob: xx/xx/1997, ssn: xxx-xx- 4256) (“YORRO”), is the Primera or #1 of the Lawrence Chapter of the Trinitarios. Investigators believe YORRO has been a member of the Trinitarios since at least 2014 based on information from multiple cooperating witnesses and historical reporting by law enforcement.

44. A photograph of YORRO follows:



45. YORRO was born in Puerto Rico and is a citizen of the United States.

46. I am familiar with YORRO’s criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On September 11, 2017, YORRO was charged in Lawrence District Court, Docket No. 1718CR004256, with Possession of a Firearm without a Permit, Carrying a Firearm with Ammunition, and Possession of Ammunition without a Firearm Identification Card (FID). YORRO was convicted on June 18, 2019, and received a sentence of incarceration for 18 months, with probation to follow. YORRO was found to have violated his probation on August 23, 2021.
 - i. Investigators are familiar with Lawrence Police report #17006670 related to Docket No. 1718CR004256. On September 8, 2017, officers were on patrol in the area of 380 Chestnut Street in Lawrence, MA, where they had received reports of gang members congregating. As they arrived, officers observed a group of Trinitarios and a group of Latin Gangster Disciples. During a frisk of YORRO’s person, a loaded firearm was recovered from his coat pocket. Among the individuals present for the confrontation were Gangster Disciple member KT, a/k/a “Juju,” who would later be targeted by the Trinitarios during a shooting on December 31, 2021, during which KT’s girlfriend was shot and killed.

- b. On May 31, 2018, YORRO was charged in Lawrence District Court, Docket No. 1818CR002270, with Threats and Assault and Battery. This case was later dismissed on March 6, 2019.
 - i. Investigators are familiar with Lawrence Police report #18002255 related to Docket No. 1818CR002270. This case pertains to threats reported by the ex-boyfriend of YORRO's girlfriend. On March 31, 2018, YORRO confronted the ex-boyfriend, grabbed him by the throat, and fought with him for approximately twenty seconds. The ex-boyfriend reported to police that YORRO threatened him, claimed to know where he lived, claimed to be "Patria" (a reference to the Trinitarios), and threatened to kill him while waving a green bandana. YORRO was cooperative and spoke with police about the incident and claimed it was self-defense.
- c. On April 23, 2021, YORRO was charged in Lawrence District Court on Docket No. 2118CR000804, with Discharging a Firearm within 500 Feet of a Building, Possession of a Firearm without a Permit, Armed Assault to Murder, and Firearm Violation with One Prior Violent Crime. These charges were in connection to the shooting of a Gangster Disciples member who is referred to as AV on March 21, 2021, and were nolle prosequi on December 10, 2021. This incident is discussed below.

47. Photographs of YORRO wearing Trinitarios beads and making Trinitarios gang signs follow.



i. 11/12/2024 - Recording of Trip to Bring Drugs to Maine

FILENAME: 2024-11-12_20-05-45

48. On November 12, 2024, YORRO was captured on a consensual recording discussing the Trinitarios enterprise and drug trafficking. YORRO states that he will buy more drugs and bring some up to Maine (“I will buy more work, and I will bring a bit up here again.”).

YORRO:	I will buy more work, and I will bring a bit up here again.
CHS:	[U/I]
YORRO:	[YAWNS] A—a hundred grams is what? Eighteen hundred (1,800)?
CHS:	Nineteen (19)?
YORRO:	Nineteen hundred (1,900).
CHS:	Mm-hmm.
YORRO:	Speed up, don’t be scared.
CHS:	Nah, I am just following the speed limit. Remember it’s thirty-five (35). Was [U/I].

49. During another portion of the conversation, YORRO states that the members are not focused. YORRO states that he had a source of firearms (“I had an American guy, bro, he would bring me a bunch of steel. Not steel like, like Glocks, but LCP’s, Ruger”) and the Trinitarios would lose the guns without even using them (“Not even using the guns, dude”). YORRO complains that some Trinitarios were also getting arrested with guns he was bringing down (“somebody got caught with—with one of those blicks”).

YORRO:	The motivation is... something that somebody else is doing or who is doing... who I gotta... You get what I am saying? Like it’s just, it’s never like, “Yo, what’s up, dude? Hey, let’s, let’s set our minds on this, bro. We have to...” Like, that—that topic only certain niggas touch that topic.
CHS:	Mm-hmm.
YORRO:	It’s like, they don’t even... You understand? They don’t even pursue that. So, like... I have—I have tried to do all that, [...]: steel, everything, dude. I had an American guy, bro, he would bring me a bunch of steel. Not steel like, like Glocks, but LCP’s, Ruger... You understand?
CHS:	Mm-hmm.
YORRO:	A bunch of steel, like that, boom-boom-boom [ONOMATOPOEIA] ... one of the guys, dude. Because they are hypocrites. Hypocrite as fuck, bro.
CHS:	Nah, they was losing the guns.

YORRO:	Not even using the guns, dude. There, there was one of the American guys from that dude. Right? He was sent some shit that somebody got caught with—with one of those blicks. That he—he already [U/I] um...
CHS:	Oh, [U/I]
YORRO:	Stolen, right? But the shit says that it got caught in Lynn, Mass’.

50. YORRO states that he gave one gun to someone who then sold it (“One person sold it, I know the person that I gave it to, he sold it to some other nigga”). YORRO indicates that because it was reported stolen, the original owner of the gun was informed about the recovery (“Come and pick up your gun”) and is now being investigated (“the American got himself a case”).

YORRO:	Do you understand?
CHS:	And that’s far. What’s is it doing down there?
YORRO:	So, I took it down there in regard to something, just something. You understand? Whoosh [ONOMATOPOEIA] It’s like... Okay. One person sold it, I know the person that I gave it to, he sold it to some other nigga. You know what I am saying?
CHS:	Well, that nigga, ya tú supiste, probably...
YORRO:	You understand? That nigga probably got caught with the shit and since an older guy up there is the owner of that thing, he receives like the—you know? Like...
CHS:	In Lawrence?
YORRO:	Yeah, “Your shit’s been found in...”
CHS:	Uh-huh, uh-huh.
YORRO:	“... in Lynn, I don’t know what, Mass’.” [U/I]
CHS:	Like, “Come and pick up your gun.”
YORRO:	“Come and pick up your gun.” [CHUCKLES] “Alright.” Otherwise their license get revoked for those shits. [U/I] Not been responsible for your shit, be selling it. Now the American got himself a case. That’s what I’ll be trying to tell these niggas, bro. [U/I] too much, bro.

51. YORRO continues to discuss the stress and problems he faces in leadership. YORRO complains about having brought up two Trinitarios associates to run a trap house for him and distribute drugs (“brought a couple of niggas up here, like, two (2) niggas”). He notes that the Trinitarios associates enjoyed themselves by ordering delivery, playing videogames, and spending money (“they guys kind of like it...,” “eating pizza, having a good time, playing PlayStation”). YORRO indicates that the Trinitarios associates spent about \$2,500 eating and being bored, which

was equivalent to the profit from the sale of 100 grams of fentanyl (“it was about a hundred (100) and something grams that they ate, food and things”).

YORRO:	Bro, you bring them up here, look, I won’t mention names, but I brought a couple of niggas up here, like, two (2) niggas, bro. You feel me? That was a last minute shit, that I did... You know, a...
CHS:	But tell me what it was, faggot.
YORRO:	Some badass shit. I get it on there... Boom [ONOMATOPOEIA] and they guys kind of like it. And niggas is jammed up up here; doing nothing, eating pizza, having a good time, playing PlayStation.
CHS:	Having the best life.
YORRO:	You know... On Facetime...
CHS:	A lot of people don’t have it that easy...
YORRO:	So, Facetime, chill... The guys... it was about a hundred (100) and something grams that they ate, food and things. [LAUGHS]
CHS:	Shut the fuck up!
YORRO:	Of course! Like, twenty-five (25), like... not even twenty (20)—yeah, like twenty-five hundred (2,500) eating and being bored...
CHS:	Eating and ordering things and buying shit.
YORRO:	Uh-huh! When niggas seen the bags, “My brother, the money doesn’t seem... they not adding up right now. You feel me?” [LAUGHS]
CHS:	Nah, there is no way niggas really ate and spent... a hundred (100) grams worth of work.

52. YORRO explains the price per gram that cocaine can be sold for in Maine. YORRO states that one drug distributor he supplies (the American gun supplier) can sell the drugs for \$125 per gram (“One twenty-five (125)... A gram”).

YORRO:	... be able to take that out. Like, “nah, alright”. You feel me? If somehow fifty (50) grams are lost, that’s one thousand (1,000) bucks right there.
CHS:	Damn!
YORRO:	I got that covered on my end; you feel me?
CHS:	They lost two thousand (2,000).
YORRO:	Up here—up here... How much do you think he gets for the “O?”
CHS:	The American guy?
YORRO:	Uh-huh.
CHS:	A bunch of money, a hundred (100) for the gram.
YORRO:	No.
CHS:	How much?
YORRO:	One twenty-five (125).
CHS:	A gram?

YORRO:	A gram.
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53. YORRO does the math: his distributor can make \$3,100 from an ounce and the distributor cooks the cocaine into crack cocaine (“He is making almost thirty-one hundred (3,100) outta of the ‘O.’”), which he then sells in eight-ball quantities (“just chips it, little three and a half (3.5) chipping it”).

YORRO:	He is making almost thirty-one hundred (3,100) outta of the “O.” And he cooks it with baking soda, so... [BACKGROUND: NOISE] now, he just... he grabs the gram and turn it into like, one ninety-two (192) dollars, nigga. You feel me?
CHS:	Oh, my God.
YORRO:	And just chips it, little three and a half (3.5) chipping it. He makes the most out of that damn shit.
CHS:	That nigga knows how to really make the most of it [U/I]
YORRO:	So, if I just sit on top, I’ll become rich, dude. Do you understand what I am saying? Just chipping.

54. YORRO explains that the drug sales in Maine must be oriented toward making as much money as possible and expanding the network of dealers being supplied (“Get every dollar.”). He notes that it is easier to move to another trap house with a greater distribution network (“Whoever is with you, the more people you have, bro, you can just relocate with your homies.”).

YORRO:	So, I am just telling you, so... what I am trying to tell you is... Don’t—don’t like... The number one (1) thing is, you’re already risking yourself. Get every dollar. You feel me?
CHS:	Of course.
YORRO:	Like, that’s—that was like my main thing, get every dollar, get every dollar. Whoever is with you, the more people you have, bro, you can just relocate with your homies. You feel me?
CHS:	Mm-hmm.
YORRO:	Like, that’s what people don’t understand, you relocate with your homies. You move [STAMMERS] the, the trap house elsewhere and that’s it.
CHS:	All good.
YORRO:	You understand? It’s just... yo-yo-yo-yo. But niggas want to be stuck like, in houses that everyone finna go there, none of that. That’s your crib [U/I] over here, dude, you do it, but [U/I]. Nice, clean homes [PH]. Boom-boom
CHS:	Mm-hmm.
YORRO:	Like, like live, live. Have a car, you understand? Have some junkies, anything, like... that junkie of mine... that nigga got a fucking GMC, fucking big ass...

55. YORRO then explains that setting up a trap house properly allows you to obtain firearms (“just an American guy, you can just tell him to go in”). YORRO describes a .22 caliber firearm he obtained for \$320 (“That shit, dude, there... a, a size twenty-two (22) for like, three hundred and twenty dollars (\$320).”), and that AR platform rifles can be obtained for \$500 or \$600 (“AR’s six hundred dollars (\$600), five hundred dollars (\$500”).

YORRO:	Right there, in, in that spot, if you have an American guy, or a—just an American guy, you can just tell him to go in. That and ‘K-9 up here too. And they got like weird ass blicks for like, like... two hundred (200), six hundred (600). Like, I see some shit like this, like a—me like, damn, it looks like that gun from... [U/I] the one from Black Ops, that had the, the little ball.
CHS:	Nigga, I know what you mean.
YORRO:	That was like a little chop’; bang-bang-bang [ONOMATOPEYA].
CHS:	Mm-hmm.
YORRO:	That shit, dude, there... a, a size twenty-two (22) for like, three hundred and twenty dollars (\$320).
CHS::	Damn.
YORRO:	I was gonna buy that shit, nigga. Right now, nigga, [STAMMERS] for the Black Friday coming up... Oh, God.
CHS:	To be active, feel [U/I]
YORRO:	Oh, AR’s six hundred dollars (\$600), five hundred dollars (\$500), like that.
CHS:	Man!
YORRO:	Of course, dude. The Colon one, nigga, like two-fifty (250), nigga. It depends where [U/I]. You’ll see, dude. [U/I] not much. But remember, over here, this is hunting ground, [U/I].
CHS:	Mm-hmm.
YORRO:	So, like niggas be shooting shit, dumb shit.

56. YORRO continues to explain the circumstances of Maine and New Hampshire and the differences with Massachusetts. YORRO offers an example that two of his drug contacts named Jeremy and Nance broke into a gun store and stole sixty-four (64) guns (“two (2) motherfucker Americans, dude, they broke in somewhere, bro, and took like sixty-four (64) guns”). YORRO also identifies another gun source named Tom, and states that these drug contacts in fact robbed

an older guy of his guns and jewelry (“those guys used to buy me a lot of guns, Tom also . . . they belonged to an old guy they robbed”).

YORRO:	That nigga Jesse [PH], he, he... Jeremy [PH] Non—Nonse [PH]... some shit like that... Nance [PH]... Those two (2) motherfucker Americans, dude, they broke in somewhere, bro, and took like sixty-four (64) guns; and you know what they got caught?
CHS:	What?
YORRO:	Listen to why they got caught. Somehow in the rushing-rush, back and forth. One of them dropped a headphone. Fucking mistake.
CHS:	Oh, my God.
YORRO:	You feel me? But those guys used to buy me a lot of guns, Tom also. Those guys, dude, they had a bunch-ch-ch-ch of guns, dude. Like, they belonged to an old guy they robbed, dude, at a house, like that. Like, somebody, like... tipped them off, you feel me? That all those things were there and that niggas really, got to that, dude. And took a whole bunch of blicks, and money, and jewelry; and came the fuck up. These motherfucker Americans, that’s why they were arrested.
CHS:	[U/I]
YORRO:	He was a wealthy man, bro. Fucking jewelry stores all the way up here to West Palm [PH].

ii. 1/28/2025 - Recording About Drugs And Shootings

FILENAME: 2025-01-28_15-50-45

57. On January 28, 2025, YORRO was captured on a consensual recording with a cooperating witness discussing drug operations in Maine. YORRO explains that he gave a Trinitarios associate named Damien a drug sale to conduct on his behalf (“How I gave Damien a play, right”), but if something is wrong with the drugs, the customers will call him first (“I leave him the... the stuff for the business,” “because they are going to call me first”). YORRO states that he will either get the work back if there is a problem or get the money from the sale (“So, I just gotta have the work or the money,” “So, if I don’t make the play, I still got the work.”). YORRO describes the adulterating process: for the two ounces, they provided 10 grams of drugs (“two (2) ounces that we cut, ten (10) grams from some shit”). The cutting agent that YORRO used in the

process apparently gave the drug users the flu (“what the cut did was give them the flu”) and they were angry (“[a]nd they’re pissed”).

YORRO:	How I gave Damien a play, right.
CHS:	Right.
YORRO:	[U/I]... you know, bro. I make the money fast, woo, woo, woo. I leave him the... the stuff for the business. And like I told you, [U/I] because they are going to call me first. So, I just gotta have the work or the money. So, if I don’t make the play, I still got the work. The money just went elsewhere.
CHS:	Yeah.
YORRO:	[U/I] play, [U/I], two (2) ounces that we cut, ten (10) grams from some shit ...
CHS:	It’s not even what you gave them.
YORRO:	No, they don’t even know what it is. And the junkies took it. And what the cut did, was give them the flu and ...
CHS:	And they’re pissed.
YORRO:	And... uh-huh. And... and... and...
CHS:	Full of hate. And they think you’re the one that brought them down.
YORRO:	No, and the guy is like, “No...” No, ‘cause I told them, “[I/I], you feel me? But I got somebody. I got the shit, you feel me? To do the one (1), two (2). So that [U/I]. The people called him back. And he was like, “No, your people [U/I]. Those guys are spoiled.”

58. YORRO was also consensually recorded discussing a recent drug delivery with an unidentified male who called him (referred to as UM8) in the presence of the cooperating witness.¹¹ The caller asks YORRO if the cocaine had already been cooked into crack (“that shit was cooked right, the [U/I] that you gave me”). YORRO confirms that it was (“Yeah, nigga.”). YORRO tells the caller that crack is precisely what the caller asked for and that he did not appreciate the questions (“you asked me for something and I gave you exactly what you asked me for. Now it’s just extra questions”). YORRO then asks to see the new firearm (“Let me see the new shit”). The caller explains that he does not have the firearm at the moment, and needs to get a

¹¹ UM8 is believed to be one of YORRO’s drug runners, possibly “Damien.”

piece for it, describing the weapon as a Glock 43X (“I don’t have it on me right now but I gotta go get the bottom piece tomorrow,” “It’s a 43X,” “A little compact shit”).

UM8:	[U/I], that shit was cooked right, the [U/I] that you gave me?
YORRO:	Yeah, nigga.
UM8:	[U/I] shit, right? Cooked up? Right? [U/I] We looked at it, [U/I], ‘cause I got [U/I], bro. I’m asking you, bro., bro. I’m asking you, bro.
YORRO:	Yes, nigga.
UM8:	Why you looking at me funny? [I/I]...
YORRO:	‘Cause... ‘cause... ‘cause... ‘cause you asked me for something and I gave you exactly what you asked me for. Now it’s just extra questions. Let me see the new shit.
UM8:	I gotta [U/I] and I can’t... I don’t have it on me right now but I gotta go get the bottom piece tomorrow. [U/I] I only got the... the top piece right now. It’s a 43X, my brother. A little compact shit.
YORRO:	Oh shit.

59. The caller tells YORRO that he has special ammunition for the weapon (“but I got these bullets on them”), and YORRO confirms it (“Nigga got red tip bullets on the gun”). The caller indicates that he will show YORRO the firearm tomorrow (“I’ll show you that shit tomorrow, when I get it.”). YORRO then reminds the caller to bring YORRO the money that the caller owes him (“bring me the money, you heard? Don’t go acting like you forgot, bye”).

UM8:	[U/I]. Yeah, but I got these bullets on them [U/I], from them putting the bullets on them and all that.
YORRO:	Nigga got red tip bullets on the gun.
CHS:	That’s crazy.
YORRO:	Yo, but put the kid back, fucker. Don’t let him touch that.
UM8:	[ASIDE: (U/I)] [BACKGROUND: UF: Coming.]
YORRO:	Then he takes one of those shits and hides it around there. And your bad shit is there, and then he comes and ... a whole mess.
UM8:	[U/I] he knows not to touch none of that, he knows. [U/I] [AL LADO: Go, go over there.]
YORRO:	Nah, alright then, then hit me up.
UM8:	A’right, I gotchu, bro. I’ll show you that shit tomorrow, when I get it.
YORRO:	And bring me the money, you heard? Don’t go acting like you forgot, bye.
UM8:	Yes, I am going to get them now, bye.

60. The conversation continues and YORRO describes how he instructs the young gang members to know where the exits are (“if you guys are at a party, and something happens [U/I], look for the back door”).

YORRO:	That’s crazy, brother. That’s why I always say to the guys, if you guys are at a party, and something happens [U/I], look for the back door.
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61. YORRO continues providing advice to young members who are frequently out in public and all together (“you guys are all over there”), noting that this creates a problem because rival gang members shoot at them and it is difficult to identify who fired the shots (“they shoot, you guys are not going to see who shot”). According to YORRO, this could lead to careless and inaccurate shots being fired by the Trinitarios in response (“You guys are just going to shoot back to get out of the situation, and maybe you hit a compatriot”). YORRO explains that he prefers to have his back against the wall, with a clear view to see where the gunfire is coming from (“I am here [U/I] the wall. I see ... see where the muzzle flash comes from”). This enables him to identify and shoot accurately at rival gang members (“I am shooting towards them and you guys are cool”).

YORRO:	You not [U/I] that well. Because you put yourself at risk. That’s what I tell the guys, you put yourselves ninety (90) percent there, and I’m here with forty-five (45) percent. Why? Because you guys are all over there. If they shoot, you guys are not going to see who shot. You guys are just going to shoot back to get out of the situation, and maybe you hit a compatriot. Me, I am here [U/I] the wall. I see ... see where the muzzle flash comes from, I am shooting towards them and you guys are cool. So, take it from [U/I]. [LAUGHS] so that they don’t...
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iii. 8/14/2025 – Recording of YORRO Discussing Structure of the Lawrence Chapter

FILENAME: BS_2025_08_14T21_09_48.wav

62. On August 14, 2025, YORRO was captured on recording discussing the structure of the Lawrence Chapter and roles of various positions during his tenure as leader. YORRO describes the fact that the Chapter needs ten strong members, and in particular a Spokesman and a

Discipline, with two people under the Discipline (“we only need ten (10) thugs,” “need a Spokesman,” “a discipline, with at least two (2) people learning”).

YORRO:	All we... all we... all we need is... listen, we only need ten (10) thugs.
UM2:	For what? For what?
CHS::	Everything.
YORRO:	You heard? Ten (10) thugs.
CHS:	The second (2 nd); discipline; security...
YORRO:	Listen...
UM2:	That’s good.
CHS:	Have the full set; entirely.
YORRO:	Look...
UM2:	That’s good.
YORRO:	We just need a Spokesman...
UM2:	We need to have those positions with good people and that’s it.
YORRO:	A discipline... hold on... hold on, a discipline, with at least two (2) people learning.

63. YORRO then identifies the need for four members to serve as enforcers or “security guards,” and that they also need a “Treasurer.”

YORRO:	A, uh... four (4) security guards and that would be, be for the same thing.
UM2:	Mm-hmm.
YORRO:	Right? Treasurer, let’s work on that.
UM2:	We need to see... That’s something important that we need now.
YORRO:	Yes, but we need to work on it...

64. YORRO then explains that the other members of the leadership team, such as the Third (or Tercera), cannot overrule the Discipline when it comes to the nature of the punishments that will be doled out to the members (“The third (3rd) cannot come and say, ‘No, that’s too much.’”). In fact, YORRO states that the Discipline will have ownership over the role and analogizes the Discipline to a “landlord” or owner of this issue (“The discipli... you are the landlord of the building”).

YORRO:	I’m not better than you. So, what does that means, that in the area that you do great, I cannot say anything, and that’s where the thugs get it confuse, because, since [CW-20] is part of the discipline and he tells me, “Bro, you have to give
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	twenty (20).” The third (3 rd) cannot come and say, “No, that’s too much.” Just because it was [CW-20] that said it.
UM2:	No.
CHS:	That’s true.
YORRO:	That’s a lie.
CHS:	The discipline knows why they are doing it.
YORRO:	The discipli... you are the landlord of the building.
UM2:	That’s how it is.
YORRO:	You feel me? Listen, when a lightbulb needs to be change, who do you call?
CHS:	The landlord.
UM2:	The landlord.
YORRO:	Because they are not going to call the person that dumps the garbage.
CHS:	No, the landlord.
YORRO:	Because discipline knows what goes.
CHS:	Of course.
YORRO:	Because they know what rule is broken and what’s correct in certain situation.

65. YORRO then explains that his role as Primera or First, is to step in and speak with all the people involved and then decide (“a first (1st). without, without, without the main key, I’m just a person that steps in, and, and have a dialogue, to at the end make the best decision”). YORRO then explains the burden of command he is currently facing: all problems pertaining to the Trinitarios become his problems as the leader (“all the problems are mine”).

YORRO:	So then, a first (1 st). without, without, without the main key, I’m just a person that steps in, and, and have a dialogue, to at the end make the best decision.
UM2:	Exactly.
YORRO:	Because I can’t tell everybody that I have the worst problems...
UM2:	No.
YORRO:	...all the problems are mine. At the end who is the bad one?
CHS:	You.

66. YORRO then describes how he can assist with obtaining a location for the Trinitarios to use for the organization; a place where they can administer beatings and hold meetings, and that he can facilitate transportation for the members to the location (“I can assist with a place so people can beat,” “The meetings; I could call the guys”, “I’ll go get them; transportation”). YORRO explains that he cannot, however, be the one who does the beatings or

does the shootings (“[i]f I’m the one that beats them; if I’m the one holding the firearm. . . Because I’m the only one doing everything, so, I’m actually in a bad position.”).

YORRO:	I can, I can put in, uh, uh, financially I can assist with a place so people can beat, you feel me?
UM2:	That’s what I need, that’s it.
YORRO:	The meetings; I could call the guys; the guys could arrive, I’ll go get them; transportation, I’ll take them. I could do everything.
UM2:	Hmm.
YORRO:	But this is the problem, that if I’m the one the beats them; if I’m the one holding the firearm, if I’m the one that facilitate the thugs, if I’m the one that... When do you think I’m going to be fine, once I’m doing bad? No, not like that. Because I’m the only one doing everything, so, I’m actually in a bad position

iv. 8/15/2025 – Punishment of JUSTANE GARCIA and ABIGAIL ARIAS

67. Investigators learned that, on August 15, 2025, the Lawrence Chapter of the Trinitarios punished JUSTANE GARCIA and ABIGAIL ARIAS for assaulting RICHARD PENA, A/K/A “BLADE.” A Trinitarios member administered the punishment, which consisted of 14 strikes to each of their buttocks. The Trinitarios used a beating paddle to administer the strikes. A photograph of the specific paddle follows.



68. Under the Trinitarios rules, the gang member being punished must hold up the “two guns” gang sign with his hands while being hit. If his arms fall or the gang sign is not maintained for the duration of the punishment, it starts over. The strikes were delivered by the Trinitarios gang member holding the rank of Discipline for the Lawrence Chapter. While administering each strike, the Trinitarios member stated “Dios, Patria, Libertad!” and GARCIA and ARIAS responded, “Patria!” YORRO, as the Primera, counted the strikes. This beating was consensually recorded by a cooperating witness working with federal law enforcement. The transcript of ARIAS receiving the punishment follows.

FILENAME: BS_2025_08_15T21_33_14

DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland. One (1)
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland! Two (2).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Four (4).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Five (5).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Six (6).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Seven (7).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Eight (8).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Nine (9)
DISCIPLINE:	God, Homeland and Freedom! [THWACK]

ARIAS:	Homeland.
YORRO:	Ten (10).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Eleven (11).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Twelve (12).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Thirteen (13).
DISCIPLINE:	God, Homeland and Freedom! [THWACK]
ARIAS:	Homeland.
YORRO:	Fourteen (14).

v. 3/15/2026 – Recording of YORRO Discussing Operations of the Lawrence Chapter

FILENAME: 2026-03-15-_11-47-51

69. On March 15, 2026, YORRO was captured on a consensual recording with a cooperating witness discussing operations of the Lawrence Chapter. During the recording, YORRO states that he is not going to be heavy-handed with the Trinitarios who are out of line because he can kill any of them for their infractions (“I go under the guys, because at the end of the day, I can—I can put a bullet on anybody”).

YORRO:	[STAMMERS] Yes, they see you as you are arrogant...
CHS:	Just how I am...
YORRO:	...a big one.
CHS:	...mocking guys a little too much.
YORRO:	I go under the guys, because at the end of the day, I can—I can put a bullet on anybody. [LAUGHS] So then... take it easy, my guy, you’re one of the... you’re one of the few good ones.

70. The cooperating witness suggests that YORRO appoint DAVILA, A/K/A “NANO FINESSE,” as Discipline (“We could put Nano as discipline”), and YORRO responds that would be a poor choice because he would enjoy beating other members too much (“Nano is a nigga that... like, he’ll grin at you, while he’s doing it”).

CHS:	My bad. We could put Nano as discipline.
YORRO:	No.
CHS:	And this nigga as security.
YORRO:	No, no, no. No, that's a bad hit.
CHS:	Why?
YORRO:	'Cause Nano is a nigga that... like, he'll grin at you, while he's doing it.
CHS:	So, what?
YORRO:	[LAUGHS] What you mean? You can't laugh.
CHS:	He's not laughing.
YORRO:	Trust me.
CHS:	And if he laughs; he'll hit him twice as much.

71. YORRO explains that he cannot promote a serial-killer to that position. YORRO notes that DAVILA has already participated in multiple murders for the Trinitarios and that someone who has committed that much violence cannot be in a managerial position (“You can’t take serial-killers and actua—and put them,” “and put them in a position of... of bigger”).

YORRO:	You can’t take serial-killers and actua—and put them...
CHS:	Nigga, what do you mean, brodie?
YORRO:	[LAUGHS] and put them in a position of... of bigger...
CHS:	You never know.
YORRO:	No, bro.

72. YORRO explains that he believes DAVILA is a “star” and is a potential leader in the gang, which would be affected if he were hitting other members and disciplining them (“Nano is [a] star,” “a potential leader,” “A potential leader. He’s a leader[.]”). YORRO states that a charismatic leadership figure like DAVILA can inspire other members of the gang to commit violence if he is involved (“I see Nano as an influence. He can influence people to do things that a normal person wouldn’t do by themselves.”).

YORRO:	Na, Nano, Nano is star.
CHS:	Yeah.
YORRO:	So, Nano is a potential...
CHS:	Nano is star and we gotta...
YORRO:	...a potential leader.
CHS:	We gotta, we gotta protect, nigga.

YORRO:	A potential leader. He's a leader. I see Nano as an influence. He can influence people to do things that a normal person wouldn't do by themselves.
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73. YORRO continues describing DAVILA as a potential inspirational leader in the gang (“Those are guys that would get near you,” “And you would jump that fence, but if this nigga jumping, nigga, I might as well try”). YORRO states that he admires gang members with this quality because they will bring strength to the next generation of Trinitarios (“I like them niggas like that. Because those are the ones that have the seed,” “That they have the seed to harvest the next generation, to grow it again”). YORRO states that, while DAVILA is a leader and one who can inspire others, there are many members who are simply “pawns” in YORRO’s organization (“and no, and don’t take it the wrong way,” “There is gon—there is gonna be a lotta niggas, that they’re gonna be pawns.”).

CHS:	I know that.
YORRO:	Like, like me, like you, like this nigga.
CHS:	Like Trenso.
YORRO:	You feel me? Those are guys that would get near you...
CHS:	[CHUCKLES]
YORRO:	And you would jump that fence, but if this nigga jumping, nigga, I might as well try.
CHS:	Of course.
YORRO:	I like them niggas like that. Because those are the ones that have the seed...
RABIA:	Those are the guys that need to be it. [LAUGHS]
YORRO:	That they have the seed to harvest the next generation, to grow it again.
RABIA:	That’s the truth, bro, that’s the truth, bro. Y’all niggas, y’all niggas, y’all niggas gotta uh...
YORRO:	You get what I’m saying to you?
RABIA:	Bro, you gotta chill.
YORRO:	And I—and no, and don’t take it the wrong way.
RABIA:	[U/I].
YORRO:	There is gon—there is gonna be a lotta niggas, that they’re gonna be pawns.

74. In another part of the recording, YORRO states that he has about thirty-two guns on the street (“The irons, I have like thirty—like thirty-two (32) irons out on the streets”). YORRO

states that he can grab them and amass them as an armory for the Trinitarios to use in the future (“I can grab them and pick them up. I can pick them up and I can put an armory, heavy”).

YORRO:	The irons, I have like thirty—like thirty-two (32) irons out on the streets.
CHS:	That don’t matter.
YORRO:	I can grab them and pick them up. I can pick them up and I can put a armory, heavy, “Look, those metals are not leaving from there...”

vi. 4/17/2026 – Controlled Purchase of 50 Grams of Fentanyl from YORRO

75. On April 17, 2026, CW-20 conducted a controlled purchase of approximately 50 grams of fentanyl from YORRO in exchange for \$1,500. This transaction was surveilled by law enforcement and audio-video recorded.¹²

76. Following the transaction, the fentanyl was seized from CW-20 and weighed and field-tested. The package of drugs purchased from YORRO weighed approximately 50 grams and tested positive for the presence of fentanyl on a TruNarc field test. The drugs were sent to the DEA lab for further testing.

vii. 4/22/2026 – Controlled Purchase of a Kilogram of Cocaine from YORRO and MARTINEZ

77. On April 22, 2026, a cooperating witness conducted a controlled purchase of approximately a kilogram of cocaine from YORRO in exchange for \$16,250. This transaction was audio-video recorded. Over the course of multiple consensual recordings and phone calls, the

¹² All of the controlled buys described in this affidavit were conducted under the supervision of the federal agents and task force agents working on this investigation. Before each controlled buys, agents employed the following set of procedures. Agents met the cooperating witness at a predetermined meet location where they searched the cooperator for money or contraband, provided the cooperating witness with a set amount of official government funds (“OGF”) to make the purchase, provided the cooperating witness with audio/video recording and monitoring equipment, and surveilled the cooperator to the buy location where possible consistent with the cooperator’s safety. After each buy, agents surveilled the cooperator back to a predetermined meet location, seized any contraband and any unused OGF, searched the cooperator for money or contraband, retrieved the recording equipment, and debriefed the cooperator. Unless otherwise noted, any cash referenced in this affidavit provided to a cooperating witness for the purpose of making a controlled purchase of contraband was official government funds.

cooperating witness confirmed that YORRO's connection for the kilogram of cocaine was JOSE MARTINEZ, A/K/A "J KILLA," who was on federal supervised release at the time of the deal.

78. On April 20, 2026, the cooperating witness and MARTINEZ had a consensually recorded phone call about the kilo deal. MARTINEZ told the cooperating witness that he is being charged "16,250" for the kilo and therefore not making any profit because he will sell it at the same price ("They charged me 16,250 manito, I'm not gonna make nothing off of it"). They discussed the logistics of YORRO getting the coke and delivering it immediately ("ASAP. He literally gonna go to the jects and grab them... nigga, you could be there nigga," "We are talking about like right now").

MARTINEZ:	They charged me 16,250 manito, I'm not gonna make nothing off of it. I'm a just get em for you. He asked me how long you bring the bread in.
CHS:	I could give it to you ASAP brodie. It is just a question if I can get it today by a certain time so I just told bro I'll just do it for tomorrow. I can do like... I'll have the bread on me at 7:30 in the morning brodie, after that I could meet up any time
MARTINEZ:	Damn. But them niggas already on their way. You messed up.
CHS:	I mean, I could do it today, brodie, it just what time would I get it so that nigga [U/I]
MARTINEZ:	ASAP. ASAP. He literally gonna goto the jects and grab them... nigga, you could be there nigga.
CHS:	Que lo que, you know I trust you brother. We can um. But you think I'll have it before 9:30, like before 10.
MARTINEZ:	Hell yeah nigga. We are talking about like right now. I'm talking about I just talking to him right now and how long your boy gonna be in there. And he like he gonna meet me in the jects right now. And I said let me have bro pull up in the jects right now.

79. The deal ultimately took place on April 22, 2026, however. During the transaction, YORRO got into the vehicle with the cooperating witness holding a black bag containing the kilogram of cocaine. The transaction was consensually audio-video recorded. YORRO and the cooperating witness exchanged the cash for the cocaine and discussed how the cooperating witness

intended to sell the kilogram of cocaine. YORRO then exited the vehicle and departed. Still images from the video recording follow.



80. During the transaction, YORRO asked the cooperating witness if he is going to sell the kilogram as a whole or if he is going to break it down (“That shit is fresh out, man. Yo, um, you gonna break that towards down you or you are gonna give it up?”). YORRO said that RICHARD PENA, A/K/A “BLADE,” had reached out to him, because a customer named RJ was looking for 100 grams (“cause this nigga Blade [PH] hit me up, supposedly RJ needs a hundred (100) grams”). YORRO indicates that if the cooperating witness did not have a buyer for the entire kilogram, he could fulfill the open order for RJ (“nah, I’m just telling you”).

YORRO:	What we ended up doing. Right back to you.
CHS:	That smells good.
YORRO:	Yikes. That shit is fresh out, man. Yo, um, you gonna break that towards down you or you are gonna give it up?
CHS:	Nah, I’m giving it to [U/I]
YORRO:	A’ight, ‘cause this nigga Blade hit me up, supposedly RJ needs a hundred (100) grams.
CHS:	What do you mean? So, I can’t do shit for a whole?
YORRO:	What you mean?
CHS:	I can’t sell that whole shit like that?
YORRO:	Nah, nah, I’m just telling you...

CHS:	Oh...
YORRO:	Since you used to see RJ...
CHS:	Sounds good, sounds good, sounds good.
YORRO:	You already know.
CHS:	I never did though.
YORRO:	You don't... I've seen... I've seen RJ
CHS:	Out of respect to YB. Out of respect to YB.

81. Following the transaction, agents seized the kilogram of cocaine from the cooperating witness and weighed and field-tested it. The package of drugs purchased from YORRO weighed approximately 1,100 grams and tested positive for the presence of cocaine on a TruNarc field test. The drugs were sent to the DEA lab for further testing.

B. JAMES CABRERA, A/K/A “TRENSITA”

82. JAMES CABRERA, A/K/A “TRENSITA,” (dob: xx/xx/1996, ssn: xxx-xx-8963) (“CABRERA”), is a senior member of the Lawrence Chapter of the Trinitarios. Agents believe CABRERA has been a member of the Trinitarios since at least 2014 based on information from multiple cooperating witnesses and historical reporting by law enforcement.

83. A photograph of CABRERA follows:



84. CABRERA was born in Puerto Rico and is a citizen of the United States.

85. I am familiar with CABRERA's criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On December 24, 2014, CABRERA was charged in Lawrence District Court, Docket No. 1418CR007764, with Possession of a Firearm without a Permit. On April 28, 2016, CABRERA was convicted and sentenced to incarceration for a period of 18 months.
 - i. Investigators are familiar with Lawrence Police report #14010409 related to Docket No. 1418CR007764. During this incident on December 23, 2014, CABRERA was observed running from a vehicle during a car stop. As he ran, CABRERA was observed throwing a firearm into a bush, which police later recovered.
- b. On October 23, 2017, CABRERA was charged in Lawrence District Court, Docket No. 1718CR005169 with Possession of a Firearm without a Permit, and Resisting Arrest. The case was later indicted in Essex Superior Court, Docket No. 1777CR00605, with additional drug charges and ammunition charges. The case was subject to nolle prosequi on January 19, 2021.
 - i. Investigators are familiar with Lawrence Police report #17007770 related to Docket No. 1718CR005169. During this incident on October 20, 2017, a 911 caller reported that CABRERA was in possession of a firearm in front of 210 Broadway in Lawrence. The caller identified that they had seen the firearm and it was in CABRERA's right pocket. Officers arrived and observed CABRERA, matching the caller's description. As a cruiser arrived, CABRERA ran away and was holding his right hand over his front waistband, consistent with securing a firearm. Officers lost sight of CABRERA as he ducked into an alley. CABRERA was then apprehended and found to not be in possession of a firearm. Officers retraced the path of CABRERA's flight and located a firearm on the roof near the alley where officers lost sight of him. A second 911 caller also reported that they saw the person who was arrested throw an item onto the roof.
- c. On February 6, 2018, CABRERA was charged in Salem District Court, Docket No. 1836CR0000289, with Assault and Battery and Disturbing a Correctional Institution. On June 1, 2018, CABRERA was convicted and sentenced to incarceration for a period of six months.
- d. On September 6, 2018, CABRERA was charged in Salem District Court, Docket No. 1836CR00173, with Assault and Battery and Disturbing a Correctional Institution. On January 8, 2019, CABRERA was convicted and sentenced to three months incarceration.
- e. On February 23, 2018, CABRERA was charged in Lawrence District Court, Docket No. 1818CR000836, with Possession of a Firearm without a Permit, Possession of Ammunition without a Firearm Identification Card (FID),

Discharging a Firearm within 500 Feet of a Building, Receiving Stolen Property, and Possessing a Loaded Firearm without a Firearm Identification Card (FID). The case was subject to a nolle prosequi on March 22, 2021.

- i. Investigators are familiar with Lawrence Police report #s, 18001275 and 18001278 related to Docket No. 1818CR000836. During this incident on February 22, 2018, a vehicle containing CABRERA was observed by officers conducting an interaction that appeared to be a drug transaction. After making these observations, officers heard gunfire. Officers continued to follow the vehicle in traffic and observed the right rear passenger throw a firearm under a nearby parked vehicle. The vehicle was stopped and CABRERA was identified in the left rear passenger seat, and Lawrence Trinitarios member, RODDERITH PERALTA, A/K/A "MAGO" was observed in the right rear passenger seat. In addition to CABRERA, PERALTA was also charged with firearm offenses related to this incident. PERALTA pleaded guilty on October 24, 2019 and was sentenced to 18 months.

86. Photographs of CABRERA wearing Trinitarios beads and making Trinitarios gang signs with his hands follow.



i. 5/29/2025 - Recording of James Cabrera Discussing Drug Distribution

FILENAME: BS_BS-3299190_BS-3299190-BR_2025_05_29T19_12_50.wav

87. On May 29, 2025, CABRERA was captured on a consensual recording with a cooperating witness discussing drug trafficking in Maine. CABRERA explains that when he recently traveled to Maine he sold a kilogram and a half of cocaine (“I go, boom, a bird and a half,” “on a upski”) and about 700 grams or so of fentanyl (“there was like 700 and something on the down”). Based on my training and experience, I know that a “bird” is a street name for a kilogram of cocaine.

CABRERA:	Holy shit! Nigga, when I go, boom, a bird and a half, nigga. A bird [stutters] a bird on a, on a upski and like... nah, I’m capping [stutters] and the res—and there was like 700 and something on the down.
CHS:	Um-hum.
CABRERA:	That the plug asked for it back and shit, like for him to make sure ha—to make shit official. Long story short, you already know. Like, long story short, if I was to be a dirt bag nigga, I would’ve went [sic] like this—around those days. I would have been like, “Psh, a bird and this, this, and that, and I don’t gotta re-up and—and I already have a motion,” ‘cause I already had a motion ready to go.
CHS:	Um-hum.
CABRERA:	Like, I wasn’t tripping on [UI] Ask D, I already—I already had my shit up there. I was already going crazy up there. I was like, psh.

88. CABRERA states that he brought such a large quantity of drugs that the customers started returning the drugs (“these niggas is literally ordering some shit and then, they telling K that they didn’t even order that”, “I’m like, ‘Yo, I could’ve sworn that you told me this.’”). CABRERA notes that he has insulated himself from the customers and rarely talks to them (“I can’t even talk to fiends myself, you feel me?”).

CABRERA:	Take this shit back, brodie. And then, I’m over here embarrassed, bro, that [U/I] was mad dumb, bro. Because... it was like, [U/I]... these niggas is literally ordering some shit and then, they telling K that they didn’t even order that. [BACKGROUND: NOISES] And I’m like, “Yo...” I’m like, “Yo, I could’ve sworn that you told me this.” Like...
CHS:	[LAUGHS]

CABRERA:	And I'm like this, so now... so like, I never delt with no shit like that. So now, like, you feel me? I got K, [ONOMATOPOEIC SOUNDS] woosh, woosh, and then I got them to [I/I] the fiends, woosh, woosh, I can't even talk to fiends myself, you feel me? Telephone, I said, "Damn, [I/I]."
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ii. 6/24/2025 – Recording of Duran and Cabrera Discussing the Murder of Trinitarios Member

Filename: 2025-06-24_11-44-02

89. On June 24, 2025, CABRERA and DURAN were captured on a consensual recording with a cooperating witness discussing the potential that a member of the Trinitarios was cooperating with federal law enforcement. This conversation took place shortly after PERALTA and MEDINA were charged with kidnapping NILBEL VENTURA AMARO, and information provided by one of the cooperating witnesses was included in the affidavit.

CABRERA:	This is, this is yesterday. [U/I]. C, YB and me, had a crack in the case like we detective federal agents on the streets.
CHS:	[LAUGHS]
CABRERA:	[U/I] trying to see who is the rat. We came to the conclusion like, whose the nigga that's ratting niggas.
DURAN:	This nigga funny.

90. CABRERA begins the conversation by discussing the fact that a Trinitarios member pleaded guilty to incidents that were not a part of the reason why he was arrested ("Unless you, nigga you a rat, nigga. Like, that's the only reason why you confessed to that case.")

CABRERA:	I don't even know how they take your charge...
CHS:	I'm like, "no."
CABRERA:	I, I don't know how he got like... charge, took a charge out. Unless you, nigga you a rat, nigga. Like, that's the only reason why you confessed to that case. Who is gonna just take a charge... let's say, they did find it on the phone. Nigga, you didn't even fight no charge, you didn't even fight no case.
CHS:	You feel me?
CABRERA:	So, how you gonna take a deal like... no, nigga like you told, nigga.
DURAN:	Wait, he saying that he took a deal like, for B shit?
CABRERA:	Yes.

CHS:	Let him.
DURAN:	Nigga said... [LAUGHS]
CHS:	That he took that shit.
DURAN:	Hey yo. [LAUGHS]
CHS:	That they charged him with.
CABRERA:	Yeah, they charged him with it.
DURAN:	Nigga said...
CABRERA:	He took that, brodie. He took that... he took everything.
DURAN:	Nigga said ...
CABRERA:	Like if anything, you probably told on yourself.

91. CABRERA then suggests that they may have to kill the Trinitarios member and then suggests that they should have shot the Trinitarios member twice (“Nigga, a [U/I] ass nigga. [U/I] have to kill him”, “We should’ve shot him two (2) times”).

CABRERA:	Nigga, a [U/I] ass nigga. [U/I] have to kill him.
CHS:	[U/I] in DR, right, my guy?
CABRERA:	We should’ve shot him two (2) times, bro, that’s it. [U/I].

92. Later in the conversation, they discuss facts related to the pending case against RODDERITH PERALTA, A/K/A “MAGO,” and ISIAH MEDINA, A/K/A “ICE.” PERALTA and MEDINA are charged with the May 2024 kidnapping of Trinitarios-affiliated drug trafficker NILBEL VENTURA AMARO. CABRERA says that PERALTA and MEDINA told the Trinitarios member they suspect of cooperating about the kidnapping (“after Ice and Mago did their whole shit, they went and linked [the Trinitarios member] and told [the Trinitarios member] everything”). CABRERA then describes the investigation and how federal agents obtained MEDINA’s cellular phone as well as text messages and content (“they have all the text messages from Ice’s phone”). DURAN then admits he was threatening to kill MEDINA in the past, and those threats may be in MEDINA’s phone (“me and him had beef, I was threatening to kill his ass”).

CABRERA:	After, after, after Ice and Mago did their whole shit, they went and linked [the Trinitarios member] and told [the Trinitarios member] everything.
DURAN:	No fucking way they told [the Trinitarios member].

CABRERA:	Yeah, brodie. They went and told him everything. And then, a couple of days later, nigga...
DURAN:	Oh my God.
CHS:	Look, they got him [U/I] kidnapping.
CABRERA:	Kidnap [U/I] and everything.
DURAN:	Oh.
CHS:	Mm.
CABRERA:	They saw...they found all that shit at Ice spot and then Ice [U/I].
DURAN:	Wow.
CHS:	And they have all the text messages from Ice's phone.
CABRERA:	All the text messages.
CHS:	So, if anybody ever talked to Ice on some hot shit, they have that too.
DURAN:	Oh my God. Yo.
CHS:	I hope you niggas know that.
CABRERA:	[U/I].
CHS:	Anybody ever talked some shit...
DURAN:	[U/I] on those days, me and him had beef, I was threatening to kill his ass.

iii. 10/21/2025 - Recording Concerning Maine Drug Trafficking

FILENAME: 2025-10-21_13-57-55

93. On October 21, 2025, CABRERA was captured on a consensual recording with a cooperating witness discussing the sale of drugs in Maine. CABRERA explains that it is a five-hour trip to deliver drugs to Maine and that he pays his runner \$200 (“On that five (5) hour trip? “Grab two-hundred (200) for yourself”). CABRERA says that he sent a runner up to Maine in his rental with no license (“I sent him up there in my rental with no—he don’t have no license, no nothing”).

CABRERA:	But if I was a thug like Ice, like Yellow, I would’ve been like, ¿ “Bro, for real?”
CHS:	You gone every Tuesday.
CABRERA:	“¿Is that, is that true?” “On that five (5) hour trip? “Grab two-hundred (200) for yourself, give bro two-hundred (200). You feel me?”
CHS:	That’s what that nigga really dubee-do [PH].
CABRERA:	One thousand (1,000) ¿Uh? ¿Uh, uh, bro? One thousand (1,000)
DURAN:	No, he can’t complain.
CABRERA:	He can’t complain.

CHS:	Damn. I know that when he first touch that first one-thousand (1,000), he said, “Damn, if I do this ten (10) times, I’ll have ten (10).”
CABRERA:	Bro, you know what I did... no, ‘cause uh... you, you wanna know something... I did that... and I looked at my stash... you, brodie, God knows, bro, my God is like, my God knows. I sent him up there in my rental with no—he don’t have no license, no nothing. And no rip, this is all I did, I took out the breesh [PH]... that I owed... like the breesh that I... that are like, the prop.

94. CABRERA says the trip is dangerous and that after one trip he put the resupplied drugs on a bureau and questioned whether he would do it again (“I took the re-up and I put it right on top of the bureau [PH]. And I was like, ‘My brother that’s going up there and coming back down with God.’”). CABRERA says that he did not want to make the trip many more times, for fear of being caught (“But I already knew that I didn’t want to do that too many times”). CABRERA states that he sent a runner named “Joppy” to Maine in a car and the trip took five hours and forty minutes each way (“Joppy went up there, bro, alone in a car... five (5) forty (40), five (5) forty (40) back”), and paid him \$1,000 (“And I gave him his one thousand (1,000), grab this here, my handsome bro, you passed.” You feel me? Straight up like that. You passed my brother.”). CABRERA advises the cooperating witness that the plan should be to send eight ounces of drugs to Maine and travel at the speed limit the whole trip (“Head up north, speed limit with, with eight (8) zips”).

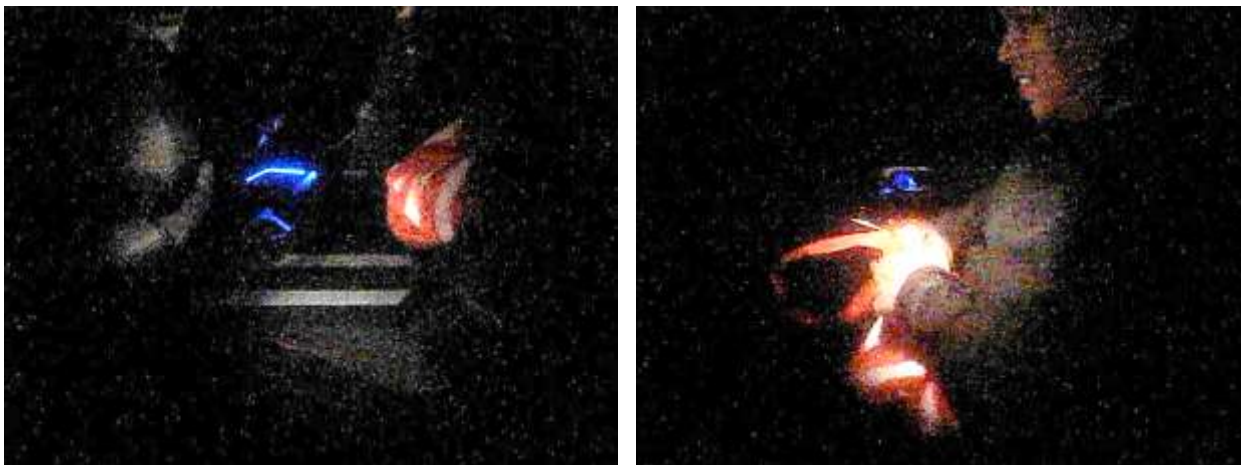
CABRERA:	Like, the, the, the re-up? I took that shit [U/I] upstairs; I took the re-up and I put it right on top of the bureau [PH]. And I was like, “My brother is going up there and coming back down with God.” But I already knew that I didn’t want to do that too many times, but I did it ‘cause he needed it for a piece.” Joppy went up there, bro, alone in a car... five (5) forty (40), five (5) forty (40) back. He drove about eleven (11), twelve (12) hours that night, came back down, exhausted like that. And I gave him his one thousand (1,000), grab this here, my handsome bro, you passed.” You feel me? Straight up like that. You passed my brother. No, everybody that, that, you gotta let your nuts hang.
CHS:	Mm-hmm.
CABRERA:	Head up north, speed limit with, with eight (8) zips.
CHS:	All those hours. And then is también, coming back down with the money and not trynna lose it.

iv. 4/2/2026 – Controlled Purchase of Methamphetamine from James Cabrera and “Ron”

95. On April 2, 2025, a cooperating witness made a controlled purchase of approximately one pound of methamphetamine from JAMES CABRERA and CABRERA’s meth connect, whom CABRERA referred to as “Ron,” for \$1,800. The transaction was audio-video recorded. JAMES CABRERA entered the vehicle with the cooperating witness. JAMES CABRERA is seated in the front passenger seat. Still images of CABRERA follow.



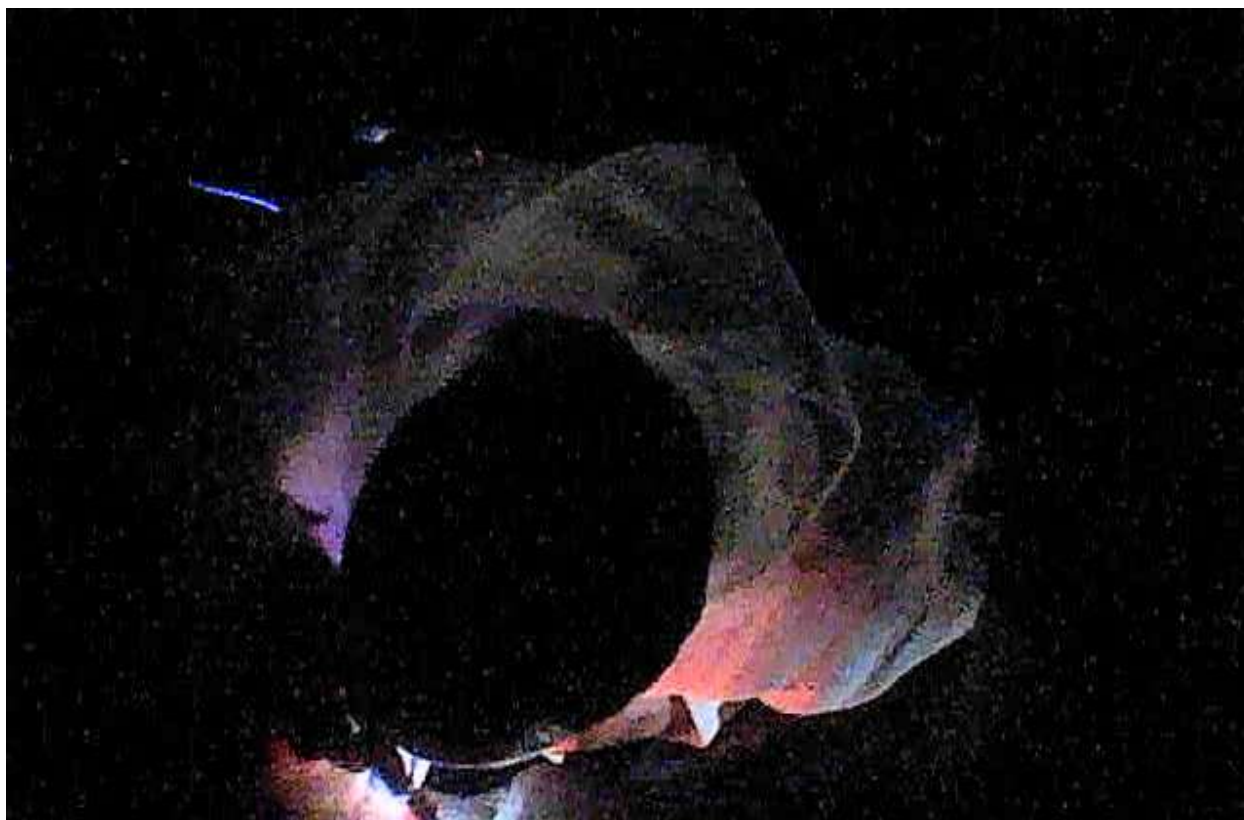
96. Shortly thereafter, an unidentified associate of CABRERA who CABRERA identifies as “Ron” enters the rear of the vehicle carrying a red bag. The red bag contained the pound of methamphetamine.



97. The cooperating witness and CABRERA exchange the cash for the red bag, which Ron passes to the front. Still images depicting CABRERA passing the cash back to Ron and CABRERA taking possession of the red bag containing the pound of methamphetamine follow.



98. After the red bag is passed to the front, JAMES CABRERA removes a plastic bag from within the red bag and opens it. JAMES CABRERA then leans into the bag and smells it to ascertain the quality of the drugs.



99. A draft transcript of the recording of the transcript was generated. CABRERA identifies the unidentified methamphetamine supplier as “Ron.”

CABRERA:	Just my man, bro, [CHS, CHS], this is my man Ron.
RON:	What’s up? Chill, chill.
CHS:	What’s up, my brother?
RON:	Chill.
CHS:	Chill.
CABRERA:	Bro, let me get my jacket. Fuck.

100. The cooperating witness requests to see the methamphetamine and CABRERA notes that he already “tried” the methamphetamine (“Let me see that shit,” “I already tried that shit”). CABRERA then describes the methamphetamine as high quality (“That shit is precious”), noting that it does not smell like ammonia, which signifies low quality (“that shit is precious and it doesn’t smell, it doesn’t smell like ammonia or anything like that”). CABRERA then notes that the methamphetamine has no smell (“Like you see how has no smell,” “no nothing?”). CABRERA

states that if the drugs smelled like acetone that would mean the drugs were low quality (“When it smells like Acetone is when that shit is trash”).

CHS:	Let me see that shit.
RON:	A’ight.
CABRERA:	I already tried that shit.
CHS:	Is good?
CABRERA:	Yea’. That shit is precious, I sent that shit to [U/I] already, on bro.
CHS:	Mm.
CABRERA:	Yeah, that shit is precious and it doesn’t smell, it doesn’t smell like ammoniac or anything like that, look. It has like uh... let me see.
CHS:	‘Cau— ‘cause now is more.
CABRERA:	Like you see how has no smell...
CHS:	At all.
CABRERA:	...no nothing? When it smells like Acetone is when that shit is trash. Booty-cheese trash.

101. During the transaction, CABRERA asks the cooperating witness to call YORRO, whom agents know is also referred to as “Twin” (“Bro, call Twin, bro”), because CABRERA wanted to provide Ron with a sample of fentanyl (“I’m trynna get this nigga a sample, brodie, for uh, uh, uh, of the downsky”).¹³ CABRERA explains that he has a new phone number and that YORRO is likely ignoring his calls because the number is unknown (“I got a new number, that’s why he’s not pro’ly not picking up either. I’m blowing that nigga up”).

CABRERA:	Bro, call Twin, bro, I’m trynna get this nigga a sample, brodie, for uh, uh, uh, of the downsky [sic], bro. This nigga, um, I got a new number, that’s why he’s not pro’ly not picking up either. I’m blowing that nigga up, K.
RON:	Yeah, I need a sample of everything right now.
CHS:	Mm. [BACKGROUND: TELEPHONE RINGS]

102. CABRERA then mentions a Trinitarios associate named “Gordo” and states that he is about to get violent with him (“to Gordo, bro, that cocksucker, bro, I’mma boutta do it to that nigga, no funny shit”). CABRERA states that Gordo sells drugs and provides good prices (“that

¹³ Based on my training an experience, I know that “downsky” or “down” is a reference to fentanyl because its effect is a downer as compared, for example, with cocaine, which is an upper.

nigga be playing mad games, bro, he be selling me mad tickets”). CABRERA complains that Gordo lines up too many customers and never has any drugs available to provide to CABRERA (“he’ll have—he’ll have as much niggas as he can, nigga, on standby. And then, nigga”, “then, nigga don’t got shit, bro”). The cooperating witness refers to a prior incident where a Trinitarios member named “Monkey” confronted Gordo about his practices, and CABRERA notes that Monkey should have killed Gordo (“Nah, yeah, Monkey shoulda killed that nigga”).

CABRERA:	Bro, to, to Gordo, bro, that cocksucker, bro, I’mma boutta do it to that nigga, no funny shit.
CHS:	What? What’s up with that hoe-ass-nigga?
CABRERA:	Bro, that nigga be playing mad games, bro, he be selling me mad tickets, “Yo... yo, yeah, I... I got... we gonna have some twist on this day, on this day.” And he’ll have—he’ll have as much niggas as he can, nigga, on standby. And then, nigga...
CHS:	And never gives them anything.
CABRERA:	And then, nigga don’t got shit, bro.
CHS:	That’s why probably that nigga Monkey got crazy with him that time.
CABRERA:	Nah, yeah, Monkey shoulda killed that nigga.

103. CABRERA then has a consensually recorded phone call with YORRO, the cooperating witness and “Ron.” During the call, CABRERA asks YORRO for a sample of fentanyl (“I need a samp, bro, of uh, uh, of the downsky, brodie,” “I’m trynna I need a sample of that bitch”).

CABRERA:	[ASIDE: Yo, bro. What’s up, bro? Yo, it’s me blowing you up, my brother.]
YORRO:	[BACKGROUND: (U/I)]
RON:	[I/I] lost a blizzy.
CHS:	Yeah.
CABRERA:	[ASIDE: I need a samp, bro, of uh, uh, of the downsky, brodie, the fastest way, bro, no funny shit.
CHS:	I think [U/I].
YORRO:	[BACKGROUND: I gotchu, brodie.]
CABRERA:	[BACKGROUND: I talked (STAMMERS) I already, I spoke to [CHS] and shit, nigga, you feel me? I’m trynna I need a sample of that bitch.]

104. On April 2, 2026, after the buy, agents met with the cooperating witness and seized the methamphetamine purchased from CABRERA and “Ron.” The drugs were sent to and analyzed at the DEA laboratory. The DEA laboratory determined that the substance weighed 444

grams and contained methamphetamine with 98% purity, resulting in 436 grams of pure methamphetamine.

C. LUIS CRISPIN, A/K/A “YB”

105. LUIS CRISPIN, A/K/A “YB,” (dob: xx/xx/1996, ssn: xxx-xx-6568) (“CRISPIN”), is a senior member of the Lawrence Chapter of the Trinitarios. Agents believe CRISPIN has been a member of the Trinitarios since at least 2017 based on information from multiple cooperating witnesses.

106. A photograph of CRISPIN follows.



107. CRISPIN was born in Massachusetts and is a citizen of the United States.

108. I am familiar with CRISPIN’s criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On November 3, 2015, CRISPIN was charged in Lowell District Court, Docket No. 1511CR006417, with Possession of a Loaded Firearm without a License, Carrying a Dangerous Weapon on School Grounds, Carrying a Firearm without a License, and Possession of Ammunition without a Firearm Identification Card (FID). On April 4, 2016, CRISPIN was convicted and sentenced to incarceration for a period of 19 months.
- b. On November 6, 2015, CRISPIN was charged in Lawrence District Court, Docket No. 1518CR006013, with Trafficking a Controlled Substance (Heroin) and Distribution of a Class A Substance. On March 21, 2016, CRISPIN was convicted and sentenced to incarceration for a period of two years and six months.

109. Photographs of CRISPIN making Trinitarios gang signs and associating with other Trinitarios members, including JAMES CABRERA and ENRIQUE DURAN, follow.



CRISPIN and CABRERA



CRISPIN, DURAN and CABRERA



DURAN, CRISPIN and JAMES CABRERA

D. ANGEL CASTILLO-GARCIA, A/K/A “CHAPPA”

110. ANGEL CASTILLO-GARCIA, A/K/A “CHAPPA,” (dob: xx/xx/1988, ssn: xxx-xx-7815) (“CASTILLO” or “CASTILLO-GARCIA”), is a member of the Lawrence Chapter of the Trinitarios. According to multiple cooperating witnesses, CASTILLO was a member of the Lawrence Chapter and a leader of a subgroup of the Lawrence Chapter of Trinitarios known as the “Chappa Boys,” which included ELVIS TRUJILLO, A/K/A “HONDURAS,” and ROBERT SEVERINO, A/K/A “PETETE.”

111. A photograph of CASTILLO follows.



112. CASTILLO was born in the Dominican Republic and was deported in 2018 following a conviction.

113. I am familiar with CASTILLO's criminal record. The following is a summary of his pertinent arrest and conviction.

- a. On April 18, 2018, CASTILLO was arrested and charged in U.S. District Court for the District of Massachusetts, in Docket No. 18-CR-10095-FDS, with Dealing in Firearms without a License, Conspiracy to Commit an Offense, and Aiding and Abetting. On January 14, 2019, CASTILLO pleaded guilty to these charges and was sentenced to incarceration for a period of 30 months.

114. Photographs of CASTILLO making Trinitarios gang signs and wearing a Trinitarios beaded necklace follow.



i. Murder of Juan Espinal and Murder of Mindy Tran

115. Multiple cooperating witnesses have described CASTILLO's participation in the murder of Juan Espinal on March 8, 2017, and the murder of Mindy Tran on November 26, 2017. Both murders are described in detail in the Detention Affidavit filed in support of the motion to

detain ELVIS TRUJILLO, A/K/A “HONDURAS.” *See United States v. Paula-Cabral, et. al.*, Docket No. 25-10058-NMG, ECF #10-1 (hereinafter “February 2025 Detention Affidavit”). The February 2025 Detention Affidavit refers to CASTILLO under the pseudonym “lesser leader of the Lawrence Chapter.” *Id.* February 2025 Detention Affidavit (ECF #10-1, pp. 68-88).

116. With respect to the murder of Juan Espinal, multiple cooperating witnesses provided information concerning the murder, including the following:

- a. CW-3 provided information regarding the murder of Espinal. CW-3 stated that TRUJILLO confessed to committing the murder of Espinal with SEVERINO. SEVERINO also confessed to CW-3 about committing the murder of Espinal. CW-3 stated that TRUJILLO and SEVERINO bragged to CW-3 about committing the murder. CW-3 stated that they described ambushing Espinal as he walked down the street and that TRUJILLO and SEVERINO were aware of where Espinal would be because Espinal was setup by an acquaintance. CW-3 stated that TRUJILLO claimed to have gotten the “kill shot” on Espinal, which is consistent with the surveillance video and physical evidence. CW-3 explained that the basis for the Trinitarios to kill Espinal was because Espinal had assaulted and beat up a Trinitarios member a week before the murder, recorded the incident and put it on the internet.
- b. CW-17 provided information regarding the murder of Espinal. SEVERINO spoke with CW-17 about the murder and SEVERINO confessed to murdering Espinal with TRUJILLO. SEVERINO told CW-17 that Espinal was a Shotgun Crip and that SEVERINO and TRUJILLO were ordered to kill Espinal by a Trinitarios leader. SEVERINO explained to CW-17 that they “were waiting for him at his house because he had gone out somewhere and so they were waiting and when he -- and they were hiding in an alley and when he got there, they just shot him.” This statement is consistent with physical evidence and surveillance video.
- c. CW-18 provided information regarding the murder of Espinal. CW-18 stated that there was a meeting where the murder of Espinal was discussed. This meeting took place in the cemetery and numerous Trinitarios attended, including CW-18, YORRO and SEVERINO. During this meeting, YORRO and SEVERINO were in favor of killing Espinal. A vote was held and the gathered membership voted to kill Espinal. After Espinal was shot and killed, CW-18 spoke with SEVERINO on many occasions and SEVERINO admitted to killing Espinal. After Espinal was shot and killed, CW-18 also spoke with TRUJILLO on many occasions and TRUJILLO admitted to killing Espinal. TRUJILLO and SEVERINO told CW-18 that CASTILLO dropped off SEVERINO and TRUJILLO to commit the murder of Espinal. CW-18 stated that SEVERINO and TRUJILLO were both blessed into the Trinitarios for the murder of Espinal.

- d. CW-20 stated that TRUJILLO and SEVERINO spoke with CW-20 about the murder of Espinal. TRUJILLO and SEVERINO stated that they both fired during the incident and that TRUJILLO had the kill shot.
- e. CW-37 stated that SEVERINO confessed to CW-37 about shooting Espinal with TRUJILLO. SEVERINO stated that TRUJILLO had the kill shot. SEVERINO told CW-37 that CASTILLO sent the mission to kill Espinal.

117. With respect to the murder of Mindy Tran, multiple cooperating witnesses provided information concerning the murder, including the following:

- a. CW-3 stated that TRUJILLO confessed to CW-3 about shooting and killing Tran during the attempted robbery. CW-3 stated that TRUJILLO conducted the robbery at the direction of CASTILLO.
- b. CW-18 provided information regarding the murder of Tran. CW-18 stated that TRUJILLO admitted to killing Tran. CW-18 stated that CASTILLO sent TRUJILLO and an individual, known to the investigation as STATE-CW-2, to rob Tran of marijuana, money and her phone and that the murder took place during the robbery.
- c. CW-22 stated that TRUJILLO confessed to CW-22 about shooting and killed Tran during the attempted robbery. CW-22 stated that TRUJILLO conducted the robbery at the direction of CASTILLO. CW-22 was present when CASTILLO ordered TRUJILLO and STATE-CW-2 to conduct the robbery of Tran.
- d. STATE-CW-2 stated that “Gordo” shot and killed Tran during an attempted robbery of Tran. STATE-CW-2 was present when TRUJILLO shot and killed Tran. STATE-CW-2 stated that CASTILLO ordered TRUJILLO to commit the robbery with a coconspirator. STATE-CW-2 later identified TRUJILLO as “Gordo.”

E. OSVIALIS SERRANO, A/K/A “OG O”, A/K/A “OG PABLO”

118. OSVIALIS SERRANO, A/K/A “OG O,” A/K/A “OG PABLO,” (dob: xx/xx/1997, ssn: xxx-xx-5723) (“SERRANO”), is a member of the Lawrence Chapter of the Trinitarios. According to multiple cooperating witnesses, SERRANO was a member of the Lawrence Chapter of the Trinitarios prior to his deportation and remains in contact with associates and members in Lawrence.

119. A photograph of SERRANO follows:



120. SERRANO was born in the Dominican Republic and was deported following multiple criminal convictions.

121. I am familiar with SERRANO's criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On November 22, 2017, SERRANO was arraigned in Lawrence District Court, Docket No. 1718CR004520, and charged with Assault and Battery, Operating Recklessly, Leaving the Scene of a Motor Vehicle Accident with Property Damage, and Operating with a Suspended License. On January 16, 2018, SERRANO was convicted and placed on probation with a suspended sentence of eighteen months. SERRANO was found to have violated the terms of his release on June 20, 2018.
- b. On March 4, 2019, SERRANO was charged in Essex County Superior Court, Docket No. 19787CR00219, with Trafficking a Controlled Substance, Fentanyl, Over Ten Grams and Assault and Battery with a Dangerous Weapon. On June 1, 2022, SERRANO pleaded guilty and was sentenced to two and one-half years in state prison.

122. Photographs of SERRANO wearing Trinitarios beads and making Trinitarios gang signs follow.



i. January 2024 - Murder For Hire Plot with ALES MENA

123. During the investigation, agents seized and searched cellular phones being used by ALES MENA, A/K/A “SHU1BILL,” a drug supplier to the Trinitarios.¹⁴ One of the cell phones

¹⁴ MENA has been charged in federal court in Massachusetts with, *inter alia*, conspiracy to distribute fentanyl. See *U.S. v. MENA, et al.*, Docket No. 26-MJ-08104-PGL.

contained a conversation, in January 2024, between MENA and SERRANO, over text messages and audio files, where they discuss contracting the murder of an individual in the Dominican Republic.

124. MENA asks SERRANO for a favor in the Dominican Republic (“I need a favor out there”). SERRANO replies concerning his status in the Dominican Republic after his deportation, complaining that the Trinitarios are ignoring him (“they are ignoring me”) and have taken his property (“they kept what was mine, when I was... when I got arrested, bro. They kept my business and a few other things too”).

MENA:	What’s going on [,] bro [?] U still need that [?] I need a favor out there [.]
MENA:	Hit me when u see this [.]
SERRANO:	I am stuck, bro, here in the patio [The DR] you know, bro, and to tell you the truth none of the thugs, you feel me? they haven’t been willing to give me a hand or help me, bro. I have my car there, which I’m going to sell, and that, but not yet. It’s like I was telling you, I’m still missing that, and I have asked a few thugs and they... you feel me? they are ignoring me, but that’s nothing, you feel me, bro? Trynna... trynna get up there, nigga, because nigga, as soon as I touchdown, bro, you know I could get that and even more than that, bro. And the thugs that are giving me the back, I’m going to give them what they deserve, because there are a few thugs that... you feel me, bro? That they kept what was mine, when I was... when I got arrested, bro. They kept my business and a few other things too.

125. MENA then sends a photograph of an individual. A series of messages from MENA are deleted and then SERRANO asks how much MENA has available and the coordinates for the target (“How many you have? Give, give me the coordinates”). Following a number of deleted messages from MENA, SERRANO states if the target is in the capital he can get with the target quickly (“You know that if he is here, I’ll—I’ll be with that nigga quick”). SERRANO also asks what MENA is willing to pay (“But I’m just asking like, yo um, what’s... what’s the price on it, you feel me? what’s the price on it”). SERRANO also asks if MENA just wants him beat up (“You want me to give him a few blows?”). Following a number of deleted messages from MENA,

SERRANO asks if MENA knows the target's location and when he can make payment to SERRANO ("u know where he be at," "When will you be willing to pay").

SERRANO:	let me know, because you know that I'll get it from you right away. What's up? How many you have? Give, give me the coordinates; tell me, let me know
SERRANO:	Yo... you know that I'm from... I'm over here in the capital, and I'm from over here. You know that if he is here, I'll—I'll be with that nigga quick, you feel me? But I'm just asking like, yo um, what's... what's the price on it, you feel me? what's the price on it, and...and what's up? You want me to give him a few blows?
SERRANO:	Say that u know where he be at?
SERRANO:	When will you be willing to pay

126. After additional deleted messages from MENA, SERRANO sends a lengthy audio message. In the audio message, SERRANO explains that paying to have someone killed in the Dominican Republic costs about 3 million pesos, which is about \$60,000 ("over here, killing someone cost three (3) million pesos; that's what it cost to kill someone here," "Which is the equivalent of sixty (60) thousand dollars. That's the cost to kill someone"). SERRANO explains that he can do the murder for MENA and can start within a week or two ("I could do that job for you and I'll get on that dude, and withing a week or two (2) doing some follow ups"). SERRANO is confident that he can get to the target, because the island is small ("I know I could get him, because we are here," "and this place is tiny place"). SERRANO asks for a portion of the fee up front and the rest once the target is dead ("you give me thirty (30), bro; you give me thirty (3), bro. You give me fifteen (15) or ten (10) up front, and the rest once I get the job done, you could do it like that"). SERRANO suggests that MENA could speak with SERRANO's father in Lawrence the following day, and give him a portion, and SERRANO will complete the job immediately ("you could get together with my dad tomorrow, you feel me? You go to the house where I live, and hand him half, ten (10), and then, the job you will see right away that"). SERRANO offers to

send MENA photographs to confirm that the murder is done (“within a week I’m going to send you pictures, and everything”).

SERRANO:	TRANSLATION: No cap, bro. Listen to what’s the deal, killing someone costs... over here, over here, killing someone cost three (3) million pesos; that’s what it cost to kill someone here. You feel me? Which is the equivalent of sixty (60) thousand dollars. That’s the cost to kill someone; so, by the time you get arrested, you have to pay sixty (60) thousand dollars, and that’s three (3) millions and at least do five (5) to six (6) in jail. You understand what I’m trying to tell you? I could do that job for you, I... I could do that job for you and I’ll get on that dude, and withing a week or two (2) doing some follow ups, I know I could get him, because we are here, you feel me? and this place is tiny place. Uh... nah nigga, you give me thirty (30), bro; you give me thirty (3), bro. You give me fifteen (15) or ten (10) up front, and the rest once I get the job done, you could do it like that. If you are willing to do that, for real, and you want to do that, bro, because I’m not playing, bro. You feel me? If you are willing to do that, you let me know what’s up. Because I have a few whips around, and those things are badass and they just want to go fishing, and I’m not walking around guessing, you feel me? Because you know that we’ve been through a lot, for you to be wondering around. If you are serious about this, you could get together with my dad tomorrow, you feel me? You go to the house where I live, and handle him half, ten (10), and then, the job you will see right away that... within a week I’m going to send you pictures, and everything. What’s up? Look at it right there fuu on a silver platter, just so you know what’s up. But that has to be kept between the two of us, that cannot come out of your mouth; only you and I will know about that. You feel me?
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127. SERRANO says that he could kill the target in a week or two (“if you for real want that, bro, I could kill that thug for you this same week, or in two (2) weeks”). SERRANO explains that he could use prostitutes to catfish the target (“I could set him up with a few whores that I have around and they are really bad bitches, and you already know; I’ll disappear him for sure”). SERRANO asks if MENA knows the type of car the target drives (“Yo, you know what car he be pushing? You know what car he be pushing?”).

SERRANO:	TRANSLATION: Where I’m not on point shut, is: if you for real want that, bro, I could kill that thug for you this same week, or in two (2) weeks, I’ll kill him, trust me. But I have a few bitches and I could set him up with a few whores that I have around and they are really bad bitches, and you already know; I’ll disappear him for sure.
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SERRANO:	MESSAGE: Yo, you know what car he be pushing? You know what car he be pushing?
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128. SERRANO tells MENA that he has already killed three people and that he really enjoys the feeling of adrenaline when he kills someone (“I already got rid of three (3) people, whom are already checked on my to do list; so, I already killed three (3). You feel me, bro? So, that makes you feel an adrenaline that gets you on high speed, and to take action right away”). SERRANO states that he is just waiting on MENA to give him the green light and he will make it happen (“I’m just waiting for you to give me the green light and that’s it.”).

SERRANO:	TRANSLATION: I don’t know if you feel what I feel, you feel me? But, I... I already got rid of three (3) people, whom are already checked on my to do list; so, I already killed three (3). You feel me, bro? So, that makes you feel an adrenaline that gets you on high speed, and to take action right away, especially if there is money on the way, when you are in need, you know. Are you crazy, bro; I’m just waiting for you to give me the green light and that’s it. What are we going to do? That way you’ll see how I disappear him for you.
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129. SERRANO explains that killing someone is serious, and will require him getting another car and changing tires and tinting the windows prior to looking for the target (“Just for me to go get the whip, I have to go down to the countryside, you feel me? because I have that in a trap at my mom’s house,” “I will also need to take out an old car that I have over there at my mother’s house. I have to change two (2) tires, and tint the windows”).

SERRANO:	TRANSLATION: And my bad that I’m charging you thirty (30), but to tell you the truth, this is serious, this is serious, trust me. If it was just to beat him up, boom, boom, and that’s it; but when, nigga, when you want a nigga gone... Nigga, you feel me? That’s... that’s [STAMMERS] that’s another level we’re talking. Just for me to go get the whip, I have to go down to the countryside, you feel me? because I have that in a trap at my mom’s house. Uh, I will also need to take out an old car that I have over there at my mother’s house. I have to change two (2) tires, and tint the windows, and then come out and do some drive around looking for that dude.
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130. SERRANO then sends a screen capture of a social media account to MENA and asks if the account is one used by the target (“That’s him”). MENA confirms that the account is

used by the target (“Yeah”). MENA states that he will need to gather some money and has already tasked his cousin with killing the target (“I’m not gonna lie I have my cousin on it”). MENA explains that his cousin is charging him \$15,000, and the cousin wanted a few people to work with (“He is charging me 15k but [,] since I’m on him [,] he wanted a few people behind him”). MENA explains that he has some people capable of this type of work but remembered SERRANO and hit him up (“I have people but remember bout you [,] that’s why I hit u”). MENA states that he could pay SERRANO’s people \$5,000 because he would not be losing that much if the guys run off on him without doing the job (“I could pay your people 5k [,] bro [,] ‘cause I don’t mind losing that if niggas run off [on] me u kno”). MENA explains that he is used to handling such business himself but is trying to step back based on the supposed success of his music career (“I’m just so use to doing shit myself but this music shit had me”).

SERRANO:	[SENDS A SCREEN CAPTURE OF A SOCIAL MEDIA ACCOUNT]
SERRANO:	That’s him
MENA:	Yeah
MENA:	Let me work real quick bro I’m not gonna lie I have my cousin on it [,] He is charging me 15k but[,], since I’m on him[,], he wanted a few people behind him[.]
MENA:	I have people but remember bout you[,], that’s why I hit u [,]
MENA:	I could pay your people 5k[,], bro[,], ‘cause I don’t mind losing that if niggas run off me u kno[.]
MENA:	I only talk money bro[,], you do a deed for me you locked for life[.]
MENA:	Whatever[.] I’m just so use to doing shit myself but this music shit had me [...]

131. SERRANO responds to MENA’s suggestion that his guys might steal MENA’s money by saying that he could do the job for free (“I could even do the job for free for you, bro”). SERRANO states that he would not steal the money from MENA, and would prefer to rob fifteen or twenty people rather than steal from MENA (“Me, bro, I won’t take your money; for that, I rather go out and rob fifteen (15) or twenty (20) people, instead of stealing from you, because I’m, I’m not like that; that system is not in me”). SERRANO again tells MENA to go to his father’s

house and give him a down payment and the job will be done right away (“If you want bro, stop by my old man, and give him that, and that way you will see what’s up with you dude. Just open that door and go to my old man’s house and give him that, and you will see what’s up with you dude, how your dude will disappear him right away”).

SERRRANO:	TRANSLATION: Nah bro, I understand; I understand, bro, to be honest I understand. You feel me? But I’m the type of guy that I don’t work like that, bro, because I’m not going to flip, because of ten (10) thousand or fifteen (15) thousand buck; I’m a pure guy, to flip over something stupid like that. You feel me? I could even do the job for free for you, bro. I don’t... I don’t play that, bro. You feel me? I’m loyal, and I’m the type of guy that will perform the job for you. Probably the people that are telling you that they would do it for you, they are probably thinking about taking your money. Me, bro, I won’t take your money; for that, I rather go out and rob fifteen (15) or twenty (20) people, instead of stealing from you, because I’m, I’m not like that; that system is not in me. You feel me? But I’ll do it whichever way you want. You just have to—you just have to tell me...listen, if you want, you can even go to and stay in my bedroom at my dad’s house, and you can stay there until the mission is completed, and once the mission is completed, you give that to my old man, and that way you will see what’s up with me, nothing but loyalty with me, bro. I’m not after ten (10) thousand or fifteen (15) thousand bucks, when I’m the type of guy that I have made a bunch of money; you know that, Shu. You know that right now we are not doing that great, but in no time, we will be making something once again, fum and you start doing good again, you feel me, bro? Because these are things that normally happen in life, but that’s nothing. If you want bro, stop by my old man, and give him that, and that way you will see what’s up with you dude. Just open that door and go to my old man’s house and give him that, and you will see what’s up with you dude, how your dude will disappear him right away.
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ii. 4/26/2025 - Recording of RICHARD PENA, A/K/A “BLADE,” Discussing Shooting of TunTun

132. On April 16, 2025, Trinitarios member RICHARD PENA, A/K//A BLADE,” was captured on a consensual recording discussing the shooting of a rival gang member named Jose Rosado, a/k/a “TunTun.” During the recording, PENA describes committing this shooting with OSVIALIS SERRANO and CRISPIN in the area of Tower Hill in Lawrence.

133. In the recording, PENA states that he was alerted to a member of the Gangster Disciples named “TunTun” who was sitting in his car without a firearm (“Nigga, in that nigga’s shoulder like, ‘Look at TunTun [PH] right there.’ The dude was like this bro, lacking in his car”). PENA states that they contacted CRISPIN (“YB”), and CRISPIN came to meet them in the area of Tower Hill in Lawrence, MA (“we got on, zoom, YB,” “nigga, over there, to Tower Hill”).

PENA:	The guy goes, zoom, you feel me? Nigga, in that nigga’s shoulder like, “Look at TunTun [PH] right there.” The dude was like this bro, lacking in his car. We went, we got on, zoom, YB came.
CHS:	Where? In [U/I]?
PENA:	We got on... nah nigga, over there, to Tower Hill [PH].

134. PENA states that SERRANO came in a car that he owned (“OSVIALIS had [U/I] and everything, a car that he had bought”). PENA states that SERRANO parked and PENA got into the driver’s seat, while SERRANO and CRISPIN walked up on TunTun (“OSVIALIS made an U-turn, zoom, and he parked. And nigga, I hopped in the driver seat, zoom, and OSVIALIS... he and YB walked out, and they started walking up on the nigga”). TunTun saw them and turned the car lights on, because, as PENA explains, TunTun saw four masked guys in a car (“that nigga turned the light car- the car lights on,” “To move. Like, he saw, he saw four (4) dudes in a car, masked”).

PENA:	And after Osvialis had [U/I] and everything, a car that he had bought. We got on, zoom. Bro, nigga, when we got on... we got on nigga, and he was like this with the lights on, bro. Ro- rolling up, he’s missing two (2) teeth and his two (2) teeth look like this, rolling the tobacco and he looked at us up and down, coming up and down the hill. You know that he became suspicious, zoom, you feel me? OSVIALIS made an U-turn, zoom, and he parked. And nigga, I hopped in the driver seat, zoom, and Osvialis... [STAMMERS] he and YB walked out, and they started walking up on the nigga, and he— nigga, that nigga turned the light car- the car lights on...
CHS:	Uh-huh.
PENA:	To move. Like, he saw, he saw four (4) dudes in a car, masked...

135. PENA explains that after seeing them approach, TunTun started moving his vehicle, and SERRANO got back into the driver’s seat and made a u-turn (“He started moving, then niggas

jumped in the driver's seat. This nigga OSVIALIS did a u-ey"). PENA describes that he was telling everyone that they are going to shoot TunTun's girlfriend ("I'm like, "Bro, nigga, we gonna blow, we gonna blow his bitch down.")). PENA tells everyone in the car that TunTun's girlfriend was driving ("The bitch is his driver"). SERRANO did not care that a woman was driving the car and started firing ("Osvialis is like, "Nigga, fuck that!" And started just dumping right through the bitch"). PENA states that SERRANO fired two times at the female driver ("No cap. Clapped her two (2) times").

PENA:	He started moving, then niggas jumped in the driver's seat. This nigga OSVIALIS did a u-ey, fu. Nigga, that nigga, that nigga went like this, you feel me? I'm like, "Bro, nigga, we gonna blow, we gonna blow his bitch down."
CHS:	Yup.
PENA:	'Cause the bitch is the driver, you feel me?
CHS:	Hmm.
PENA:	The bitch is his driver. And Osvialis is like, "Nigga, fuck that!" And started just dumping right through the bitch.
CHS:	[LAUGHS]
PENA:	No cap. Clapped her two (2) times.

136. PENA states that CRISPIN did not want to shoot and kill the girl who was driving ('YB didn't wanna blow either, he didn't want to whack the bitch").

CHS:	And now he's supposedly blind, nigga.
PENA:	YB didn't wanna blow either, he didn't want to whack the bitch.
CHS:	[CHUCKLES]
PENA:	No cap. But dude, bro, that bitch was gonna go, gang.
CHS:	And look—
PENA:	Everything was gonna hit that bitch.

137. PENA explains that TunTun fired at their car ("He supposedly shot once. He supposedly shot the first bullet [PH] through the back.") while the Trinitarios were approaching the vehicle on foot and hit the car in the rear windshield ("He supposedly shot once. He supposedly shot once;" "The first shot, TunTun. Boom! Supposedly this nigga walked up. He like").

PENA:	He supposedly shot once. He supposedly shot the first bullet [PH] through the back.
CHS:	The what?

PENA:	He supposedly shot once. He supposedly shot once...
CHS:	He?
PENA:	The first shot, TunTun. Boom! Supposedly this nigga walked up. He like—
CHS:	And how the fuck, nigga? If I shoot at you, nigga, how I am not going to shoot more, nigga? What's wrong with you, bro? You know the niggas walked up to you, plus it is supposedly four (4) dudes. [U/I].
PENA:	No cap.
CHS:	But the guys beat him up before he shoot [STAMMERS] or... how did he shoot?
PENA:	He shot- there was a shot, right? Boom!

138. PENA explains that once they shot at TunTun, he threw himself on his girlfriend (“And then, when, when the shooting started, he just threw himself to his shorty.”). PENA describes the shots as going through TunTun and hitting his girlfriend (“He would’ve put his head down like this, nothing would’ve hit that nigga. Everything would’ve been straight to her, but that it still went through him and it hit her.”).

PENA:	And then, when, when the shooting started, he just threw himself to his shorty.
CHS:	Dude.
PENA:	No cap.... He would’ve put his head down like this, nothing would’ve hit that nigga. Everything would’ve been straight to her, but that it still went through him and it hit her.
CHS:	That’s crazy too bro, ‘cause I thought that nigga [U/I]...
PENA:	‘Cause the passenger seat was laid back. And you know when the passenger seat is laid back...
CHS:	Uh-huh.
PENA:	What goes and pass through here is gonna hit you.
CHS:	Uh-huh.
PENA:	No cap.
CHS:	[STAMMERS] so it was-it was in the passenger, you’re sure it wasn’t the driver? Or she was in the driver—
PENA:	She was in the driver.
CHS:	Oh...

139. PENA states that when SERRANO and the other shooter fired, TunTun covered his girlfriend and the rounds hit him (“They blew at him, but if he would’ve put his head down... All the bullets were like this. All the bullets was [sic] right here,” “if the nigga wouldn’t have thrown himself over here to hug his shorty, he would’ve just duck, he would’ve been good”). Had TunTun not done that, his girlfriend would have been killed (“They wouldn’t have even touch him, no cap.

But she would've got whacked", "the dude threw himself to her. They hit him mad times. They hit him with the [U/I] in the chest").

PENA:	Feel me? They blew at him, but if he would've put his head down... All the bullets were like this. All the bullets was [sic] right here, like shoted [sic] this way...
CHS:	[STAMMERS] Oh...
PENA:	So, zoom, zoom, zoom, zoom [PH]. So, if the nigga wouldn't have thrown himself over here to hug his shorty, he would've just duck, he would've been good, nigga...
CHS:	Shh...
PENA:	They wouldn't have even touch him, no cap. But she would've got whacked.
CHS:	Damn, man...
PENA:	The dude threw himself to her. They hit him mad times. They hit him with the [U/I] in the chest.

F. JERVIS ALMANZAR, A/K/A "JB"

140. JERVIS ALMANZAR, A/K/A "JB," (dob: xx/xx/2004, ssn: xxx-xx-1927) ("ALMANZAR"), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that ALMANZAR has been a member of the Trinitarios since at least 2022 based on information from multiple cooperating witnesses.

141. A photograph of ALMANZAR follows.



142. ALMANZAR was born in Massachusetts and is a citizen of the United States.

143. I am familiar with ALMANZAR's criminal record. The following is a summary of his pertinent arrest and conviction:

- a. In December 2023, ALMANZAR was charged in the United States District Court for the District of Maine with drug offenses (Docket No. 2:24-CR-

00011). In August 2024, ALMANZAR pleaded guilty to two counts of distribution of 40 grams or more of fentanyl. On January 30, 2025, ALMANZAR was sentenced to 60 months in federal prison and is currently serving that sentence. According to court papers in that case, ALMANZAR sold a cooperating witness in Maine approximately 300 grams of fentanyl.

144. Photographs of ALMANZAR wearing Trinitarios beads and making Trinitarios gang signs follow.



145. CW-48 provided information concerning ALMANZAR's participation in the May 2024 kidnapping of NILBEL VENTURA AMARO with ISIAH MEDINA, A/K/A "ICE," and RODDERITH PERALTA, A/K/A "MAGO." Specifically, CW-48 stated that, in May 2024, ALMANZAR, MEDINA, and PERALTA, and others held VENTURA AMARO in the basement of a residence for multiple days. CW-48 stated that ALMANZAR's hand is visible on the left side of a video taken of VENTURA AMARO being held in handcuffs in the basement. MEDINA and PERALTA were previously charged with this kidnapping, where VENTURA AMARO was taken

at gunpoint by MEDINA and PERALTA who wear DEA raid jackets and forced him into a vehicle, and kept him locked in a basement for multiple days. *See United States v. Medina & Peralta*, Docket No. 25-cr-10302-NMG, ECF #1-1, p. 8.

G. ENRIQUE DURAN, A/K/A “JEFE E”

146. ENRIQUE DURAN, A/K/A “JEFE E,” (dob: xx/xx/2000, ssn: xxx-xx-1923) (“DURAN”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that DURAN has been a member of the Trinitarios since at least 2020 based on information from multiple cooperating witnesses.

147. A photograph of DURAN follows.



148. DURAN was born in the Dominican Republic and is not a citizen of the United States. DURAN is a lawful permanent resident.

149. I am familiar with DURAN’s criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On May 28, 2024, DURAN was arraigned in Lawrence District Court, Docket No. 2418CR002063, and charged with Discharging a Firearm within 500 Feet of a Building, Possession of a Large Capacity Weapon Feeding Device, Resisting Arrest, Possession of a Firearm without a Permit, Assault with a Dangerous Weapon, Making False Statements Regarding Firearm ID Card, and Carrying a Firearm with Ammunition. The False Statements charge was dismissed on October 3, 2025. He was released with pre-trial conditions of release. This case remains pending.

- b. On August 26, 2025, DURAN was arraigned in Lawrence District Court, Docket No. 2518CR002989, and charged with Malicious Damage to a Motor Vehicle. He was released with pre-trial conditions of release. This case remains pending.

150. Photographs of DURAN wearing Trinitarios beads and making Trinitarios gang signs with MEJIA, PENA, Jimenez and ARIAS follow.





H. ABIGAIL ARIAS, A/K/A “BESTIA”

151. ABIGAIL ARIAS GONZALEZ, A/K/A “BESTIA,” (dob: xx/xx/1999, ssn: xxx-xx-2150) (“ARIAS”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that ARIAS has been a member of the Trinitarios since at least 2019 based on information from multiple cooperating witnesses and other sources of information.

152. A photograph of ARIAS follows.



153. ARIAS is a citizen of the United States.

154. I am familiar with ARIAS' criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On December 10, 2019, ARIAS was charged in Essex Superior Court, Docket No. 1977CR00519, with Distribution of Fentanyl, and Conspiracy to Violate the Controlled Substance Act. On March 2, 2021, ARIAS was convicted and sentenced to two and one-half to three and one-half years in state prison.¹⁵
- b. On October 8, 2025, ARIAS was charged in the United States District Court for the District of Massachusetts, Docket No. 25-cr-10410-NMG, with 21 U.S.C. 846, with Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, and 18 U.S.C. § 924(c), Possession of One or More Firearms in Furtherance of a Drug Trafficking Crime. This case is pending.
 - i. This case relates to a year-long drug distribution conspiracy involving GARCIA and ARIAS distributing fentanyl and cocaine and obtaining numerous firearms over the course of the conspiracy. *See* Docket No. 25-cr-10410-NMG, ECF #1-1 (Complaint Affidavit). This conspiracy is related to and part of the Trinitarios criminal enterprise, as both GARCIA and ARIAS are Trinitarios members and agents believe they obtained their drugs from a common Trinitarios source of supply, specifically, JOSE MARTINEZ, A/K/A "JAY KILLA." As noted in the affidavit supporting the criminal complaint, agents believe GARCIA and ARIAS have distributed kilogram bricks bearing the "LV" logo, which is consistent with the type and marking of kilogram bricks distributed by MARTINEZ at the time

155. Photographs of GARCIA wearing Trinitarios beads and making Trinitarios gang signs follow.

¹⁵ This case was part of Operation Emerald Crush. *See* "79 Guns Taken Off Streets in Greater Lawrence Area and Over 30 Individuals Charged," Press Release, available at <https://www.justice.gov/usao-ma/pr/79-guns-taken-streets-greater-lawrence-area-and-over-30-individuals-charged>.



I. RIKY MONTILLA, A/K/A “RICO”

156. RIKY MONTILLA, A/K/A “RICO,” (dob: xx/xx/2004, ssn: xxx-xx-8806) (“MONTILLA”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that MONTILLA has been a member of the Trinitarios since at least 2022 based on information from multiple cooperating witnesses.

157. A photograph of MONTILLA follows.



158. MONTILLA was born in the Dominican Republic and is not a citizen of the United States. MONTILLA is a lawful permanent resident.

159. I am familiar with MONTILLA's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On August 8, 2022, MONTILLA was charged in Lawrence Juvenile Court, Docket No. 22DL0589, with Threats. On January 10, 2023, MONTILLA was found delinquent and committed to the custody of DYS.
 - i. Investigators are familiar with Lawrence Police report #22003475 related to Docket No. 22DL0589. On May 11, 2022, a teacher at RISE Academy reported being threatened by MONTILLA. Specifically, MONTILLA stated to another student, "im going to spray that bitch," referring to the teacher, and to "ask about me in the streets." The teacher and principal confronted MONTILLA about the statements, and MONTILLA stated that he would strangle her and then told her, "that is why your friend got hit with an AR. Ask about me in the streets." This was in reference to a friend of the teacher who was killed in December of last year. The teacher was visibly upset, crying and in fear as she told the officer about the incident.
- b. On December 12, 2022, MONTILLA was charged in Lawrence District Court, Docket No. 2218CR004012, with Possession of a Firearm without a Permit, Possession of Ammunition without a Firearm Identification Card (FID), and Carrying a Firearm with Ammunition. On September 20, 2023, MONTILLA was convicted and sentenced to 18 months incarceration.
- c. On June 13, 2025, MONTILLA was charged in Essex Superior Court, Docket No. 2577CR00178, with Assault and Battery with a Dangerous Weapon, Assault with a Dangerous Weapon, Armed Assault with Intent to Murder, and Possession of a Firearm without a Permit (Second Offense). These charges relate to a March 2025 shooting incident described below, and the charges remain pending.

160. On June 13, 2025, MONTILLA was arrested on an outstanding court warrant at a hotel in Tewksbury, Massachusetts. The arrest warrant charged MONTILLA with the March 2025 shooting described below. A search warrant was executed for the hotel room where MONTILLA was arrested. Upon being placed into custody, an arresting officer heard MONTILLA state that the

gun in the room was his. Officers located a semi-automatic firearm with a blue slide and laser attachment submerged in the tank of the toilet. The firearm was loaded with a magazine containing 9mm ammunition.



161. On June 13, 2025, MONTILLA was charged in Lowell District Court with firearm offenses. *See* Lowell District Court, Docket No. 2511CR003019. On September 22, 2025, this case was dismissed due to the unavailability of indigent criminal defense lawyers in Middlesex County.

162. Photographs of MONTILLA wearing Trinitarios beads and making Trinitarios gang signs follow.



J. JEREMY FELIX, A/K/A "PEPE," A/K/A "JUAN PEPE"

163. JEREMY FELIX, A/K/A "PEPE," (dob: xx/xx/1999, ssn: xxx-xx-4656) ("FELIX"), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that FELIX has been a member of the Trinitarios since at least 2020 based on information from multiple cooperating witnesses.

164. A photograph of FELIX follows.



165. FELIX was born in Massachusetts and is a citizen of the United States.

166. I am familiar with FELIX's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On May 30, 2019, FELIX was charged in Lawrence District Court, Docket No. 1918CR002348, with Possession of a Firearm without a Permit and Failing to Produce Firearm Identification Card. On August 30, 2019, FELIX was convicted and sentenced to a suspended sentence of 18 months. FELIX violated probation on August 27, 2020, and was incarcerated.
- b. On June 24, 2020, FELIX was charged in Lawrence District Court, Docket No. 2018CR001654, with Possession of a Firearm without a Permit, Trespassing, Ammunition Possession without a Firearm Identification Card, Firearm Possession without a Permit, Resisting Arrest, and Disorderly Conduct. On January 21, 2021, FELIX was convicted and sentenced to 18 months of incarceration, with two and one-half years of additional incarceration suspended. On December 5, 2024, FELIX was found in violation of probation and was sentenced to two and one-half years incarceration.
- c. On February 23, 2021, FELIX was charged in Salem District Court, Docket No. 2136CR000214, with two counts of Assault and Battery and Disturbing a Correctional Institution. On October 12, 2021, FELIX was convicted and sentenced to incarceration for six months.
- d. On November 7, 2024, FELIX was arraigned in Essex County Superior Court, Docket No. 2477CR00397, and charged with Assault and Battery with a Dangerous Weapon, Malicious Destruction of Property over \$1,200, Possession of a Firearm without a Permit, Discharging a Firearm within 500 feet of a dwelling, and Possession of a Firearm without a Permit (Second Subsequent Offense). This case remains pending. The incident giving rise to these charges took place on June 16, 2024, and is described below.
- e. On September 18, 2025, FELIX was arraigned in Salem District Court, Docket No. 2536CR001823, and charged with Assault and Battery on a Correctional Officer and Disturbing a Correctional Institution. This case was continued on November 12, 2025.

167. A photograph of FELIX wearing Trinitarios beads and making Trinitarios gang signs follows.



168. A cooperating witness provided information about violent acts committed by FELIX. Specifically, CW-18 stated that: (1) FELIX shot someone near Water Street in Lawrence, Massachusetts, during a drug transaction; and (2) FELIX told CW-18 that he shot at someone near the bridge on Route 110 during a road rage incident.

K. JOSE MARTINEZ, A/K/A “JAY KILLA”

169. JOSE MARTINEZ, A/K/A “JAY KILLA,” (dob: xx/xx/1995, ssn: xxx-xx-7024) (“MARTINEZ”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that MARTINEZ has been a member of the Trinitarios since at least 2018 based on cooperating witness information. Multiple cooperating witnesses have described MARTINEZ as a drug supplier who supplies senior members of the Trinitarios with cocaine and fentanyl.

170. A photograph of MARTINEZ follows.



171. MARTINEZ was born in the United States and is a citizen.

172. I am familiar with MARTINEZ's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On January 28, 2016, MARTINEZ was charged in Hillsborough County Superior Court, Docket No. 2262016CR115, with Sale, Transport, Manufacture of Controlled Drug, and Conspiracy to Sell, Transport, Manufacture Controlled Drug. On November 14, 2017, MARTINEZ was convicted and sentenced to 128 days, and two to four years in state prison suspended for five years of probation.
 - i. Investigators are familiar with the facts of this incident as reported in MARTINEZ's Presentence Report. On January 28, 2016, a confidential source arranged to purchase 100 grams of heroin from a supplier named "Will" for \$3,200. As Will arrived at the location for the purchase, officers approached Will's vehicle. The vehicle then attempted to leave the area at high speed but was stopped prior to the entrance to the highway. The occupants were removed from the vehicle. JOSE MARTINEZ was the driver. A search warrant was obtained for the vehicle and drugs were discovered.
- b. On December 5, 2016, MARTINEZ was charged in Lawrence District Court, Docket No. 1618CR006327, with Assault to Murder, Assault and Battery with a Dangerous Weapon, Discharging a Firearm within 500 Feet of a Building, Possession of a Firearm without a Permit, and Possession of Ammunition without a Firearm Identification Card. The Assault to Murder charge was dismissed on May 11, 2017. All other charges were nolle prosequi on June 27, 2017.
- c. On June 28, 2019, MARTINEZ was charged in the United States District Court for the District of Massachusetts, No. 19-cr-10273-RGS, with Being a Felon in Possession of Firearm and Ammunition and Distribution of Fentanyl. On July 13, 2021, MARTINEZ was convicted and sentenced to 66 months incarceration

followed by 4 years of supervised release. MARTINEZ is currently in violation proceedings based on new charges in Lawrence District Court.

- i. Investigators are familiar with the facts set forth in the complaint affidavit filed in support of case No. 19-cr-10273-RGS. The case involved multiple controlled purchases of fentanyl from MARTINEZ by an undercover law enforcement officer that were facilitated through a codefendant delivering them, as well as the recovery of multiple firearms, including a rifle, during the subsequent search of MARTINEZ's residence.

173. Photographs of MARTINEZ with other Trinitarios gang members, including Jimenez, CABRERA, and PENA follow.





i. 6/21/2024 – Controlled Purchase of Fentanyl from MARTINEZ

174. On June 21, 2024, CW-6 contacted MARTINEZ and arranged to purchase approximately 85 grams of fentanyl for \$2,000. The June 21, 2024, transaction was arranged through MARTINEZ and completed by a Trinitarios member who works for MARTINEZ as a runner, whose identity is known to me. CW-6 had a consensually recorded phone conversation discussing the sale of fentanyl. The drugs were tested at the DEA laboratory and determined to contain fentanyl and weigh 86 grams.

ii. 7/3/2024 – Controlled Purchase of Fentanyl from MARTINEZ

175. On July 3, 2024, CW-6 contacted MARTINEZ and arranged to purchase approximately 86 grams of fentanyl for \$2,000. The July 3, 2024, transaction was arranged through MARTINEZ and completed by ORTIZ. This transaction was not recorded. The drugs were tested at the DEA laboratory and determined to contain fentanyl and weigh 79 grams.

iii. 7/30/2024 - Controlled Purchase of Fentanyl from MARTINEZ

176. On July 30, 2024, CW-6 contacted MARTINEZ and arranged to purchase approximately 30 grams of cocaine for \$2,000. The July 3, 2024, transaction was arranged through MARTINEZ and completed by MARTINEZ. This transaction took place in a parking lot and was subject to physical surveillance by agents who made a video recording of CW-6 conducting the transaction at the window of MARTINEZ's vehicle. MARTINEZ is not visible during the transaction but a male matching his description can be observed in the video. MARTINEZ's girlfriend was the registered owner of the vehicle and the driver. The drugs were tested at the DEA laboratory and determined to contain cocaine and weigh 29 grams.

L. JAYDEN MUNIZ, A/K/A "ANUELITO"

177. JAYDEN MUNIZ, A/K/A "ANUELITO," (dob: xx/xx/2002, ssn: xxx-xx-8929) ("MUNIZ"), is a member of the Lawrence Chapter of the Trinitarios. Agents believe MUNIZ has been a member of the Trinitarios since at least 2018 based on information from multiple cooperating witnesses and reporting by law enforcement.

178. A photograph of MUNIZ follows.



179. MUNIZ was born in Massachusetts and is a citizen of the United States.

180. I am familiar with MUNIZ's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On February 26, 2018, MUNIZ was charged in Lawrence Juvenile Court, Docket No. 18DL0182LA, with Armed Assault with Intent to Murder. On June 19, 2018, the case was dismissed.
 - i. Investigators are familiar with Lawrence Police report #18001245 related to Docket No. 18DL0182LA. On February 21, 2018, MUNIZ and ELVIS TRUJILLO, A/K/A “HONDURAS,” were captured on video running from the scene of a shooting where eleven rounds were fired in broad daylight and multiple rounds entered a nearby residence. On the video, MUNIZ and TRUJILLO can be observed discarding their clothing and TRUJILLO can be seen holding a firearm.
- b. On December 10, 2018, MUNIZ was charged in Lawrence Juvenile Court, Docket No. 18DL1070L, with Possession of a Large Capacity Weapon. On January 29, 2019, this case was subject to nolle prosequi.
 - i. Investigators are familiar with Lawrence Police report #18008013, related to Docket No. 18DL1070L. On December 8, 2018, officers conducted a car stop on a vehicle operated by ABIGAIL ARIAS, who did not have a valid license. MUNIZ was identified in the passenger seat and a large capacity firearm was located under MUNIZ’s seat.
- c. On November 13, 2019, MUNIZ was charged in Lawrence Juvenile Court, Docket No. 19DL0909L, with Possession of a Large Capacity Weapon, Possession of a Controlled Substance in a School Zone, and Possession of Ammunition. On January 29, 2019, MUNIZ was found delinquent and committed to DYS custody.
- d. On February 3, 2020, MUNIZ was charged in Lawrence Juvenile Court, Docket No. 20YO0002L, with two counts of Possession of a Firearm Without a Permit and Firearm Trafficking. On March 1, 2022, MUNIZ was convicted and placed on probation. MUNIZ violated probation and was committed to state prison for a term of three to five years.
- e. On December 1, 2021, MUNIZ was charged in Lawrence District Court, Docket No. 2118CR003661, with Possession of a Firearm without a Permit, Assault with a Dangerous Weapon, and Carrying a Firearm without an ID Card. On May 31, 2022, MUNIZ was convicted and sentenced to incarceration for two years.
 - i. Investigators are familiar with Lawrence Police report #21008340 related to Docket No. 2118CR003661. On November 23, 2021, a victim reported that while driving his car, he pulled over to let another vehicle pass on a narrow street. MUNIZ was identified to be driving a vehicle that drove up to the victim’s vehicle and rolled down his window. MUNIZ asked the victim where he was from and if he was in a gang. MUNIZ then pulled out

a gun and pointed it at the victim. MUNIZ told the victim that Basswood Street was his block and he owned it.

- f. On December 1, 2021, MUNIZ was charged in Lawrence District Court, Docket No. 2118CR003674, with Improper Storage of a Firearm, Possession of a Firearm, and Possession of Ammunition without a Firearm Identification Card. On May 31, 2022, MUNIZ was convicted and sentenced to incarceration for two years.
 - i. Investigators are familiar with Lawrence Police report #21008529 related to Docket No. 2118CR003674. On November 30, 2021, Lawrence Police executed a search warrant at MUNIZ's residence and recovered a loaded firearm with an extended magazine. This search warrant was in relation to the incident charged in Docket No. 2118CR003661.
- g. On April 2, 2025, MUNIZ was charged in Haverhill District Court, Docket No. 2538CR00568, with Assault Dangerous Weapon and Threats. On August 6, 2025, the case was dismissed.
 - i. Investigators are familiar with Haverhill Police report # 25017310 related to Docket No. 2538CR00568. On April 2, 2025, Haverhill Police responded to MUNIZ's former girlfriend's residence for a domestic dispute. The girlfriend reported that MUNIZ threatened to kill her and pointed a firearm at her. The victim shared text messages and photographs with responding officers, including a photograph depicting a firearm being held by a person which the victim said was MUNIZ. In the text messages, MUNIZ states to the victim, "Bitch u tryna get smacked with a 10 clip talkin bout money."
- h. On July 7, 2025, MUNIZ was charged in Essex Superior Court, Docket No. 2577CR00179, with Assault and Battery with a Dangerous Weapon, Assault with a Dangerous Weapon, Possession of a Firearm without a Permit (Second Offense), and two counts of Armed Assault. These charges relate to the March 2025 shooting incident described below, and the charges remain pending.

181. Photographs of MUNIZ making Trinitarios gang signs follow.



M. GEOVANE FERNANDES, A/K/A “SPOOKY”

182. GEOVANE FERNANDES, A/K/A “SPOOKY,” (dob: xx/xx/2001, ssn: xxx-xx-9617) (“FERNANDES”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that FERNANDES has been a member of the Trinitarios since at least 2020 based on information from multiple cooperating witnesses and other sources of information.

183. A photograph of FERNANDES follows.



184. FERNANDES is a citizen of the United States.

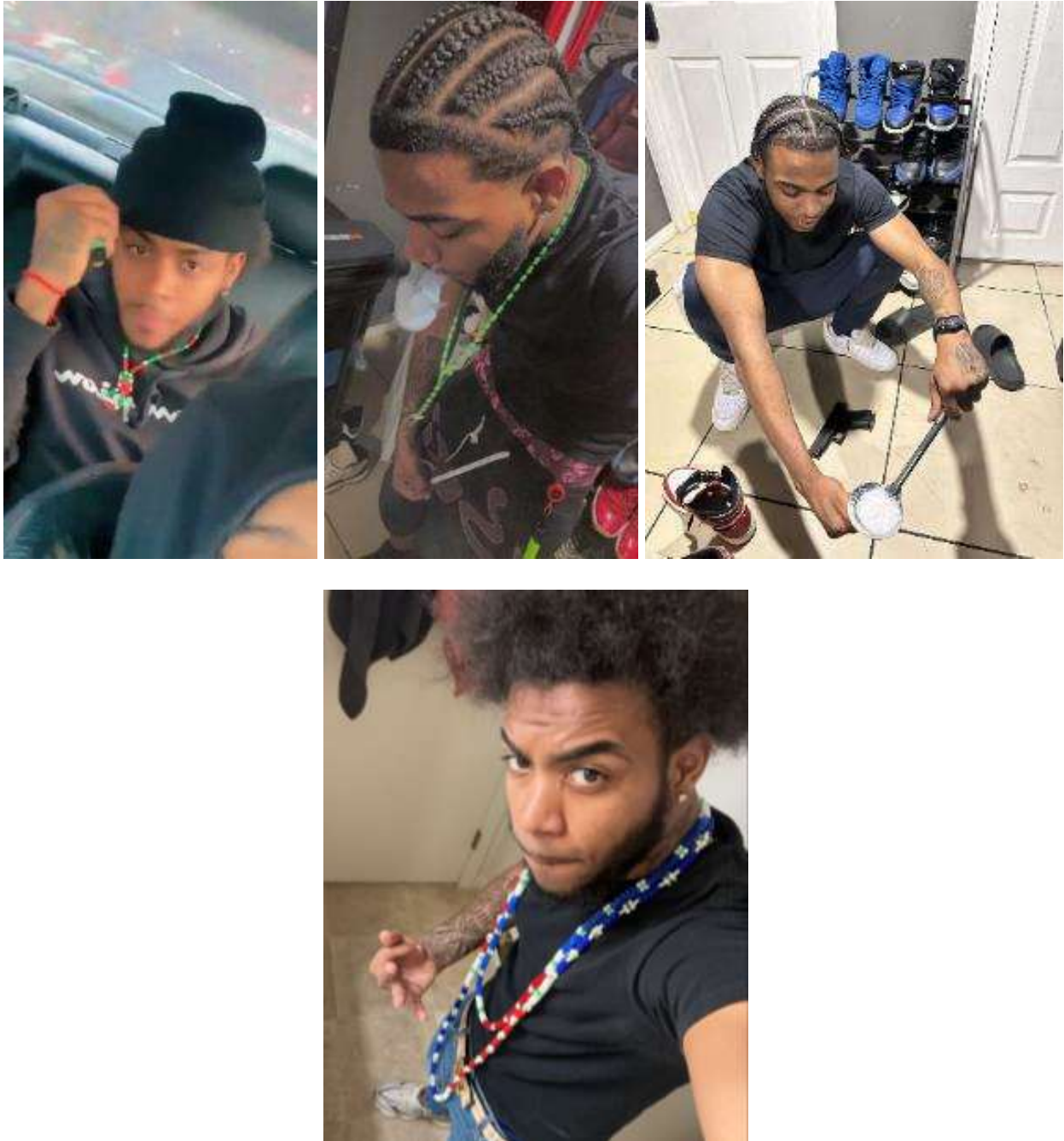
185. I am familiar with FERNANDES’s criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On August 10, 2020, FERNANDES was charged in Lawrences District Court, Docket No. 2018CR002021, with Trespassing, and Breaking and Entering in

the Daytime with the Intent to Commit and Armed Felony, and Possession of a Firearm without a Permit. On December 21, 2020, FERNANDES was convicted and sentenced to 18 months of incarceration.

- i. Investigators are familiar with Lawrence Police report # 20004302 related to Docket No. 2018CR002021. On August 7, 2020, officers observed a series of videos depicting YANUEL MEJIA, A/K/A “NANO PROBLEMA,” holding firearms and walking through the Essex Street Projects. Officers arrived and observed MEJIA on the ground apparently having just jumped from the third-floor porch. Officers observed numerous Trinitarios in front of an apartment and obtained consent to search. During the search, officers located FERNANDES inside the apartment hiding in a closet. Six firearms were recovered during the search. The owner of the apartment did not give the Trinitarios permission to film from her apartment, did not know that any firearms were in the premises, and had no idea that FERNANDES was in the closet.
- b. On September 15, 2020, FERNANDES was arraigned in Lawrence District Court, Docket No. 2018CR002047, with six counts of Possession of a Firearm without a Permit. On December 12, 2020, FERNANDES was convicted and sentenced to 18 months incarceration.
 - i. This case relates to the firearms recovered on August 7, 2020, described above.
- c. On February 26, 2021, FERNANDES was charged in Salem District Court, Docket No. 2136CR00233, with Assault and Battery and Disturbing a Correctional Institution. On July 29, 2021, FERNANDES was convicted and sentenced to 9 months incarceration.
- d. On February 14, 2025, FERNANDES was charged in Salem District Court, Docket No. 2536CR00269, with Assault and Battery and Disturbing a Correctional Institution. On May 15, 2025, FERNANDES was convicted and sentenced to 90 days incarceration.
- e. On May 1, 2025, FERNANDES was charged in Essex County Superior Court, Docket No. 2577CR00072, with Carrying a Firearm without a Permit – Second Offense, Carrying a Loaded Firearm, Discharging a Firearm within 500 Feet of a Building, and two counts of Assault with a Dangerous Weapon. On December 22, 2025, FERNANDES pleaded guilty and was sentenced to four to five years in state prison. These charges arose from the August 15, 2024, shooting that occurred at Attika Night Club in Lawrence, which is described below.

186. Photographs of FERNANDES wearing Trinitarios beads and cooking crack cocaine with a firearm at his feet follow.



N. JAHIR DAVILA, A/K/A “NANO FINESSE”

187. JAHIR DAVILA, A/K/A “NANO FINESSE,” (dob: xx/xx/2003, ssn: xxx-xx-7963) (“DAVILA”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that DAVILA has been a member of the Trinitarios since at least 2021 based on information from multiple

cooperating witnesses and other sources of information. As of March 2026, DAVILA was promoted by YORRO to the positions of Disciplina and Seguridad of the Lawrence Chapter.

188. A photograph of DAVILA follows.



189. DAVILA is a citizen of the United States.

190. I am familiar with DAVILA's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On February 4, 2020, DAVILA was charged in Lawrence Juvenile Court, Docket No. 19YO0054, with Unarmed Robbery and Carjacking. On September 14, 2020, DAVILA was convicted and committed to DYS.
 - i. Investigators are familiar with Lawrence Police report # 19007358 related to Docket No. 19YO0054. On November 12, 2019, a victim reported that he was robbed by two males who took his vehicle while he was making a pizza delivery. The two males threatened him and one stated, "give me your shit," driving off in the victim's vehicle and taking \$200 from his deliveries. Methuen Police located and pursued the vehicle and apprehended the occupants, one of whom was JAHIR DAVILA.
- b. On May 17, 2023, DAVILA was charged in Essex Superior Court, Docket No. 2377CR00160, with Carjacking and Unarmed Robbery. On January 21, 2025, DAVILA was convicted and sentenced to 3 years in state prison, with two years of probation to follow.
 - i. Investigators are familiar with Lawrence Police report # 21007696 related to Docket No. 2377CR00160. On October 30, 2021, a victim walked into the police station and reported a recent carjacking. The victim stated that he was punched in the face and the robbers stole his taxicab, \$560 cash, and his cell phone. The victim reported being punched and choked by three males, who stated "we are going to kill you, we are going to kill you."

JAHIR DAVILA and Lawrence Chapter member ROBERT SANTANA, A/K/A “PICCARINE,” were identified as two of the three males who conducted the carjacking and robbery.

- c. On October 6, 2023, DAVILA was charged in Salem District Court, Docket No. 2336CR01771, with Assault and Battery on Correctional Officer, Threats to Commit a Crime, and Disturbing a Correctional Institution. On December 3, 2024, DAVILA was convicted and sentenced to 14 months incarceration, and 6 months suspended for a period of probation.
- d. On November 7, 2023, DAVILA was charged in Salem District Court, Docket No. 2336CR01978, with Assault and Battery on Correctional Officer with Serious Bodily Injury, Assault and Battery on Correctional Officer, and Disturbing a Correctional Institution. This case remains pending.

191. Photographs of DAVILA making Trinitarios gang signs follow.



O. YANUEL MEJIA, A/K/A “NANO PROBLEMA”

192. YANUEL MEJIA, A/K/A “NANO PROBLEMA,” (dob: xx/xx/2003, ssn: xxx-xx-9829) (“MEJIA”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe MEJIA

has been a member of the Trinitarios since at least 2020 based on information from multiple cooperating witnesses and other sources of information.

193. A photograph of MEJIA follows.



194. MEJIA is a citizen of the United States.

195. I am familiar with MEJIA's criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On December 18, 2019, MEJIA was charged in Lawrence Juvenile Court, Docket No. 19DL1091LA, with two counts of Armed Assault, a Firearm Violation, Carrying a Firearm with Ammunition, and Possession of a Firearm without a Permit. On November 17, 2020, MEJIA was found delinquent for Firearm Possession and Carrying a Firearm and committed to DYS. The armed assault charges were dismissed.
 - i. Investigators are familiar with the facts of this case. This case relates to a shooting committed on December 8, 2019, by MEJIA and GARCIA targeting rival gang members that is described below. *See* Section V(E), below.
- b. On August 10, 2020, MEJIA was charged in Lawrence Juvenile Court, Docket No. 20DL0424LA, with Possession of a Firearm without a Permit, Breaking and Entering for a Misdemeanor, Trespassing, and Disorderly Conduct. On November 17, 2020, MEJIA was found delinquent for Firearm Possession and Breaking and Entering and committed to DYS.
 - i. Investigators are familiar with Lawrence Police report # 20004302 related to Docket No. 20DL0424LA. On August 7, 2020, officers observed a series of videos depicting YANUEL MEJIA, A/K/A "NANO PROBLEMA," holding firearms and walking through the Essex Street Projects. Officers

arrived and observed MEJIA on the ground apparently having just jumped from the third-floor porch. Officers observed numerous Trinitarios in front of an apartment and obtained consent to search. During the search, officers located FERNANDES inside the apartment hiding in a closet. Six firearms were recovered during the search. The owner of the apartment did not give the Trinitarios permission to film from her apartment, did not know that any firearms were in the premises, and had no idea that FERNANDES was in the closet.

- c. On March 29, 2022, MEJIA was charged in Lawrence District Court, Docket No. 2218CR000918, with Negligent Operation of a Motor Vehicle, Disorderly Conduct, Resisting Arrest, and Compulsory Insurance Violation. On November 8, 2022, MEJIA was convicted and sentenced to incarceration for a period of sixty days.
- d. On April 14, 2022, MEJIA was arraigned in Essex Superior Court, Docket No. 2277CR00147, and charged with Murder, Possession of a Firearm without a Permit (Second Subsequent Offense), and Possession of a Loaded Firearm without a Permit. These charges are associated with the murder of Ewdy Lopez that occurred in Methuen, Massachusetts. This case is pending.
- e. On September 30, 2022, MEJIA was charged in Salem District Court, Docket No. 2236CR001623, and charged with two counts of Assault and Battery on Correctional Officer, and Disturbing Correctional Institution. On July 10, 2023, MEJIA was convicted and sentenced to 284 days incarceration.
- f. On September 13, 2024, MEJIA was charged in Lowell District Court, Docket No. 2411CR002467, with Assault and Battery with a Dangerous Weapon and Assault and Battery. On April 16, 2025, MEJIA was convicted and sentenced to incarceration for thirty days.

196. Photographs of MEJIA wearing Trinitarios beads and making Trinitarios gang signs with PENA and DURAN follow.



197. The following group photographs depict MEJIA with other Trinitarios. In the first photograph, MEJIA is with other Trinitarios making gang signs, including ENRIQUE DURAN. In the second photograph, MEJIA is with other Trinitarios, including JAMES CABRERA who is making pistol gestures with his hands.



P. LUIS FERNANDEZ LOPEZ, A/K/A “PICHULO”

198. LUIS FERNANDEZ LOPEZ, A/K/A “PICHULO,” (dob: xx/xx/2001) (“LOPEZ”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that LOPEZ has been a member of the Trinitarios since at least 2022 based on information from multiple cooperating witnesses and other sources of information.

199. A photograph of LOPEZ follows.



200. LOPEZ was born in the Dominican Republic and is not a citizen of the United States. LOPEZ is a lawful permanent resident.

201. I am familiar with LOPEZ’s criminal record. The following is a summary of his pertinent arrests:

- a. On June 26, 2018, FERNANDEZ-LOPEZ was charged in Lawrence Juvenile Court, Docket No. 18DL0541LA, with Possession of a Firearm without a Permit and Possession of Ammunition without a Firearm Identification Card (FID). The charges were dismissed in 2019.
- i. Investigators are familiar with Lawrence Police report # 18003281 related to Docket No. 18DL0541LA. On May 11, 2018, officers responded to a residence for reports of a juvenile being shot. As officers entered the apartment, they observed a gunshot victim and a firearm on a bed. The victim told police that he had been hanging out with LOPEZ when he heard a bang and felt that he had been shot. LOPEZ then began yelling and apologizing. LOPEZ was the only other person in the room when the victim was shot. LOPEZ spoke with police and explained that he found the firearm and brought it home and while hanging out with the victim accidentally

pulled the trigger thinking it was a bb gun. At the time of this incident, LOPEZ was sixteen years old.

202. Photographs of LOPEZ making Trinitarios gang signs, wearing Trinitarios beaded necklaces, and holding a firearm follow.



Q. VICTOR DIAZ, A/K/A “MELVIN”

203. VICTOR DIAZ, A/K/A “MELVIN,” (dob: xx/xx/1997, ssn: xxx-xx-3895) (“DIAZ”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that DIAZ has been a member of the Trinitarios since at least 2019.

204. A photograph of DIAZ follows.



205. DIAZ was born in the Dominican Republic and is a naturalized citizen of the United States.

206. I am familiar with DIAZ’s criminal record. The following is a summary of his pertinent arrests and convictions:

- a. On December 18, 2019, DIAZ was charged in Lawrence District Court, Docket No. 1918CR004604, with Possession of a Firearm without a Permit and Possession of Ammunition without a Firearm Identification Card (FID). On June 23, 2021, DIAZ was convicted and sentenced to two and one-half years in jail with 18 months to serve.
- b. On June 24, 2021, DIAZ was charged in Haverhill District Court with four counts of Violating an Abuse Prevention Order. On June 24, 2021, DIAZ was convicted and sentenced to 30 days in jail.
- i. **4/18/2025 - Recording About Obtaining Kilograms of Controlled Substances from JOSE MARTINEZ, A/K/A “JAY KILLA”**

FILENAME: BS_2025_04_18T13_39_25

207. On April 18, 2025, DIAZ was captured on a consensual recording with a cooperating witness discussing the purchase of controlled substances from JOSE MARTINEZ,

A/K/A “JAY KILLA.” During the recording, DIAZ states that he wants to buy a kilogram of drugs and has the money available (“I wanted to buy a kilo, bro. I have the money to buy a kilo, bro”). DIAZ states that he wants to purchase the kilogram from MARTINEZ and that he will pay \$7,000, which equates to paying half of the price at the time of the purchase and being fronted the remainder (“I want to buy it from Jay Killa. I told him I wanted to give him seven thousand (7,000) and shit to buy half and half”).

DIAZ:	Indio [PH] was here.
CHS:	Let’s get together with him, [U/I], [STAMMERS] we’ll make a couple of bucks bro, because right now [U/I], bro.
DIAZ:	He said he was going to pick me up, bro. I’ve left my business for two (2) weeks, but I’m already [U/I] nothing. I wanted to buy a kilo, bro. I have the money to buy a kilo, bro.
CHS:	Crazy... Somebody hit me up, one of the dudes that - one of my buddies...
DIAZ:	I want to buy it from Jay Killa. I told him I wanted to give him seven thousand (7,000) and shit to buy half and half.
CHS:	Hmm.
DIAZ:	If not, I’ll get it with Jay Killa, bro.
CHS:	Of course.
DIAZ:	I’ll tell you so you can see if, if you can because sometimes it comes with tricks [PH] and shit.
CHS:	Yes, dude.
DIAZ:	I was waiting like two (2) weeks to be ready again and shit, but next week I’ll be ready.

208. DIAZ explains that MARTINEZ has made over \$100,000 from selling drugs in less than a year (“Jay Killa made more than a hundred thousand (100,000) in less than a year, bro”).

DIAZ:	With Jay Killa. Jay Killa made more than a hundred thousand (100,000) in less than a year, bro.
CHS:	No, [U/I] he’s always hustling, dude.

209. DIAZ explains that he used to sell 10-gram fingers of fentanyl for \$300 and \$350 (“Fingers at three hundred (300)”, “I used to sell them for three and a half (350) bro”).

DIAZ:	Fingers at three hundred (300) [...], what’s wrong?
CHS:	Dude...
DIAZ:	I used to sell them for three and a half (350) bro, I’m just [U/I] not doing anything, dude.

210. DIAZ says another Trinitarios member named “Monkey” is getting large amounts of drugs and suggests that he and the cooperating witness obtain an amount and sell it together (“Monkey is getting a lot of drugs, dude”, “That’s why I want to get the thing, you know, to move it”). DIAZ proposes that they deal with Monkey and that DIAZ can utilize his kilogram press to adulterate the kilogram they buy, press it, and go back up to Maine and sell the cut drugs (“if you know what’s up with him, let’s deal with him”, “I got the press, and if we get that, we can add the three hundred (300) and we go back”).

DIAZ:	Look at Monkey, Monkey is getting a lot of drugs, dude.
CHS:	Uh-huh.
DIAZ:	That’s why I want to get the thing, you know, to move it...
CHS:	[STAMMERS] [U/I] I talked to Monkey [U/I] went, nigga.
DIAZ:	You feel me? [STAMMERS] if you know what’s up with him, let’s deal with him. I got the press, and if we get that, we can add the three hundred (300) and we go back.
CHS:	[GRUNTS] Hmm.
DIAZ:	You feel me? And we make everything, that’s why I wanted to talk to you, dude.

211. DIAZ then explains that he also sells cutting agents for use in adulterating fentanyl (“I also do the cut too, of fentanyl”). DIAZ states that he first sold MARTINEZ 2,000 grams of cutting agents for fentanyl (“To Jay Killa, I’ve sold to him two thousand (2,000) grams”). After this first sale, DIAZ explains that he sold MARTINEZ 10,000 grams of cutting agent and then sold MARTINEZ 20,000 grams of a purple cutting agent a few months ago (“And ten thousand (10,000). I’ve sold to him even twenty thousand (20,000), dude, of a purple cut, he bought it from me a couple of months ago, twenty thousand (20,000) grams”).

DIAZ:	I also do the cut too, of fentanyl.
CHS:	No, I thought it was of lard [U/I].
DIAZ:	Yes, I do it, yes.
CHS:	right now I’m telling you that the fentanyl’s, nigga, no, no, is not worth it.
DIAZ:	No, I can do the cut, dude.
CHS:	No...
DIAZ:	To Jay Killa, I’ve sold to him two thousand (2,000) grams.
CHS:	Dude...

DIAZ:	And ten thousand (10,000). I've sold to him even twenty thousand (20,000), dude, of a purple cut, he bought it from me a couple of months ago, twenty thousand (20,000) grams.
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212. DIAZ tells the cooperating witness that MARTINEZ was selling the fentanyl and his customers wanted it to be purple (“was for some people that had—it seems that they were fucking with a couple of [U/I] purple work”). DIAZ explains that he can obtain all different colors of cutting agents (“I know how to do cuts of all types of colors: pink, purple”, “All the colors, dude”). DIAZ states that he charges \$1.00 per gram of cutting agent (“How much for the gram?”, “A buck”, “You already know. If it is five thousand (5,000), it is five thousand (5,000)”).

DIAZ:	That I made good with him, nice, nice, dude, no bullshit. It was for some people that had—it seems that they were fucking with a couple of [U/I] purple work. I know how to do cuts of all types of colors: pink, purple...
CHS:	Oh lord.
DIAZ:	All the colors, dude.
CHS:	How much for the gram?
DIAZ:	A buck.
CHS:	A buck, oh...
DIAZ:	You already know. If it is five thousand (5,000), it is five thousand (5,000).

213. DIAZ states that JAMES CABRERA sent a customer to him the day before and that customer purchased 200 grams of cutting agent for \$200 (“Trencita sent me a kid yesterday, there. For two hundred (200) bucks”).

DIAZ:	Trencita sent me a kid yesterday, there. For two hundred (200) bucks. And he already sent him to me twice (2), I don't know where he is from.
CHS:	Well...
DIAZ:	And he already sent him to me twice (2), and I don't know where he's from.

214. DIAZ states that he has 100 grams of fentanyl that is being held by a friend (“I have one hundred (100) grams that my buddy has”). DIAZ explains that the drugs he bought from MARTINEZ were not good quality and that the customers were not willing to purchase it (“I gave him fifty (50) and] and supposedly he gave it to a cousin and they haven't done anything, and he hasn't given me my money. And I gave him fifty (50) the day before yesterday, that I bought from

Jay Killa”, “supposedly that they don’t work and they gave some to a junkie, and look at what he said”, “And he’s telling me it is bad, dude.”). DIAZ tells the cooperating witness that he has asked for the drugs to be returned and is waiting for that to happen (“I told him to bring me my shit and he said he was going to bring it today”).

DIAZ:	I have one hundred (100) grams that my buddy has, I told him to not even bring it to me.
CHS:	No, no, no... [SNIFFLES]
DIAZ:	Because I didn’t want to, dude. Look, I’m even going to call him right now because he hasn’t even answer me.
CHS:	[SNIFFLES]
DIAZ:	Because he told me they were bad and they’ve already been passed—I gave him fifty (50) and] and supposedly he gave it to a cousin and they haven’t done anything, and he hasn’t given me my money. And I gave him fifty (50) the day before yesterday, that I bought from Jay Killa...
CHS:	Uh-huh.
DIAZ:	And no shit, bro. I’m going to tell him what’s up, what’s up with my money...
CHS:	Supposedly the other fifty (50) didn’t pass through?
DIAZ:	[STAMMERS] supposedly that they don’t work and they gave some to a junkie, and look at what he said... look at what the new guy that I got said yesterday...
CHS:	It doesn’t pass?
DIAZ:	“Hell, yeah, that’s fire. Dude.” [BACKGROUND: TELEPHONE RINGS] He told me yesterday... look at it, I told him, “Bro...” [MUMBLES] look at what the junkie told me yesterday dude, “Hell yeah, that’s good.” And he’s telling me it is bad, dude.
CHS:	[SMACKS LIPS]
DIAZ:	And it is weird that Jay Killa has bad work, dude.
CHS:	[U/I].
DIAZ:	You feel me? I told him to bring me my shit and he said he was going to bring it today. And I told him to bring me my work - even though I throw it over there, bro.
CHS:	Of course.
DIAZ:	But no, I don’t want to put my hands on that, bro. I’m already scared of it.

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215. The conversation continues and DIAZ and the cooperating witness call MARTINEZ. DIAZ tells MARTINEZ that he is going to start buying drugs again (“Now we are going to do things nicely”, “We are going to work good now, bro”). MARTINEZ replies that DIAZ has accumulated \$5,000 worth of guns (“has like five thousand (5,000) in guns, asshole”). DIAZ

responds that he has about \$7,000 worth of jewelry and \$8,000 in cash (“like seven thousand (7,000) dude, in jewelry, eight thousand (8,000) bucks”). DIAZ tells MARTINEZ that he wants to invest it in MARTINEZ’s drugs (“I just want to invest it bro, like I told you, dude”, “I’m waiting on getting better, to invest it with you right away”).

DIAZ:	He knows what’s up, that I’m one of the good ones, he knows what’s up with me.
MARTINEZ:	You have to get your stuff right away, bro. You can’t leave nobody with...
DIAZ:	No, Jay, now we are coming nice, Jay.
CHS:	No...
DIAZ:	Now we are going to do things nicely, God willing, I’m just waiting to get back on my feet like I told you, I was down, bro... Now I’m good again, getting better. We are going to work good now, bro.
MARTINEZ:	[U/I] has like five thousand (5,000) in guns, asshole.
DIAZ:	No, dude...
CHS:	Of course.
DIAZ:	I have like seven thousand (7,000) dude, in jewelry, eight thousand (8,000) bucks, Jay. And I can get it right away, right now, I just want to invest it bro, like I told you, dude.
CHS:	Of course.
DIAZ:	You feel me? I’m waiting on getting better, to invest it with you right away.

216. After MARTINEZ is no longer on the phone, DIAZ discusses other Trinitarios members. Specifically, DIAZ brings up RODDERITH PERALTA, A/K/A “MAGO,” who he says was selling drugs in Maine and doing well (“Mago [PH] sleeping bro, he was doing good, he did a couple of runs, [...], and did good. And he started doing packages here”). DIAZ says PERALTA was almost killed and that was lucky he did not get killed as well (“they almost kill him, bro”, “He got a couple of shots that same day, bro. I was lucky that I didn’t get shot, bro. Because he sent me the address to go over there”). DIAZ states that the people PERALTA stole from are paying to have him killed (“They are paying to get rid of him bro, listen to that.” “You can’t just steal from anybody, bro. You feel me?”, “You could be the most badass, and you can’t just steal from anybody, bro,” “There are people that would pay more to get rid of you, you feel me, bro?”).

DIAZ:	Look at Mago [PH] sleeping bro, he was doing good, he did a couple of runs, [...], and did good. And he started doing packages here, dude.
CHS:	And locked up.
DIAZ:	And locked up, they almost kill him, bro.
CHS:	Yeah?
DIAZ:	Oh, you didn't see the shots he got?
CHS:	No.
DIAZ:	He got a couple of shots that same day, bro. I was lucky that I didn't get shot, bro. Because he sent me the address to go over there. He got like three (3) shots, [...].
CHS:	Dude...
DIAZ:	They are paying to get rid of him bro, listen to that.
CHS:	He did a couple of dumb shit.
DIAZ:	You know the dumb shit he's done out here, dude. You can't just steal from anybody, bro. You feel me?
CHS:	Exactly.
DIAZ:	You could be the most badass, and you can't just steal from anybody, bro.
CHS:	Exactly.
DIAZ:	There are people that would pay more to get rid of you, you feel me, bro?
CHS:	Just so you know.
DIAZ:	You can't just steal from anybody, bro.
CHS:	Bro...
DIAZ:	He wanted to do... dumb shit.
CHS:	To everybody.

217. DIAZ says PERALTA stole a kilogram of drugs (“He took a kilo”) and that DIAZ was assisting PERALTA in breaking it down for sale (“I’m here with him, pressing them, making them to sell them”). PERALTA also stole from DIAZ and never paid him (“he took, and leave the shit here and he stole from the buddy and me too. He didn’t give me a single buck”). DIAZ says he kept an AR-15 rifle that PERALTA had (“But I kept an AR-15 that he had”). DIAZ states that he was the one who was doing the work on preparing the drugs and he kept the drugs for like two days (“I was the one that did the work and I kept that for like two (2) days”).

DIAZ:	He took a kilo. And I’m here with him, pressing them, making them to sell them. And he took, and leave the shit here and he stole from the buddy and me too. He didn’t give me a single buck, dude.
CHS:	[SMACKS LIPS]
DIAZ:	But I kept an AR-15 that he had, normal.
CHS:	[U/I] some way.

DIAZ:	Of course, I was the one that did the work and I kept that for like two (2) days, if I've known, I would've kept that, dude.
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218. DIAZ states that PERALTA provided a very small payment to DIAZ and DIAZ kept the rifle as payment (“he came with five hundred (500) bucks,” “And that’s it, and after that I stopped hanging out with him, bro. And I kept the AR-15”). DIAZ estimates that PERALTA made \$7,000 to \$10,000 from the stolen kilogram and that DIAZ let PERALTA use his press to rebrick the drugs and then stored the drugs for him (“where he made seven thousand (7,000) or ten thousand (10,000)”, “I was the one that lent him my machine to do it. I got hot here doing that with him. I stashed it for him for like three (3) days”).

DIAZ:	You feel me? Because I know that Mago is one of mine, dude, and I couldn't do that shit to him, bro. You feel me? And I'm loyal if you are showing me loyalty. When he got the money, [...], he came with five hundred (500) bucks, bro.
CHS:	Listen...
DIAZ:	I told him, “No, give it to me, bro.” And that’s it, and after that I stopped hanging out with him, bro. And I kept the AR-15.
CHS:	[SMACKS LIPS] Five hundred (500) bucks...
DIAZ:	Five hundred (500) bucks, where he made seven thousand (7,000) or ten thousand (10,000) and something dollars, bro. And I was the one that lent him my machine to do it. I got hot here doing that with him. I stashed it for him for like three (3) days, bro. And if it would've been somebody else, they would've stolen from him.

R. XAVIER PUELLO, A/K/A “BODEGA”

219. XAVIER PUELLO, A/K/A “BODEGA,” (dob: xx/xx/2003, ssn: xxx-xx-2650) (“PUELLO”), is a member of the Lawrence Chapter of the Trinitarios. Agents believe that PUELLO has been a member of the Trinitarios since at least 2021 based on information from multiple cooperating witnesses and other sources of information.

220. A photograph of PUELLO follows.



221. PUELLO was born in Massachusetts and is a citizen of the United States.

222. I am familiar with PUELLO's criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On October 19, 2021, PUELLO was charged in Lawrence District Court, Docket Nos. 2118CR003134 and 2118CR003135, with Carrying a Firearm with Ammunition, Discharging a Firearm, and Possession of a Firearm without a Permit, and Possession of a Firearm without a Permit and Carrying a Firearm with Ammunition. On March 11, 2022, PUELLO was convicted and sentenced to incarceration for a period of two years and two years of probation.
 - i. These charges arose out of a shooting incident in Lawrence on October 10, 2021, where PUELLO shot at rival gang members. This incident is discussed in detail below.
- b. On May 5, 2025, PUELLO was charged in Piscataquis Criminal Court (Maine), Docket No. PISCDCCR202500140, with two counts of Aggravated Trafficking of Scheduled Drugs and three counts of Criminal Forfeiture of Property. This case was charged in federal court in Boston and remains pending. *See United States v. Jenkins & Puello*, Docket No. 25-CR-10449-NMG.
 - i. The facts of this case relate to a search by Maine law enforcement targeting a trap house in Abbot, Maine. Multiple firearms were recovered from the residence, along with controlled substances.

223. Photographs of PUELLO making Trinitarios gang signs with DURAN and holding a firearm follow.



i. April 2025 and May 2025 – Drug Distribution in Maine

224. On May 7, 2025, PUELLO was arrested and charged in Maine State Court with drug and firearms offenses related to a house that PUELLO and another dealer, STANLEY JENKINS, were using as a location to sell drugs. During the search of the residence, officers found

approximately 50 grams of cocaine base, 55 grams of cocaine, and two firearms. *See United States v. Jenkins & Puello*, Docket No. 25-cr-10449-NMG, ECF #1-1 (Complaint Affidavit).

225. JENKINS and PUELLO had been utilizing this residence for a number of months prior to their arrest. At the time of the arrest, PUELLO was on probation from an October 10, 2021, shooting case, where he targeted rival gang members and mistakenly fired at an innocent victim. *See Section V(K), below.*

226. During the May 7, 2025, search of the residence in Maine, agents seized an AR-platform rifle with a large-capacity drum-style magazine. A still image of that firearm follows.



227. During the course of the investigation, investigators located a video posted by PUELLO to a social media account where he is holding that same red AR-platform rifle recovered by Maine law enforcement. Still images from that video follow.



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228. On April 20, 2025, a few weeks before his arrest in Maine, PUELLO was captured on a consensual recording with a cooperating witness discussing the distribution of controlled substances with other Trinitarios gang members. During this recording, PUELLO discusses his drug distribution activities in Maine. PUELLO described the inefficiency of selling kilogram quantities of controlled substances in Maine. PUELLO complains that when dealing large quantities, there is no payment up front -- you have to wait for the customers to sell the drugs and then pay you (“Those twenty (20) bricks that you gave to all of those plays, you have to wait for them to move them. So that they can come back and buy more from you, from now and the time they move them... it’s a long time”).

PUELLO:	Listen, listen to what the deal is. And it’s not- not even selling bricks, the bricks you can sell’em, but check this out. You grab twenty (20) bricks, right? [ONOMATOPOEIA] Bang! You sell it... and then you go and like... “oh nah, nigga, I wanna double up my investment”, you grab forty (40) bricks. Those twenty (20) bricks that you gave to all of those plays, you have to wait for them to move them. So that they can come back and
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	buy more from you, from now and the time they move them... it's a long time ... those guys, that weed that you- that you grabbed, it'd dry up.
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229. PUELLO states that selling weed is far more lucrative because it is a larger customer base buying smaller quantities, which can result in the money being provided in a week (“to move weed, you gotta have like, thirty (30) niggas buying QPs”, “the QPs is like a week”).

PUELLO:	It's that no, the thing is that thing, those, those, to move weed, you gotta have like, thirty (30) niggas buying QPs. [BACKGROUND: NOISES] That, that the QPs is like a week.
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230. PUELLO says pills are what sell quickly and that is what he will be selling (“It's the pills. Straight pills, that's what I'mma—that's gonna be my lane, that I wanna pick up”). PUELLO states that he has two drug customers (“fiends”) from whom he expects to be able to get prescription pills (“I found two (2) of them. Perc fifteens (15s) and the pink ones, that's why I've been steady getting pills”).

PUELLO:	It's the pills. I already know...
CHS:	I know.
PUELLO:	...its the pills. The pills...
CHS:	That's what moves.
PUELLO:	Yeah, the pills...
CHS:	You gotta have a little extra flavor on the side.
PUELLO:	It's true. It's the pills. Straight pills, that's what I'mma—that's gonna be my lane, that I wanna pick up.
CHS:	That's hard.
PUELLO:	The pills. No, no, it's not. Trust me. 'Cause I'mma already working on some shit to get prescriptions. Niggas that get prescriptions, I've been doing that and I found two (2) of them with [U/I], my fiend.
CHS:	Mm-hmm.
PUELLO:	I found two (2) of them. Perc fifteens (15s) and the pink ones, that's why I've been steady getting pills.

231. PUELLO states that he has a large number of firearms that he has obtained from investing his drug proceeds (“I invest ninety (90%) percent of everything I make on at least in one (1) blick, nigga. Trust me, nigga, I gotta grab... hell'a blicks”).

PUELLO:	You don't even know how many blicks I got. [LAUGHS]..... Nigga, I invest ninety (90%) percent of everything I make on at least in one (1) blick, nigga. Trust me, nigga, I gotta grab... hell'a blicks.
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S. JOSE MERCADO, A/K/A “PUNTO EFFECTIVO”

232. JOSE MERCADO, A/K/A “PUNTO EFFECTIVO,” (“MERCADO”), is the former Primera, or leader, of the Lawrence Chapter of the Trinitarios. Agents believe that MERCADO has been a member of the Trinitarios since at least 2012 based on information from multiple cooperating witnesses and other sources of information.

233. A photograph of MERCADO follows.



234. MERCADO is a citizen of the United States.

235. The below still image is from a selfie-video taken by MERCADO at the filming of the Sacale Too music video. MERCADO is wearing his custom Trinitarios t-shirt bearing the Trinitarios logo with his street name PUNTO EFFECTIVO printed above the Trinitarios logo.



236. In September 2025, MERCADO was charged in the District of Connecticut with federal offenses related to the armed robbery of interstate shipments of Apple products. *See United States v. Mercado, et al.*, Docket No. 25-cr-00144-SVN (D.Conn.).

237. On August 21, 2025, a federal search warrant and arrest warrant were executed at MERCADO's residence on Birch Street in Lawrence, Massachusetts. During the search, agents seized various items related to the Trinitarios enterprise, including Trinitarios beaded necklaces,

memorial shirts for deceased Trinitarios member Jonathan Roman, a/k/a “Funda,” and the custom t-shirt with Trinitarios logo for MERCADO bearing his Trinitarios gang name “PUNTO EFECTIVO” depicted above. Investigators also seized a Make America Great Again hat along with the Trinitarios apparel and accessories. Still images from the search follow.





T. JOELFRY CABRERA

238. JOELFRY CABRERA (dob: xx/xx/2003, ssn: xxx-xx-2891) (“JOELFRY CABRERA”), is an associate of the Lawrence Chapter of the Trinitarios. Agents believe JOELFRY CABRERA has been associated with the Trinitarios since at least 2020 based on information from multiple cooperating witnesses.

239. A photograph of JOELFRY CABRERA follows.



240. JOELFRY CABRERA was born in the Dominican Republic and is a naturalized citizen of the United States.

241. I am familiar with JOELFRY CABRERA's criminal record. The following is a summary of his pertinent conviction.

- a. On June 3, 2024, JOELFRY CABRERA was charged in Lawrence District Court, Docket No. 2418CR002162, with a number of offenses, including Assault and Battery Dangerous Weapon, Assault and Battery on a Household Member, Improper Storage of a Firearm, and Assault by Means of a Firearm. On August 19, 2025, JOELFRY CABRERA was convicted and placed on probation until August 19, 2027.

III. THE HAVERHILL CHAPTER OF THE TRINITARIOS

242. On March 4, 2024, the Haverhill Chapter of the Trinitarios was created by PAULA-CABRAL during a universal ceremony. During this ceremony, PAULA-CABRAL formally created the Haverhill Chapter and blessed a number of members into the gang, including HECTOR MOTA, A/K/A "BEBO."

243. According to multiple cooperating witnesses, the Haverhill Chapter is effectively subordinate to the Lawrence Chapter and is under the overall leadership and command of YORRO, the Primera, or #1, of the Lawrence Chapter.

244. The members of the Haverhill Chapter charged in this investigation include:

- a. JUSTANE GARCIA, A/K/A “JAY BILLZ,” (“GARCIA”);
- b. RICHARD PENA, A/K/A “BLADE,” A/K/A “RICHIE” (“PENNA”);
- c. HECTOR MOTA, A/K/A “BEBO,” (“MOTA”); and
- d. JEAN DELGADO, A/K/A “NEGRITO,” (“DELGADO”).

A. JUSTANE GARCIA, A/K/A “JAY BILLZ”

245. JUSTANE GARCIA, A/K/A “JAY BILLZ,” A/K/A “J-BILLZ” (dob: xx/xx/2001, ssn: xxx-xx-9360) (“GARCIA”), is a senior member of the Haverhill Chapter of the Trinitarios. Agents believe that GARCIA has been a member of the Trinitarios since at least 2020 based on information from multiple cooperating witnesses and other sources of information.

246. A photograph of GARCIA follows.



247. GARCIA was born in New York and is a citizen of the United States.

248. I am familiar with GARCIA’s criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On August 14, 2018, GARCIA was charged in Lawrence Juvenile Court, Docket No. 18DL0782LA, with Carrying a Firearm without a License, Carrying a Firearm without a License, and Knowingly Receiving Stolen Property. On August 26, 2019, GARCIA was found delinquent and committed to the custody of DYS.
 - i. Investigators are familiar with Lawrence Police report #18005603 related to Docket No. 18DL0782LAA. On August 13, 2018, officers observed a

Trinitarios member making Trinitarios gang signs to another vehicle. Officers conducted a car stop and observed GARCIA in the passenger seat. The Trinitarios member was frisked, an amount of drugs was found on his person, and he was arrested. GARCIA was also frisked and a loaded firearm was recovered from his waist band.

- b. On December 18, 2019, GARCIA was charged in Lawrence District Court, Docket No. 1918CR005267, with Assault with a Dangerous Weapon, a Firearm Violation, Carrying a Dangerous Weapon, and Carrying a Firearm with Ammunition. On August 18, 2020, GARCIA was convicted and sentenced to incarceration for eighteen months.
 - i. Investigators are familiar with the facts of this case. This case relates to a shooting committed on December 8, 2019, by MEJIA and GARCIA targeting rival gang members that is described below. *See* Section V(E), below.
- c. On October 8, 2025, GARCIA was charged in the United States District Court for the District of Massachusetts, *see* 25-cr-10410-NMG, with 21 U.S.C. 846, Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, and 18 U.S.C. 924(c), Possession of One or More Firearms in Furtherance of a Drug Trafficking Crime. This case is pending.
 - i. This case relates to a year-long drug distribution conspiracy involving GARCIA and ARIAS distributing fentanyl and cocaine and obtaining numerous firearms over the course of the conspiracy. *See* 25-CR-10410-NMG, ECF #1-1 (Complaint Affidavit). This conspiracy is related to and part of the Trinitarios criminal enterprise, as both GARCIA and ARIAS are Trinitarios members, and they are believed to have obtained their drugs from a common Trinitarios source of supply, specifically, JOSE MARTINEZ, A/K/A “JAY KILLA.”

249. Photographs of GARCIA wearing Trinitarios beads and making Trinitarios gang signs follow.



i. 5/3/2025 - Recording of GARCIA Arranging Drug Transaction

FILENAME: 299190_BS-3299190-BR_2025_05_03T21_39_08

250. On May 3, 2025, GARCIA was captured on a consensual recording with a cooperating witness discussing a drug transaction. During the recording, GARCIA receives a call and is asked for a price for counterfeit Percocet pills, which the caller refers to as “the M,” meaning the M-30 imprint on a pill. GARCIA states that his source of supply does not have 10 mg pills and only has 30 mg pills (“He don’t got tens (10s), he only got thirties (30s)”) and they begin discussing another pill described as a 7.5 mg (“seven point five”). The caller then appears to ask an associate if he will take the 7.5 mg pills (“Do you want seven point five (7.5)?”) and asks GARCIA for the price (“How much he got the seven point for (7.5) for?”). GARCIA replies that they cost \$15 (“fifteen bucks”).

UM2:	How much for the M?
GARCIA:	He don’t got tens (10s), he only got thirties (30s). Nigga, my other man got seven-forty-fives (745s), nigga. He sells them at fifteen (15).

UM2:	[U/I] seven point five (7.5). [U/I]. There is [U/I] and there are thirties (30s) too. Do you want seven point five (7.5)? How much he got the seven point for (7.5) for?
GARCIA:	Fifteen (15) bucks.
UM2:	Ah, good. Fifteen (15). [U/I]?
GARCIA:	Yeah, I just gotta call him.
UM2:	Alright. Alright. Fuck it. I'mma [U/I] literally like ten (10) minutes.
GARCIA:	Text me. Yeah, text me, though. So, I can get your number, so I can call you back.
UM2:	Alright, bro.

ii. 9/14/2025 Recording of GARCIA Discussing a Historical Shooting

FILENAME: BS_BS-3299190_BS-3299190-BR_2025_09_14T21_05_36

251. On September 14, 2025, GARCIA was captured on a consensual recording with a cooperating witness discussing a historical shooting he conducted. Cooperating witnesses described this shooting as taking place prior to 2019. During the recording, GARCIA states that he shot at a rival gang member, shooting at him multiple times one-handed (“I hit this guy just like that, bam, bam, bam, and I’m not that type of guy at the beginning... I was tiny and I shot at him with one hand,” “I was happy so I shot at him one-handed once again.”), and that he ran away (“I started running”).

GARCIA:	So, I hit this guy just like that, bam, bam, bam, and I’m not stupid because at the beginning... I shot at him with one hand, that shit sounded, bloc, bloc, bam, and I said, “Oh damn.” And I held it better and that’s when I hit him with two (2), bam, bam, and I saw him when he jumped, and I said, “I hit him.”
UM:	You said, I’m out.
GARCIA:	I got happy and I shoot at his hand once again, bam, bam, bam. Dude, what, I started running, and then, I bumped into them, that they on [U/I] porch. You know how the SP’s are? They like on a porch
UM:	Yeah, yeah, yeah.
GARCIA:	All of them waiting for the nigga to come back. I passed by them, they looking at me like, and I point the empty gun at them. They all ducked. [LAUGHS]
YORRO:	What the fuck. [LAUGHS]
GARCIA:	Oh shit.
UM:	You like, I’m out, nigga. Damn.

252. GARCIA states that when he got home the rival gang members were waiting for him out front of his house (“when I got to my house, that was the funniest part. They were waiting for me in five (5) cars, right in front of my house”). GARCIA says a Trinitarios member named Omar told GARCIA to retrieve three guns from Omar’s residence, to store at GARCIA’s residence (“Omar told me, come to my house to pick up the three (3) guns”). The rival gang members chase GARCIA and he ran and an individual named Omar passed him a gun (“Omar passed me a gun, he said, ‘here there it is.’”). When GARCIA saw the rivals in the car, he began shooting (“As soon as I see the car, these niggas, these niggas I start shooting, bam, bam, bam, bam, right away I said, that’s them, boom, we got in the car”). GARCIA fled the scene and hid and evaded the police (“The cops were at the door, we were on the third floor, I’m not going down; nobody is going to make me go downstairs”).

GARCIA:	But when I got to my house, that’s when reality hit. They were waiting for me in five (5) cars, right in front of my house. I came out, bro, boom, ‘cause Omar told me, come to my house to pick up three (3) guns, so you can store them at your house. I was a little nigga.
GARCIA:	Sounds good, bro, so I headed over there. I’m walking, nigga, and this one says, “Isn’t that Jay Billz right there.”
UM:	[LAUGHS]
GARCIA:	So, they are already getting of the car, they opened the door, I’m like, Oh shit, nigga. I started running, G. boom, I jumped the fence, I fell down the fence and I hit myself hard. So, I take off, dude, and they started chasing me, bro.
UM:	[LAUGHS]
GARCIA:	Omar passed me a gun, he said, “here there it is.” Bam, a thirty (30) clip. I put one in the chamber right away, and I put it in my pocket, since I’m tiny. As soon as I see the car, these niggas, these niggas I start shooting, bam, bam, bam, bam, right away I said, that’s them, boom, we got in the car, we left Monto with all the guns. We were scared. The cops were at the door, Monto was on the third floor, “I’m not going down; nobody is going to make me go downstairs, bro, I don’t know anything about that; that was on the first floor.
YORRO:	[CHUCKLES] Yo.
GARCIA:	That was too funny.

B. RICHARD PENA, A/K/A “BLADE,” A/K/A “RICHIE”

253. RICHARD PENA, A/K/A “BLADE,” (dob: xx/xx/2001, ssn: xxx-xx-2909) (“PENA”), is a member of the Haverhill Chapter of the Trinitarios. Agents believe that PENA has been a member of the Trinitarios since at least 2019 based on information from multiple cooperating witnesses and other sources of information.

254. A photograph of PENA follows.



255. PENA is a citizen of the United States.

256. I am familiar with PENA’s criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On May 8, 2017, PENA was charged in Lawrence Juvenile Court, Docket No. 17DL0470LA, with Discharging a Firearm, Possession of a Firearm without a License, and Possession of Ammunition without a Firearm Identification Card (FID). On July 15, 2019, PENA was found delinquent and placed on probation.
 - i. Investigators are familiar with Lawrence Police report #17003008 related to Docket No. 17DL0470LA. On April 20, 2017, officers responded to PENA’s residence. PENA’s mother reported that he had shot himself accidentally. Officers spoke with PENA, who gave a full statement. PENA stated that “he was trying to open up the gun and when he pulled back on the slide, the gun went off, causing the bullet to go through his left hand.” PENA said he did not think the gun was loaded. PENA also told police he was holding the firearm for another individual.
- b. On July 11, 2023, PENA was charged in Middlesex Superior Court, Docket No. 2281CR00347, with Trafficking a Class A Controlled Substance Over 200 Grams, Trafficking of a Controlled Substance (Cocaine) over 200 Grams, Use of a Firearm During the Commission of a Crime, two counts of Possession of a Large Capacity Weapon, Possession of a Glock Pistol, two counts of Possession

of a Firearm, Possession of Ammunition, and Possession of a Class B Controlled Substance. One count was subject to a nolle prosequi, and PENA was found not guilty of the other charges on October 27, 2025.

- i. Investigators are familiar with Tewksbury Police report #22TEW-16975-B-AR related to Docket No. 2211CR001226. This case is described in detail below and the federal investigation has revealed multiple witnesses and digital evidence in addition to the evidence gathered during the state investigation and prosecution. *See* Section V(O).

257. Photographs of PENA follow. The photographs include PENA making Trinitarios gang signs with another Trinitarios member; PENA, MEJIA and Alan Jimenez, a/k/a “Montana,” posing together, with PENA wearing Trinitarios beads and the Trinitarios cipher (157) and symbols (green heart, pineapple) in the cation; PENA wearing a “Make America Great Again” hat; and PENA posing with CABRERA and making Trinitarios gang signs.



PENA, MEJIA, Jimenez



PENA and JAMES CABRERA

i. 7/11/2021 – Pena Discusses Shooting in Retaliation for Disrespect Toward Alan Jimenez

258. Investigators reviewed one of PENA’s cellular phones that was seized during an April 2022 arrest of PENA and others for drug offenses in Tewksbury, Massachusetts. Review of that cellular phone revealed a conversation between PENA (utilizing a phone number ending in 6894) and a contact named “Polito” (utilizing a phone number ending in 3306).

259. During the conversation on July 2021, PENA and Polito discuss conducting a shooting of rival gang members for disrespecting deceased Trinitarios member “Montana,” a/k/a Alan Jimenez, who was killed in March 2020 in PENA’s vehicle. Polito sent an image of a music video that was posted on YouTube by rival gang members from Haverhill, noting that they are disrespecting Montana (“niggas from Haverhill disrespecting your dead on sum otha level,” “Montana In his mouth manito bello”). PENA responds by asking Polito if he wants to participate in a shooting of the rivals (“U wanna hop on a drill”). PENA further notes that he knows where the rival gang member is known to be (“I got his drop”). Polito replies that he will do it himself

(“imma go dolo”) if PENA can provide him with a car (“just give me the habibi”). Polito asks whether PENA wants him to do the shooting with others (“You want me to do it with more?”, “People, you know I'm not just dead weight, bro.”).

DATE / TIME	AUTHOR	CONTENT
7/21/2021 10:08:48 PM(UTC+0)	Polito	These niggas from Haverhill disrespecting your dead on sum otha level no kap
7/21/2021 10:08:54 PM(UTC+0)	Polito	They dissin dissin
7/21/2021 10:09:46 PM(UTC+0)	Polito	Q vamo haca
7/28/2021 10:06:33 PM(UTC+0)	Polito	 Rico Sav - Ain't Lettin Up (Dir. @MikeCityVisuals) Rico Sav · 434 views · 3 hours ago
7/28/2021 10:07:36 PM(UTC+0)	Polito	Montana In his mouth manito bello they outside outside no kap
7/28/2021 10:07:45 PM(UTC+0)	Polito	They dissin dissin
7/28/2021 10:08:06 PM(UTC+0)	PENA	U wanna hop on a drill
7/28/2021 10:08:08 PM(UTC+0)	PENA	When I get back
7/28/2021 10:08:12 PM(UTC+0)	PENA	I got his drop
7/28/2021 10:08:17 PM(UTC+0)	PENA	Don't be on no bulto
7/28/2021 10:08:17 PM(UTC+0)	PENA	Shit
7/28/2021 10:08:55 PM(UTC+0)	Polito	Pero just give me the habibi y el juguete and imma go dolo
7/28/2021 10:09:04 PM(UTC+0)	Polito	Oh tú quiere q yo lo aga con más (“You want me to do it with more?”)
7/28/2021 10:09:12 PM(UTC+0)	Polito	Gente tú sabe q yo no soy bulto bro (“People, you know I'm not just dead weight, bro.”)

260. PENA states that he has Trinitarios members who will participate and want to turn up the heat on the rivals (“I got the ppl for u”, “ThTs gonna turn shit up”). Polito says he will conduct a number of shootings to force the rivals to back off (“so you gotta put me in a position where I can keep spinning so they can back off”). Polito notes that if the Trinitarios only commit one shooting the rivals will start doing shootings themselves (“if we on that they gon hit back”), which will not happen if he commits multiple shootings. PENA says he understands and has done

multiple shootings himself (“I’m hip trust me”, “I’m a demon on that. Drilling shit I just been laid back but I’m back”).

DATE / TIME	AUTHOR	CONTENT
7/28/2021 10:09:18 PM(UTC+0)	PENA	I got the ppl for u
7/28/2021 10:09:20 PM(UTC+0)	PENA	My heart
7/28/2021 10:09:25 PM(UTC+0)	PENA	ThTs gonna turn shit up
7/28/2021 10:10:03 PM(UTC+0)	Polito	Poh ya Tt set it up
7/28/2021 10:10:12 PM(UTC+0)	Polito	Pero te quiero decir
7/28/2021 10:11:10 PM(UTC+0)	Polito	Q after is done is finna kick back so you gotta put me in a position where I can keep spinning so they can back off
7/28/2021 10:11:43 PM(UTC+0)	Polito	Cuz if we on that they gon hit back if we don't keep going in we can't just be thinking about doing one you feel me?
7/28/2021 10:21:36 PM(UTC+0)	PENA	I'm hip trust me
7/28/2021 10:21:49 PM(UTC+0)	PENA	I'm a demon on that. Drilling shit I just been laid back but I'm back
7/28/2021 10:26:00 PM(UTC+0)	Polito	Say nomore

ii. 8/24/2021 – Pena Text Message Conversation Concerning Drug Trafficking

261. During the review of PENA’s cellular phone, investigators located a conversation with a contact named “Skillz2” utilizing a phone number ending in 2012. During the conversation, PENA and Skillz2 discuss the distribution of large quantities of fentanyl and cocaine and share media depicting those drugs.

262. The conversation starts on August 24, 2021, with Skillz2 sending PENA a video of an opened kilogram brick of controlled substances, which appears consistent with cocaine or fentanyl. Still images from that video follow.



263. After receiving the video, PENA asks about the drugs (“Lmk”) and Skillz2 asks how much PENA wants (“How much”). PENA replies that he will take 60 grams to try it out and also asks for fentanyl (“I need downtown”).

DATE / TIME	AUTHOR	CONTENT
8/24/2021 11:44:34 PM(UTC+0)	PENA	Lmk
8/25/2021 12:39:55 AM(UTC+0)	Skillz2	How much
8/25/2021 12:42:58 AM(UTC+0)	PENA	I'll do a quick 60 to try it out
8/26/2021 3:24:21 PM(UTC+0)	PENA	I need downtown

264. Skillz2 texts PENA a few days later and they agree that the transaction will take place that day (“Today my brotha”, “For sure”). They agree to meet on Woodland Street in Lawrence (“I’m in law now”, “Woodland st”).

		CONTENT
8/30/2021 4:15:10 PM(UTC+0)	Skillz2	Today I'm a call u everything looks back to normal
8/31/2021 1:45:55 AM(UTC+0)	PENA	Klk
9/1/2021 3:07:56 PM(UTC+0)	PENA	Today my brotha
9/1/2021 3:08:09 PM(UTC+0)	PENA	For sure
9/2/2021 10:59:41 PM(UTC+0)	PENA	Klk
9/3/2021 7:28:45 PM(UTC+0)	Skillz2	In Haverhill real quick seeing my last guy
9/3/2021 8:41:50 PM(UTC+0)	Skillz2	Where u at
9/3/2021 8:41:56 PM(UTC+0)	Skillz2	Where r u I'm in law now
9/3/2021 8:56:00 PM(UTC+0)	PENA	Woodland st

265. A few days later, PENA texts Skillz2 that the quality of the drugs is very good (“This gas’s”, “Gasss”). PENA asks for a larger quantity (“I need some twerk”) and complains that Skillz2 has made him wait for multiple days to resupply (“u be having me waiting for days”). Skillz2 asks how much PENA needs (“What u need”, “How much”) and PENA replies that he needs more than 70 grams (“I need like 70+”). Skillz2 says he is on his way (“I’m on my way”).

		CONTENT
9/9/2021 6:56:21 PM(UTC+0)	Skillz2	Yo how much u needed again?
9/9/2021 7:12:24 PM(UTC+0)	PENA	Hood to Spicy rn
9/10/2021 2:34:06 AM(UTC+0)	PENA	This gas’s
9/10/2021 2:34:09 AM(UTC+0)	PENA	Gasss
9/10/2021 1:48:00 PM(UTC+0)	PENA	I need some twerk
9/10/2021 6:59:19 PM(UTC+0)	PENA	Dam b u be having me waiting for days I can’t depend on u
9/10/2021 7:06:52 PM(UTC+0)	Skillz2	What u need
9/10/2021 7:06:53 PM(UTC+0)	Skillz2	How much
9/10/2021 7:10:16 PM(UTC+0)	PENA	I need like 70+
9/10/2021 7:10:23 PM(UTC+0)	PENA	Just lmk if u can bro
9/10/2021 7:42:14 PM(UTC+0)	Skillz2	How much exactly
9/10/2021 7:42:42 PM(UTC+0)	PENA	Bring me 70
9/10/2021 9:00:00 PM(UTC+0)	Skillz2	I’m on my way.

iii. 8/12/2025 – Recording of Pena Discussing Shooting and Killing Other Trinitarios

266. Following a dispute between factions of the Trinitarios, PENA got into an altercation with GARCIA and ARIAS at the Essex Street Projects. The dispute between the factions arose over the suspected theft of drugs and proceeds by one faction from another. A Trinitarios associate who reported to GARCIA was believed to be responsible for the theft. According to cooperating witnesses, GARCIA, ARIAS, and another Trinitarios member attacked PENA and knocked out one of his teeth out during the fight.

FILENAME: BS_2025_08_12T17_26_26

267. On August 12, 2025, PENA was captured on a consensual recording with a cooperating witness discussing the circumstances of GARCIA and ARIAS recently jumping him. PENA complains that they were hitting him and that he was basically jumped (“That’s basically

jumping, nigga. Niggas basically jumped me, brodie”). PENA says he was going to shoot them (“I’m going to shoot at all of those people today”, “I’m a start blowin’ at em today, bro”, “I’mma blow out all them niggas”).

PENA:	...hitting me. Then, they’re talking about. “Let him go, let him go.” After this, this nigga, bro... after this nigga already hitting me. He left me go, bro, like, nigga...
CHS:	[ASIDE: In a minute, I’m gonna go.]
PENA:	That’s basically jumping, nigga. Niggas basically jumped me, brodie. Now, on my heart, bro, I’m going to shoot at all of those people today, brodie. I swear to God, brodie. I’mma start blowin’ at’em today, bro. Like, there is no... I’m just letting you know, bro, there’s no coming back. Ain’t nothin’, no talk. Then, the niggas watching recorded me. He was recording me from his car like, “Blade, Blade.” But it’s cool, it’s fine, bro, you gon’ see, bro. I swear to God on my mom, nigga.
CHS:	Damn, nigga, bro.
PENA:	[U/I], brodie. Nigga, today I’mma blow out all them niggas, brodie.

268. PENA continues stating that he is going to shoot those responsible for jumping him (“I’m going to shoot at them and that’s it”, “But I’m blowing at them”).

PENA:	No, nobody cares, brodie. That’s it, bro, that’s okay, bro. I’m going to shoot at them and that’s it, and after that, if they wanna, if they wanna snap off. It’s fine, nigga. But I’m blowing at them, brodie. That’s not, that’s not saying, nigga. I’m over there by myself, nigga, to get the ones, nigga wanna be touching, gotten in. Why niggas is getting in for, bro?
CHS:	Mm-hmm.
PENA:	Why niggas is getting in for? Like, it ain’t two (2) grown man. They wanna grab me, when I’m on top of him... then, they wanna let it go, nigga, after, right? Like...

269. PENA says he will shoot them even if it results in him getting disciplined (“If I get DP, I don’t care, brodie. I’m going to shoot them, bro.”).

PENA:	No, bro, I’m going to shot a couple of rounds at them, bro, even if you don’t, even if I’m wrong... I’m going to shoot them, bro. I’m going to my hood, brodie. That’s, that’s my [U/I], game. If I get DP, I don’t care, brodie. I’m going to shoot them, bro. I’mma show these niggas, niggas keep playing with me, bro, niggas don’t know me, you gon’ see, you gon’ see, brodie, I’mma shoot a couple—I’mma, I’mma blow a couple of shots at them today. No cap. [BACKGROUND: NOISES]
CHS:	Take it easy, bro, bro. So, you don’t end up like...

iv. 9/4/2025- Recording Of Pena and Crispin Discussing Shooting a Trinitarios Associate

FILENAME: 2025-09-04_15-32-00.wav

270. On September 4, 2025, PENA and CRISPIN were captured on a consensual recording with a cooperating witness discussing the recent incident where PENA was attacked by GARCIA and ARIAS based on a Trinitarios associate who worked for GARCIA stealing drug proceeds from PENA. CRISPIN states that he can shoot the Trinitarios associate in the knee as retaliation and punishment (“Dude, that little nigga, he’s lucky. I’ll pop that little nigga randomly”, “on the low, on the super low, we pop him on the knee”, “Pop him on the knee”).

DURAN:	Right, yo, Skee, where you’ve been at?
PENA:	I don’t know.
CRISPIN:	Dude, that little nigga, he’s lucky. I’ll pop that little nigga randomly.
DURAN:	[CHUCKLES] C’mon, bro. Nigga, I told, I told him.
CRISPIN:	[U/I] on the low, on the super low, we pop him on the knee.
DURAN:	You heard? I told him, he didn’t want, yo...
CRISPIN:	Pop him on the knee.

v. 12/18/2025 – Controlled Purchase of Methamphetamine From Pena

271. On or about December 18, 2025, a cooperating witness arranged for the purchase of a pound of methamphetamine from PENA. The transaction was audio-video recorded. During the deal, PENA is seen on video handling cash received from the cooperating witness. Still images depicting PENA holding the cash for the transaction follow.



272. PENA tells the cooperating witness during the deal that he is sourcing the methamphetamine from another individual. The cooperating witness and PENA travel to meet the source of supply. The source of supply enters the vehicle, and PENA provides him with the money. The source of supply provides PENA with the methamphetamine, which is in a bag. PENA removes the methamphetamine from the bag, holds it, and discusses the quality of the methamphetamine. Still images of PENA holding the brick of methamphetamine follow.



273. The drugs purchased during the transaction were provided to investigators and sent to the DEA Laboratory for testing. The lab determined that the substance weighed 439 grams and

contained methamphetamine at 97% purity, resulting in a total weight of 426 grams of pure methamphetamine.

274. During the transaction, PENA discusses the quality of the methamphetamine. PENA states that the methamphetamine is in large chunks and suggests they have a video call with JAMES CABRERA to get his opinion on the quality of the drugs (“he got big ass chunks”, “You show Trensi this, this shit right here”). They called CABRERA but he did not answer.

PENA:	...be looking bigger. Like this [U/I]. Like, a pound looks bigger than this.
CHS:	Nigga, that shit looks like, fucking, piece of salt.
PENA:	But he got chop- he got big ass chunks.
CHS:	I can see, nigga.
PENA:	You show Trensi this, this shit right here... you Facetime him, show...
CHS:	Let's facetime him right now.
PENA:	Be like, “Yo, brodie. What you think? This fire?”
CHS:	I'll be like, “Yo, I just bought this. What you think, bro?”
PENA:	You will see. He's gonna be like, shi...

275. PENA says the drugs are high quality, comparing prior amounts he has seen which were in small pieces with the large chunks of what was purchased (“This is gas, my nigga”, “this one is white” “Chunks”, “Usually is mad little pieces”). PENA says they usually cut methamphetamine with ice salt (“They cut it with salt. That's what they cut it with”).

PENA:	This is gas, my nigga, I've seen, I've seen mad different, mad different...
CHS:	[U/I].
PENA:	And this one is white....
CHS:	Nigga, that's what...
PENA:	Chunks.
CHS:	... usually is, bro.
PENA:	Usually is mad little pieces.
CHS:	Like, nigga, if you ever seen pure salt, when it—how it comes before they...
PENA:	Yeah, yeah.
CHS:	... grind it down. That's what it looks like.
PENA:	Brodie, they cut this with salt, bro.
CHS:	Yeah?
PENA:	They cut it with salt. That's what they cut it with. The ice salt, because the one uh, the one for the ice... that's what they cut it with, brodie. [U/I]. That's how they cut meth, muddy.

276. PENA discusses his ongoing drug operation in Maine. PENA says he moves about a kilogram of cocaine per month (“I move at least one (1), one (1), one (1) a month”, “Whole bird?”, “Hell yeah”). PENA asks if CW-20’s sources can obtain drugs at a price of \$15,000 or \$16,000 or \$17,000 per kilogram (“if he could get me a good ass ticket like, let’s say like, even like, like in the fifteen (15), sixteen (16), seventeen (17)”).

PENA:	Take left. Like, brodie, I move at least one (1), one (1), one (1) a month.
CHS:	Whole bird?
PENA:	Hell yeah.
CHS:	Nigga, how much is that shit, nigga?
PENA:	Shit...
CHS:	That shit like, still like twenty-eight (28) dollars a gram, thirty (30) dollars?
PENA:	Type shit, yeah. Twenty-five (25). But I’m talking about pressed shit like that or if I like...
CHS:	Nah, I’m talking about shit that you can put in it... bro, you know what’s crazy?
PENA:	If he could beat that number like, if he could be like... if he could get me a good ass ticket like, let’s say like, even like, like in the fifteen (15), sixteen (16), seventeen (17), like, some brodie, I'mma 'bout to show you. I was [U/I] same.

277. CABRERA calls back. The cooperating witness asks CABRERA his opinion (“Yeah, what you think about this shit?”). CABRERA asks if it is methamphetamine (“What is that? Tina? Yeah, that’s Tina”). CABRERA opines that it looks like it is good quality (“I ain’t gon’ lie, right through that bag, that shit look a’ight, brodie. No cap”). PENA agrees and states that it does look good (“Yeah, that’s what I was telling him. That looks like some precious.”).

CHS:	What’s up, good sir?
CABRERA:	Yo.
CHS:	Yo.
CABRERA:	What’s the word, my brother?
CHS:	Nigga, I just...
PENA:	Hmm.
CHS:	Bought some shit, nigga, I wanna know... [STAMMERS] what you doing, nigga.
CABRERA:	That you bought some shit?
CHS:	Yeah, what you think about this shit? Damn, my head [I/I].
CABRERA:	What is that? Tina? Yeah, that’s Tina. I ain’t gon’ lie, right through that bag, that shit look a’ight, brodie. No cap.
PENA:	Yeah, that’s what I was telling him. That looks like some precious.

278. CABRERA says he can see the quality through the bag (“Like, right through the bag like, right through the bag, you can tell if it’s precious or not, it’s not fucked up or nothing”). CABRERA states that if it smells like diesel fuel then it is high quality (“it has like a, like a diesel smell like a, like a fuel, diesel smell, that’s some fire shit”). CABRERA says he needs some high-quality methamphetamine (“I need that”). CABRERA says he could sell that amount in a single day (“I can get that shit sold tomorrow.”).

CABRERA:	Yeah. Like, right through the bag like, right through the bag, you can tell if it’s precious or not, it’s not fucked up or nothing. If they don’t smell like acetone and it has like a, like a diesel smell like a, like a fuel, diesel smell, that’s some fire shit, I need that.
CHS:	Yeah, you need that?
CABRERA:	I can get that shit sold tomorrow.
CHS:	I gotchu, bro, twenty-eight-hunnit (2,800) just for you. [RÍE] Nah, I’m...
CABRERA:	Twenty-eight (28)...
CHS:	[LAUGHS] I’m fucking. [LAUGHS]
CABRERA:	[LAUGHS] Twenty-one (21).
PENA:	Nigga, right.
CABRERA:	I’ll start letting go for, for fifteen (15) of them.
CHS:	[LAUGHS] Yo. Make it more strong.
PENA:	Yeah.
CABRERA:	What’s the word with that?
CHS:	Nah, but [U/I]. What’s up?
CABRERA:	That shit looks good, brodie. If that shit don’t smell like acetone... and it got like a fuel smell or like a gas fuel smell to it, that’s that.
PENA:	That shit looks crazy, I ain’t gon’ hold you.
CHS:	Nah, you [U/I] trust that shit.
CABRERA:	Yo, smell it. You’ll see, smell it. How it smells.
PENA:	Let me see. Hold on, stop right here.
CHS:	Grab it in the bag. Dude, I smell it. I’m scared after that Willy nigga died in Boston, I ain’t smelling shit like that. [LAUGHS]
CABRERA:	Nigga, trust me, you only die if you smoking fentanyl.

279. CABRERA tells the cooperating witness to smell the methamphetamine and tell him what it smells like. PENA reports that it smells like fuel (“It kind of smells like fuel a little but”). CABRERA reiterates that he can sell that amount tomorrow (“Like, yo, nigga, I can get that shit moved tomorrow, nigga”). The cooperating witness reports the price paid for the pound and

CABRERA replies that it looks good and is high quality (“yeah, that shit looks good. That shit looks like some real Twizzlers”).

CHS:	Exactly what you said, he said smells like.
CABRERA:	Like what?
PENA:	It kind of smells like fuel a little bit.
CHS:	Like fuel a little bit.
CABRERA:	Like diesel, like diesel.
PENA:	With alcohol, with the alcohol too.
CHS:	Like diesel, alcohol.
CABRERA:	Hey yo, and, and what’s the word? Like, yo, nigga, I can get that shit moved tomorrow, nigga.
CHS:	I mean, the nigga, I just bought the ounce for eighteen-hundred (1,800) right now.
PENA:	Yeah, I’mma call you.
CHS:	A’ight. Hit me up, brodie.
PENA:	Alright, dude.
CHS:	I’mma call you when I’m done.
CABRERA:	An ounce?
CHS:	Like an ounce, my bad, a pound.
CABRERA:	A p?
CHS:	Yeah.
CABRERA:	Nah, yeah, that shit looks good. That shit looks like some real Twizzlers.
CHS:	Nah, facts. Nah, I’m about to... do this little job, nigga, I’mma hit you up if you out here, we link up if any, we smoke.
CABRERA:	Yeah, hit me up, hit me up. I’mma be active. [STAMMERS] I gotta be bat-man, nigga, after ten (10).

vi. 2/9/2026 – Recording Of Pena Discussing the Distribution of Drugs in Maine

Filename: 2026-02-09_20-10-07

280. On February 9, 2026, PENA was captured on a consensual recording with a cooperating witness discussing drug distribution in Maine. The cooperating witness says he could potentially supply 10 kilograms (“they’re asking me if I could take ten (10) birds”) and that YORRO is taking five of them and PENA can take five (“You don’t gotta worry about the whole ten (10) ‘cause Low is gonna take five (5)”). PENA says he can quickly sell them if they are high quality (“them shit is gone, muddy. If the consistency is right there, they gone, nigga”). PENA says his network is efficient in Maine and he can move drugs through many dealers (“... my shit is

dumb valid, that shit is ready with [I/I], brodie, like, even, even me and uh... brodie, just wit'... wit' passing work to other niggas").

CHS:	Yo, brodie, look. I got two (2) ounces. I just didn't agree to anything because I don't know. So, they're asking me if I could take ten (10) birds.
PENA:	Ten (10) birds?
CHS:	Yeah. You don't gotta worry about the whole ten (10) 'cause Low is gonna take five (5).
PENA:	Nah, alright.
CHS:	But... I just wanna make sure, my brother, because that's five (5) birds! Just for you.
PENA:	I already know. [U/I] them shit is gone, muddy. If the consistency is right there, they gone, nigga.
CHS:	Like, I'm not the type, you know, and I never asked you, none of that or anything. woo, woo, woo. None of that, my guy, but like, your trap is valid, brodie, like, you think you can handle that?
PENA:	I know [U/I].
CHS:	'Cause I'mma about to give these niggas uh... [CHUCKLES]
PENA:	Muddy, my... my shit is dumb valid, that shit is ready with [I/I], brodie, like, even, even me and uh... brodie, just wit'... wit' passing work to other niggas, muddy, like, that's why I... bro, must of my work [I/I] like [I/I] stayed knocked out 'cause I use my work.

281. PENA says he can sell 350 grams or 250 grams in two or three days ("I still move like, like, three-fifty (350), two-hundred fifty (250), two (2) to three (3) days").

PENA:	And I still move like, like, three-fifty (350), two-hundred fifty (250), two (2) to three (3) days, you feel me?
CHS:	No, of course. I'm saying like...
PENA:	[U/I].
CHS:	In the sense like, brodie, like, max out your straps and whoever you can sell to out here too, my brother.

282. PENA says he would rather trust the dealers in Maine than the gang members in Lawrence ("I rather trust them white-boys than, than these niggas out here, brodie"). PENA says some of his rural drug contacts in Maine are capable of moving entire kilograms and more ("I got white boys that's, that's moving a whole, a whole one (1) and a half (1/2), gang").

PENA:	Brodie, brodie, I rather trust them white-boys than, than these niggas out here, brodie.
CHS:	Mm, I hear.

PENA:	I got white boys that's, that's moving a whole, a whole one (1) and a half (1/2), gang, that I haven't even reach out to, muddy. It's cause, you know, I haven't been able to, you feel me? Like, that nigga comes straight cash, straight cash... like, when I don't got work; I buy off them, sometimes, but they [sic] shit is trash, but they sold me some for six-hundred (\$600.00) dollars. No cap. Even though I went like, half (1/2) a point. I still doing that.
CHS:	It don't matter, it just...
PENA:	The point is to get it gone.

283. PENA reiterates that he can quickly move 250 grams to 300 grams a day if he has it in hand (“if we got enough twerk like that, right there, muddy, like, it—bro, there is no taught to running off like, muddy, brodie, I dump, like, I can dump like two-fifty (250), three-hundred (300) daily, brodie”).

PENA:	[U/I]. If we got, if we got enough twerk like that, right there, muddy, like, it—bro, there is no taught to running off like, muddy, brodie, I dump, like, I can dump like two-fifty (250), three-hundred (300) daily, brodie, if I have it.
CHS:	Nah, [I/I]. I've been seeing that, brodie, with my own eyes.
PENA:	If I have it. It's like, no cap, if it's around, the thing is, like, look, I don't got tweak right now, we haven't had tweak. So, now... niggas gotta go again and take back our people [U/I] get active again, you know, they already doubting you, “This nigga is not gonna be active for long.” You feel me?

284. PENA states that even if the five kilograms are low quality they can sell them (“even though if those five (5) birds are low, that shit is gonna be wildin’. They got niggas, they can’t even serve like that, brodie”). PENA says will have to sell the kilograms in smaller quantities because the dealers cannot sell in large amounts (“They got niggas, they can’t even serve like that, brodie”).

PENA:	Yeah, I know. I ain't gon' hold you like, even, even though if those five (5) birds are low, that shit is gonna be wildin'. They got niggas, they can't even serve like that, brodie.
CHS:	Nah, I [I/I].
PENA:	They just don't serve them 'cause they limited.
CHS:	Yeah.
PENA:	Everybody is limited.
CHS:	Nah, I'm [U/I].
PENA:	Like, I ain't gon' hold you.
CHS:	Trust.

PENA:	Brodie, there is mad jugs out here, mad jugs, mad jugs.
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285. PENA discusses adulterating the kilograms with cutting agents to make a larger amount (“The only way they can make it better is with ten (10). So, imagine yourself with ten (10), can you dance on them”). PENA explains that he adds twenty-six grams of cutting agent for every two grams of drugs (“Or like two (2), that’s what I do now. I do twenty-six (26) and two (2)”). PENA then explains that they need a kilogram press to reform the kilogram bricks once they add the cutting agent (“But it’s like, we need a press... damn, who got a press, like, we need a press and uh, I think Woody got one (1), if I ask him to use it”).

PENA:	No cap, brodie. So, you know why they wanna give you ten (10), right? The reason why they wanna give you ten (10) is, nigga, nigga, it’s ‘cause of the quality. The only way they can make it better is with ten (10). So, imagine yourself with ten (10), can you dance on them.
CHS:	[STAMMERS]
PENA:	You put on it, bro, you put less on it, but it’s ten (10). No cap.
CHS:	But like, you don’t wanna fucking... you don’t wanna [U/I]?
PENA:	What you mean? Like [U/I] them up?
CHS:	Uh-huh.
PENA:	Or cut them up?
CHS:	Cut them up, like, take the whole bird and just cut the whole shit.
PENA:	It’s that it is hard, gang. It’s like...
CHS:	Nah like, like, how you said you did it like...
PENA:	I thought about it. It’s, it’s...
CHS:	Four (4) grams every ounce, like...
PENA:	I know.
CHS:	Take twenty-four (24) throw four (4) and... and leave it there.
PENA:	Or like two (2), that’s what I do now. I do twenty-six (26) and two (2).
CHS:	Oh, you can do two (2).
PENA:	‘Cause the quality now hasn’t been, you know, up there. But it’s like, we need a press... damn, who got a press, like, we need a press and uh, I think Woody got one (1), if I ask him to use it, but I don’t know what type of time he’s on. But, but, that’s, that’s the only way. And one, one thing I noticed that, that sometimes like, they get really tight when you press them shits. But regardless, the way we get them is like...

C. HECTOR MOTA, A/K/A “BEBO”

286. HECTOR MOTA, A/K/A “BEBO,” (dob: xx/xx/2007, ssn: xxx-xx-0115) (“MOTA”), is a member of the Haverhill Chapter of the Trinitarios. Agents believe that MOTA has been a member of the Trinitarios since 2024, based on information from multiple cooperating witnesses and other sources of information, and believe that MOTA was blessed into the Trinitarios in 2024 by PAULA-CABRAL during the 2024 universal meeting.

287. A photograph of MOTA follows.



288. MOTA was born in Massachusetts and is a citizen of the United States.

289. MOTA has no criminal convictions.

290. Photographs of MOTA wearing Trinitarios beads, making Trinitarios gang signs, and holding a firearm follow.



D. JEAN DELGADO, A/K/A "NEGRITO"

291. JEAN DELGADO, A/K/A "NEGRITO," (dob: xx/xx/2005, ssn: xxx-xx-5904) ("DELGADO"), is an associate of the Haverhill Chapter of the Trinitarios. Agents believe that DELGADO began his association with the Haverhill Chapter of the Trinitarios in approximately 2022 based on information from multiple cooperating witnesses and other sources of information.

292. A photograph of DELGADO follows.



293. DELGADO was born in Puerto Rico and is a citizen of the United States.

294. DELGADO has no criminal convictions.

IV. THE BOSTON CHAPTER OF THE TRINITARIOS

295. The Boston Chapter of the Trinitarios is primarily focused around the area of Franklin Field. Given the small number of members of the Boston Chapter, and the larger Dominican culture in Lawrence, the members of the Boston Chapter frequently go to Lawrence and interact with the Lawrence Chapter.

296. The Boston Chapter members facing federal charges include:

- a. LUIS JOSE CABRAL, A/K/A “MONO,” the Primera or First of the Boston Chapter;
- b. YOLDARI TEJEDA CORONADO, A/K/A “NONOY,” and
- c. MARTIN TAVERAS, A/K/A “FLEX.”

A. LUIS CABRAL, A/K/A “MONO”

297. LUIS CABRAL, A/K/A “MONO,” (dob: xx/xx/2000, ssn: xxx-xx-9139) (“CABRAL”), is the former leader and member of the Boston Chapter of the Trinitarios. Agents believe that CABRAL has been a member of the Trinitarios since at least 2018 based on information from multiple cooperating witnesses and other sources of information.

298. A photograph of CABRAL follows.



299. CABRAL is a citizen of the United States.

300. I am familiar with CABRAL's criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On October 6, 2014, CABRAL was charged in Suffolk County Juvenile Court, Docket No. 14DL1056BO, with Kidnapping and Armed Robbery. On August 17, 2016, CABRAL was found delinquent, sentenced to probation, which he violated, and was then committed to DYS custody.
- b. On November 8, 2018, CABRAL was charged in Lawrence District Court with Possession of a Class B Substance with Intent to Distribute, Possession of a Class A Substance with Intent to Distribute and Resisting Arrest. On May 19, 2021, CABRAL admitted sufficient facts and the case was continued without a finding.
- c. On August 8, 2020, CABRAL was charged in Essex Superior Court, Docket No. 2077CR00156, with Possession of a Class B Substance with Intent to Distribute, and Possession of a Class A Substance with Intent to Distribute. On February 16, 2022, CABRAL was convicted and sentenced to two years in state prison and then found in violation of probation and sentenced on September 26, 2023, to an additional two and one-half years in the house of corrections.
- d. On April 28, 2022, CABRAL was charged in Salem District Court, Docket No. 2236CR00678, with Larceny and Possession of Burglarious Tools. On January 5, 2023, CABRAL was convicted and sentenced to one year suspended, with six months incarceration. On February 14, 2024, CABRAL was found in violation of probation and sentenced to six months incarceration.

- e. On September 14, 2025, CABRAL was charged in the U.S. District Court for the District of Maine, Docket No. 25-CR-00162-JAW, with Conspiracy to Distribute Fentanyl, Cocaine, and Cocaine Base, Possession with Intent to Distribute Fentanyl, Use of a Firearm During and in Relation to a Drug Trafficking Crime, Hobbs Act Robbery, and Felon in Possession of a Firearm. This case remains pending.
- i. Investigators are familiar with the facts and circumstances related to this case and they are discussed below. *See* Section V(KK).

301. Photographs of CABRAL wearing Trinitarios beads and making Trinitarios gang signs follow.



i. 9/6/2025 - Recording of CABRAL Discussing the Distribution of Drugs

302. On September 6, 2025, CABRAL was captured on a consensual recording with a cooperating witness discussing distributing drugs with other Trinitarios in Maine. The cooperating witness states that he will offer CABRAL drugs at his price (“I’ll have there whatever you want and I could give it to you at my price”) and also says he has a young Trinitarios associate who wants to work in Maine with CABRAL selling drugs (“I have a young boy that wants to go up there.”). The cooperating witness says CABRAL should meet the guy and get a sense for him (“I can introduce him to you tomorrow when we get together, and after that we spoke a blunt with

him, so you could take a look at his behavior.”). CABRAL says anyone working for him needs to focus on moving the drugs (“grab the work”), get the drugs, do the deals (“do the play”), and make the money (“get the money”).

CHS:	Yeah, I’ll have there whatever you want and I could give it to you at my price.
CABRAL:	Say no more.
CHS:	No, for a fact. Tribu, I also wanted to ask, what’s going on, we are not going up there? I have a young boy that wants to go up there.
CABRAL:	Which one? Don’t tell me is Deli [PH]?
CHS:	What freaking Deli you are talking about; I don’t deal with rapist.
CABRAL:	Okay.
CHS:	Nah, nah, nah, it’s a young guy that lives here, in the same building my mom lives; it’s a white boy.
CABRAL:	So, let’s work; that’s cool.
CHS:	Nah, we are on it; if you want, I can introduce him to you tomorrow when we get together, and after that we spoke a blunt with him, so you could take a look at his behavior.
CABRAL:	[U/I] go there, and the only thing he needs to do is grab the work, you know how it is.
CHS:	Nah, nah, okay.
CABRAL:	He’s going to do the play, and get the money [U/I]

303. The cooperating witness says the worker won’t steal the drugs and will pay what’s owed (“he doesn’t steal, none of that”). CABRAL asks if the worker is “Deli,” referring to DEREK MERCADO, A/K/A “DELI,” A/K/A “DELI THE DEMON,” and the cooperating witness says it is not DELI. CABRAL says RICO, referring to RIKY MONTILLA, accused CABRAL of being a part of something that took place in Maine (“accusing me of being part of something that they did up there”), which I believe to be a reference to a shooting that took place in April 2025, described below. The cooperating witness says a Trinitarios member named ‘Lil Baby’ was accused of snitching.

CHS:	And he also has his Jordans; he is ready, [U/I] he doesn’t steal, none of that.
CABRAL:	Oh, that’s cool. The main thing is pay the mortgage and all. [U/I]
CHS:	Nah, nah, no cap, no cap. Nigga, that Deli nigga, I don’t fuck with that nigga, all, all that bitch ass nigga, the Little Baby, nigga. Those niggas are thugs, at the end of the day, they did something bad to Spookie [PH], and they shot at Rico, and those are my dudes, so, I can’t...

CABRAL:	Rico called me and he was telling me about that those niggas, are fucked up, they were accusing me of being part of something that they did up there, and he wanted to say that it was me and shit and that's not true; it's been a while since I went up there.
CHS:	Nah, that nigga is crazy. What do you mean? He wanted to throw you under the bus with the cops?
CABRAL:	Yeah.
CHS:	And the funny thing is that, that... do you know the one called, Woodie [PH]?
CABRAL:	Mm-hm.
CHS:	He is saying that it was Little Baby that snitched on him, because he was the only one that knew where he was at, and when the cops got him, they went exactly to where he was at.

ii. 9/7/2025 - Recording of CABRAL Purchasing 100 Grams of Cocaine

FILENAME: 2025-09-07_00-33-45

304. On September 7, 2025, CABRAL was captured on a consensual recording with a cooperating witness and YORRO. During the call, CABRAL agrees to purchase 100 grams of cocaine from YORRO the following morning.

305. YORRO tells CABRAL that he does not have anything left ("I don't have anything left"). CABRAL responds that he already told the customer that he would be coming up to Maine early that morning ("I had already told the guy that I was coming up, you know, today in early morning and all of that"). CABRAL says that another source already provided him with some low-quality drugs ("the faggot of my friend came over and brought me some shitty stuff too").

YORRO:	They're crushing it, I don't have anything left.
CHS:	Yeah, bro, that's what I told the guys, brodie, I didn't want to let you down, you know.
YORRO:	Nah.
CHS:	But that's the only possible scenario, for sure.
CABRAL:	Yeah, because it's like, honestly, for real, I had already told the guy that I was coming up, you know, today in early morning and all of that... The guy is—he's bugging me at lot, he's been bugging me for three (3) days now, for real.
CHS:	No, of course.
CABRAL:	And the faggot of my friend came over and brought me some shitty stuff too.

306. CABRAL states that he has enough for 100 grams (“enough for eleven-hundred (1,100) right now, for, for a’hundred (100)”). YORRO asks if CABRAL is looking for 100 grams (“looking for a’hundred (100)?”). CABRAL says he has enough money to buy 100 grams and asks if YORRO can supply him with a little more and CABRAL will pay him for the drugs in two days, as soon as the drugs are sold, which CABRAL states will be by Monday (“I got, got bread for a’hundred (100) right now, but if you could give me a little more than that, I’ll give you the bread in two (2) days or as soon as I sell it; I’ll give you the bread on Monday, without fail”). YORRO agrees (“I’mma do that”). CABRAL states that he is planning to go to Miami and wants to make as much money as possible before he leaves (“I’mma be going to Miami on the tenth (10th). But... I’m trynna make as much moves as I can”). YORRO asks if CABRAL will be ready in the morning and states that he has to retrieve the drugs (“if you are ready in the morning, I’mm be up. ‘Cause I gotta go pick that shit up”).

CABRAL:	But that is... enough for eleven-hundred (1,100) right now, for, for a’hundred (100).
YORRO:	That you look, looking for a’hundred (100)?
CABRAL:	I got, got bread for a’hundred (100) right now, but if you could give me a little more than that, I’ll give you the bread in two (2) days or as soon as I sell it; I’ll give you the bread on Monday, without fail...
YORRO:	Nah, I’mma do that [U/I]. That’s...
CABRAL:	No bullshit, I’mma be going to Miami on the tenth (10 th). But... I’m trynna make as much moves as I can.
YORRO:	If you, if you are ready in the morning, I’mm be up. ‘Cause I gotta go pick that shit up.

307. CABRAL asks when YORRO can meet the following morning (“so at what time you want to talk to me, exactly?”). YORRO replies that he has two packages of drugs on him at the moment, but they will be sold since the drugs were already paid for (“I have two (2) of them here, they will be gone in the morning. I’m just waiting on them to call me. Those two (2) will be gone in the morning and the play was already paid for”). CABRAL and YORRO confirm that they

will meet at 8:30 (“What time do you want to meet me?”, “eight thirty (8:30), eight ten (8:10) o nine (9:00), ten (10:00), it don’t matter just show up”, “So, we can meet up at eight thirty (8:30)?”).

CABRAL:	Bro, so at what time you want to talk to me, exactly?
YORRO:	Look, I have two (2) of them here, they will be gone in the morning. I’m just waiting on them to call me. Those two (2) will be gone in the morning and the play was already paid for.
CABRAL:	So then, what time do you want to go with me in the morning?
YORRO:	I’ll be out on the streets at eight (8:00) in the morning, you let me know.
CABRAL:	At what time do you want to meet me? Not what time you’re going to be out on the streets.
YORRO:	Eight (8:00)...
CABRAL:	What time do you want to meet me?
YORRO:	...eight thirty (8:30), eight ten (8:10) o nine (9:00), ten (10:00), it don’t matter just show up.
CABRAL:	So, eight thirty (8:30).
YORRO:	At eight thirty (8:30), I’ll be out on the streets, bro.
CABRAL:	So, we can meet up at eight thirty (8:30)?
YORRO:	Anywhere.
CABRAL:	One-hundred percent (100%), without fail?
YORRO:	Without fail, bro, call me, I...
CABRAL:	Got it. We’re set for that time; we are set for eight thirty (8:30) in the morning then.

B. YOLDARI TEJEDA CORONADO, A/K/A “NONOY”

308. YOLDARI TEJEDA CORONADO, A/K/A “NONOY,” (dob: xx/xx/2001, ssn: xxx-xx-8279) (“TEJEDA”), is a member of the Boston Chapter of the Trinitarios. Agents believe that TEJEDA has been a member of the Trinitarios since at least 2022 based on information from multiple cooperating witnesses and other sources of information.

309. A photograph of TEJEDA follows.



310. TEJEDA was born in the Dominican Republic and is a naturalized citizen of the United States.

311. I am familiar with TEJEDA's criminal record. TEJEDA has no record of felony convictions. TEJEDA is currently charged with two pending cases. The following is a summary of his pertinent arrests and convictions.

- a. On July 18, 2023, TEJEDA was charged in West Roxbury District Court, Docket No. 2306CR000615, with Carrying a Firearm with Ammunition, Possession of a Firearm without a Permit, Possession of Ammunition without a Firearm Identification Card, and Operating After Suspended License. These charges remain pending.
- b. On December 17, 2025, TEJEDA was charged in the U.S. District Court for the District of Massachusetts, Docket No. 26-CR-10148-DJC, with Collection on Extension of Credit By Extortionate Means, in violation of 18 U.S.C. § 894. This case remains pending. I am familiar with the facts of this case from the Complaint Affidavit, and they are discussed below. *See* Docket No. 26-CR-10148-DJC, ECF #4-1. On May 21, 2026, TEJEDA pleaded guilty to Collection on Extension of Credit By Extortionate Means and Conspiracy to Commit Hobbs Act Robbery. *See* Docket No. 26-CR-10148-DJC.

312. Photographs of TEJEDA making Trinitarios gang signs and holding firearms follow.





313. TEJEDA has a tattoo of “L.E.S.” above his eye. This refers to the Trinitarios symbols Luna, Estrellas, and Sol (Moon, Stars and Sun). A photograph of TEJEDA’s tattoo follows.



314. Numerous photographs were recovered from TEJEDA's social media accounts depicting him possessing firearms and controlled substances, including still images depicting kilogram bricks of suspected fentanyl that bear the "LV" logo. This stamp is well-known to investigators and is believed to have originated from a common source of supply utilized by the Trinitarios.



315. As can be seen in the following photographs, TEJEDA has a tattoo of a scorpion on his hand.



316. This same tattoo can be seen in numerous photographs and videos that investigators observed on TEJEDA's social media. These photographs and videos depict him in possession of firearms and controlled substances. Still images follow.





i. 10/10/25 Recording of TEJEDA Discussing Robbery of Drug Dealers

317. TEJEDA is currently charged and held in custody in relation to an ATF investigation. See *U.S. v. Yoldari Tejeda Coronado*, Docket No. 26-CR-10148-DJC. That investigation targeted TEJEDA through a robbery sting where TEJEDA would conduct a robbery of a purported stash location containing a large quantity of drugs. Specifically, a cooperating defendant discussed arranging the robbery of a stash location containing approximately 20 to 30 kilograms of cocaine. TEJEDA was captured on a recording discussing the proposed robbery on a number of occasions and describing his experience and capabilities in committing drug house robberies.

FILENAME: 10-10-25_URI_Meet_CI_Audio.001

318. For example, on October 10, 2025, TEJEDA was captured on a recording discussing the proposed stash house robbery with undercover officers posing as Mexican drug traffickers (identified as “Mexico” and “S/A” in the transcript). In short, the undercover officers offered to provide information to TEJEDA about the whereabouts of the drugs that they were transporting. The plan was that TEJEDA would conduct the robbery and provide the stolen drugs to the Mexican drug traffickers who set it up and TEJEDA would receive three or four kilograms of cocaine as payment.

319. During the recording, TEJEDA asks the undercover officers if the people in the stash location will be armed and how many will be inside (“we will need to know, if they are armed, how many people are they, you feel me”). TEJEDA says it is an important detail but one they can deal with because TEJEDA’s team of robbers will be armed (“don’t worry about that, because we have firearms”). TEJEDA says that a mutual acquaintance posing as a cousin of the Mexican drug traffickers (“your cousin”) will arrange for the split of the stolen drugs (“your cousin told me that we are going to split it in half, and he will be in charge of everything, on your behalf [U/I] and I’ll take care of my part”).

TEJEDA:	Of course, of course, we have to look into that, of course; those are key points, because we will need to know, if they are armed, how many people are they, you feel me?
MEXICO:	[U/I]
TEJEDA:	Ah no, don’t worry about that, because we have firearms, you feel me? And the... [STAMMERS] people are without jobs, and all I need is an opportunity and for everything to be a hundred percent (100%). You understand what I’m saying?
MEXICO:	[U/I]
TEJEDA:	Of course, but no, your cousin told me that we are going to split it in half, and he will be in charge of everything, on your behalf [U/I] and I’ll take care of my part [U/I] ...
S/A:	You already know.
MEXICO:	Yes, yes, I know that’s not a problem [UNINTELLIGIBLE]
TEJEDA:	Understood; I understand.

MEXICO:	So, in this [U/I] that... that everything is fine. [UNINTELLIGIBLE CONVERSATION]
TEJEDA:	Okay.
MEXICO:	[U/I]
TEJEDA:	Okay, okay, okay; okay. I understand.

320. The undercover officer confirms that TEJEDA will retain operational control of the team conducting the robbery (“You’ll be in charge of the amount of people”). TEJEDA replies that he has a group of individuals already in mind (“don’t worry about that, I have my group”). TEJEDA asks for assurance the mission is confirmed (“what I need it to be assurance, for us to be a hundred (100) ... a hundred percent (100%), you feel me”), and states that he will handle the robbery team and their firearms (“About the people and the firearms, and all that, you don’t have to worry”). TEJEDA confirms that he is prepared to execute the mission and just needs to know when (“ready for whichever day you tell me; I’m ready already, you feel me? It’s just a matter of you telling me and that’s it”).

MEXICO:	You’ll be in charge of the amount of people; the amount of people that you...
TEJEDA:	No, no, about that... don’t worry about that, I have my group...
MEXICO:	[U/I]
TEJEDA:	No, no... okay, what I need it to be assurance, for us to be a hundred (100) ... a hundred percent (100%), you feel me? About the people and the firearms, and all that, you don’t have to worry.
MEXICO:	Okay. As long as you have all that ready for us, or for you...
TEJEDA:	I’m ready for whichever day you tell me; I’m ready already, you feel me? It’s just a matter of you telling me and that’s it.
MEXICO:	Oh, okay. Anything else... anything else buddy, that you may need?

321. TEJEDA reiterates that he needs assurance about the mission going forward (“All I want is assurance, and to be a hundred percent (100%)”). TEJEDA says he will start recruiting people to conduct the robbery (“moving forward from today, I’m going to start looking for the people, you feel me”). TEJEDA asks if it would be better for the robbers to dress as police or if they should order everyone to the floor (“What’s convenient for you, for us to do it, dress as cops, or everybody to the floor”).

TEJEDA:	That's all, buddy. All I want is assurance, and to be a hundred percent (100%). Because moving forward from today, I'm going to start looking for the people, you feel me? Hey, I wanted to ask you this, you... it's better... What's convenient for you, for us to do it, dress as cops, or everybody to the floor?
MEXICO:	Well, I'm going to leave that up to you guys.
TEJEDA:	Alright. Okay, okay. No, no perfect, that's fine. A hundred percent (100%).

322. TEJEDA continues requesting assurance that the robbery is going forward and says that robbing drug dealers is how he makes money and characterizes it as his "job" ("Because this is how I bring food to my table; this is our job, you feel me").

MEXICO:	And if anything comes up, talk to my cousin, if you or your people... says, "Hey, you know what, [U/I] I don't want to do it." Then we find somebody else.
TEJEDA:	No, that's not negotiable, it's a hundred percent (100%). I feel you are sure about it; all I need is assurance, that's all. You feel me?
MEXICO:	All right.
TEJEDA:	Because this is how I bring food to my table; this is our job, you feel me? All we need is to be a hundred percent (100%), and to be a serious deal... that there is no... you understand? That there is no variance. That there is no...
MEXICO:	For us to have firmness
TEJEDA:	A hundred percent (100%) firmness and that's it. That's what I need.

323. TEJEDA asks the undercover officers whether they can work with the drug suppliers after the robbery ("After we finish doing this, you guys won't work with those people anymore?"). The undercover officer replies that the suppliers will be looking for them ("With those people, no, because they will be... they are going to be looking for us"). TEJEDA emphasizes that he will cover his angle but the undercover officers must make sure the drugs are in the house. TEJEDA explains he has done prior robberies where he was told there would be five kilograms in a particular house and those missions have failed ("there are times, that I've been told, 'Listen, there's going to be five (5) kilos there, and that's the house'"). TEJEDA explains that he undertakes all the effort to map out the location, conduct the robbery and tie up the victims, and it would be very unfortunate if there were ultimately no drugs in the house ("after I do the map, and I do everything at the top, with everybody tied up, and then, there's no kilos").

TEJEDA:	After we finish doing this, you guys won't work with those people anymore?
S/A:	With those people, no, because they will be... they are going to be looking for us, this is why we need to do this right, fast and without, and without...
TEJEDA:	No, because this is what I say, look, this is...[STAMMERS] ...my job; this is what I do for living; this is how I put food on the table for my family, you understand? The same way that you...
S/A:	[U/I] Uh-huh.
TEJEDA:	...just like the way you move around...
S/A:	Yeah.
TEJEDA:	...that's the same way... this is my job. You understand? So, what I need is, and I'll repeat, confirmation, and for that to be a hundred percent (100%), because there are times, that I've been told, "Listen, there's going to be five (5) kilos there, and that's the house." And after I do the map, and I do everything at the top, with everybody tied up, and then, there's no kilos, you understand what I'm saying?

C. MARTIN TAVERAS, A/K/A "FLEX"

324. MARTIN TAVERAS, A/K/A "FLEX," (dob: xx/xx/2002, ssn: xxx-xx-8746) ("TAVERAS"), is a former member of the Lynn Chapter of the Trinitarios who was reporting to LUIS CABRAL following the arrests of the leadership of the Lynn Chapter in February 2025. Agents believe that TAVERAS has been a member of the Trinitarios since at least 2022 based on information from multiple cooperating witnesses and other sources of information.

325. A photograph of TAVERAS follows.



326. TAVERAS is a citizen of the United States.

327. I am familiar with TAVERAS' criminal record. The following is a summary of his pertinent arrests and convictions.

- a. On June 6, 2019, TAVERAS was charged in Essex County Juvenile Court, Docket No. 19DL0431SA, with Carrying a Firearm. On August 24, 2020, TAVERAS was found delinquent and committed to DYS custody.
- b. On October 10, 2019, TAVERAS was charged in Essex County Juvenile Court, Docket No. 19YO0035S, with Carrying a Firearm. On August 24, 2020, TAVERAS was found delinquent and committed to DYS custody.
- c. On June 6, 2022, TAVERAS was charged in Essex Superior Court, Docket No. 2277CR00063, with Armed Carjacking, Assault and Battery with a Dangerous Weapon, Assault with a Dangerous weapon, and Witness Intimidation. On February 2, 2023, TAVERAS was convicted and sentenced to incarceration for one year followed by two years probation. TAVARES was found in violation of his probation and sentenced to three years in state prison.
 - i. Investigators are familiar with Salem Police report #210030203 related to Docket No. 2136CR001810. On November 15, 2021, officers responded to a report of a large fight in a parking lot. The victim reported to police that while in the driver's seat of a parked vehicle, two males approached and got into the vehicle. One of the males, later identified as TAVERAS, pointed a firearm at the victim and stated, "give me the car keys," and then pistol whipped the victim in his left eye. A struggle ensued and the two suspects fled the area. As they fled the area one of the suspects encountered a female victim and pointed a gun at her stating, "don't say anything." Surveillance video and fingerprints were recovered that led to TAVERAS being identified as one of the suspects. TAVERAS also left behind his cellular phone in the victim's vehicle during the struggle. Prior to the robbery, TAVERAS was observed in a nearby stairwell with multiple identified Trinitarios members.
 - ii. Following a shooting in Rumford, Maine, on August 15, 2025, while TAVERAS was on probation for this case, TAVERAS violated the terms of his probation and fled to the Dominican Republic. TAVERAS was encountered by law enforcement pursuing ANGEL SANTOS, A/K/A "BIGGIE," who was then in fugitive status for the December 27, 2023, murders charged in the first phase of Operation Paper Machetes. TAVERAS and SANTOS were detained and removed from the Dominican Republic and arrested upon their return to the United States.
- d. On October 22, 2025, TAVERAS was charged in U.S. District Court for the District of Maine, Docket No. 25-CR-00162-JAW, with Conspiracy to Distribute Fentanyl, Cocaine, and Cocaine Base, Possession with Intent to Distribute Fentanyl, Use of a Firearm During and in Relation to a Drug Trafficking Crime, Hobbs Act Robbery, and Felon in Possession of a Firearm. This case remains pending.

- i. Investigators are familiar with the facts and circumstances related to this case and they are discussed below. *See* Section V(KK).

328. Photographs of TAVERAS wearing Trinitarios beads and making Trinitarios gang signs follow.



i. 2/19/2025 – Witness Retaliation Message

329. In the hours after the federal arrests that took place on February 19, 2025, investigators learned that multiple uncharged members of the Trinitarios discussed the takedown on an encrypted Trinitarios group chat. At approximately 11:51 AM on February 19, 2025, TAVERAS, identified by his handle “F Money,” stated that if he was to get arrested (“if I get bagged”), he would check himself into protective custody (“I’ll goto pc”) and murder a cooperating witness (“and kill dat nikka,” referring to the cooperating witness by name).

V. RACKETEERING ACTIVITY

A. 9/16/2017 – SHOOTING OF WT

330. Investigators are familiar with a shooting on December 8, 2019, in Lawrence, Massachusetts. According to Lawrence Police report #17006861, officers responded to General

Street at 4:14 AM for a report of shots being fired. While en route, officers learned that a gunshot victim had arrived at Lawrence General Hospital

331. Officers responded to the hospital and spoke with the victim, who I will refer to as WT, who had been shot in the hand. The victim reported that he was on Juniper Street in Lawrence when someone started shooting from a car located on the other side of the street. Surveillance showed that the victim was dropped off at the hospital by a red vehicle.

332. The next day, officers located the scene of the shooting and spoke with witnesses. The witnesses confirmed that there was gunfire and officers observed blood. Officers also located the individual who drove the victim to the hospital and who described the gunfire. No ballistics evidence or surveillance depicting the incident was recovered.

333. A cooperating witness provided information on this shooting.

- a. CW-18 provided information about the shooting of Victim 21. CW-18 stated that JOSE MARTINEZ shot WT in the hand. CW-18 stated that the shooting took place near Juniper Street in Lawrence. CW-18 was present with MARTINEZ during the incident, along with JAMES CABRERA. CW-18 personally observed MARTINEZ shoot WT. CW-18 stated that MARTINEZ shot WT over a drug debt and that before the shooting, MARTINEZ asked WT if he wanted to be shot in the chest or hand.

B. 3/4/2018 – ROBBERY AND ATTEMPTED MURDER

334. Investigators are familiar with a robbery and shooting in Lawrence, Massachusetts, on March 4, 2018. A cooperating witness generated a consensual recording of VICTOR DIAZ, A/K/A “MELVIN,” describing how he committed this robbery and attempted murder with JEREMY FELIX, A/K/A “PEPE.” DIAZ explains that OSVIALIS SERRANO sent him to do the robbery and provided the information about the victim.

i. Initial Police Response

335. According to Lawrence Police report #18001551, on March 4, 2018, officers responded to the area of 2 Nightingale Court for a report of shots fired and a victim on the ground. When officers arrived, they located the victim who was lying face down on the ground suffering from a gunshot wound to the left side of his neck.

336. The victim told officers that he was smoking by the riverside when three Hispanic males wearing black approached him and demanded his wallet. The victim stated that he threw his wallet at them and tried running away and they shot him. Further description of the males indicated that they were short. The victim was later sent by helicopter from Lawrence to Boston for additional treatment.

337. In the area where the victim was located, officers located a .40 caliber shell casing and several amounts of cash on the ground near the river. Additionally, on the trail by the Merrimack River, officers found six baggies of a white hard substance consistent with cocaine base.

338. Officers located surveillance video in the area that shows three males consistent with the description of the suspects. The video shows the three males arriving in a black Honda dressed in dark colored pants and hooded sweatshirts. The three men walk together to the river and then appear to engage in a struggle. One of the males pulls an item of clothing off the victim and runs down the hill. Then a burst of light consistent with gunfire is observed on the video.

ii. April 18, 2025, Recording of Victor Diaz

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339. On April 18, 2025, VICTOR DIAZ was captured on a consensual recording with a cooperating witness discussing the shooting that took place on March 4, 2018. In the recording, DIAZ is asked to explain the shooting. DIAZ explains that the victim was originally the customer

of SERRANO and that DIAZ paid SERRANO for him (“Osvialis was the one that sold him to me”). DIAZ further identifies the incident by the fact that the victim was flown to the hospital by helicopter and that the incident happened near a residence where JOSE MARTINEZ used to reside (“they took him on a helicopter, look it up”, “the kid that got beat up around where Jay Killa used to live”).

DIAZ:	Of course. Osvialis was the one that sold him to me.
CHS:	No, but I knew there was [STAMMERS] a lot of... shit—
DIAZ:	No, they took him on a helicopter, look it up that there’s only that one around there, the kid that got beat up around where Jay Killa used to live... back there.

340. DIAZ says that the victim had drugs that DIAZ did not take during the robbery (“I didn’t see the drugs, dude, and the drugs was there”) and that the police ended up finding the drugs (“the police found it. And I didn’t see it”). DIAZ says they went to rob him and successfully took \$6,000 from the victim along with the victim’s phone and coat (“I took six thousand (6,000) dollars from him and I took his phone, and I took his coat”). DIAZ states that he pinned the victim against the tree and told him not to run away and the victim begged for DIAZ to not kill him (“When I pinned him to the tree, I told him, ‘Don’t run away...’ And he told me, ‘Don’t kill me!’”).

DIAZ:	And I didn’t see the drugs, dude, and the drugs was there, the police found it. And I didn’t see it.
CHS:	Oh, so you went to ... to...
DIAZ:	Mug him. Of course, to [U/I]. I took six thousand (6,000) dollars from him and I took his phone, and I took his coat. When I pinned him to the tree, I told him, “Don’t run away...” And he told me, “Don’t kill me!”

341. DIAZ says the victim ran away and then DIAZ shot at him (“all of the sudden he ran away, and when he ran away, I shot at him like this... because I didn’t even point to shoot at him”). DIAZ says the victim was taken on a helicopter to the hospital (“my friend told me, ‘Dude, look, they took that guy on a helicopter, bro.’”).

DIAZ:	Feel me? And all of the sudden he ran away, and when he ran away, I shot at him like this... because I didn't even point to shoot at him, [CW-3].
CHS:	Scared?
DIAZ:	It was like this dude, I hit him there.
CHS:	[CHUCKLES]
DIAZ:	Dude, then I was the next day—my friend told me, “Dude, look, they took that guy on a helicopter, bro.”

342. DIAZ explains that the robbery was setup by SERRANO, who invited DIAZ to commit the robbery, but SERRANO didn't participate (“OSVIALIS comes and gets me and tells me, ‘Bro, come, so you can make a couple of bucks.’ But I thought I was going with him. Yeah right, what was I going with him, he sent me by myself”). DIAZ states that he went to see the victim and the victim saw him first so he left and came back with a gun a second time with JEREMY FELIX, A/K/A “PEPE,” A/K/A “JUAN PEPE” (“went walking first and I saw him, and then I kept on walking, and he didn't see me. And then I came back with Juan Pepe and I came with the gun”), and the victim thought DIAZ was a drug customer (“When I come back on the side, he think I'm a junkie bro”).

DIAZ:	...yes, that I already knew. Because OSVIALIS was - he told me, go, because he didn't want to go. He sent me. I thought I was going with OSVIALIS, OSVIALIS comes and gets me and tells me, “Bro, come, so you can make a couple of bucks.” But I thought I was going with him. Yeah right, what was I going with him, he sent me by myself.
CHS:	[LAUGHS]
DIAZ:	I went walking first and I saw him, and then I kept on walking, and he didn't see me. And then I came back with Juan Pepe [PH] and I came with the gun. When I come back on the side, he thinks I'm a junkie bro, and he stays normal. When I come...

343. The victim told DIAZ “no, no no,” and then DIAZ grabbed him and took his coat (“I took his coat and everything”), which is consistent with the video surveillance recovered in the case. FELIX did not look for the drugs and they did not get the drugs from the robbery (“Juan Pepe didn't even look for the drugs, that motherfucker”). Because they did not get any drugs, DIAZ took most of the money and only gave FELIX \$1,000 for participating (“I only gave Juan Pepe a

thousand (1,000) bucks”). DIAZ says they wanted DIAZ to give the gun to FELIX because it was his gun but DIAZ kept the gun himself because he was more experienced (“they wanted to give him the gun”, “because it was his,” “I told him, ‘give it to me that I will use it and I know what I’m doing’”).

DIAZ:	You already know he said, “No, no, no, no, that’s it.” You already know I took his coat and everything, and Juan Pepe didn’t even look for the drugs, that motherfucker. That’s why...
CHS:	So then what was Juan Pepe doing there, that pussy?
DIAZ:	Nothing, dude, bro. He left the guy with all the drug, dude. No bullshit. I took all the money, I kept all the money, bro.
CHS:	[LAUGHS]
DIAZ:	I only gave Juan Pepe a thousand (1,000) bucks, and I didn’t give money to anybody else. Of course, that pissed me off, dude. I thought I was going with him. Because he sold him to me, dude.
CHS:	sending Juan Pepe that is a kid, nigga...
DIAZ:	Of course, and they wanted to give him the gun, and I told him- because it was his, I told him, “No, give it to me that I will use it and I know what I’m doing.” What’s up, dude... Yes, dude, and that guy [U/I]...

344. DIAZ describes the gun as one that originally belonged to the Gangster Disciples (“Because it belonged to the pencos, bro”). DIAZ states that when they committed the robbery, he took the victim’s belongings and FELIX did not check the victim and the drugs fell out (“I took the shit away from him and the idiot didn’t even check him out. And the guy—and the drug fell out”). DIAZ says this was acceptable because the police found all the drugs (“which was for the best... they found all that drug on him”). DIAZ says it was behind Water Street and there are news reports about the incident (“going to see it on Google. Look behind Water, on the seventeen (17)”, “you can see that shit, bro, the news”).

DIAZ:	Thank God that man didn’t know me, bro. And OSVIALIS sent me with him, dude. And I told him, “Give the gun to me.” Because it belonged to the pencos, bro. I said for that gun, “Give it to me.”
CHS:	[CHUCKLES]... Uh-huh.
DIAZ:	When they gave it to me, you already know.
CHS:	[CHUCKLES]

DIAZ:	And when I went, I took the shit away from him and the idiot didn't even check him out. And the guy—and the drug fell out, which was for the best... they found all that drug on him.
CHS:	Yeah, but...
DIAZ:	Huh?
CHS:	Oh... after he got shot...
DIAZ:	Uh-huh.
CHS:	They went to look for him over there...
DIAZ:	You're going to see it on Google. Look behind Water, on the seventeen (17)...
CHS:	It saved you.
DIAZ:	So, you can see that shit, bro, the news.
CHS:	[GRUNTS] that saved you then.
DIAZ:	That's why, dude. Look it up so you could see.

345. DIAZ says the shooting is gang related and expects that the police will investigate (“Yes, because they know it is gang related”, “has drug cases and gang shit”). DIAZ states that for the shooting and robbery, he would have to do a couple years, but he was masked and he fled the area (“Because of that you do a couple of years... nicely. I was masked and when I fled it was far away, you feel me? It was nowhere nearby so it's hard”). DIAZ says the only one who knows about the incident is SERRANO, who is now in the Dominican Republic (“only one that knows me is OSVIALIS, and OSVIALIS is over there in Dominican Republic”).

CHS:	[STAMMERS] I mean, they are going to investigate because they are cops, they are going to investigate, obviously.
DIAZ:	Yes, because they know it is gang related...
CHS:	But- uh-huh, when [U/I]...
	[VOICES OVERLAP]
DIAZ:	[U/I] has drug cases and gang shit.
CHS:	Exactly.
DIAZ:	You feel me? Because of that you do a couple of years... nicely. I was masked and when I fled it was far away, you feel me? It was no where nearby so it's hard... to get it. The only one that knows me is Osvialis, and Osvialis is over there in Dominican Republic, you feel me?
CHS:	Uh-huh.
DIAZ:	And because of that buddy I don't be going around there, bro. And I did mugged Pepe, bro, I told him [CHUCKLES]...

346. DIAZ says he confronted FELIX after the incident about the victim throwing the money on the ground (“when you get hit with a nine (.9) of all metal, bro. That you kneeled, bro.

And he threw all the money on the ground”). DIAZ says he did the robbery with FELIX and another member of the Gangster Disciples (“they are pencos”, “Juan Pepe. He’s the only one that knows”). I know that FELIX was previously a member of the Gangster Disciple and was a member of the Gangster Disciples at the time of this incident. When DIAZ describes multiple “pencos” being part of the incident, he is referring to FELIX and the other accomplice who was the second Gangster Disciple. I know that FELIX is known as JUAN PEPE based on information from cooperating witnesses and law enforcement sources.

DIAZ:	I hit him, dude, I hit him, look [CW-3], that guy... when you get hit with a nine (.9) of all metal, bro. That you kneeled, bro. And he threw all the money on the ground, dude. That pissed me off, bro.
CHS:	[CHUCKLES]
DIAZ:	And the other one ran away when I went there with Chacal [PH], the other one ran away—Boom! I shot at him with the nine (.9) and he froze, you already know once he froze, bro. I hit him dude, I told him, “Give me the money, man...”
CHS:	[CHUCKLES]
DIAZ:	He threw it at me out of anger on the ground and was like, “Here!” I did like this to him he- here! Boom! Just one [U/I], bro. I just hit him. And I told him, “Bro, I split your head. I was the one that split your head.” Do you remember in South Lawrence that they were working on the buildings?
CHS:	[MUMBLES]
DIAZ:	That day with a K2 [PH]. It was him and me, locked in the room, I remember. A K2, they were even fixing the windows...
CHS:	Oh, yeah...
DIAZ:	And I asked him, “Dude, did you get mug [PH] in South Lawrence?” Because his face seems familiar, like I’ve seen his face.
CHS:	was it on a weekend or something?
DIAZ:	Yes, a weekend. Like a Friday or something like that.
CHS:	Friday, Saturday- Saturday [U/I], oh shit...
DIAZ:	Or Saturday. Yes, look up his picture that they took him on a helicopter, bro. They are still looking for me, bro.
CHS:	[LAUGHS]
DIAZ:	Of course, dude. And that guy knows me because he didn’t see my face, dude... he didn’t see my face.
CHS:	Which is... So, there was another penco there?
DIAZ:	That’s- they are pencos... Juan Pepe. He’s the only one that knows.

iii. Cooperating Witness Information

347. CW-3 provided information about the shooting on March 4, 2018. CW-3 said that DIAZ tried to rob a drug dealer of drugs and money behind Water Street in Lawrence, Massachusetts, and that DIAZ fired one shot and hit the victim. CW-3 confirmed that FELIX is known as “Juan Pepe” and FELIX is the individual referred to by DIAZ in the recording.

348. CW-18 also provided information about the shooting on March 4, 2018. CW-18 said JEREMY FELIX participated in an armed robbery and shooting in the area of Water Street in Lawrence, Massachusetts, that investigators believe is this incident.

C. 9/3/2018 – MURDER OF JAITHIAN AMADOR

349. Investigators are familiar with the murder of Jaithian Amador, a/k/a “Jay EBK,” on September 3, 2018, on Brook Street in Lawrence, Massachusetts. Amador was a member of the Shotgun Crips. The murder was a drive-by shooting, captured on video, committed from a 2010 Nissan Murano, bearing MA registration 9CD645 (the “Murano”). The Murano was registered to LUIS CRISPIN, A/K/A “YB,” at 14 Mt. Auburn Street, in Haverhill, Massachusetts. Multiple cooperating witnesses stated that CRISPIN admitted to participating in the murder.

i. Initial Police Response and Investigation

350. On September 3, 2018, at approximately 4:58 PM, according to Lawrence Police Report #18006079, officers from Lawrence PD responded to the area of 18 Brook Street, Lawrence, MA, for a report of shots fired. When they arrived, officers found a victim, later identified as Jaithian Amador, a/k/a “Jay Ebk,” (“Amador”) suffering from at least one gunshot wound to the head. Amador subsequently passed away from the gunshot wound at the hospital.

351. Officers recovered three 9mm shell casings and three spent projectiles at the scene and determined that the three shell casings were fired by the same 9mm firearm.

352. Officers reviewed privately owned surveillance cameras in the area and one of the surveillance cameras captures the shooting on video. The video shows that, at approximately 4:58 PM, the Murano drives past Amador, who is walking on the sidewalk, and approximately five shots come from the car. Amador runs and then falls to the ground. Prior to the drive-by shooting, Amador is holding his phone in a manner consistent with active use of a camera. Five separate shots are heard on the audio portion of video recovered near the scene.





353. Investigators identified the suspect vehicle as the Murano, registered to CRISPIN at 14 Mt. Auburn Street in Haverhill. Investigators located the Murano at 14 Mt. Auburn Street shortly after the murder. Investigators saw several dented areas on the driver's side of the Murano. These dents do not appear visible on the car on the video of the shooting. By the time the officers located the Murano, the video showing the Murano in the shooting had already been released to the media and shown on television and social media to assist in identifying it.

354. One of CRISPIN's neighbors reported hearing loud "kicking" noises outside their home at approximately 3 AM or 4 AM on the morning after the murder. A nearby privately owned surveillance video system showed activity at the driver's side of the Murano at approximately 4:00 AM on the morning after the murder. The video has audio, which captures ten seconds of loud banging while an individual is seen at the driver's side of the Murano. Based on this information, investigators believe CRISPIN intentionally caused damage to the Murano to obscure the identification of the vehicle compared with the publicly released surveillance video.

ii. CSLI

355. In the course of the investigation, officers obtained historical cell site location information for a cellular phone used by CRISPIN at the time of the murder. This cellular phone is associated with a phone number ending in 6758. This phone number was identified by multiple individuals as CRISPIN's phone number.

356. Review of the CSLI for CRISPIN's cellular phone revealed the following.

- a. On September 3, 2018, at approximately 4:16 PM, CRISPIN's phone ending in 6758 utilized a cell tower located at 531 Broadway, Lawrence, Massachusetts. This location is approximately 1.1 miles from the scene of the murder at 18 Brook Street. This utilization coincided with an incoming call from a phone number ending in 7041.
- b. On September 3, 2018, at approximately 5:18 PM, CRISPIN's phone ending in 6758 utilized a cell tower located at 232 Main Street, Haverhill, Massachusetts. This location is approximately 1 mile from CRISPIN's residence at the time, which was 14 Mt. Auburn Street, Haverhill, MA.

iii. Cooperating Witness Information

357. Multiple cooperating witnesses provided information concerning the murder of Jaithian Amador.

- a. CW-3 provided information about the murder of Amador. CW-3 learned about the murder of Amador from CABRERA and CRISPIN. CW-3 stated that CABRERA ordered CRISPIN to shoot Amador. The shooting occurred on Brook Street in Lawrence, Massachusetts. CRISPIN said he was a passenger in his mother's vehicle, which was driven by a Gangster Disciples gang member. JAMES CABRERA located Amador based on Amador going live on social media and CRISPIN was already in the area at the time of the live stream. CRISPIN told CW-3 that he shot and killed Amador and that a Gangster Disciples member was driving. CABRERA told CW-3 that immediately after the shooting he ran to a location where there was a known surveillance camera to ensure that he was on video following the shooting to establish an alibi.
- b. CW-18 provided information about the murder of Amador. CW-18 spoke with JAMES CABRERA and YORRO about the shooting. YORRO told CW-18 that YORRO was in the vehicle with CRISPIN during the murder. YORRO stated that CRISPIN was driving and two Gangster Disciples were also in the vehicle. YORRO stated that he shot at Amador and that one of the Gangster Disciples named "Fat Boy" also fired at Amador. YORRO told CW-18 that "Fat Boy" had the kill shot on Amador. JAMES CABRERA told CW-18 that the shooting

happened because Amador had shot at CABRERA and CABRERA learned about Amador's whereabouts from a Facebook Livestream. CABRERA relayed the location of Amador to CRISPIN and YORRO who were in the area and they conducted the mission.

- c. CW-20 provided information about the murder of Amador. CW-20 learned about the murder of Amador from CRISPIN. CRISPIN stated that he was in a vehicle with members of the Gangster Disciples. CRISPIN stated that members of the Gangster Disciples shot and killed Amador. CRISPIN told CW-20 that he was driving.
- d. CW-37 provided information about the murder of Amador. CW-37 spoke with CRISPIN about the incident. CRISPIN told CW-37 that he had shot and killed Amador. CRISPIN told CW-37 that his boy was the one driving the car. CW-37 learned that CRISPIN was blessed into the Trinitarios for participating in the Amador murder.
- e. CW-39 provided information about the murder of Amador. CW-39 stated that CRISPIN told CW-39 that he shot and killed Amador. CRISPIN told CW-39 that YORRO was also in the vehicle during the murder.

iv. 10/17/2019 – Recording of CABRERA During Purported Drug Sale

FILENAME: 20191017_044326_EDT.mp4

358. On October 17, 2019, at approximately 4:00 PM, a cooperating witness conducted a controlled purchase of controlled substances from CABRERA. This purchase was audio-video recorded. The cooperating witness arranged to purchase cocaine base from CABRERA. The drugs that were purchased during the transaction were field tested and determined to not be cocaine base.

359. During the transaction, CABRERA was captured on recording discussing drug distribution. For example, in the recording, CABRERA states that he is selling "just a stick," which is a term referring to 10 grams of fentanyl. CABRERA describes how he sent six sticks of fentanyl ("Gave them 6 of my shits") to a customer ("cuddy") that were to be delivered by a female ("bitch that I sent to give it to him"). However, the cuddy only paid CABRERA \$200 or \$250 dollars.

Just a stick. Well, he is in New York, my nigga [PH]. So, I gave this shit to his cousin. The bitch that I sent to give it to him... This is a bunch of people that don't know what the fuck they are doing. Gave them 6 of my

shits, my nigga. Six, six, gave it to the cuddy. The cuddy gave 200 dollars or 250. He is still with six, my nigga.

360. CABRERA tells the cooperating witness that he sells fentanyl, not cocaine (“this is my work”, “this is fatty”, “I don’t sell that cocaine shit”).

No, but this is my work. This is not no... This is fatty, nigga. This is no fucking cocaine. I don’t sell that cocaine shit. If I sold that cocaine, shit would not be a thing. Take whatever you want, whatever... boom, boom, boom.

361. CABRERA goes on to tell the cooperating witness that following the shooting of Jaithian Amador, a/k/a “Jay EBK,” that he was waiting to hear if Amador died or not (“when they killed Jay EBK”, “were waiting for the results”). CABRERA states that he was being recorded live when they heard that he died, and CABRERA started jumping up and down celebrating, stating “He Died! He Died!” CABRERA explains that he had to delete the video.

This window is the reason why I am not in jail right now, because when they killed Jay EBK.... [UI] niggas [PH] were waiting for the results... if he died or not...[UI] My man’s recording live, [UI] that’s when they said, that he died. Nigga tells me how I don’t... I start jumping up and down. Talking about... He died! He died! The Nigga [PH] said [UI]. I had to delete that shit!

D. 10/17/2019 – FORCED OVERDOSE OF DENNYS HILARIO DEJESUS

362. Investigators are familiar with an overdose incident on October 17, 2019, involving Dennys Hilario-Dejesus, a/k/a “Bori.” During this incident, Dennys claimed he was forced to consume fentanyl at gunpoint by members of the Trinitarios, specifically, JAMES CABRERA, because he was known to have cooperated with law enforcement. Despite being forced to take fentanyl, Dennys survived and specifically identified CABRERA as one of the men responsible for forcing him to take the fentanyl.

363. Dennys was a member of the Trinitarios who had provided information to state investigators on the Trinitarios and their crimes, including multiple murders. The murders

discussed by Dennys included the murder of Aracelys Valdez Deleon and the murder of Mindy Tran. Dennys was targeted by Luis Rodriguez, who was in custody charged with the murder of Aracelys Valdez Deleon. Agents believe that Rodriguez placed an outstanding bounty of \$25,000 to murder witnesses that were anticipated to testify against him at trial. Dennys was a percipient witness to the murder and was one of the witnesses subject to the bounty set in place by Rodriguez. This bounty was communicated by Rodriguez to other Trinitarios member who were detained with Rodriguez in jail.

364. Dennys survived the forced overdose attempt and identified CABRERA as one of the individuals responsible. CABRERA was charged with state offenses related to the incident. Dennys later died from a separate drug overdose, which terminated the prosecution of CABRERA for lack of evidence. CABRERA confessed to committing this crime to multiple cooperating witnesses, and YORRO was captured on recording discussing the bounty and that CABRERA had forced Dennys to take fentanyl in order to collect the bounty, and that Dennys survived.

i. Initial Police Response

365. On October 17, 2019, according to Lawrence Police report #19006916, at approximately 3:47 AM, Lawrence Police responded to Willow Street for a 911 call of an unconscious male suffering from an overdose, who was later identified as Dennys Hilario-Dejesus. Officers arrived and provided Narcan to Dennys. He was transported to the hospital and it was determined that Dennys had suffered from a drug overdose.

366. Officers spoke with Dennys at the hospital shortly after he regained consciousness. Dennys reported that his life was in danger because he was testifying in a shooting case. Dennys stated that he went out onto the front porch of his house to smoke a cigarette, and two men were waiting for him with guns. Dennys identified one of the men as JAMES CABRERA, A/K/A

“TRENSITA.” Dennys said that CABRERA put a gun to his head and asked the other man what they should do to him. The second man produced a tan/brownish powder and forced Dennys to sniff the substance at gunpoint. Dennys then went inside to sleep and was not feeling well.

ii. Further Investigation

367. Dennys was a former member of the Lawrence Chapter of the Trinitarios. Dennys was also a witness in multiple pending homicide investigations involving the Lawrence Chapter of the Trinitarios. Additionally, Dennys had previously provided information concerning the Trinitarios to the FBI in 2016.

368. Investigators spoke with the second-floor residents of the Willow Street address where Dennys lived. The second-floor residents included a woman and her nine-year-old daughter. The daughter reported that on the night of the overdose that she heard approximately four people on the staircase outside of her apartment’s front door talking. The daughter heard one of the voices raise and say twice: “if you don’t do this, I’m going to kill you.” The daughter said she heard another male agree to do it, and that this male sounded scared.

369. Dennys testified at the Essex County Grand Jury. Investigators have reviewed the grand jury transcript.

- a. Dennys testified that on the night of October 17, 2019, he woke up and went downstairs to the porch on the second floor. As he opened the door, “a guy called Tren[s]ita point[ed] a gun” at him and that there was a second male he did not know. Dennys testified that JAMES CABRERA, A/K/A “TRENSITA,” “point[ed] a gun at me and they ask me why I ratted [on] them in the case of the Lacava in Lawrence.” The second male also had a gun and pointed it at Dennys’ head.¹⁶

¹⁶ I know that La Cava is a nightclub in Lawrence, Massachusetts, that was the scene of a murder. A Trinitarios gang member named Luis Rodriguez was convicted on May 11, 2023, for the murder of Aracelis Valdez that took place on April 16, 2017. I know that this murder took place outside of La Cava nightclub. Dennys had testified at grand jury on that matter and was a percipient witness to the murder. It is my understanding that the grand jury transcript of Dennys’ testimony was provided to Rodriguez in discovery.

- b. CABRERA asked Dennys if he wanted to be killed immediately by being shot, or if he wanted to die by fentanyl overdose so that Dennys could say goodbye to his family. Dennys opted to die by fentanyl. At this point, CABRERA pulled out a bag of fentanyl and forced Dennys to inhale it through his nose. After Dennys took the fentanyl, he could not see straight. CABRERA and the other man brought Dennys up to the door of his apartment.

370. On November 20, 2019, the day of Dennys' grand jury testimony, he was threatened in the Salem Superior Courthouse by WILSON ALBA, a Trinitarios gang member. This incident took place in front of a Massachusetts State Trooper. WILSON ALBA said to Dennys in Spanish: "what are you doing here, you goddamn snitch?" and "I'm going to kill you, you goddamned snitch. You betrayed us, you goddamned snitch." The Trooper heard ALBA make the statements and characterized Dennys' demeanor as being terrified and emotional. On July 22, 2020, WILSON ALBA pleaded guilty to witness intimidation for this incident and was sentenced to 2.5 to 3 years in state prison. *See Commonwealth v. Wilson Alba*, Essex Superior Court, Docket No. 1977CR00630.

371. Dennys' mother also testified that she was with Dennys in the hospital when he first woke up from the overdose. The mother testified that the first thing that Dennys stated when he woke up was, "It was Tren[s]ita. He killed me. He wanted to kill me. He was the one that gave the drugs to me." Dennys was crying uncontrollably as he said this to his mother.

372. Investigators are aware that Dennys later died of a separate drug overdose on February 5, 2022. Following his death, Luis Rodriguez went to trial and was convicted at trial without Dennys' testimony.

iii. Cooperating Witnesses

373. Multiple cooperating witnesses provided information concerning the October 17, 2019, forced overdose of Dennys Hilario Dejesus.

- a. CW-18 provided information about the forced overdose of Dennys Hilario Dejesus. CABRERA told CW-18 that CABRERA had accepted the mission to kill Dennys from Luis Rodriguez in exchange for money. Rodriguez learned that Dennys had testified against Rodriguez, and Rodriguez wanted Dennys killed prior to Rodriguez's trial starting. While detained in Middleton, CW-18 also talked to Rodriguez about killing witnesses.
- b. CW-20 provided information about the forced overdose of Dennys Hilario Dejesus. CW-20 stated that this incident arose because a Trinitarios member named Luis Rodriguez was charged with the murder of Aracelis Valdez, which had taken place outside of a club after Dennys Hilario-Dejesus started a fight. After the incident, Dennys Hilario-Dejesus had cooperated with police and identified Luis Rodriguez as the shooter. While in jail for the murder, Luis Rodriguez placed a bounty on the head of Dennys Hilario-Dejesus to have him killed. According to CW-20, CABRERA took the contract and picked up Hilario-Dejesus. CW-20 reported that CABRERA forced Hilario-Dejesus to inject fentanyl and threw Hilario-Dejesus out of the car believing he was dead.
- c. CW-37 provided information about the forced overdose of Dennys Hilario-Dejesus. CW-37 stated CABRERA conducted the forced overdose of Dennys. CABRERA told CW-37 that he forced Dennys to take fentanyl at gunpoint in order to kill him, but that Dennys did not die. CABRERA told CW-37, "Bro, I gave that nigga pure fatty and he didn't die." CW-37 knew that Dennys was providing information to the police about Luis Rodriguez. While detained in Middleton, CW-37 also talked to Luis Rodriguez about killing witnesses against him and the bounty that Luis Rodriguez was offering for the witnesses to be killed.

iv. 1/28/2025 - Recording of YORRO Discussing the Overdose

Filename: 2025-01-28_15-50-45

374. On January 28, 2025, YORRO was captured on a consensual recording discussing the plot to murder Dennys Hilario-Dejesus. YORRO states that when he was released from jail for a gun case ("when I first came out from doing my gun bit"), the mother of a Trinitarios member named "Bibi" was going to pay YORRO \$25,000 to kill Dennys ("Bibi's mom was going to give me twenty-five thousand (\$25,000) dollars for me to kill him"). YORRO states that he went and did all the legwork, and even smoked with Dennys and knew where he was hanging out ("I was doing everything and all that for him and we were... I even smoked with Bori and everything

there”, “He would hang out.... behind the... behind Bunker Hill”). YORRO states that he had planned to split the profit with a Trinitarios member named “Pollito” (“I was doing the favor because Polito was [U/I]. Polito and I were going to go half and half and what we were going to do was give him a beating.”). YORRO says that CABRERA (“Trenzo”) and the other participant took Dennys, gave him the drugs, and Denny ended up surviving (“They left him and he came back.”, “niggas took him”, “Like the shit that they gave him”).

YORRO:	[SINGS: “Bori took 17, he only wants them to write to him. Our Bori was a snitch and they shot him in the stomach...”]
CHS:	My nigga, this [U/I] saying that “just overdosed.”
YORRO:	Yeah.
CHS:	So, why would they be jacking that?
YORRO:	What?
CHS:	Niggas gave him some shit to kill him.
YORRO:	‘Cause you... do you know? Right? Listen, so that you see why sometimes I only get more mad at niggas. When I first came out from doing my gun bit [PH]. You know that Bibi’s mom was going to give me twenty-five thousand (25,000) dollars for me to kill him. I was doing everything and all that for him and we were... I even smoked with Bori and everything there. He would hang out.... behind the... behind Bunker Hill. With Pollito and those guys sniffing. You understand? I was doing the favor because Pollito was [U/I]. Pollito and I were going to go half and half and what we were going to do was give him a beating. Bam! And supposedly [WHISPERS] the homey Trenzo and the guy [U/I]. They left him and he came back. That was the real story. That’s a real story. That’s not no cap. From what I heard, I don’t know if he was there or not, but it was a real story, that niggas took him and they [U/I] ...
CHS:	Nigga, I heard that...
YORRO:	... and wherever they threw him at, he came back. Like the shit that they gave him, when they pushed him out the car. And he got scraped and everything and he like...
CHS:	Hold on, hold on, hold on.
YORRO:	...he came back.

375. The cooperating witness says the story at the time of CABRERA’s arrest was that “they grabbed him, put a gun to his head and Trensi [(CABRERA)] made him sniff some Fent.” YORRO discounts any knowledge of all the details, but confirms that they, referring to CABRERA

(“Trenso”) and the other guy having forced the overdose (“gave him something, he fell, and they left him for dead”).

CHS:	Hold on. So, [WHISPERS] his people [U/I].
YORRO:	Nah, somebody in the car. I don’t know...
CHS:	[U/I].
YORRO:	I don’t know if it was... he was there physically. [WHISPERS] But I know that he got, he got taken [sic]. You feel me? And then, boom, they pushed him out the car. Fum! And...
CHS:	‘Cause nigga...
YORRO:	When they [U/I]...
CHS:	When the niggas was jacking, when Trenso got locked up, was that...
YORRO:	He wasn’t found.
CHS:	Nah, that... they grabbed him, put a gun to his head and Trens made him sniff some Fent.
YORRO:	I don’t know. All I know is that they gave him something, he fell and they left him for dead.

376. The cooperating witness says that after CABRERA was released, he claimed that Dennys was snitching on him (“then when he came home, he’s like, ‘Yo, Bori really snitched on me saying that I tried to kill that nigga’). YORRO does not dispute CABRERA’s involvement and confirms that “they gave him something” that ended up not being strong enough to kill him (“They gave him something. But he fell and... and it seems like it wasn’t that strong”).

CHS:	And then when he came... And then when he came home...
YORRO:	He came back and called his m— his sister.
CHS:	And then... and then when he came home, he’s like, “Yo, Bori really snitched on me saying that I tried to kill that nigga.
YORRO:	No, they gave him something. They gave him something. But he fell and... and it seems like it wasn’t that strong. [WHISPERS] [U/I].

377. They go on to discuss that Dennys was cooperating against Luis Rodriguez as well. YORRO tells the cooperating witness to not worry about that, because Dennys’ statement was excluded (“Listen to me, forget about that. Bori... Bori’s statement was secluded”). I am aware that Dennys died of a separate drug overdose prior to the trial, and therefore his statements were not admitted in evidence at the trial.

YORRO:	No, Yayi's [PH] mom is the one... uh, who fucked over Bibi. Did you know that?
CHS:	[COUGHS]
YORRO:	Look at the caption. The caption of [U/I].
CHS:	[COUGHS] It was Yayi's mom and the nigga that's a rat.
YORRO:	Listen to me.
CHS:	But Bori told on that shit too.
YORRO:	Listen to me, forget about that. Bori... Bori's statement was secluded. Everything went towards BiBi's brother, BiBi's girl, the eyewitness that said that he was there, a R&B face recognition. Right? And a surveillance video of the street in the back. Because you know that street is right there. Because that was right there, right here. The street where Xaxin [PH] is on, had cameras. There were people that fled and they saw his clothing. They didn't see his face, with the hat on, so... You know what Bibi's mistake was. This was Bibi's mistake, that he can't say, "Look...I was [U/I] sitting down with him." I spent three (3) days reading his paperwork, in the cell, quietly. He told me, "Yo, don't show that to anyone." And tell me if it's true that what I [U/I] seven (7) years.

E. 12/8/2019 – SHOOTING BY JUSTANE GARCIA AND YANUEL MEJIA

378. Investigators are familiar with a shooting on December 8, 2019, in Lawrence, Massachusetts. According to Lawrence Police report #19008193, officers responded to 70 Newbury Street at 1:06 AM for a report of shots being fired. Officers located thirty shell casings. Additionally, officers identified two vehicles that had been struck by gunfire.

379. Officers obtained video surveillance from the surrounding area. The surveillance video depicted the confrontation between two groups outside of the residence, which culminates in gunfire. Based on further investigation, JUSTANE GARCIA and YANUEL MEJIA were identified as the shooters.

380. GARCIA, MEJIA and a third individual are together in front of the residence. A second group of two individuals are down the street. From review of the surveillance video, GARCIA and MEJIA aim weapons at the other group first, prior to the other group discharging weapons. Officers obtained a search warrant for JUSTANE GARCIA's residence and recovered a Glock firearm box that contained an extended magazine with ten rounds loaded.

381. JUSTANE GARCIA was charged with this case in Lawrence District Court under Docket No. 1918CR005267. On August 18, 2020, JUSTANE GARCIA pleaded guilty to Assault by Means of Dangerous Weapon, Discharge of a Firearm within 500 Feet of a Dwelling and Carrying a Dangerous Weapon. GARCIA was sentenced to 18 months in jail.

382. YANUEL MEJIA was charged as a juvenile in Lawrence Juvenile Court under Docket No. 19DL1091. On November 17, 2020, MEJIA was found delinquent for Carrying a Loaded Firearm and Unlicensed Possession of a Firearm, and on August 30, 2021, was committed to custody of Department of Youth Services.

i. YANUEL MEJIA PHONE

383. Investigators reviewed YANUEL MEJIA's cellular phone that was searched as part of this investigation. Investigators found a note dated October 21, 2021, which stated:

*Up 4 Smacks I Ain't Gotta Talk The city hears all that
Dressed all Black posted at that party
Me n my CoD started shooting had them running from the party to there v*

384. Investigators believe that MEJIA says that the Trinitarios have committed four violent acts against the rivals without response ("Up 4 smacks I Ain't Gotta Talk The city hears all that"). MEJIA then references the December 8, 2019, shooting where he and GARCIA (his "CoD") started shooting, and the rival gang members ran from the party back to their vehicle ("started shooting had them running from the party to there").

F. 3/1/2020 – MURDER OF ALAN JIMENEZ, A/K/A "MONTANA"

385. On March 1, 2020, Alan Jimenez, a/k/a "Montana, a prominent member of the Lawrence Chapter, was shot and killed in Lawrence, Massachusetts. The Trinitarios suspected that the Gangster Disciples killed Jimenez. In 2022, Elias Leger, a member of the Gangster Disciples, was charged with Jimenez's murder. *See Commonwealth v. Elias Leger*, Docket No.

2277CR00355. The Jimenez murder caused a substantial escalation of the ongoing war between the Trinitarios and the Gangster Disciples.

386. In the years since Jimenez's murder, the Lawrence Chapter of the Trinitarios has frequently recognized him through numerous memorials and references in social media and digital media where historical photographs and videos of Jimenez are posted along with a celebration of his role with other members of the Lawrence Chapter of the Trinitarios. Multiple Lawrence Chapter members refer to themselves as "Monty Gang," as a tribute to Jimenez as motivation and justification for violent reprisals against the Gangster Disciples.

G. 3/4/2020 – ATTEMPTED MURDER OF NEWT EBK

387. On March 4, 2020, "Newt EBK," a member of the Gangster Disciples, whose identity is known to me, was shot by multiple Trinitarios members in Methuen, Massachusetts. Cooperating witnesses identified ENRIQUE DURAN and YANUEL MEJIA as the shooters who fired numerous rounds at Santana, hitting him multiple times as he sat in his car.

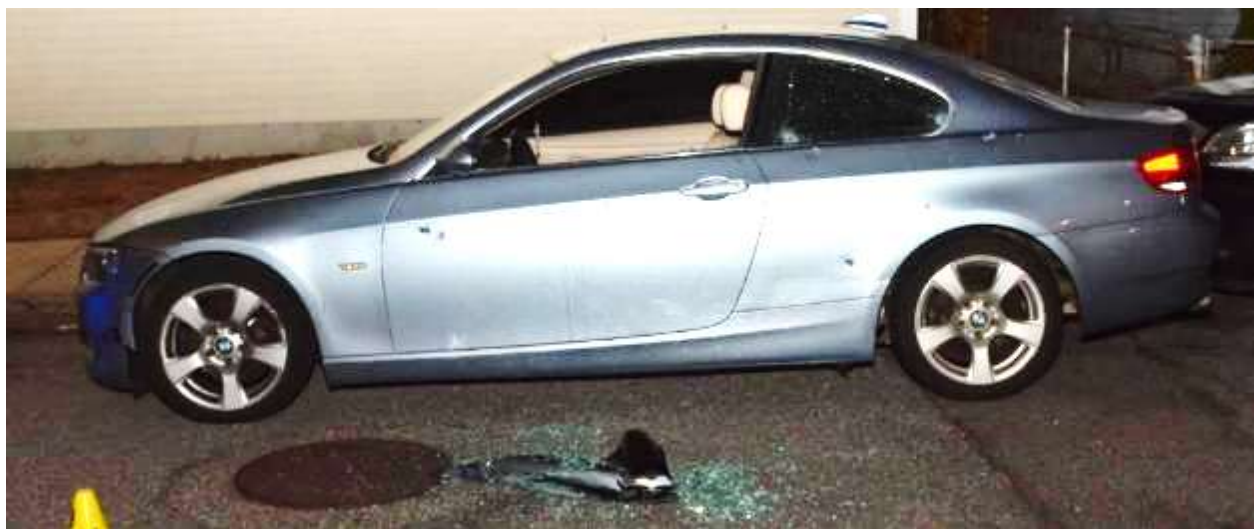
i. Initial Police Response and Crime Scene

388. According to Methuen Police Report #20-6591, at approximately 9:30 PM on March 4, 2020, a Methuen Police Detective in the area of French Street in Methuen reported hearing gunshots. Officers responded and saw a grey BMW on French Street with multiple bullet holes along the driver's side of the vehicle and the driver's side window shot out. Officers also saw fresh blood on the driver's seat.

389. Officers located the victim, Newt EBK, who had been struck with gunfire. Newt EBK was holding his stomach and appeared to have been shot multiple times. "Newt EBK" is known to be a member of the Gangster Disciples. Officers also located a female victim, whom I will refer to as VICTIM YY. VICTIM YY said that she was with Newt EBK at the time he was

shot. VICTIM YY stated that they had just parked the BMW when a red Honda CR-V pulled up alongside and started shooting at their car.

390. At the scene of the shooting, investigators located thirteen 9mm shell casings in the area in front of 58 French Street, Methuen, MA. Crime scene photographs follow.





391. A few days later, investigators received information about a firearm that was located in the area of Route 495 South and Route 114 West. Investigators recovered a Beretta model BU9 Nano semi-automatic 9mm firearm. The firearm was recovered in the area near the Route 114 west ramp.

ii. High Speed Chase and Suspect Vehicle

392. Shortly after the report of gunfire, officers who responded to the scene observed a red Honda CR-V leaving the area. After the vehicle failed to stop for officers, the police engaged in a high-speed chase of the red Honda CR-V onto Route 495 South. During the pursuit, the red Honda CR-V crashed into a fence. Officers subsequently returned to the scene of the crash and located Massachusetts License Plate 3EJH31, which was registered to a 2001 Honda CR-V.

393. The red Honda CR-V was later found abandoned in the area of Garden Street in North Andover and processed for evidence. Officers found a 9mm shell casing under the front passenger seat.

394. The front and rear passenger side of the red Honda CR-V tested positive for gunshot residue. The red Honda CR-V was also examined for the presence of latent friction ridge detail. On the exterior of the rear passenger door investigators located friction ridge detail that matched the left palm of OSVIALIS SERRANO, A/K/A “OG PABLO,” A/K/A “OG O.”

395. Shortly thereafter, agents determined that the red Honda CR-V was owned by a member of the Trinitarios. Approximately 30 minutes after the shooting, the owner’s mother called Methuen Police to report the red Honda CR-V stolen.

iii. Surveillance Video

396. Officers obtained surveillance video at the scene of the shooting. The video shows Newt EBK’s BMW parking and the red Honda CR-V pulling up alongside it and then speeding off. The video then shows Newt EBK’s BMW hitting another vehicle, as it appears the brake was released after Newt EBK was shot.

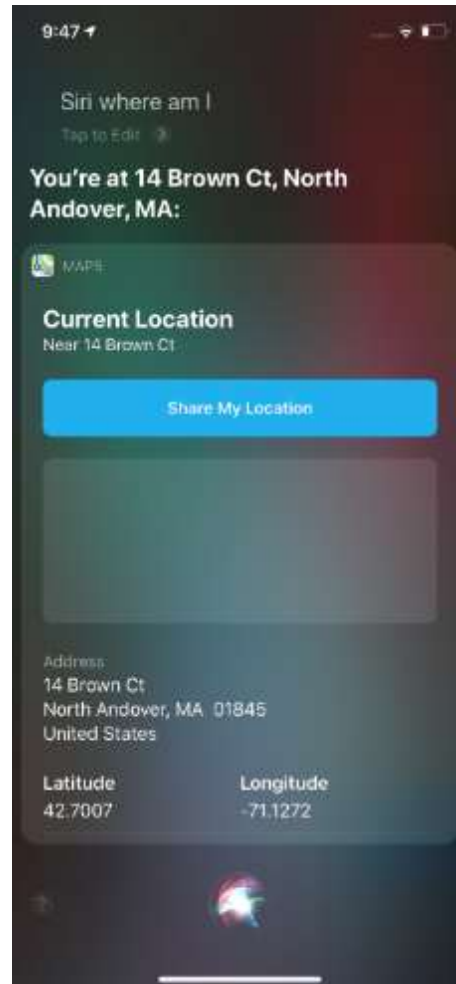
iv. YANUEL MEJIA PHONE

397. YANUEL MEJIA was arrested for the murder of Ewdy Lopez, a/k/a “Timmy Brook,” in April 2022 (*see infra*) and his cellular phone was seized. Agents later obtained a federal search warrant for his phone. In MEJIA’s phone, investigators located a note from March 4, 2020, at 3:34 AM, that appears to identify vehicles used by members of the Gangster Disciples. The note read as follows:

Chachi got a baby blueish Honda audacy, wit a black front bumper, they always be in that shit deep, and they be in a BMW X5 like 2015+ all white wit black tints, it be parked in front of trouble crib sometimes

398. Investigators know that “Chachi” is Justin Suriel, a leader of the Lawrence Gangster Disciples who was charged federally in 2021 and is currently serving a twelve-year sentence. *See United States v. Suriel*, Docket No. 21-cr-10204-IT.

399. Investigators observed that MEJIA's phone had a screen capture of a mapping program showing that the current location of the device was 14 Brown Court, North Andover, Massachusetts. This screen capture was taken at 9:47 PM on March 4, 2020, which was shortly after the shooting and chase. The address of 14 Brown Court is within 100 feet of where the red Honda CR-V was later recovered on Garden Street. The screen capture follows.



v. YANUEL MEJIA Notebooks

400. In April 2022, investigators executed a search warrant at YANUEL MEJIA's residence in Lawrence, Massachusetts. During the search, agents seized two notebooks containing numerous admissions to membership in the Trinitarios, drug trafficking, and participation in violent acts. Federal search warrants were later obtained for the notebooks.

401. In one portion of the notebook, the entry reads: “I just popped out of the car w[ith] that new glock n then he got shot”, “N I aint even use the dot”, “pussy nikka was just parking when got hit on the spot.” Investigators believe this is an admission by MEJIA to conducting the shooting of Newt EBK who was shot while parking his vehicle.

Shocked I just Popped out of the car
w/ that new glock N then he got shot
N I aint even use the dot Pussy
nikka was just parking when he
got hit on the spot Yea I been

402. Another entry in the notebook states, “Newt got shot inside his whip.” Investigators believe this is an admission to MEJIA participating in the shooting of Newt EBK.

NEWt got shot inside his
Whip

403. Another entry states; “In the whip I was w[ith] my bro flippin all em bricks[,] Jefe shot em in the stomach now he sick.” Investigators believe in this portion, MEJIA is noting that ENRIQUE DURAN (“Jefe”) shot a rival gang member in the stomach, which is where Newt EBK was shot. It is also significant that MEJIA does not refer to the victim as dying from the injuries – which is consistent with this incident – but instead refers to the victim only being shot.

In the whip I was w my bro, \$ flipping
all em brick's ~~they were~~ shot em
in the Stomache now he sick

vi. Cooperating Witnesses

404. Multiple cooperating witnesses have stated that this shooting was committed by the Trinitarios against the Gangster Disciples in retaliation for the murder of Alan Jimenez, a/k/a “Montana,” in March 2020, as discussed above.

405. CW-20 provided the following information about the attempted murder of Newt EBK.

- a. CW-20 told investigators that this shooting took place in retaliation for the death of Jimenez. CW-20 was present when CW-44, MEJIA, and DURAN were ordered to commit the retaliatory shooting, which they then conducted. CW-20 stated that the shooting targeted another member of the Gangster Disciples named Nate BDK and that the Trinitarios learned the target’s address from CRISPIN who provided the information to MEJIA and DURAN.

406. CW-44 provided the following information about the attempted murder of Newt EBK.

- a. CW-44 stated that, on March 4, 2020, the Trinitarios held a candlelight vigil for Jimenez close to where he was killed. Numerous Trinitarios leaders and members from the Lawrence Chapter attended. CW-44, YANUEL MEJIA, ENRIQUE DURAN, and a Trinitarios associate named Jeffrey all were in a red Honda CR-V on March 4, 2020. CW-44 was driving, MEJIA was in the front passenger seat, DURAN was in the rear passenger side seat, and Jeffrey was seated behind CW-44. CW-44 stated that DURAN and MEJIA had guns with them.
- b. At some point, OSVIALIS SERRANO, A/K/A “OG PABLO,” A/K/A “OG O,” came to the CR-V and told the group to go commit a shooting against the Gangster Disciples to retaliate for the murder of Jimenez. CW-44 stated that DURAN and MEJIA knew where rival gang members were located. CW-44 drove the CRV and headed toward French Street in Methuen.
- c. The group was looking to find a member of the Gangster Disciples that they knew as “Nate BDK.” The group knew that Nate BDK drove a BMW and the

group headed to a location where Nate BDK was known to frequent. When they arrived, CW-44 parked the CR-V on a nearby cross street.

- d. The group saw a BMW pull up and park on French Street. The group saw that the driver was a Gangster Disciple member known to them as “Newt EBK.” CW-44 pulled up next to Newt EBK with the BMW to the passenger side of their car and rolled down the windows.
- e. DURAN and MEJIA fired their guns at Newt EBK. Somewhere around twenty rounds were fired into the BMW. CW-44 said they were trying to kill Newt EBK. CW-44 saw Newt EBK’s body collapse onto the steering wheel. CW-44 then drove away at high speed.
- f. At some point, the police began following the CR-V and there was a chase. CW-44 evaded the police by going onto the highway and then exiting the highway around the movie theatres in Lawrence, where they stopped briefly. MEJIA and DURAN disassembled their firearms and threw the pieces into the woods.

H. 3/31/2020 – MURDER OF CARLOS RIVERA

407. Investigators are familiar with the March 31, 2020, homicide of Carlos Rivera, a/k/a “Chin.” Rivera was a known member of the Gangster Disciples. Multiple cooperating witnesses have described the homicide of Rivera as taking place during a high-speed chase involving the Gangster Disciples and Trinitarios.

408. On March 31, 2020, at approximately 11:30 PM, the Lawrence Police Department received a report of shots being fired in the area of Belleview Street, Lawrence, Massachusetts. Officers responded to the area but were unable to locate any signs of shots being fired.

409. On April 1, 2020, at approximately 12:30 AM, the Massachusetts State Police received a report of a male left on the street having been pushed out of a dark colored vehicle at the Holy Family Hospital in Methuen, Massachusetts. The male, later identified as Carlos Rivera, had a gunshot wound to his forehead and was later pronounced deceased. Rivera was a known member of the Gangster Disciples and went by the street name “Chin.” A later autopsy by the Medical Examiner would confirm that Rivera was killed by a gunshot wound to the front forehead

that exited from the rear of his head. Additionally, the Medical Examiner did not note any indications of stippling that would result from gunfire being discharged in close proximity to the wound.

410. Through review of video surveillance, the vehicle from which Rivera was left at the hospital was identified as a Nissan Altima with a Maryland registration. The Nissan Altima had been reported stolen in Tewksbury, Massachusetts.

411. The Nissan Altima was located a few hours later. Multiple persons in the vehicle were detained, including a Gangster Disciples member whose identity is known to me and is referred to by his street name, "Bombi GZ." Officers observed blood all along the passenger side of the Nissan and there were large visible pools of blood on the seats and floor. Officers also observed a bullet hole in the passenger side mirror.

412. Investigators began reviewing surveillance video in the area where there were reports of shots being fired. On the camera at May Street and Currant Hill Road, at approximately 11:33 PM, two vehicles (one similar to the Nissan Altima) raced through the stop sign at high speed and went up Currant Hill Road just prior to the time of the shots fired report from the caller on Hilltop Avenue in Lawrence.

413. Investigators later located a series of discharged shell casings in the area of Currant Hill Road in Lawrence. The discharged casings were 9mm and .40 caliber. A 9mm Taurus model PT111G2A firearm was later recovered in the area of Ashland Avenue in Methuen.

414. The Massachusetts State Police Crime Laboratory analyzed the physical evidence.

- a. The Taurus firearm was determined to have fired seven of the 9mm casings recovered from Currant Hill Road. Three of the 9mm casings were determined to have been fired by a single 9mm firearm which was not the Taurus.
- b. Seven of the .40 caliber casings recovered from Currant Hill Road were fired from the same .40 caliber firearm.

i. YANUEL MEJIA PHONE

415. Investigators reviewed YANUEL MEJIA's cellular phone that was seized in 2022 and located a series of notes.

416. Investigators located one note dated June 21, 2020. Based on the date of this note's creation, investigators believe this note is a reference to a shooting where MEJIA claims to have raised his firearm ("I Uped it Nikka") started firing ("Started Squeezing") and killed the target ("lefted him not breathing"). The pertinent portion of the note follows:

Spin a opp block off a perk me n bro n we shot it up packed it up ik that body the medics had to pick him up

But I Uped it Nikka Started Squeezing nikka wit glock i lefted him not breathing nikka

417. Investigators located another note dated May 20, 2020. In the note, MEJIA writes that the rival gang members will get hit in the face and that the Trinitarios are now smoking on his name ("u get hit in the face now we smoking your name"). As noted above, Rivera was shot in the forehead. MEJIA continues writing that he and another Trinitarios member killed a rival gang member who had sold them guns ("Fuck that dead nikka he sold us blixks then we got him hit"), and that they committed the murder as retaliation and did so on the rival gang member's own block ("we the real get back we turned that boy ebk pack in his own block wit a glock"). As noted below, multiple cooperating witnesses identified Rivera as selling firearms to the Trinitarios prior to his murder, consistent with the note. The pertinent portion of the note follows:

nun of my nikkas is fake u dplk u get hit in the face now we smoking your name

Patria the movement we get to the cake em kids talk so much that's why they got so many dead's mans if they really check the score we up n they down

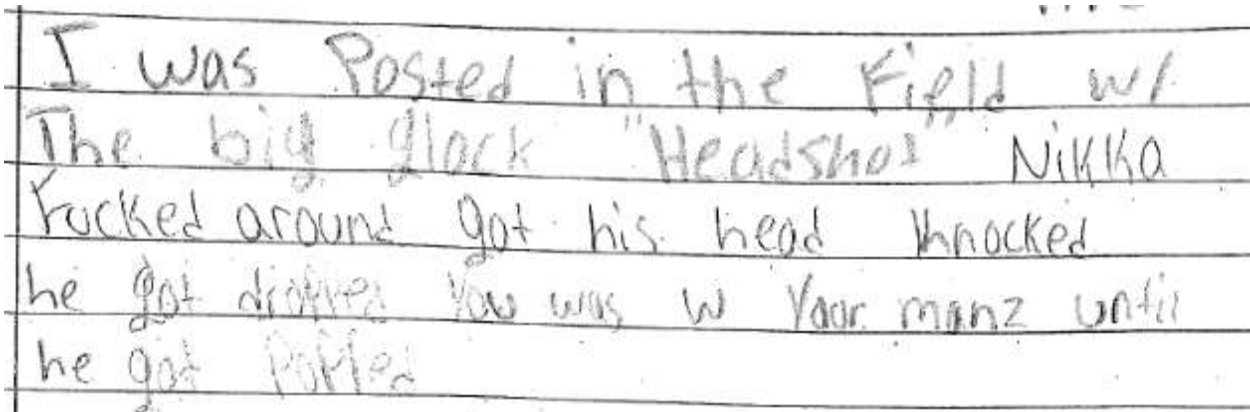
Did em dusty like galobli shoot at opps like I'm kode they can hold me caught a body n I'm chilling like I beat the race

I ain't gon trip yea my shi Jammed but I still got him blamed to be spin the hood smoking on that new opp pack Ina fat ass wood Fuck that dead nikka he sold us blixks then we got him hit yea I'm back we the real get back we turned that boy ebk pack in his own block wit a glock

ii. YANUEL MEJIA Notebooks

418. In April 2022, a search warrant was executed at YANUEL MEJIA's residence in Lawrence. During the search, two notebooks were recovered that contained numerous admissions to membership in the Trinitarios, drug trafficking, and participation in violent acts.

419. In one portion, the entry reads: "I was posted in the field w[ith] the big glock[...] 'Headshot' nikka fucked around got his head knocked[...] he got dropped you was w[ith] your manz until he got popped." Investigators believe this is a reference to the murder of Rivera, who was shot in the head while in a vehicle with other Gangster Disciples members.



A photograph of a handwritten note on lined paper. The text is written in cursive and matches the quote in paragraph 419: "I was Posted in the Field w/ The big glock 'Headshot' Nikka Fucked around Got his head knocked he got dropped You was w Your manz until he got Popped".

420. Another entry states: "I just finished get out the highway from a fucking chase", "now I'm at the base smoking on that Chin pack to the face." Investigators believe that in this entry MEJIA is admitting to the high-speed chase after the shooting and boasts about having killed Rivera by smoking the ashes of the deceased rival, which he refers to as a "Chin pack."

I Just finished getting out the highway
from a ~~long~~ ~~slow~~ fucking chase
Now im at the base smoking on
that Chin Pack to the face I dont

421. Another entry states: “I just smoked that nikka to the face”, “was at the 700 when I fucking caught that case”, “folk’s was on his bully till he got his face erased.” Investigators believe that in this entry MEJIA describes shooting Rivera in the face (“I just smoked that nikka to the face”, “till he got his face erased”), which is consistent with the fact that Rivera suffered a gunshot wound to his forehead.

I Just smoked that nikka to the
face was at the 700 when I
fucking caught that case Folk's
was on ~~beat~~ his bully Till he
got his face erased Bronem

422. Investigators located an entry in the notebook that appears to be a response to a school writing assignment prompt about the importance of being respectful. In the section directly below the prompt, it appears that MEJIA wrote a lengthy admission to numerous acts of violence. In particular, MEJIA writes: “my oppas kill’t my brother y[ou] k[now] a month later we get back”, “what you talkin bout lil nigga Chin up in the air we aint texting back n forth he really died right there”, “they took him to the hospital thought they could repair.” Investigators believe that this is MEJIA’s admission to his participation in the shooting that resulted in the death of Carlos Rivera, a/k/a “Chin,” which took place less than a month after Alan Jimenez, a/k/a “Montana,” was

murdered (i.e., Jimenez was murdered on March 1, 2020, and Carlos Rivera was shot and killed within thirty days).

Writing Prompt: #1 (Noncompliance)

Directions: Write 5 or more complete sentences. Give an example of what being respectful looks like to you. In what ways do you practice being respectful? Be descriptive and prepared to talk about these examples prior to processing off your repair.

I Just bought New Black N a Ski mask N'KKaz
 Say I caught a body I aint gon say I
 did that Niggaz kno. I'm spinning in a foreign
 yea the Helicat my opps Ruff my ~~brother~~ K
 a month later we get back what you talkin
 bout lil nigga chin up in the air we aint
 texting back N forth he really died right there
 They took him to the hospital they thought they
 could repair N we gon keep on drilling even when we
 millionaires but at 16 I already shot 3 oppz N ditch I'm ~~like~~
 like that Jay got left dead on his block ~~that~~ exotic
 ebk pack when I catch his lil kuz e he the
 next dead opp I aint even Diss them brook St higgas ~~and~~
~~they aint on shit I can gon even eat nigga's~~
~~they aint on shit I can gon even eat nigga's~~
~~they aint on shit I can gon even eat nigga's~~
 They aint top opps all they do is talk shit on the net
 I'll knock them top off yea I spin the black ~~and~~ som off white
 till I take the white off

423. In another entry, MEJIA states: “How we up on 4 smacks n you talking all that fucking shit”, “Zandre how you is talkin like ain’t get pistoled fucking whip”, “Now we smoking on a new pack n I’m about that Chin.” Investigators believe this is another reference to the recent murder of Rivera, as MEJIA describes smoking on his ashes (“new pack”, “that Chin”) and takes credit for the murder (“we been spinning”). Investigators believe that MEJIA is referencing four murders committed by the Trinitarios (“How we up on 4 smacks”).

smacks
 How we up on 4 ~~packs~~ N you talking
 all that ~~shit~~ fucking shit
 Zandre how you is talking like you
 aint get pistoled ~~was~~ fucking
 whip now we smoking on a
 new pack N Im talking bout
 that chin ~~now~~ we been spinning

iii. Cooperating Witness Information

424. Multiple cooperating witnesses provided information concerning the March 31, 2020, murder of Carlos Rivera.

- a. CW-20 provided information about the murder of Carlos Rivera. CW-20 reported that a Gangster Disciple named Bombi Gz claimed to have accidentally shot and killed Rivera, while shooting at the Trinitarios during this incident. This statement by Bombi Gz is inconsistent with the physical evidence in that the medical examiner determined Rivera was killed by a single gunshot wound to his forehead and no stippling was observed.
- b. CW-44 provided information about the murder of Carlos Rivera. PENA and MEJIA spoke with CW-44 about the incident on the same day it happened. MEJIA told CW-44 that he was at a gun deal and that it went bad. MEJIA stated that he shot at a Gangster Disciples member named Carlos Rivera, who was known by his street name "Chin," near the cemetery. CW-44 knew that Rivera had previously sold guns to the Trinitarios.
- c. CW-48 provided information about the murder of Carlos Rivera. PENA told CW-48 that PENA was the driver during the murder of Carlos Rivera and stated that Rivera was selling guns to both PENA and MEJIA. MEJIA then posted pictures of the guns on social media. The Gangster Disciples saw that the Trinitarios were in possession of their firearms and ordered Rivera to shoot the Trinitarios and get the firearms back. According to PENA, Rivera, Bombi Gz, and another Gangster Disciples member got into a car chase with them and fired

at PENA and MEJIA. PENA told MEJIA to shoot back. MEJIA fired at the pursuing car and saw Rivera's body slump down onto the window.

I. 3/21/2021 – ATTEMPTED MURDER OF AV

425. On March 21, 2021, an individual whose identity is known to me, who I will refer to as AV, was shot in Lawrence. During the initial stages of the investigation, AV identified YORDALI YORRO, A/K/A "OG LOW" as the shooter. After being intimidated by other members of the Trinitarios, including ERIC ROSARIO, AV recanted his identification and refused to testify. The Trinitarios recorded a phone call made by ROSARIO, where he is heard speaking with AV and telling him to tell the Judge that he identified the wrong person.

i. Initial Police Response

426. According to Lawrence Police Report #21001734, on March 21, 2021, at approximately 8:00 PM, Lawrence Police were dispatched to Lawrence General Hospital for an individual who had sustained a gunshot wound to his right arm. The victim was identified as AV.

427. AV told police that he was driving his vehicle on South Union Street in Lawrence, when a white Toyota RAV-4 pulled up next to him. AV observed the rear driver's side window roll down and a Hispanic male began shooting at him. AV stated that the shooter was a Hispanic male but claimed to not know the shooter. Later, AV was encountered by Lawrence Police who asked about his wellbeing. AV stated he was not a "snitch" but that all he was going to say was "OG Low" in relation to the incident.

428. Lawrence Police found AV's vehicle and saw that it had sustained a number of bullet holes from the shooting, and there was blood on the center console and passenger seat. Three bullet fragments were recovered from the vehicle.

429. At the scene of the shooting, investigators recovered two .40 caliber shell casings. These casings would later be identified as having been fired from one of the same weapons involved in the December 31, 2021, murder of Jumil Celladilla, discussed below.

ii. Surveillance Video

430. Lawrence Police recovered surveillance video that captured the shooting. The footage shows a white RAV-4 pulling up to the passenger side of AV's vehicle. It appears that AV communicates with the operator of the RAV-4, appears to point a black object at the RAV-4, and then lowers it while continuing to communicate with the RAV-4.

431. The white RAV-4 then swerves toward AV's vehicle, and AV accelerates away from the white RAV-4. The suspect in the RAV-4 is then seen discharging a firearm at AV's vehicle. The arm of the suspect can be seen extended from the driver's window of the RAV-4, and the firearm appears to have three or four muzzle flashes in the direction of AV's vehicle.

432. Other surveillance video that was recovered during the investigation captured the driver of the RAV-4 wearing a red Adidas shirt. The video also captured the registration of the RAV-4 to be a rental owned by Enterprise. At the time of the shooting, the white RAV-4 was rented to a known Trinitarios associate.

433. Lawrence Police obtained footage from a 7-11 depicting YORRO entering the store. In the video, he can be observed wearing a backwards red baseball hat, and his hair can be observed in dread locks.



434. Lawrence Police then recovered camera footage from March 21, 2021, at 18:56, showing the driver of the white RAV-4, which is approximately one hour before the shooting. That footage depicts a male with a backwards red baseball hat driving the white RAV-4.





435. Lawrence Police tracked the white RAV-4, and it appears that it pulled into a gas station that AV was utilizing a few minutes before the shooting. It appears that upon identifying AV, the white RAV-4 follows AV's vehicle and then the shooting takes place.

436. The RAV-4 was later returned to an Enterprise location in Raleigh, NC, by a long-haired male and a female. The RAV-4 was searched by Raleigh, NC, police, and they recovered a shell casing from the front windshield and hood of the vehicle. Additionally, two water bottles and facemasks were recovered

iii. Recording of Witness Intimidation by ERIC ROSARIO, A/K/A "MANIATICO"

437. During the course of this investigation, investigators learned that after the initial charges were brought, the Trinitarios learned that AV had provided information to police identifying YORRO as the individual who had shot AV. Specifically, AV was identified in the police reports used to charge YORRO in Lawrence District Court.

438. Following this, the Trinitarios set about to intimidate and harass AV from testifying against YORRO. As part of the effort, ERIC ROSARIO, A/K/A "MANIATICO, who was feared in Lawrence for his violent reputation, called an associate of AV to intimidate AV from testifying

and prevent him from cooperating with the investigation. This call was recorded. During the recording, ROSARIO can be heard stating that “it was not going to go good for him” if he “goes to Court” and continues to identify YORRO as the shooter. ROSARIO advises AV’s associate that “if he feels like his life is in danger” then he should go “MIA.” ROSARIO then says it explicitly: “what he gotta do is he gotta go to court and tell them that he got the wrong niggas... they got the wrong nigga locked up.” After ROSARIO states this, AV is then heard on the line, and ROSARIO advises AV to tell the Judge that he wrongly identified the shooter.

iv. Cooperating Witness Information

439. Multiple cooperating witnesses provided information concerning the March 21, 2021, attempted murder of AV.

- a. CW-18 provided information about the attempted murder of AV. YORRO told CW-18 that YORRO had shot AV. CW-18 stated that ERIC ROSARIO conducted a phone call with AV in order to dissuade AV from testifying against YORRO. This phone call was recorded.
- b. CW-20 provided information about the attempted murder of AV. CW-20 heard about the incident from YORRO and CRISPIN. CRISPIN was driving with YORRO when they saw AV. CRISPIN attempted to fire, but the magazine fell out of the firearm. YORRO took the firearm, inserted the magazine and fired at AV. JUSTIN ALBA, A/K/A “TUTO” provided the vehicle to YORRO, which was a rental. Following the shooting, YORRO called ALBA and asked for help moving the car. CW-20 drove to a hotel where ALBA, CRISPIN and YORRO were staying. CW-20 picked up ALBA, CRISPIN and YORRO and drove to the scene of the shooting. About one or two days after the shooting, ERIC ROSARIO called AV and told AV to not speak to the police about the shooting. This call was recorded.
- c. CW-37 provided information about the attempted murder of AV. YORRO told CW-37 that he shot AV. Prior to the shooting, YORRO stated that he asked AV why he is a member of the Gangster Disciples, which led to a verbal altercation.

J. 5/27/2021 – ATTEMPTED MURDER OF “PEEWEE”

440. Investigators are familiar with a Trinitarios shooting taking place on May 21, 2021. According to cooperating witnesses, a Gangster Disciples member named “PeeWee,” whose

identity is known to me, was shot by CABRERA and CRISPIN. On multiple consensual recordings made by a cooperating witness, CABRERA admits to participating in the shooting.

i. Initial Police Response

441. According to Lowell Police report #2021-7219, officers responded to 95 West Sixth Street in Lowell, MA, at approximately 10:27 PM, for reports of shots being fired. Multiple individuals reported hearing numerous gunshots. In the area of 42 Jewett Street, officers located a male who stated his vehicle was struck by gunfire. Officers observed numerous shell casings.

442. The male whose vehicle was struck told officers that he was awoken by sounds of gunfire. He came outside and saw bullet holes in his vehicle and gunfire damage to his residence. Officers saw that a window in the front part of his residence had been struck by gunfire.

443. Another caller reported hearing 10 to 15 gunshots and observed a male running toward West Sixth Street in a white t-shirt. Another caller reported hearing gunshots and seeing a male limping up Jewett Street toward West Sixth Street.

444. Officers later learned about a female gunshot victim inside a nearby apartment, who was suffering from a wound to the neck. The injuries were determined to be non-life threatening. This female gunshot victim stated that she was outside when a dark gray four-door sedan came in her direction at high-speed and rounds were fired.

445. Officers also learned about a second victim who I know to be known by his street name, "PeeWee," who had already been transported to Lowell General Hospital. PeeWee was suffering from eight gunshot wounds: two on his upper back, four on his right thigh/groin, and two on his left thigh. PeeWee was transported to Boston for further treatment. Though his condition was critical, he survived.

ii. Crime Scene

446. At the scene of the shooting, officers collected 25 discharged shell casings from the area of Jewett Street. The shell casings were 9mm and .40 caliber. A total of six .40 caliber casings were recovered. A total of nineteen 9mm casings were recovered. A vehicle and multiple residences were also struck with gunfire.

iii. Surveillance Video

a. L Street Video

447. Investigators received a copy of the surveillance video depicting the shooting of PeeWee. The surveillance camera was located on L Street, which is an alley that intersects Jewett Street. The video captures an angle facing Jewett Street. In the video, an individual believed to be PeeWee can be observed walking from the right to the left of the frame, in a direction up Jewett Street toward 42 Jewett Street.

448. At approximately 00:34 seconds into the video, numerous gunshots can be heard consistent with multiple weapons firing in a semi-automatic cadence, and a vehicle can be observed entering the frame travelling to the right, down Jewett Street. As the vehicle passes, a flash consistent with a muzzle flare can be observed emanating from the front passenger window of the vehicle. At 00:51 seconds into the video (approximately 15 seconds later), additional gunshots can be heard.

iv. Cellular Phone

449. A cellular phone belonging to PeeWee was recovered and searched. In the phone, investigators located numerous Snapchat videos, demonstrating disrespect by PeeWee and the Gangster Disciples towards the Trinitarios. These videos appear to have been created and/or shared on May 27, 2021, at various times throughout the morning on the same day as the shooting that took place later that evening.

- a. For example, investigators located a number of videos depicting the same incident on Brook Street in Lawrence, Massachusetts. The videos depict a Trinitarios associate leaning out of a ground floor window being taunted by multiple individuals who call him a “bitch ass ni***” and demand he “come outside.” These individuals were identified to be members of the Gangster Disciples. As the individual leans out the window, a hand comes and slaps his face.
- b. Investigators located a video where a voice consistent with that of NR’s states, “let me use they store real quick.” The video shows a car door opening and the phone user appearing to enter a convenience store. This convenience store is in the vicinity of the Essex Street Projects in Lawrence, Massachusetts, within the heart of Trinitarios gang territory. This convenience store has been featured in multiple music videos posted by members of the Lawrence Chapter.
- c. Investigators located a video depicting an individual holding a firearm and waving it to the camera. The individual states, “come get your shit back in blood bitch.”

450. A series of conversations between PeeWee and others over Snapchat were recovered, most of which had been partially deleted. One such message was an audio message sent by PeeWee to LUIS CRISPIN (using his Snapchat account “og_lu4”) on May 27, 2021, at 9:59 PM (UTC -0), a few hours before the shooting. In the message, PeeWee states, “Whatsup papi.”

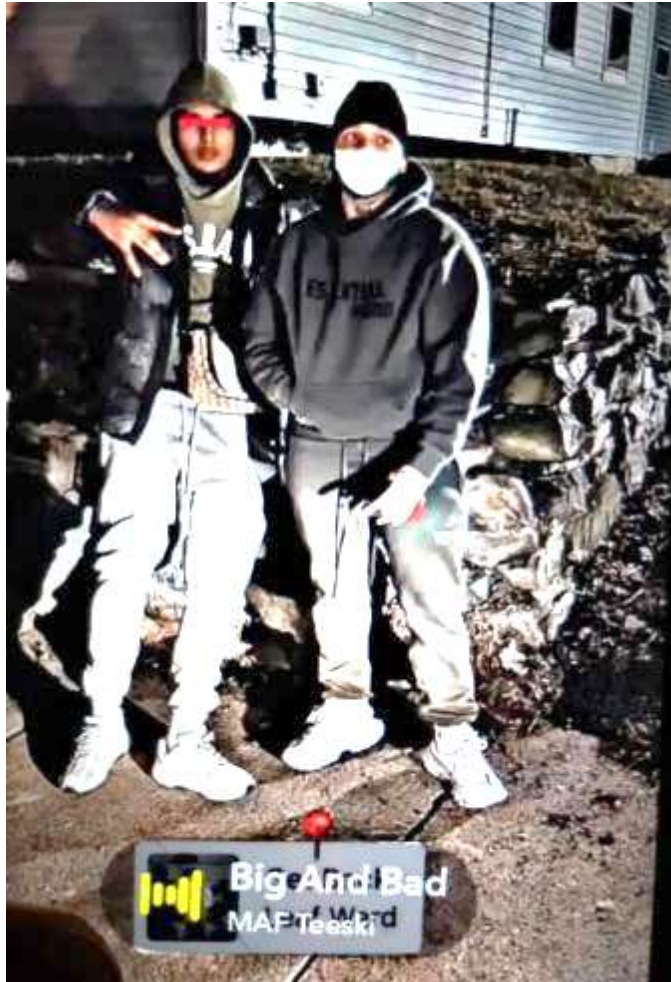
v. October 2025 Postings

451. Around October 2025, investigators learned of an image posted by CABRERA to CABRERA’s Snapchat account, the same image that was posted to CRISPIN’s Instagram account. In the image, CABRERA and CRISPIN can be observed standing outside on a street near a residence and stone wall. I know that this image was photographed in the area of 42/45 Jewett Street in Lowell, Massachusetts, which is the precise location where PeeWee was shot. This location is in the heart of Gangster Disciples territory and also where PeeWee was known to be staying at the time. This same image was also publicly posted to CRISPIN’s Instagram account around the same time that CABRERA posted it publicly.

452. Review of CRISPIN's Instagram post revealed that it is actually a repost of CABRERA posting the same image to his own Instagram account as well. CRISPIN's repost appears to add content to the picture, including an emoji of a trophy and a bullseye. These additions appear to reflect that the Trinitarios were targeting the rival gang member and that the shooting of PeeWee was a noteworthy achievement for the Trinitarios.

453. Investigators believe that the public postings made by CABRERA and CRISPIN were to claim credit for the shooting, and also to taunt the Gangster Disciples and PeeWee in particular. Investigators believe that this public posting is effectively a confession to the shooting that is designed to take credit, taunt the rival gang members, and bolster the street credibility of CABRERA and CRISPIN among the Trinitarios and rival gang members.

454. The posted images follow, along with a Google Street image depicting the same location on Jewett Street from roughly the same angle. The first image is the posting from CABRERA's Snapchat. The second image is the post from CRISPIN's Instagram reposting an image from CABRERA's Instagram. The third image is the physical location of 42/45 Jewett Street, Lowell, Massachusetts. Of note, the same stone wall, residential structure, utility wires and windows can be observed in the images:



vi. Recordings of JAMES CABRERA

455. JAMES CABRERA was captured on multiple recordings discussing the attempted murder of PeeWee.

a. June 24, 2025, Recording of CABRERA and CRISPIN

FILENAME: 2025-06-24_11-44-02

456. On June 24, 2025, CABRERA was captured on a consensual recording discussing the attempted murder of PeeWee. CABRERA states that PeeWee knows why he does not contact CABRERA or CRISPIN and only contacts other Trinitarios (“He knows why he don’t hit me up. Or YB up. Why he don’t hit me or YB up? He gon’ hit everybody else”).

CABRERA:	He knows why he don’t hit me up. Or YB up. Why he don’t hit me or YB up? He gon’ hit everybody else..
CHS:	[LAUGHS] Nigga is gon’, niggas is gon’ hide Momo too.
CABRERA:	Like, sending messages and shit.
CHS:	[U/I] Momo [U/I]. “Shit, I don’t want to be in the middle.” Then, Momo added them and then Momo started giving them [U/I]. “Man, look at this nigga.] Da, ra, ra, ra, da, ra, ra, ra. I’m like, “Yup.” Niggas a clown.

457. A cooperating witness comments about how the other Gangster Disciples present for the shooting hesitated returning fire. CABRERA reiterates that point and notes that the other Gangster Disciple shot back approximately thirty seconds later (“have your man shoot back thirty (30) seconds later”).

CHS:	But how your man, how your man, how your man scared to shoot back, nigga?
CABRERA:	You have your man shoot back thirty (30) seconds later. Nigga, like c’mon.

458. A cooperating witness comments that the shooting was surreal in that PeeWee was shot in his vehicle (“when he turned his car on, bro”, “That he got shot”). CABRERA confirms the story that when PeeWee was shot, the music started playing very loud and that it was a song called Lov Medicine (“Medicina de amor started playing mad loud ‘cause he had the music all the way

up”). CABRERA sings the lyrics: “Love medicine” “is what I want from you” and confirms the story (“No cap”).

CHS:	The nigga turned his - when he turned his car on, bro...
CABRERA:	[U/I] Medicina de amor.
CHS:	That he got shot. Medicina de amor started playing mad loud ‘cause he had the music all the way up.
CABRERA:	Music was mad loud.
CHS:	And then, my nigga started cursing cars, trynna get out.
CABRERA:	[SINGS] Love medicine...
CHS:	Love medicine is what I want from you.
CABRERA:	I want from you... [U/I].
CHS:	[U/I] with nine (9) shots on you. Argh, argh, argh!
CABRERA:	No cap.

459. CABRERA then tells the group that he plans to go talk to PeeWee and ask him what song he heard after the gunshots, and if it was bachata music (“I’m down to go talk to him one day and be like, “Yo, what was the first thing you heard after the gunshots like what song heard? Was it like bachata”). CABRERA comments that he counted the seconds after the shooting and got to thirteen second before anyone fired back (“I counted the seconds like this, one (1) Mississippi, two (2) Mississippi. Three (3) Mississippi, all the way to thirteen (13) and that’s when [U/I] back”, “My son ain’t shoot back, my son shot back at the... thirteen (13) Mississippi.”). This is consistent with the surveillance recovered in the case.

CABRERA:	Like, I’m down to go talk to him one day and be like, “Yo, what was the first thing you heard after the gunshots like what song heard? Was it like bachata? ‘Cause I know he gotta remember that.
CHS:	[LAUGHS]
CABRERA:	He got to remember Medicina de amor. [U/I].
CHS:	Let him. Like, I know, I know somebody still gotta have that video of him when he came out the hospital.
CABRERA:	Bro, I counted the seconds like this, one (1) Mississippi, two (2) Mississippi. Three (3) Mississippi, all the way to thirteen (13) and that’s when [U/I] back.
CHS:	Oh hell no.
CABRERA:	[SIGHS]

CHS:	That nigga is a bitch.
CABRERA:	Brodie, that's how you count seconds, one (1) Mississippi...
CHS:	[U/I].
CABRERA:	...Two (2) Mississippi, three (3) Mississippi, four (4) Mississippi.
CHS:	He didn't listen to football in the hood.
CABRERA:	I'm trynna tell you, bro, you hear how many Mississippis I'm doing, fool? I didn't even hit seven (7) Mississippi.
CHS:	And the nigga stay [U/I] back.
CABRERA:	And I'm [U/I], my nigga. My son ain't shoot back, my son shot back at the... thirteen (13) Mississippi.

b. October 21, 2025, Recording of CABRERA

FILENAME: 2025-10-21_13-57-55

460. On October 21, 2025, CABRERA was captured on a consensual recording discussing the attempted murder of PeeWee. While the Trinitarios were discussing the recent murder of a Trinitarios member named "Panza," CABRERA comments that he recently spoke with Panza. CABRERA states that he and Panza were "supposed to kill PeeWee together."

CABRERA:	Bro, they killed Panza [PH], brodie.
CHS:	I know.
CABRERA:	That's crazy, right?
CHS:	You know they invited me to his funeral in Puerto Rico?
CABRERA:	That's crazy, brodie. They killed that nigga Panza [PH] I was, nigga, on the phone, choppin' it up; we were supposed to kill PeeWee together. [BACKGROUND: MUSIC]
CHS:	That's his cousin, the nigga that I grew up with. Geo, from here. He has family in Lawrence, Panza.
CABRERA:	Oh, fact, fact.

461. During the conversation, CABERA and other Trinitarios discuss a female who was previously dating a common acquaintance referred to as 'Izzi' ("She used to fuck with Izzi"). According to CABRERA, 'Izzi' mistreated the female and she went on to have relations with members of the Gangster Disciples, including specifically PeeWee ("She got really mad, went on and fucked on this nigga, went and fucked one of the niggas' man, which is PeeWee. Nigga, got seeded by the nigga and everything"). CABRERA states that this female is the one who gave the

information about where “Izzi” was located and provided that information to the Trinitarios, which was provided to CABRERA and CRISPIN who drove to the location. CABRERA states that they drove by the area that night and they saw PeeWee which led to the shooting (“went to drive thru there that same night... we saw PeeWee”).

CABRERA:	My brother, listen, I don’t know if you remember this shit. Yo, Jefe, you remember how that shit went. She used to fuck with Izzi, brodie. Remember Izzi? Do you remember the shit?
CHS:	Yeah.
CABRERA:	She fuck with Izzi and Izzi did her wrong.
CHS:	I thought it was, didn’t think it was real, though.
CABRERA:	Yeah, brodie. Izzi did her wrong, right? She got really mad, went on and fucked on this nigga, went and fucked one of the niggas’ man, which is PeeWee. Nigga, got seeded by the nigga and everything. That nigga... She gave the drizzy um... Izzi. And when we went to drive through there that same night... we saw Peewee. It was like, “What, bingo.”

c. December 24, 2025, Recording of CABRERA

462. On December 24, 2025, JAMES CABRERA was captured on a consensual recording having a conversation with rival Gangster Disciples gang members, Chana and Nongo, whose identities are known to me. In the recording, JAMES CABRERA taunts Chana for being present when Gangster Disciples member Hugo Del Rosario was recently murdered on September 13, 2025 (“Chana can’t say nothing! Chana can’t say nothing, his man died... his man died and he was there”). Chana then taunts JAMES CABRERA with the death of a Trinitarios member, and CABRERA denies that it is a proper comparison, because he was not present for the death of the Trinitarios member (“I wasn’t there”). CABRERA then notes that he shot Peewee in retaliation for a prior incident (“Peewee (PH) got shot for that. (STAMMERS) I popped PeeWee for that.”). CABRERA then notes that his baby mother gave him the location of PeeWee that he used for the shooting (“my BM gave me the drop”).

CABRERA:	[ASIDE: Chana can’t say nothing! Chana can’t say nothing, his man died... his man died and he was there. Your man died with his ass out.]
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CHANA:	[BACKGROUND: Your man died too]
CABRERA:	[ASIDE: My man... (STAMMERS) I wasn't there. I wasn't there]
CHANA:	[BACKGROUND: (U/I) niggas died.]
CABRERA:	[ASIDE: (STAMMERS) I wasn't there. Peewee got shot for that. (STAMMERS) I popped PeeWee for that. What you do for your man?]
CHANA:	[BACKGROUND: (U/I) I popped him too.]
CABRERA:	[ASIDE: No... my BM gave me the drop. Look, he hung up, he hung up. He said, he about to go (U/I) Juice (PH) right now. [LAUGHS] Yo, Chana hung up, Chana hung up. Nigga, Chana hung up. [LAUGHS]. Nigga mad- nigga mad [U/I].]

463. Chana then hangs up the phone and CABRERA continues to talk with Nongo. CABRERA then recounts that when they shot PeeWee (referred to in a derogatory fashion as “PeePee”) they were talking with him on the phone in the same manner (“when we popped PeePee, it was just like this, he was talking to us. It was like this... When we popped PeePee it was just like this”).

CABRERA:	[ASIDE: He ain't trynna go to Target.]
ÑONGO:	[BACKGROUND: (U/I).]
CABRERA:	[ASIDE: (CHUCKLES) For you... for you... Yo, when we popped PeePee, it was just like this, he was talking to us. It was like this... When we popped PeePee it was just like this.]

vii. Cooperating Witnesses

464. Multiple cooperating witnesses provided information concerning the shooting of PeeWee.

- a. CW-3 provided information about the shooting of PeeWee. CABRERA told CW-3 that he and CRISPIN shot PeeWee. CW-3 stated that CABRERA and CRISPIN took a picture where they shot PeeWee.
- b. CW-18 provided information about the shooting of PeeWee. Shortly after the incident, CABRERA contacted CW-18 and stated that he and CRISPIN shot PeeWee. CABRERA stated that he contacted Peewee over Facetime in order to find him. CRISPIN was in the vehicle. CABRERA stated that another Trinitarios member was the driver and that this member should be blessed into the Trinitarios for driving during the shooting.
- c. CW-20 provided information about the shooting of PeeWee. CW-20 learned about the shooting of Rivera from CABRERA and CRISPIN. According to

CW-20, a Trinitarios associate named Dior was driving during this incident and CABRERA and CRISPIN were passengers in the vehicle. CABRERA and CRISPIN stated that they shot PeeWee using a 9mm firearm and .40 caliber firearm. CABRERA and CRISPIN provided the firearms used in this incident to CW-20 after the fact.

- d. CW-37 provided information about the shooting of PeeWee. CABRERA told CW-37 that he shot PeeWee. CRISPIN was present when CABRERA confessed to shooting PeeWee. When CABRERA told CW-37 about the shooting, CRISPIN started laughing.
- e. CW-50 provided information about the shooting of PeeWee. CABRERA told CW-50 that he shot PeeWee. CABRERA described conducting the shooting in revenge for the murder of Trinitarios member Montana (Alan Jimenez).

K. 10/10/2021 – ATTEMPTED MURDER OF GANGSTER DISCIPLES BY PUELLO

465. According to Lawrence Police Report #21007074, on October 10, 2021, at 7:22 PM, Lawrence Police responded to 137 Boxford Street for a report of gunfire. Witnesses reported that the shooter was wearing a tri-color jacket and had screamed out “I don’t care my G, I am going to shoot everyone in this street.” Multiple residents in the area reported hearing gunfire.

466. A 14-year-old victim told police that while he was riding his bike down the street, a male suspect screamed at him and asked him questions that he did not understand. The male suspect began chasing after the victim and he fled the area in fear for his life.

467. Surveillance video depicted a suspect and captured five gunshots being fired. The suspect in the tri-color jacket was observed leaving the area in a gray vehicle. The male suspect also can be heard yelling, “GDK, GD fucking K nigga,” which investigators know to mean “Gangster Disciple Killer.” The suspect in the tri-color jacket was later identified to be XAVIER PUELLO.

468. PUELLO is captured on video directing his attention to the 14-year-old victim, yelling “Yo, you folk? You folk my nigga,” asking the victim’s gang affiliation. The victim starts running, and PUELLO can be observed clenching his left arm at his waist, consistent with holding

a firearm. PUELLO is also observed wearing a balaclava mask covering his face. A second individual on the scene with PUELLO was identified to be a Trinitarios associate as well.

469. On October 19, 2021, PUELLO was charged with the shooting in Lawrence District Court, Docket No. 2118CR003134. On March 11, 2022, PUELLO pleaded guilty to the charges and was sentenced to two years in jail, and two years of probation.

L. 12/31/2021 – MURDER OF JUMIL CELLADILLA

470. Investigators are familiar with a murder taking place on December 31, 2021. According to information from cooperating witnesses, during this incident Trinitarios gang members were sent to target a rival gang member and in fact shot and killed the girlfriend of the rival gang member who was present in the car with the intended target.

i. Initial Police Response

471. According to Lawrence Police Report #21009425, on December 31, 2021, at approximately 5:09 PM, officers responded to Pearl Avenue for a report of shots being fired. Officers encountered an individual whose identity is known to me, who I will refer to as “KT.” KT was observed to be attending to a woman, who was later identified as Jumil Celladilla, and yelling for help. Jumil was unresponsive and appeared to have a gunshot wound to the head. Jumil was transported to Lawrence General Hospital where she was pronounced deceased. Jumil’s six-month-old baby was in the vehicle at the time of the gunfire and not struck by gunfire. Jumil was twenty-two years old and worked as a teacher’s aide.

472. KT told police he was Jumil’s boyfriend. KT stated that he, Jumil and Jumil’s six-month-old daughter were in their red Honda CR-V during the incident when they were shot at. KT was extremely agitated and in a state of distress and shock. KT made statements such as, “it’s my fault,” and “should have been me,” when he interacted with police.

473. A witness reported that they were in their home near to the scene when they heard gunshots. The witness identified a black car at the top of the hill driving away.

474. KT later told investigators that he, Jumil and Jumil's baby left their home on Byron Avenue and traveled to 20 Pearl Avenue in the red Honda CR-V. They traveled to Pearl Avenue in order for KT to sell marijuana to his cousin who lived there. Once at the location, KT texted the cousin that he was "here." KT then observed and heard the windows of the vehicle shatter and saw Jumil's head fall forward. The vehicle continued forward until it came to a stop at the end of the parking lot.

ii. Crime Scene

475. Officers observed that KT's vehicle was a red Honda CR-V that had multiple bullet holes along the passenger side. The car seat where the six-month-old child was located can be seen in the rear of the vehicle. Photographs of the red CR-V follow:





476. Around the scene, officers located eleven .40 caliber casings and one 9mm casing. In total, the officers recovered twelve shell casings.



iii. Surveillance Video

477. Officers recovered video at 32 Pearl Avenue that depicted a black SUV pulling into the driveway, making a three-point turn, and exiting the driveway. Gunfire can be heard and then the red Honda CR-V moves and then stops. Shortly after this, the operator of the red Honda CR-V, identified as KT, exited and ran to the passenger side, opened the door, and placed Jumil on the ground, attempting to render aid. Lawrence Police were observed arriving shortly thereafter.

478. From review of cameras in the area, the black SUV used by the shooters was identified to be a black 2011 Acura RDX, bearing Mass. Reg. 7VJB20. The black Acura was reported stolen in November 2021.

479. The black Acura was observed on surveillance video driving past KT and Jumil's residence on Byron Avenue multiple times earlier in the day, including at approximately 4:30 PM. The red Honda CR-V was also captured on surveillance leaving Byron Avenue.

480. Further investigation revealed that KT had left his residence with a known Gangster Disciple member in a silver Dodge Charger at approximately 9:30 AM on the morning of the murder and was with this individual until approximately 12:53 PM. When confronted with this prior activity, KT indicated that he had traveled to a store on Lawrence Street, an area known to within the Trinitarios territory. Multiple Gangster Disciples members were identified on recorded jail calls following the death of Jumil discussing the fact that KT was at the Essex Street Projects which is in Trinitarios territory, making disrespectful gang signs on the morning Jumil was killed.

iv. Recovery of black Acura

481. On January 22, 2022, the black Acura was recovered by Methuen Police in the area of Mystic Street in Methuen. The vehicle was searched pursuant to a warrant. During the search, four 9mm casings and one .40 caliber casing were recovered, consistent with the casings recovered from the crime scene. Additionally, one live 9mm round of ammunition was also recovered.

482. During the search of the black Acura, a crave vape pen was recovered from the rear of the vehicle. A DNA profile was developed from the vape pen. According to a report from the Massachusetts State Police Crime Lab, the "DNA profile from this item is at least 12 thousand times more likely if it originated from JERVIS ALMANZAR and two unknown individuals than if it originated from three unknown, unrelated individuals. This provides support that Jervis Almanzar is included as a contributor to this DNA profile."

v. Ballistics Examination

483. The casings recovered from the crime scene and the black Acura were forensically examined at the Massachusetts State Police Crime Laboratory. That analysis revealed the following:

- a. all of the .40 caliber casings recovered from the scene and the vehicle were discharged by the same firearm;
- b. the 9mm casing from the scene and two of the 9mm casings from the black Acura were fired by the same firearm. Two of the 9mm casings from the black Acura lacked sufficient markings to conduct an analysis.

484. High-quality images of the shell casings were entered into ATF's NIBIN system. The image of one of the .40 caliber shell casings recovered from the Jumil Celladilla investigation was matched to a .40 caliber shell casing recovered from the March 21, 2021, shooting of AV described above. This suggests that the same .40 caliber weapon was used to fire both rounds.

vi. YANUEL MEJIA Phone

485. Investigators reviewed data derived from YANUEL MEJIA's cellular phone in connection with the Celladilla murder.

486. On September 4, 2021, MEJIA sent a text message to a Trinitarios member identified by the street name "Jefe Flacko." In the message, MEJIA sends the address of "48 Byron Avenue." The address of 48 Byron Avenue is the building next to the residence where Jumil Celladilla and KT resided at the time of the murder.

487. Investigators located a text message conversation in MEJIA's phone between MEJIA and ENRIQUE DURAN taking place on December 31, 2021. At approximately 3:11 PM on December 31, 2021, MEJIA asked DURAN where he is and advises DURAN that JAHIR DAVILA (referred to as "Twin") is going to pick up a firearm immediately ("goin to go get that", "Ps4 rn"). MEJIA advises DURAN that rival gang members are outside and vulnerable ("Em kids outside"). MEJIA asks DURAN to call him ("Dime my nigga").

		Content
12/31/2021 3:11:39 PM(UTC-5)	MEJIA	Yo my nigga wya
12/31/2021 3:11:48 PM(UTC-5)	MEJIA	Twin goin to go get that
12/31/2021 3:11:53 PM(UTC-5)	MEJIA	Ps4 rn
12/31/2021 3:12:32 PM(UTC-5)	MEJIA	My nigga
12/31/2021 3:15:48 PM(UTC-5)	MEJIA	My nigga
12/31/2021 3:15:56 PM(UTC-5)	MEJIA	Em kids outside
12/31/2021 3:16:15 PM(UTC-5)	MEJIA	Dime my nigga
12/31/2021 3:33:14 PM(UTC-5)	DURAN	Lmk

488. At 3:19 PM, on December 31, 2021, JAHIR DAVILA sent MEJIA a text message stating “63 Sullivan ave.”

489. At approximately 3:33 PM through 3:35 PM, on December 31, 2021, MEJIA has a text message conversation with a contact believed to be MEJIA’s sister named “Gorda Finesse.” In the exchange, MEJIA states that he has left his residence and that the door is locked (“I lefted the door is locked”, “You left bro”, “The house”, “Yea I had to leave”).

490. At 3:48 PM, on December 31, 2021, MEJIA sent a Snapchat message to a known Trinitarios member named “Malocoro”, who is identified by the contact name “Malocorito.” The content sent by MEJIA is not visible.

491. Investigators observed a note in MEJIA’s cellular phone from January 2, 2022. A portion of the note reads:

Get it back in blood that’s just how I Fuckin feel Me and twinem up in traffik With A Couple Steals Im Talking Blixkys talking big thangs Show Em How We Feel Don’t diss Montana on a beat it turn into drill

492. Investigators observed a note in MEJIA’s cellular phone from January 15, 2022. A portion of the note reads:

But fr tho you ain’t Tryna hop out blick dirty Stick Yea I gotta twin n nigga we don’t miss actived power ranger man they really ain’t on shit Ain’t Gon talk about no dead that’s n ndictment from the pigz But We Smoking Lotta Dead Ones Itz 3 flavors in this blunt. Came outta jail n started sliming everybody playing both sides It’s the green side or the black side ain’t no playing in between.

493. In these notes, investigators believe that MEJIA is discussing the murder of Celladilla. In particular, he references JAHIR DAVILA, A/K/A “NANO FINESSE,” who he refers to as his “twin” and boasts that they “don’t miss” in relation to shooting. MEJIA then states that he will not name the people he has killed because it could lead to being charged with the offense (“Ain’t Gon talk about no dead that’s n ndictment from the pigz”). Nevertheless, MEJIA does state that they are smoking on the ashes of three different individuals (“But We Smoking Lotta Dead Ones Itz 3 flavors in this blunt”). MEJIA references the gang war and that Trinitarios are fighting the Gangster Disciples (“It’s the green side or the black side ain’t no playing in between”).

vii. Jervis Almanzar Music Video

494. Investigators are aware of a music video entitled “PSA” posted to YouTube on March 16, 2024, by ALMANZAR under ALMANZAR’s rap name “MG Shy.” In the music video, ALMANZAR describes selling drugs and shooting rival gang members. The music video is publicly posted online at <https://www.youtube.com/watch?v=WsTYsLtUs-g>.

495. In one portion of the song, ALMANZAR states, “Hop out the v and I’m letting it rip.” I believe this to be a reference to ALMANZAR conducting a shooting on foot after exiting a vehicle, instead of conducting a drive-by shooting. During the song ALMANZAR also states, “Me and brody two deep trying to whack him.” In this statement, ALMANZAR refers to his efforts with another gang member to search for a male rival gang member to kill him. I believe this is a reference to the Celladilla murder, where they intended to kill KT and conducted surveillance.

496. ALMANZAR then raps, “smoking civilians that shit got me laughing.” I believe this is a reference to the murder of Celladilla. A cooperating witness has informed investigators that this lyric refers to having shot and killed Celladilla, who was not a rival gang member. During the song, ALMANZAR also references a “40 be bumpin sound like a bitch” which is a reference

to a .40 caliber firearm that he uses during shootings. As noted above, a .40 caliber firearm was used during the shooting of Celladilla.

viii. Cooperating Witness Information

497. Multiple cooperating witnesses provided information concerning the murder of Jumil Celladilla.

- a. CW-17 provided information about the murder of Jumil Celladilla. CW-17 stated that YANUEL MEJIA told CW-17 that MEJIA participated in the murder of Celladilla.
- b. CW-18 provided information about the murder of Jumil Celladilla. CW-18 reported that YORRO ordered the mission targeting KT. According to CW-18, this mission was ordered because KT was speaking negatively about deceased Lawrence Trinitarios member Alan Jimenez on social media. DAVILA told CW-18 that DAVILA and ALMANZAR did the shooting. YORRO told CW-18 that it was a failed mission because KT was not killed. YORRO and DAVILA told CW-18 that DAVILA and ALMANZAR were the shooters. YORRO and DAVILA also told CW-18 that YANUEL MEJIA was also present in the vehicle. CW-18 stated that DAVILA and ALMANZAR conducted the shooting in order to make rank in the Trinitarios and get blessed into the gang.
- c. CW-20 provided information about the murder of Jumil Celladilla. YORRO told CW-20 about the murder. YORRO stated that he sent ALMANZAR, DAVILA, and a Trinitarios associate named "MALOCORO" to kill KT who was a member of the Gangster Disciples. YORRO told CW-20 that during the attempt to kill KT, ALMANZAR and MALOCORO shot and killed Jumil Celladilla, the girlfriend of KT. YORRO told CW-20 that Celladilla was his cousin but did not mind that she was murdered because she was in a relationship with a rival gang member. CW-20 also learned about the shooting from DAVILA and MALOCORO. DAVILA and MALOCORO told CW-20 that ALMANZAR, DAVILA, and MALOCORO followed KT. Then, ALMANZAR and MALOCORO then shot at KT.
- d. CW-29 provided information about the murder of Jumil Celladilla. On the day after the murder of Jumil Celladilla, CW-29 received a call from ALMANZAR. During the call, ALMANZAR asked CW-29 to drive him to a trap house in Maine. CW-29 picked up ALMANZAR and drove him to Maine. ALMANZAR told CW-29 that they intended to kill the guy, who was a Gangster Disciple, and did not intend to kill the girl that was murdered.
- e. CW-37 provided information about the murder of Jumil Celladilla. CW-37 reported that MEJIA told CW-37, "I'm King Von and smoked that bitch too,"

referring to KT's girlfriend. According to CW-37, MEJIA mentioned the name Jumil and said that the motive for the shooting was to kill KT.

- f. CW-39 provided information about the murder of Jumil Celladilla. CW-39 stated that RIKY MONTILLA told CW-39 that ALMANZAR and DAVILA were in the car during the murder of Jumil Celladilla.
- g. CW-53 provided information about the murder of Jumil Celladilla. ALMANZAR told CW-53 that he was one of the shooters responsible for killing Jumil Celladilla.

M. 2/17/2022 – MURDER OF EWDY LOPEZ, A/K/A “TIMMY BROOK”

498. Investigators are familiar with the murder of Ewdy Lopez, a/k/a “Timmy Brook”, who was shot and killed on February 17, 2022, in Lawrence, Massachusetts. Lopez was a member of the Gangster Disciples and killed by gunfire from multiple firearms.

499. As a result of the investigation by state and local investigators, YANUEL MEJIA, A/K/A “NANO PROBLEMA,” was charged with the murder of Lopez. *See Commonwealth v. Yanuel Mejia*, Essex Superior Court, Docket No. 2277CR00147. The *Mejia* state case is scheduled for trial in September 2026.

500. As a result of the federal investigation, agents have identified multiple other participants in the murder of Ewdy Lopez, in addition to YANUEL MEJIA, and they have been charged with RICO Conspiracy. As described herein, the investigation has determined that the murder of Lopez was committed by multiple members of the Trinitarios as part of the enterprise's efforts to kill rival gang members, in this case, the Gangster Disciples.

i. Initial Police Response

501. According to Methuen Police report #22-4215, on February 17, 2022, at 5:25 AM, officers responded to 15 Kimball Road for a report of gunfire. A witness reported a white Lincoln Navigator with a New Hampshire registration fleeing the scene.

502. Once officers arrived, they found Ewdy Lopez slumped in the driver's seat of a Honda CR-V suffering from five gunshot wounds to the torso and head. Lopez would later be pronounced deceased at the hospital. At the scene, officers located eight .40 caliber shell casings and five 9mm shell casings.

ii. Further Investigation

503. Shortly after the report of gunfire, the Lincoln Navigator was located at 21 Sand Hill Road, Salem, New Hampshire, approximately .6 miles from the scene of the murder. The Navigator had been reported stolen from Nashua, New Hampshire on February 7, 2022.

504. On the floor of the rear driver's side seat, investigators located a 9mm Glock magazine loaded with eight rounds of ammunition. This magazine was distinctive with red coloring at the bottom. An image of the magazine follows.



505. Outside of the Lincoln Navigator near the driver's door, investigators located a rolled cigarette. The GPS system from the Navigator was downloaded and used to locate and recover surveillance video of the Navigator's travels.

506. Approximately fifty feet from the Navigator, investigators located: a .40 caliber Smith and Wesson SD40VE firearm, bearing serial number FXJ1092 and magazine; and a 9mm Glock 43x firearm, bearing serial number BAKX921, with a laser sight, magazine and one round of ammunition. The .40 caliber casings recovered from the scene were determined to have been fired by the recovered .40 caliber Smith and Wesson firearm. The 9mm casings recovered from the scene were determined to have been fired by the recovered 9mm Glock 43x firearm. Photographs of the Smith and Wesson and the Glock 43x follow.



507. A DNA profile was developed from samples taken from the 9mm Glock 43 firearm, magazine, and ammunition. YANUEL MEJIA was identified as a contributor of the profile with certainty in the quintillions.

508. Investigators reviewed surveillance video from the area and determined that two additional vehicles were involved in the murder: a white SUV consistent with the make/model of a Ford Explorer and a dark colored sedan. Both vehicles were observed on surveillance video coordinating with the stolen Lincoln Navigator before and after the murder.

509. Investigators obtained video from shortly before the murder showing that the white Ford Explorer was parked in a Methuen Housing Authority parking lot at 24 Mystic Street, Methuen, Massachusetts. The video shows three individuals exiting the white Explorer and walking to the Lincoln Navigator and getting in. The Lincoln Navigator then traveled to Kimball Road in Methuen, arriving at approximately 5:17 AM.

510. The Lincoln Navigator remained on Kimball Road from 5:17 AM until 5:23 AM, which is approximately the same time as the reports of shots fired. At 5:23 AM, the Lincoln Navigator drove to 21 Sand Hill Road. The Lincoln entered 21 Sand Hill Road at 5:25 AM, and it remained there until 9:01 AM, when it was recovered.

511. Within approximately a minute of the Lincoln Navigator arriving at 21 Sand Hill Road, a dark-colored sedan is observed on surveillance video leaving the area. At 5:34 AM, the dark colored sedan is then observed entering the Methuen Housing Authority parking lot at 24 Mystic Street in Methuen. The dark sedan backs into a parking spot and three occupants get out of the sedan and get into a white SUV consistent with the white Ford Explorer.

512. Investigators reviewed the GPS system for the Lincoln Navigator for the period after it was stolen. GPS data revealed that the Lincoln Navigator had traveled in the area of Kimball Road on February 8, 2022, from 4:02 AM until 5:51 AM. Investigators believe that this activity is consistent with scouting the area and determining the schedule and activity of Ewdy Lopez.

513. Investigators learned that Lopez's work schedule required him to leave his residence at approximately 5:30 AM every morning.

iii. Stolen Lincoln Navigator

514. Investigators determined that the white Lincoln Navigator was stolen from Nashua, New Hampshire, on or about February 7, 2022. In the Nashua Police report concerning the theft

of the Lincoln Navigator, a Hyundai Accent rental with New Hampshire Registration #BA69917 was identified as being involved.

515. Agents queried the New Hampshire Registration #BA69917 and located a Lawrence Police report, #22000649, involving the Hyundai Accent. The report, dated January 26, 2022, identifies Trinitarios associate JOELFRY CABRERA as a passenger in the Hyundai Accent that was operated by CW-29.

iv. Focus on YANUEL MEJIA, A/K/A “NANO PROBLEMA”

516. Officers learned that YANUEL MEJIA was residing at 165/167 Salem Street in Lawrence. Through review of surveillance cameras, investigators learned that a white Ford Explorer was in the area of MEJIA’s residence on February 16 and February 17. At least one individual was captured on surveillance video coming and going from MEJIA’s residence at times consistent with when the white Ford Explorer and the dark-colored sedan were observed near MEJIA’s residence. This white Ford Explorer was later identified as having been rented by a third-party for use by RICHARD PENA, A/K/A “BLADE.”

v. YANUEL MEJIA PHONE

517. Investigators reviewed MEJIA’s phone and observed that the device recorded location information on February 17, 2022.

- At 12:19 AM, the location information placed MEJIA’s cellular phone in the parking lot of the Methuen Housing Authority on Mystic Street (longitude and latitude 42.723526, -71.197510).
- At 12:33 AM, the location information placed MEJIA’s cellular phone in the parking lot of the Methuen Housing Authority on Mystic Street (longitude and latitude 42.723526, -71.197510).
- At 12:51 AM, the location information placed MEJIA’s cellular phone in the parking lot of the Methuen Housing Authority on Mystic Street (longitude and latitude 42.724273, -71.197826).

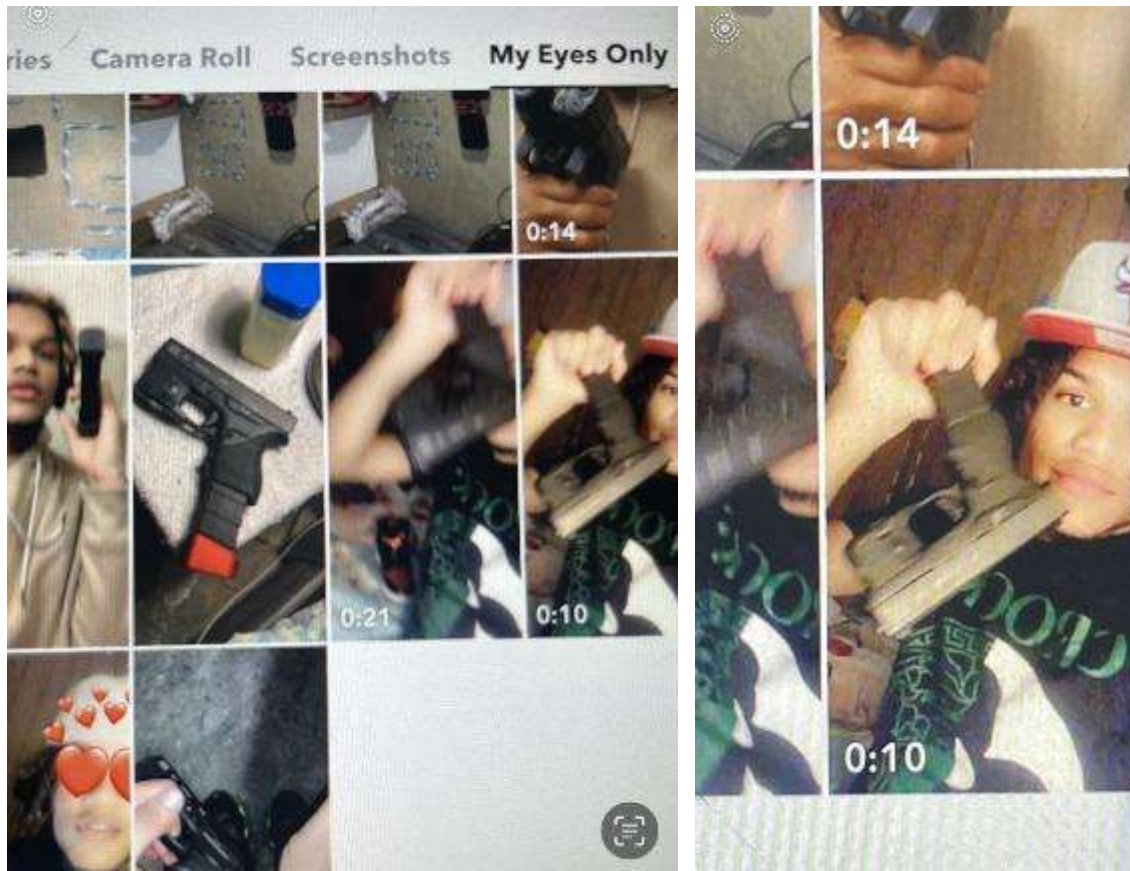
- At 1:00 AM, the location information placed MEJIA's cellular phone in the parking lot of the Methuen Housing Authority on Mystic Street (longitude and latitude 42.724273, -71.197826).
- At 1:22 AM, the location information placed MEJIA's cellular phone in the vicinity of 400 Ames Hill Drive, Tewksbury, Massachusetts (longitude and latitude 42.637103, -71.227513). This location was a Trinitarios drug stash house that was operated by RICHIE PENA, A/K/A "BLADE" and other Trinitarios. This stash location would later be searched by Tewksbury Police on April 1, 2022, and is discussed below.
- At 4:34 AM, the location information placed MEJIA's cellular phone in the vicinity of 400 Ames Hill Drive in Tewksbury. (longitude and latitude 42.637103, -71.227513).
- At 5:48 AM, the location information placed MEJIA's cellular phone in the vicinity of Salem Street in Lawrence (longitude and latitude 42.697993, -71.159959).
- At 6:12 AM, the location information placed MEJIA's cellular phone in the vicinity of 400 Ames Hill Drive in Tewksbury (longitude and latitude 42.637113, -71.227478).

518. Investigators also observed that MEJIA's cellular phone was disconnected from a Ford Explorer on February 17, 2022, at approximately 3:21:44 PM.

519. MEJIA's phone also contained photographs stored in the Snapchat application that depicted a hand holding a Glock 43 firearm with laser attachment and an inserted magazine with red at the bottom. This firearm was consistent with the Glock 43 firearm recovered in Salem, New Hampshire, and the magazine appears consistent with the magazine recovered from the Lincoln Navigator. Still images of those images located in MEJIA's phone follow.



520. During a manual review of the Snapchat application on MEJIA's cellular phone, investigators also observed media depicting MEJIA holding a firearm that appears to be the same recovered Glock 43 firearm with laser attachment. Photographs of that media follow.



vi. YANUEL MEJIA Notebooks

521. In April 2022, a search warrant was executed at YANUEL MEJIA's residence in Lawrence. During the search, two notebooks were recovered that contained numerous admissions to membership in the Trinitarios, drug trafficking and participation in violent acts. Search warrants were obtained to review the content of the notebooks.

522. In one portion, an entry reads: "I just did a hit n now it's time to pay me", "Im the chosen one I have a golden gun", "you see me run", "I do this shit for fun", "I been catching bodys I feel like we won." Investigators believe that this is an admission by MEJIA that he has personally killed multiple rival gang members and believes that the Trinitarios have won the war.

crazy I just did a hit N Now it's
time to pay me ~~the~~ ~~the~~ ~~the~~ ~~the~~
~~the~~ ~~money~~ Im the chosen one I
have a golden gun You see me ~~the~~ Run
I do this shit for fun I been
catching bodys i feel like we
won ~~the~~ ~~the~~ ~~the~~ ~~the~~ ~~the~~ ~~the~~ ~~the~~

523. Another entry in the notebook reads: “I just play this street shit nigga like it was a game of chess”, “[and] I cant talk on how he died that’s an in[dict]ment from the fed’s”, “yea im smoking hella dead opps”, “they rest in piss.” Investigators believe that in this portion of the entry, MEJIA is noting that he cannot provide details on a recent murder he committed (“can’t talk on how he died”), because it would comprise evidence against him and could lead to his indictment (“that’s an ind[ict]ment from the feds”). MEJIA then admits that he is celebrating the murder of multiple rival gang members and is openly disrespecting them (“smoking hella dead opps”, “rest in piss”). MEJIA then notes that if he were to be charged with any of his crimes, he would pay a lawyer, beat the case and then continue committing murders with no mistakes in the future (“god forbid I get locked up”, “I got the money for the lawyer go to trial beat the case”, “and Ill repeat with no mistakes”). A crossed out portion of the entry includes refers to a female associated with the Gangster Disciples with whom MEJIA is romantically involved (“I got a GD bitch she sucking dick while she throwing up Trini”), who provides the locations of the rival gang members (“she giving drops”) that MEJIA uses to target and kill them (“then I’m knocking down top opps”).

I ~~just~~ play this Street Shit nigga like
 it was a game of chess N I
 cant talk on how he died
 that's an indement from the fed's
 Yea im smoking hella dead opps
 out the Pound ~~I feel like King von I dont~~
~~know~~ they rest in PiSS lost my brotha
 time to time i feel like King von i cant miss
~~i gotta GD bitch she sucking dick while she~~
~~throwing up him living drops while giving~~
~~top then im knocking down top opps~~
 and god forbid i get locked up i got
 the money for the lawyer go to trial
 beat the case and ill repeat with
 no mistakes

vii. Cooperating Witness Information

524. Multiple cooperating witnesses provided information concerning the murder of Ewdy Lopez.

- a. CW-17 provided information about the murder of Ewdy Lopez. MEJIA confessed to CW-17 about shooting Lopez on numerous occasions. MEJIA would often brag about the shooting and earned a higher rank in the gang for this shooting. MEJIA also told CW-17 that "Jay Billz" (JUSTANE GARCIA) was involved in the shooting.

- b. CW-18 provided information about the murder of Ewdy Lopez. PENA told CW-18 that JAHIR DAVILA and YANUEL MEJIA were the shooters who killed Ewdy Lopez. PENA told CW-18 that after the murder, they went to PENA's house to help them get rid of evidence. This statement is consistent with the CSLI for MEJIA's phone showing tower usage in the area of 400 Ames Hill Road, Tewksbury, MA after the murder.
- c. CW-20 provided information about the murder of Ewdy Lopez.
 - i. CABRERA told CW-20 about the murder of Lopez. According to CABRERA, Lopez was outside of CABRERA's mother's old house and created a video that depicted Lopez revealing his location and that he wants to kill CABRERA. CABRERA told CW-20 that CABRERA sent the video to his "Monty Gang" or "MG" members, that included DAVILA, MEJIA, ENRIQUE DURAN, A/K/A "JEFE E," and PENA.
 - ii. CABRERA told CW-20 that DAVILA told CABRERA that DAVILA shot Lopez and observed him twitching when he was shot. CABRERA pointed out the fact that DAVILA "popped out first". CABRERA was upset that DURAN and PENA represent and boast "Monty Gang" on social media but did not themselves "pop out" and were not the ones who "popped out" and killed Lopez.
 - iii. DURAN told CW-20 about the murder of Lopez. DURAN stated that "Lil Nano", referring to DAVILA "hopped out first." DURAN told CW-20 that DURAN, PENA, DAVILA and YANUEL MEJIA, A/K/A "NANO PROBLEMA" were in the vehicle that traveled to commit the murder of Ewdy Lopez.
- d. CW-29 provided information about the murder of Ewdy Lopez. CW-29 stated that JOELFRY CABRERA stole the white Lincoln Navigator from a parking lot in Nashua, New Hampshire. CW-29 drove JOELFRY CABRERA to Nashua to conduct the theft and waited for JOELFRY CABRERA to steal the Navigator. CW-29 then followed JOELFRY CABRERA to a parking lot in Methuen that was surrounded by smaller apartments. This location was near where ALMANZAR's mother lived. JOELFRY CABRERA left the Navigator in that parking lot for the other Trinitarios to use and got into CW-29's vehicle to leave the area. JOELFRY CABRERA then told CW-29 that ALMANZAR and MEJIA had asked JOELFRY CABRERA for a stolen car because they intended to use it in a shooting or other act of violence against rival gang members. JOELFRY CABRERA later identified the murder of Ewdy Lopez as the incident where the stolen Navigator was used by the Trinitarios.
- e. CW-37 provided information about the murder of Ewdy Lopez. YANUEL MEJIA told CW-37 that he was one of the shooters who killed Ewdy Lopez. MEJIA told CW-37 that he waited two or three hours for Lopez with others,

including PENA. MEJIA stated he made a mistake in using his sister's car. MEJIA stated that they conducted the murder because Lopez was disrespecting the Trinitarios on Facebook. Separately, PENA told CW-37 that he was present during the murder.

- f. CW-48 provided information about the murder of Ewdy Lopez. PENA told CW-48 that PENA was the driver during the murder of Ewdy Lopez. PENA told CW-48 that the group of Trinitarios who committed the murder waited for a couple hours for Ewdy Lopez to come outside. PENA told CW-48 that they knew Lopez had a job and that Lopez was going to leave the house in the morning.

N. 3/30/2022 – ATTEMPTED MURDER OF JR

525. Investigators are familiar with a shooting taking place on Grafton Street in Lawrence on March 30, 2022. Based on cooperating witness information and the underlying investigation, ISIAH MEDINA and JUSTANE GARCIA are believed to have conducted this shooting.

i. Initial Police Response & Crime Scene

526. According to Lawrence Police Report #22002397, on March 30, 2022, at approximately 9:58 PM, Lawrence Police received information from Lawrence General Hospital that a shooting had occurred at 39 Grafton Street in Lawrence. Officers responded and established a crime scene and spoke to witnesses.

527. Officers also responded to Lawrence General Hospital and spoke with an individual whom I will refer to as "JR", who is also known by the streetname "Trap." JR was suffering from two gunshot wounds to his buttocks. JR is a known member of the Gangster Disciples. JR reported to police that he was travelling in a car with an associate he identified as "Juice." I know "Juice" to be Hugo Del Rosario, a member of the Gangster Disciples who would later be murdered by the Trinitarios in September 2025.

528. JR reported that, as they were driving, he heard a window shatter and felt that he was shot in his buttocks. JR drove to Lawrence General Hospital and checked himself in. JR did not identify who shot him and claimed that he was not associated with any gangs.

529. At the crime scene, officers located six spent shell casings and a spent round in the area of 39 Grafton Street. Officers located the victim's vehicle and found eight bullet holes on the driver's side and hood. Three projectiles were recovered.

ii. Further Investigation

530. Officers conducted a further investigation of this incident and determined through review of surveillance video that the shots were fired from a newer model Infiniti Q50 sedan. The surveillance video revealed that when the victim and Del Rosario arrive at 39 Grafton Street the Infiniti Q50 is seen arriving on Grafton Street approximately four minutes later and makes a U-turn and then parks several yards away from 39 Grafton Street.

531. The Infiniti Q50 parks for approximately one minute and then proceeds toward South Union Street. The Infiniti Q50 enters a parking lot at 7:27 PM and then moves to a parking space that has a vantage point of 39 Grafton Street.

532. After waiting over two hours, at 9:42 PM the Infiniti Q50 exits the parking lot and travels to 39 Grafton Street where the shooting occurs. The Infiniti then departs the area quickly at high speed with its lights off. The surveillance video reveals that the Infiniti Q50 waited over two hours for the victim to come out of 39 Grafton Street before conducting the shooting.

533. The Infiniti Q50 did not have a visible license plate. An Infiniti Q50 matching the description of the suspect vehicle, however, was identified as owned and operated by ISIAH MEDINA, A/K/A "ICE," a Trinitarios associate, currently charged with conducting the kidnapping of a Trinitarios drug supplier, in May 2024, with other Trinitarios members.

534. Officers obtained MEDINA's Snapchat account data and located a conversation approximately two hours after the shooting where MEDINA stated to an individual who has ties to 39 Grafton Street, "Your mans Shu1bill gave your own nephews up." I know that "Shu1bill" is ALES MENA, a large-scale drug supplier associated with the Trinitarios and the Gangster Disciples who was recently charged in federal court in Boston with conspiracy to distribute narcotics, and that the nephew who was given up was the victim JR.

iii. Jail Recordings

535. Officers obtained call recordings from the Essex County House of Correction for a Gangster Disciples member known by the street name "Chana," whose identity is known to me and who is a close associate of JR, a/k/a "Trap" and Hugo Del Rosario, a/k/a "Juice." On Thursday March 31, 2022, the day after the shooting, Chana contacted a female who appears to be his girlfriend. The girlfriend informs Chana in Spanish that, "A Jose le dieron dos (2) tiros en el culo," which translates to, "They gave Jose two (2) shots in the ass; Outside of your mom's crib." Chana then asks the female, "They shot him in the ass twice?" The female tells Chana to shut up in Spanish but then answers his question saying "Yes." Chana then informs the female that he will be calling JR -- the victim of this incident.

536. Chana then called JR, who was still hospitalized at the time of call. JR confirms that he is at the hospital. Chana asks JR how he is and then asks him what happened. JR tells Chana, "Remember the nigga that was like 'It was him, it was him,' when that shit with [(name of person who spoke to Medina)] happened?" Chana responds, "Oh. Hielo Frio?" (translated to nickname "Ice Cold"). JR responds, "Yeah" and states that Ice Cold ("Hielo Frio") was with "Kutthroat Business," indicating there was another party involved. JR then informs Chana that the

shooting was a result of a previous issue they had with the mutual acquaintance of MEDINA. JR confirms that Chana and Juice were at the scene as well.

537. I am aware that at the time JUSTANE GARCIA was known by his Trinitarios sub-faction, Kut Throat Trappers or “KTT.” I am aware that GARCIA previously self-identified as “KTT Billz” on social media.

538. On Monday April 25, 2022, at approximately 6:11 PM, MEDINA’s Infiniti (bearing MA 1XEF94), was captured on a license plate reader in Lawrence. Upon reviewing city cameras, investigators observed that the vehicle had the same tints and same defective front passenger side daytime running light as the Infiniti utilized in the shooting.

iv. Review of JUSTANE GARCIA Cellular Phone

539. Investigators reviewed a cellular phone seized from JUSTANE GARCIA in January 2025 during a drug arrest in New Hampshire. The cellular phone was searched pursuant to a warrant. In the cellular phone investigators located a series of notes related to drug distribution and there was a note from April 11, 2022, where GARCIA states, “An[d] he got shot in the ass hanging wit the opps ain’t getting no pass.” I believe in this note, GARCIA is boasting about having shot JR in the buttocks for hanging around with rival gang members (“the opps”).

540. Additionally, in the cellular phone investigators located a note from March 17, 2022, in which GARCIA writes “He jamming ktt K so his body gon drop his body gon drop ain’t no talking to cops, but they drew that boy w chalk.” I believe in this note GARCIA is stating that he will shoot and kill anyone who disrespects Kut Throat Trapper Killer (“ktt K”), referencing GARCIA’s sub-faction Kut Throat Trappers.

v. Cooperating Witness Information

541. Multiple cooperating witnesses provided information about the shooting of JR.

- a. CW-20 provided information about the shooting of JR. MEDINA told CW-20 about this shooting. MEDINA stated that JUSTANE GARCIA shot JR, a/k/a “Trap,” (Gangster Disciple) in retaliation for “Trap” and “Juice” kidnapping ISIAH MEDINA. (Juice was later murdered by Trinitarios on September 13, 2025, outside the Acqua Lounge.).
- b. CW-37 provided information about the shooting of JR. CW-37 stated that GARCIA shot “Trap” referring to JR. CW-37 reported that JR was friends with ALES MENA. CW-37 stated that GARCIA conducted the shooting in response to MEDINA getting robbed. CW-37 stated that MEDINA was the driver during this shooting. MEDINA and JUSTANE GARCIA both told CW-37 that GARCIA shot JR.

O. 4/1/2022 – TEWKSBURY POLICE DRUG WARRANT

542. Investigators are familiar with Tewksbury Police report #22TEW-16975-B-AR that relates to a drug investigation and search warrant executed on April 1, 2022, at 437 Ames Hill Drive, Tewksbury, Massachusetts. Over the course of the federal investigation, and based on information received from multiple cooperating witnesses, investigators learned that this was a Trinitarios stash house utilized for the storage and distribution of drugs and firearms. This location is also believed to have been used by the participants in the murder of Ewdy Lopez, before and after the murder.

543. Prior to the execution of the warrant, investigators learned that, on March 27, 2022, the Tewksbury Police received a call for service to the stash house. The call involved two individuals who claimed to reside on the premises but had been locked out. One of the individuals was NILBEL VENTURA AMARO, A/K/A “NINO,” A/K/A “MEGAMIND,” a Trinitarios associate and large-scale drug trafficker.¹⁷ Additionally, on March 22, 2022, during surveillance

¹⁷ VENTURA AMARO is charged separately with drug and firearm offenses. *See U.S. v. VENTURA AMARO*, Docket No. 26-MJ-71620-JCB. As noted previously, VENTURA AMARO was also targeted by ISIAH MEDINA and RODDERITH PERALTA and other Trinitarios members during a May 2024, kidnapping.

of 437 Ames Hill Road prior to the issuance of the search warrant, officers observed what appeared to be a drug transaction involving a dark-colored Infiniti sedan. Officers conducted a traffic stop of the Infiniti involved in the transaction and LUIS CRISPIN, A/K/A “YB,” was identified as the operator of the vehicle.

544. On April 1, 2022, the day of the execution of the search warrant, officers saw RICHARD PENA and another Trinitarios member exit the stash house apartment and walk to a Toyota Avalon. They got in the car and drove away from the residence with PENA driving. The Avalon stopped nearby to talk with a U-Haul truck parked that was occupied by two Hispanic males. The Avalon then travelled on the highway and made a number of traffic infractions. It was then stopped by police. During the interaction with PENA, officers located an amount of oxycodone on the driver’s seat in a plastic bag.

545. As officers prepared to execute the search warrant, the U-Haul truck was observed in the rear of 400 Ames Hill Drive.

546. Officers then made entry into the stash house and a Trinitarios member, who was identified to be the main target of the investigation, and a second Trinitarios member. Officers searched the stash house and found large quantities of controlled substances, cutting agents, items and paraphernalia used in the manufacturing and packaging process, and three firearms. The three firearms were identified to be: a .38 caliber Taurus, model 856 revolver bearing s/n ACL518094; a 9mm Glock 19 pistol bearing s/n G138541; and a 9mm Glock, model 19, pistol, bearing s/n ABPT023.

547. Among the drug items seized during the search were scales, blenders, kilo presses and entire bottles filled with cutting agents. The drug items were sent to the Massachusetts State Police Crime Laboratory for testing, and it was determined that over 600 grams of fentanyl and

200 grams of cocaine were recovered. Multiple cellular phones were recovered and were later subject to federal search warrants.

548. Photographs of the seized items follow:



549. Personal items bearing the name RICHARD PENA were recovered from the master bedroom, including medication in the name of RICHARD PENA and dental braces and

accessories. PENA proceeded to bench trial in Middlesex Superior Court, Docket No. 2281CR00347 and was found not guilty on October 27, 2025, of drug and firearm offenses.

550. PENA's cellular phone was identified to be associated with a phone number ending in 9090. The location data for PENA's cellular phone showed that it had over 135 geolocation entries in the immediate vicinity of 437 Ames Hill Drive, Tewksbury, Massachusetts, from March 1, 2022, through April 1, 2022.

551. PENA's cellular phone also contained numerous conversations and messages concerning drug trafficking and firearm use and possession. Additionally, on February 21, 2022, Villar-Peralta sent PENA a series of videos depicting the interior of 437 Ames Hill Drive (IMG_2032.mov, IMG_2034.mov, IMG_2036.mov). In text messages from February 22, 2022, PENA and Villar-Peralta discuss the quality of drugs ("Y el trabajo se parece como el peje lo hace", roughly translated to ("the work has a fish-like appearance"). In late February 2022, they also discuss the apartment that they reside in, variously discuss bringing food to the apartment, and PENA asks Villar-Peralta to "Clean my room pls." In another exchange, on March 4, 2022, Villar-Peralta asks PENA to give him the key to take out the trash ("Pásame la llave para botar la basura", roughly translated to "Pass me the key to take out the trash").

552. In PENA's phone investigators also located videos and images depicting drugs, firearms, and controlled substances. Still images from those videos follow (IMG_0618.mov, IMG_1218.mp4).



553. PENA's phone also contained screen captures of websites depicting: a Taurus .38 caliber model 856 revolver and Glock 19 firearms. The firearms depicted in the screen captures were consistent with the firearms recovered from 437 Ames Hill Drive during the execution of the search warrant by Tewksbury Police.

P. 7/1/2023 – WILMINGTON PUNTO SHOOTING

554. Investigators are familiar with a shooting taking place on July 1, 2023, in Wilmington, Massachusetts. The shooting took place during a "punto," which is an impromptu gathering of vehicles organized over social media. These gatherings take place in industrial and business areas of suburban towns and involve hundreds of people and cars arriving at a set time.

There is usually music, alcohol, and a general party atmosphere. Gang members generally attend these gatherings with firearms. Violent confrontations frequently ensue. One such gathering took place on July 1, 2023.

555. According to Wilmington Police report #23-863-OF, on July 1, 2023, Wilmington Police responded to 349 Ballardvale Street in Wilmington for a report of cars shooting at each other. As officers arrived on scene, approximately 100 vehicles were identified leaving the area. Various individuals encountered on scene described that there were at least two people shooting at each other.

556. As vehicles exited the area, responding officers saw that a Honda Accord appeared to have a rear passenger window shot out and a projectile lodged in the back seat. The occupants were identified but refused to cooperate. The occupants included JOELFRY CABERA; JERVIS ALMANZAR, A/K/A "JB;" and HECTOR MOTA, A/K/A "BEBO."

557. Officers located freshly broken glass in the rear of the parking lot and shell casings in the area. The shell casings appeared to be multiple calibers. In total, nineteen shell casings in four separate calibers were recovered: four .22 caliber casings; one .380 caliber casing; ten 9mm casings; and four .45 caliber casings.

558. CW-48 provided information concerning this shooting. CW-48 was present for this incident and was a percipient witness.

- a. CW-48 stated that this shooting took place because a group of Trinitarios, including HECTOR MOTA and JERVIS ALMANZAR, observed rival gang members at the punto. CW-48 stated that JOELFRY CABRERA drove the entire group to the gathering. CW-48 stated that HECTOR MOTA fired multiple shots at the rival gang members during this incident. CW-48 stated that, after MOTA fired, MOTA passed the firearm to JERVIS ALMANZAR, who also fired multiple rounds at the rival gang members. According to CW-48, the vehicle the Trinitarios used had been shot. CW-48 stated that JOELFRY CABRERA drove the group from the shooting when they were stopped by

police and identified and provided false information to police concerning their involvement.

Q. 5/27/2024 – ENRIQUE DURAN SHOOTING

559. Investigators are familiar with a shooting taking place on May 27, 2024, at the intersection of Haverhill Street and Union Street in Lawrence. Through cooperating witness information and evidence developed during the Lawrence Police investigation, investigators believe that ENRIQUE DURAN conducted this shooting.

i. Initial Police Response

560. According to Lawrence Police report #24003158, on May 27, 2024, at approximately 5:54 AM, officers responded to the intersection of Haverhill Street and Union Street in Lawrence for a ShotSpotter report of one shot being fired. Arriving officers located one .40 caliber shell casing bearing a “40 S&W CBC” headstamp.

561. Numerous traffic cameras captured the area and officers reviewed footage. Soon after the shot, a white Mercedes sedan was identified as the suspect vehicle, and an image of the vehicle was forwarded to officers on duty. The white Mercedes was later identified as bearing Massachusetts Registration 2RED63 and officers determined the vehicle was registered to 9 Berkeley Street in Lawrence.

562. Officers converged at 9 Berkeley Street and observed the white Mercedes parked there. As they approached the vehicle, ENRIQUE DURAN exited the driver’s seat of the vehicle. DURAN initially complied with orders to lay on the ground but soon got up and attempted to pull away from officers. Officers observed a black firearm under the passenger seat.

563. The firearm was recovered moments later and was determined to be a .40 caliber Glock 27, Gen 4, with an extended magazine inserted. The magazine contained 18 rounds of

ammunition and could hold 22 rounds in total. Seventeen of the eighteen rounds bore the “40 S&W CBC” headstamp consistent with the casing recovered from the scene.

564. A witness to the shooting was later identified as a Maine resident. The victim reported that the white Mercedes was following him around Lawrence, but he did not know who the driver was. The victim saw the driver of the Mercedes fire one round into the air and speed off.

ii. Cooperating Witnesses

565. CW-20 provided information concerning the May 27, 2024, shooting. DURAN discussed the incident with CW-20. DURAN told CW-20 that he saw Chana, Mula, and another rival gang member in a car. DURAN stated he exchanged words with the rival gang members and fired at them. DURAN told CW-20 that his girlfriend was in the car at the time.

566. CW-48 provided information concerning the May 27, 2024, shooting. CW-48 stated that PENA told CW-48 that DURAN was in his white Mercedes when members of the Gangster Disciples pulled up next to him and began firing. This caused DURAN to return fire.

R. 6/3/2024 – OXFORD AND LOWELL STREET SHOOTING

567. Investigators are familiar with a shooting taking place on June 3, 2024, at the intersection of Oxford Street and Lowell Street in Lawrence.

i. Initial Police Response

568. According to Lawrence Police report #24003326, on June 3, 2024, officers responded to 133 Oxford Street in Lawrence at approximately 7:43 PM, for a report of shots being fired and striking a residence. Witnesses reported that projectiles had entered a residence. One resident reported a projectile struck a television and window near a sofa.

569. Officers recovered three shell casings. Officers observed that one round had struck the residence at 123 Oxford Street and entered through a closed window, striking a television and embedding into a staircase.

570. A witness reported that they were in the house and observed a red Honda Accord driving down Oxford Street with loud music. This Honda Accord was reported as associated with a neighboring residence and had been seen multiple times before. This vehicle was later identified as a red 2009 Honda Accord.

571. Investigators obtained surveillance video from the surrounding area. Based on review of that video, it appeared that the 2009 Honda Accord was interacting with an Infiniti G37. This Infiniti G37 was later identified as a 2012 Infiniti G37 with a license plate registered to FELIX's brother.

572. The next day, officers spoke with the registered owner of the red 2009 Honda Accord. The owner stated that his vehicle was not struck by gunfire. The owner also reported he was on Oxford Street to see friends, whom he would not identify.

573. Officers then spoke with the occupants of a nearby residence where the 2012 Infiniti G37 was registered. One resident identified JEREMY FELIX as the primary operator of the Infiniti. Investigators also obtained video from Water Street in Lawrence, which depicted a male similar in appearance to JEREMY FELIX, getting into the 2012 Infiniti G37 at approximately 11:20 AM and driving away from Water Street.

574. Investigators later obtained video of the 2012 Infiniti G37 on Oxford Street shortly before the shooting. This video depicted the operator, which was JEREMY FELIX, A/K/A "PEPE."

575. Officers also obtained a search warrant for cell site location information (CSLI) for a phone number associated with JEREMY FELIX. Review of the CSLI showed that JEREMY FELIX's cellular phone was utilizing cell towers consistent with being on Water Street at 11:20 AM. Review of the CSLI showed that it continued to be in the same locations as the 2012 Infiniti throughout the day of June 3, 2024, and immediately before and after the shooting at 7:40 PM.

ii. Cooperating Witness Information

576. Multiple cooperating witnesses provided information concerning the shooting at Oxford and Lowell Street.

- a. CW-17 provided information about the shooting at Oxford and Lowell Street. CW-17 stated that FERNANDES and FELIX called him shortly after the shooting claiming they saw a Gangster Disciple member named "Nate BDK" and had shot at him.
- b. CW-18 provided information about the shooting at Oxford and Lowell Street. CW-18 heard about the shooting from FERNANDES and FELIX. FERNANDES and FELIX told CW-18 that FERNANDES told FELIX to pass him a gun and FERNANDES fired out the window without looking.
- c. CW-20 provided information about the shooting at Oxford and Lowell Street. CW-20 stated that FERNANDES told CW-20 that he fired at Nate BDK with FELIX.
- d. CW-37 provided information about the shooting at Oxford and Lowell Street. CW-37 stated that FERNANDES told CW-37 that he did a shooting with FELIX and fired at rival gang members, along with a few other shootings.
- e. CW-39 provided information about the shooting at Oxford and Lowell Street. CW-39 stated that FERNANDES described committing the shooting on Oxford and Lowell Street with JEREMY FELIX. FERNANDES stated he fired at Nate BDK.

S. 6/16/2024 – SHOOTING AT 100 LINDBERG AVENUE, METHUEN, MA

577. Investigators are familiar with a shooting taking place on June 16, 2024, in Methuen, Massachusetts. This shooting took place during a "punto," similar to the one described above.

i. Initial Police Response

578. On June 16, 2024, at approximately 1:50 AM, officers responded to a report of shots fired. Officers arrived and encountered multiple victims suffering from gunshot wounds. Numerous vehicles were observed fleeing the area. The gunshot victims were transported to the hospital. In total, seven victims were struck by gunfire during the incident.

579. The victims were later interviewed at the hospital, and witnesses were interviewed on scene. The victims and witnesses all reported that they had attended a “meet up” on Lindberg Avenue based on a flyer they had seen on Snapchat. The witnesses and victims reported that many vehicles arrived, and a party ensued, with loud music playing and people drinking alcohol. It was estimated that over 100 people were in attendance prior to the shots being fired.

580. Four of the victims reported that they heard gunfire and began running and were struck by a projectile. None of the victims observed who was shooting but all believed the shooter was southwest of their respective locations.

581. Eleven shell casings were recovered at the scene. Seven of the casings were .40 caliber and four of the casings were 9mm. The seven .40 caliber casings were determined to have been fired by the same handgun chambered in .40 caliber. The four 9mm casings were determined to have been fired by the same handgun chambered in 9mm. A photograph of the crime scene follows.



582. Eleven shell casings were recovered at the scene. Seven of the casings were .40 caliber and four of the casings were 9mm. The seven .40 caliber casings were determined to have been fired by the same handgun chambered in .40 caliber. The four 9mm casings were determined to have been fired by the same handgun chambered in 9mm. A photograph of the crime scene follows.



ii. Video Surveillance

583. Officers obtained video surveillance from businesses surrounding 100 Lindberg Avenue. The recovered videos include an angle from a camera focusing on a gas pump which captures the party taking place in the parking lot in front of the business across the street. Dozens of vehicles are seen driving into the area and parking, and well over 100 individuals are seen drinking, smoking, and conversing.

584. Later in the video, after the shooting occurs, LUIS FERNANDEZ LOPEZ, A/K/A “PICHULO” is seen in the video. LOPEZ runs by the camera, holding an item in his right hand that appears to be consistent with a firearm. LOPEZ is wearing the same red pants, and black zip-up hooded sweatshirt with and green shirt underneath that were observed captured on the bodycam.



iii. 10/23/2024 - Recording of LOPEZ

FILENAME: 2024-10-23_23-40-30

585. On October 23, 2024, LUIS FERNANDEZ LOPEZ, A/K/A “PICHULO,” was captured on a consensual recording with a cooperating witness discussing the June 16, 2024, shooting. GEOVANE FERNANDES, A/K/A “SPOOKY,” was also present for the conversation.

586. LOPEZ is asked what happened (“Pichulo, what... what happened that night”) and whether or not a rival gang member asked LOPEZ whether he was going to attack (“what type of time you on?”). LOPEZ states that he pulled out a Glock 23 and sees the rival gang member (“I pulled out like the twenty-three (23) and I see the target.”).

CHS:	It’s already late, asshole. Pichulo, what... what happened that night, my dear dude? The day of the thing.
LOPEZ:	[U/I] [MUMBLES] [U/I] and there he comes 33Static.
CHS:	Oh, that [U/I]. So, it was really him who told you that, supposedly... supposedly, “what type of time you on?” That cocksucker.

LOPEZ:	Yeah, like this, throwing [U/I], to see if [U/I] trying. The same one made a signal, but I also had like a sweater.
CHS:	Mm-hmm.
LOPEZ:	To see if it shows, they were all cramped together. When I was about to turn around to [U/I], I pulled out like the twenty-three (23) and I see the target.

587. LOPEZ states that he saw the target, racked the slide, aimed at the rival gang member and started shooting (“I see the target. I clacked it back. Right away I aimed at him, I just started shooting that nigga”). LOPEZ says that the rival gang members shot back at him (“they’re shooting”, “then I shot back right away. And I... they’re shooting”). LOPEZ reports that he was aiming accurately and knew that he hit two or three of the targets (“And it was then that I knew I hit one (1) of them, I think even two (2)”). LOPEZ then states that he ended up hitting a bunch of other people in addition to the rival gang members (“that’s when I hit a bunch of people”).

LOPEZ:	I see the target. I clacked it back. Right away I aimed at him, I just started shooting that nigga, and then I shot back right away. And I... they’re shooting, but I was [ONOMATOPOEIA] I was on point... when I was shooting... I was on point shooting [ONOMATOPOEIA].
CHS:	Mm-hmm.
LOPEZ:	And it was then that I knew I hit one (1) of them, I think even two (2). And then right there [ONOMATOPOEIA], that’s when I hit a bunch of people...
CHS:	Sh...

588. LOPEZ states that he saw the people he had shot (“a bunch of people hurt”). LOPEZ saw a victim with a foot wound, one victim that he had shot in the stomach (“I saw a shorty that was on the ground with a blow on his foot, with some other one... hit... blow in the stomach”), one shot in the arm, and one who was missing a finger as a result of the gunfire (“a blow in the arm and another one didn’t have a finger”).

LOPEZ:	... and jumped through some stuff. [ONOMATOPOEIA], when I jumped through some stuff, I checked myself and I don’t have anything. I shot everything, when I get out, people were there, a bunch of people hurt. A lot of, I saw a shorty that was on the ground with a blow on his foot, with some other one... hit... blow in the stomach.
FERNANDES:	But they’ll him that I [U/I] [MUMBLES]

LOPEZ:	My buddy... I didn't even know about my buddy, I knew about somebody else. One (1) had a blow in the arm and another one didn't have a finger and everything.
CHS:	Mm.
FERNANDES:	And he's still shooting with that finger. Word on my mother, nigga, the day that, bro... With the thing that ESP is looking for, nigga. Nigga... It was, bro... he clutched on them niggas... Bro, "Yo, give me the gun, give me the gun." That nigga just... upped it in my face
LOPEZ:	Yo, and I was going...
FERNANDES:	And when I got there... When I left the nigga...
LOPEZ:	So that...
FERNANDES:	... he didn't have a finger, okay. I swear on my grandma that is [U/I]...
CHS:	That nigga was shooting with a half of missing finger.
LOPEZ:	Yeah, bro.
FERNANDES:	[U/I]...
UM1:	That nigga is a savage, man.
FERNANDES:	And he ran with that kid... he... he ran with my little corito [PH] and [UI] and split up by Polito. And little corito still cried that niggas left him. Dude, a guy that, nigga... you feel me?

589. LOPEZ then describes being encountered by police ("One of them stopped me and pulled the gun on me"). LOPEZ explains that they searched him ("searched me"), put him in the cruiser ("got me inside the cruiser"), identified him ("took my information"), and they let him go ("let me go").

LOPEZ:	[U/I], when I started walking...
FERNANDES:	I don't know, nigga.
LOPEZ:	... there were like twenty (20) cruisers coming. One after the other. One of them stopped me and pulled the gun on me, and I get on the ground. They searched me and didn't find anything, I was by the bushes.
CHS:	Mm.
LOPEZ:	Dude, they got me in [I/I] and they got me inside the cruiser [I/I] and they took me back. They took my information, and I tell him that I lost my phone, because I lost it.
CHS:	Of course
LOPEZ:	and after they got my information, dude, he let me go. I start walking, dude, to my house [U/I].
CHS:	Damn. [U/I], dude. If that's true, manito.
LOPEZ:	And then, after that, dude
CHS:	No cap.

LOPEZ:	... about like... like two (2) weeks later they came to my house, you know, asking questions and I was like, “I don’t, I don’t know anything, I was drunk that day.”
CHS:	Yeah, of course. I feel like...
LOPEZ:	“And you all... you all know... and they asked for the phone. Ask [U/I] what happened with my phone, I told him, I lost it.”

iv. Cooperating Witness Information

590. CW-17 provided information concerning the shooting at the June 2024 punto shooting. CW-17 was present at the shooting. CW-17 told investigators that LUIS FERNANDEZ LOPEZ committed the shooting on June 16, 2024. CW-17 observed LOPEZ shoot at approximately three members of the Gangster Disciples who approached LOPEZ. Among the individuals that LOPEZ fired at was a rival gang member named “Static” who is a Gangster Disciple.

T. 8/15/2024 – ATTIKA SHOOTING

591. Investigators are familiar with a shooting that occurred on August 15, 2024, at the Attika nightclub in Lawrence, Massachusetts. Based on the investigation, agents believe that PUELLO, FERNANDES, and a Trinitarios associate targeted rival gang members that they observed at the nightclub. PUELLO, FERNANDES and the other associate observed the rival gang members while inside the club. They exited the nightclub and FERNANDES retrieved a firearm from a nearby vehicle and returned to the club and was denied entry. When the club was closing, the rival gang members exited and FERNANDES and the rival gang members exchanged gunfire.

i. Initial Police Response

592. According to Lawrence Police Report #24004912, at approximately 1:00 AM on August 15, 2024, officers responded to the area of Methuen Street and Mill Street in Lawrence for a report of shots fired. This is the area of the Attika nightclub in Lawrence. The 911 caller reported

two shooters firing approximately six shots. The 911 caller described one shooter as wearing a red hat with red sneakers and the other shooter wearing a blue hat.

593. Officers located three 9mm shell casings in the parking lot across from the Attika nightclub. A nearby resident later reported to police that he found a bullet hole in his car, near where the shooters were reported.

594. The Lawrence Police ShotSpotter system was queried and five shots were detected in the area of the reports.

595. A witness reported hearing approximately 6 gunshots and said that he saw at least 2 individuals coming out from the parking lot and running westbound on Methuen Street. According to the witness, one of the individuals was shooting. The witness reported that one of the individuals was wearing a blue hat, and the other was wearing a red hat with red sneakers.

ii. Crime Scene

596. At the scene, officers recovered three 9mm shell casings in the parking lot diagonally across the street from the nightclub (outlined in blue). At the intersection of Mill Street and Essex Street a vehicle was struck by gunfire and one 9mm shell casing was recovered (outlined in red).



iii. Surveillance Video

597. Investigators recovered surveillance video from a variety of locations. Review of the surveillance video showed that the incident arose between two groups in the nightclub. One group is believed to be comprised of Gangster Disciples gang members, and the other group was identified to be comprised of Trinitarios gang members. Among the Trinitarios in the nightclub who are believed to have participated in the shooting are GEOVANE FERNANDES and XAVIER

PUELLO. FERNANDEZ, PUELLO and a Trinitarios associate exit Attika nightclub at approximately 12:48 AM.

598. At approximately 11:48 PM, PUELLO and FERNANDES can be observed entering the nightclub. PUELLO entered the club wearing brown pants and a white shirt, with his hair in dread locks. FERNANDES entered the club wearing black sneakers, black shorts, and a white T-shirt.



599. Once inside, PUELLO and FERNANDES can be observed by a table to the right of the entrance. PUELLO and FERNANDES are outlined in red.



600. In the far corner of the club, the rival gang members can be seen. While inside, it appears that PUELLO and FERNANDES spot the rival gang members. PUELLO and FERNANDES then exit the club at approximately 12:46 AM and turned left down Mill Street. PUELLO and FERNANDES are outlined in red. As he exits, FERNANDES motions to the sky with his hand making a gun symbol and then walks out of the club. FERNANDES then returns to the club while PUELLO and the associate remain in the area.



601. A short while later, PUELLO, FERNANDES, and the associate then continue down Mill Street and congregate in the area about halfway to the intersection with Essex Street. As they do so, their attention is drawn to the area of the parking lot at the corner of Methuen Street and Mill Street.



602. The rival gang members exit the club at approximately 12:55 AM and head north on Mill Street. As they exit, they peer down Mill Street, apparently alerted to the presence of the Trinitarios. They then appear to cross over to Methuen Street and engage with PUELLO and FERNANDES from a distance. At some point, they cross over Methuen Street and walk through the parking lot at the corner of Methuen Street and Mill Street. Both are holding firearms. As they come towards PUELLO and FERNANDES, at least one of the rival gang members discharges a firearm at PUELLO and FERNANDES.



603. As the rival gang members approach, PUELLO and the associate begin to retreat. FERNANDES can be observed raising his arm and appears to be holding a firearm that can be seen discharging in the direction of the rival gang members. The group then runs towards Essex Street. FERNANDES is outlined in red in the following images.



iv. 9/27/2024 - Recording of PUELLO

FILENAME: 2024-09-27_11-17-24

604. On September 27, 2024, PUELLO was captured on a consensual recording with a cooperating witness discussing the August 15, 2024, shooting. PUELLO states that they left the club (“We outta here”) and as they are leaving he sees rival gang members (“I see Jackson, it’s like two (2) or three (3) of them, [U/I] crip niggas there too”). PUELLO yells over to the rival gang member and then walks to his vehicle, presumably to retrieve his firearm (“We were walking to

my whip”), but the rival gang members move quickly towards PUELLO and FERNANDES (“this nigga is coming over here and shit.” He’s like, “Yo’, [U/I], move, move”, “yeah, towards me ‘cause I was... I was [I/I] me and Spooky were in the front right here”). As they approach, the rival gang members were already throwing down the Trinitarios gang signs to disrespect PUELLO and FERNANDES (“These niggas over here throwing down rakes, “What’s up, nigga. What’s up.” “[I/I]... [I/I], nigga.”).

PUELLO:	And so, we ended chilling [ONOMATOPEIA]... [U/I] that nigga, “We outta here. This shit wack, bro. You feel me, bro?” Like, “Let’s go, bro. [U/I].” Feel me? It was like, I was like, “Nigga, fuck that nigga.” I took another shot. We leaving. I’m looking across the street, everything, [ONOMATOPEIA]. Then, like... Spooky’s like, Yo’, [U/I]” And I’m like, “Yo’, hold on, hold on. Let me hang up.” I hang up the phone. I was on the phone, I hung up, whatever and then, bro, I see Jackson, it’s like two (2) or three (3) of them, [U/I] crip niggas there too. So, and then I go, “Yo’, Jackson, what’s up, yo’ [U/I]. Jackson, nigga.” I’m like, “Yo’.” So we [U/I], bro, let’s go... you feel me. And I... so I was like, “Yo’, go to the car.” And we... we started going to the car. I unlock the whip, you feel me. We were walking to my whip, I’m thinking... you feel me. He fixed everything for my whip, bro. And you know the little alley, where the stop sign is at? I told you my car was parked. To your left side across, there’s like a little street, a little alley, a... uh-huh. So, I...I go in through there [U/I] next to me and shit. And I’m like... I’m like, “Yo’, but this nigga is coming over here and shit.” He’s like, “Yo’, [U/I], move, move.”
CHS:	The crip nigga?
PUELLO:	Yeah, yeah. [I/I]...
CHS:	Oh so, that nigga started coming towards y’all?
PUELLO:	Yeah, yeah, yeah, towards me ‘cause I was... I was [I/I] me and Spooky were in the front right here. [ASIDE: Isn’t it true?] Bolin [PH] was on the side. But I already see what was going on. I’m like, “Yo, Spooky, I already know, hurry up.” I tried to move Bolin out of the way. These niggas over here throwing down rakes, “What’s up, nigga. What’s up.” “[I/I]... [I/I], nigga.” I’m like, “Yo, my nigga, move.” Nigga, the... the... this nigga um, so we started throwing. I started ducking, I started ducking. The dude was around waiting for me, and I’m... I’m trying like... you fell me. And I though, I was like, “Yo yeah, I got hit or something, dude. This is too close, man. But I was good I ran I cross the street, dude. Tell me how...

605. PUELLO explains that FERNANDES saved his life, because he had the gun (“Spooky saved my life”, “Spooky had the blicky [PH] and everything, dude”). PUELLO saw the

rival gang member pull out a firearm and PUELLO believed he was going to have to run away (“I see this nigga take out the gun out of his fanny pack”).

PUELLO:	And, and Spooky saved my life, bro. Spooky knows that shit. I was close, bro. You feel me. Spooky had the blicky [PH] and everything, dude. So, I see the [U/I] going on. I’m like, “Yo Spooky, this nigga... I see this nigga take out the gun out of his fanny pack. “Shit, nigga, I’mma have to run.” ‘Cause that shit, nigga, ain’t... I was like, “Damn, nigga, I’mma get hit. Fuck it, I’mma is running.” I’m running, nigga [ONOMATOPOEIA], Spooky [ONOMATOPOEIA] and this dude stopped, man. “Oh shit!” Spooky was in the corner, man. Niggas started blending. Sometimes...
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v. Related Prosecution

606. GEOVANE FERNANDES, A/K/A “SPOOKY,” was charged by Indictment in Essex Superior Court with firearm and assault offenses related to the August 15, 2024, shooting at the Attika nightclub. *See Commonwealth vs. Geovane Fernandes*, Essex County Superior Court, Docket No. 2577CR00072. FERNANDES pled guilty on December 22, 2025, and received four to five years in state prison. During the plea colloquy in Essex Superior Court, FERNANDES admitted to committing the shooting and that PUELLO was present.

U. 9/9/2024 – LAWRENCE ROBBERY

607. Investigators are familiar with a robbery taking place on September 9, 2024, in Lawrence, Massachusetts. This robbery was committed by multiple members of the Trinitarios, including XAVIER PUELLO, A/K/A “PUELLO.”

i. Initial Police Response

608. According to Lawrence Police Report #24005455, Lawrence Police responded on September 9, 2024, at 1:43 AM to Cambridge and Winthrop Avenue for a report of an armed robbery. When they arrived, two victims reported that they had been in their car counting money

from a charitable fundraiser when a van struck their vehicle. This accident caused one of the victims to get out of their car.

609. While the victim was outside out of the car, three men dressed in black with ski masks and carrying pistols approached the victims with guns drawn. One of the gunmen put a gun to the head of one of the victims. The other two gunmen approached the second victim and demanded her purse. The three assailants took approximately \$1,300 in cash and then drove off in a light-colored van with white lettering. One of the victims reported that the gunmen were Dominican based on their accent.

ii. Further Investigation

610. Officers obtained surveillance video from the area surrounding the robbery. Officers determined that the van used by the gunmen was a Ford Transit school van that had been reported stolen from Shirley, Massachusetts a few days earlier. The vehicle was registered to a Haverhill taxi company and later determined to have a GPS attached to it. Lawrence Police recovered the stolen transit on Weare Street in Lawrence and searched it pursuant to a warrant. Officers recovered video from the location where the vehicle was found. The video captured the three assailants travelling on Weare Street after abandoning the vehicle.

iii. Cooperating Witness Information

611. CW-39 provided information about the September 9, 2024, armed robbery and was a participant.

- a. CW-39 stated that CW-39 committed the robbery with PUELLO and another member of the Trinitarios known to investigators who I will refer to as CC-10.
- b. According to CW-39, CC-10 stole a school transport van from Haverhill, Massachusetts. CC-10 drove for this incident and PUELLO was in the front passenger seat. CC-10 parked the van across the street from a nightclub and waited for people to come out with flashy chains and jewelry. CC-10 and PUELLO had firearms.

- c. They saw a white Mercedes park outside of the club. CC-10, PUELLO, and CW-39 exited the van and approached the Mercedes to see who was inside. CW-39 then sideswiped the Mercedes to draw the driver out. After being hit, the driver of the Mercedes exited and both CC-10 and PUELLO robbed him. CW-39 got out of the van, looked in the Mercedes and saw a female. CW-39 then robbed the female of her purse.
- d. CW-39 explained that this robbery was not only to obtain money, but also to test CW-39 as part of CW-39's initiation into the Trinitarios. After committing the robbery, CW-39, CC-10 and PUELLO drove the van to South Lawrence and parked. They then walked to Prospect Street.

V. 10/19/2024 – ACQUA LOUNGE SHOOTING

612. Investigators are familiar with a shooting taking place on October 19, 2024, at the Acqua Lounge nightclub in Lawrence, Massachusetts. Based on the investigation, PUELLO and another Trinitarios member are believed to have targeted rival gang members that they observed outside of the nightclub.

i. Initial Police Response

613. According to Lawrence Police Report #24006281, at approximately 2:13 AM on October 19, 2024, officers were on duty in the area of the Lawrence nightclubs when they heard gunfire in the area of Essex Street and Jackson Street. Lawrence ShotSpotter also reported gunfire in the area.

614. Officers responded and observed four individuals near a black Subaru SUV. The first victim encountered was a male who I will refer to as Victim XX who was standing on the sidewalk. Victim XX was wearing a light blue sweater. Another male, who is known to investigators to be a member of the Gangster Disciples, known by his street name "Nongo," was also observed outside of the black Subaru SUV. Two female victims were also located. One victim had been shot in her hip and the other had been grazed by gunfire on her right forearm. Both female victims had been in their black Subaru when they were shot.

615. Officers observed that the black Subaru had two bullet holes -- one in the front driver's side door and a second in the rear passenger side door. The vehicle was later searched and photographed.



616. One of the female victims was interviewed at the hospital. She reported that she was walking out of Acqua Lounge with the other female victim and a male that she did not know. The victim and her friend walked over to their Subaru with Victim XX. The victim decided to sit in the left rear (behind driver's seat) because her feet hurt. The victim was unsure if the male ever

entered the vehicle. At this point, a black vehicle drove by and the victim suddenly felt pain in her left hip.

ii. Further investigation

617. Investigators obtained surveillance video from the area. From review of the video, the gunfire appeared to come from a gold and yellow Honda Accord with black rim and black door handles that drove by at the time. This vehicle was identified as a 2013 gold/yellow Honda Accord registered to XAVIER PUELLO (the “2013 Honda Accord”).

618. Surveillance video for the incident showed Victim XX (wearing a blue hooded sweatshirt) and the two female victims walking to the black Subaru. Victim XX, Nongo and the two female victims then entered the black Subaru. A still image depicting Victim XX and one of the female victims walking to the black Subaru follows.



619. The 2013 Honda Accord turned left and drove by the black Subaru and slowed down at which point a dent in the black Subaru can be observed. The location of the dent is consistent with the location of one of the bullet holes. Still images of the 2013 Honda Accord driving past the black Subaru follow.



620. Investigators located video footage from the night of the shooting at 2 Museum Square. The video showed the 2013 Honda Accord driving by a camera at approximately 2:08:34 AM, which was approximately 30 seconds before the shooting. The surveillance image shows that an individual in a red coat was operating the 2013 Honda Accord. Still images from that video depicting the red clothing worn by the driver follow.



621. Investigators located the 2013 Honda Accord on Market Street in Lawrence, Massachusetts. This vehicle was located, in part, because it was listed for sale and the investigating officer knew the location where the posted photographs of the 2013 Honda Accord were taken.

622. When it was located, the 2013 Honda Accord had a stolen license plate attached. A search warrant was obtained for the 2013 Honda Accord, and the vehicle appeared consistent with the suspect vehicle depicted on the surveillance video. In the 2013 Honda Accord, investigators located a bottle of Fantastik cleaner, and a green microfiber towel. The 2013 Honda Accord had streaks that were consistent with the vehicle having been wiped down.

623. Investigators obtained surveillance video for the area where the 2013 Honda Accord was found. PUELLO was observed driving the 2013 Honda Accord. During this video, PUELLO is observed wearing a black top. PUELLO takes photographs of the 2013 Honda Accord that were used to list the vehicle for sale. In the surveillance video, another individual is observed wearing a red puffy jacket and PUELLO is observed conversing with the individual and embracing him.



iii. 11/1/2024 - Recording of PUELLO

Filename 2024-11-01_18-22-28

624. On November 1, 2024, PUELLO was captured on a consensual recording with a cooperating witness discussing the October 19, 2024, shooting. During the recording, PUELLO states that he “shot this nigga Nongo,” which I know to be the street name for Luis. PUELLO states that he saw Nongo and saw another high-ranking rival gang member (“And I saw another penco there”, “another topnotch”). PUELLO says that he saw the baby blue sweater that the other

rival gang member was wearing (“I see that nigga with the baby blue... the baby blue sweater. So, when I see the baby blue sweater, dude, I already got my eyes on the sweater”). PUELLO states that he takes his time, comes around the corner and fires two shots at the two rival gang members (“I go ahead take the corner, bam, and I shot two (2) to those guys, they came out of the car and everything”).

CHS:	I was gonna tell you, bro; what happened that day, brother?
PUELLO:	The day that—that happened?
CHS:	Yeah, bro but talk to me in English, ‘cause [redacted].
PUELLO:	Yeah man, nah fucking, I shot, I shot [PH] this nigga ‘Nongo’ [PH]. And I saw another penco there, and I went to the [U/I] – I saw them moving, so I’m like, “oh yeah, what?” so I doubled back, and I see that nigga with the baby blue... the baby blue sweater. So, when I see the baby blue sweater, dude, I already got my eyes on the sweater, “Oh yeah, he is with him, fuck.” So, I see them niggas and take my time, I go ahead take the corner, bam, and I shot two (2) to those guys, they came out of the car and everything.

625. PUELLO is asked if he did the shooting by himself in his own car while driving, and PUELLO replies that he did, and that “Baby” was there as well. I know Baby to be a reference to another Trinitarios gang member named “Lil Baby.” PUELLO states that he was driving during the incident (“I was driving”). PUELLO says that he is committing violence on the rivals every time that he sees them, without fail (“I’m not giving no passes to any of them niggas”).

CHS:	So, so what you seen Nongo?
PUELLO:	And, and, and...
CHS:	Nigga, you did that shit in your own car by yourself, nigga?
PUELLO:	Yeah, bro. Oh this nigga was there; this nigga, this nigga was there. You know, B baby.
CHS:	He was driving with you?
PUELLO:	Nah, I was driving, that nigga was on some ... You know, bro. [U/I].
CHS:	That’s some pussy shit.
PUELLO:	Like, you know, bro, like...
CHS:	On some little hoe, bitch, nigga shit.
PUELLO:	He like, “Yo nigga, you about to like turn.” I’m like, “Nigga, fuck all that shit. Like what the fuck nigga?” Like, bro, niggas done shot at me, bro. Look, bro, my nigga Decy [PH] from middle school, bro, I don’t even post that I don’t do none of that, I keep them in my heart, but that shit hurt me, bro. You feel me. I

	see all these fucking niggas posting, and I'm like, 'nah, bro'. I see them niggas, I'll slap them, [U/I] that shit, posting shit, you feel me, bro? So, that shit fucked me, 'cause those niggas; niggas that shot at me, did mad shit to me, you feel me? I'm like, mad shit, you feel me gang? Like I'm some – I'm some ... Like they waited when they in a group, nigga. You feel me.
CHS:	Mm-hmm.
PUELLO:	[U/I], I mean, nobody my brother, you feel me, fuck all that shit. I'm not giving no passes to any of them niggas. I got [U/I] that shit. You feel me, bro?

626. PUELLO states that he saw Nongo on the sidewalk, and that when he turned the corner, he saw the other rival gang member wearing baby blue (“when I go and hit the corner, I see that nigga in the back seat” and “see the nigga with the baby blue”). PUELLO says that he shot Nongo as he was entering the vehicle (“Nah bro, while he was getting in the whip – he threw himself out the whip.”).

CHS:	So what? So, when you see the nigga in the parking lot of Blue, and then what?
PUELLO:	Nah, nah, nah, it wasn't in the parking lot of Blue, it was like in the sidewalk, so I bust a U, but not right there that I took a right to, to the street; I did a smart [U/I] and then nigga, when I go and hit the corner, I see that nigga in the back seat like [U/I], and see the nigga with the baby blue. So, I [U/I] from outside, [U/I], so I put the window down, and I said, “[U/I] what is he bagging, woo-woo. [U/I].” Nigga, that shit... his face, nigga, that nigga, you know what he went back for? [U/I], boom-boom. Right there, bro. So, it seems that [U/I] was outside [U/I] was outside too, and said, “Hey, [U/I].” “cause, like this nigga threw a fucking [U/I] like they found a [U/I]. Like, like going to the hospital, some shit. Like they were waiting there, and some shit and they brought a stretcher [U/I].
CHS:	So, nigga, you shot at this nigga while he was standing on the sidewalk?
PUELLO:	Nah bro, while he was getting in the whip – he threw himself out the whip.
CHS:	Oh.
PUELLO:	And he was like, like, “Oh shit, like fuck, I don't give a fuck nigga.” [BRIEF PAUSE] you already know, bro.
CHS:	Niggas be crazy, bro.
PUELLO:	Niggas wanna be doing mad shit, trying to act tough and shit, [U/I], trying to clap at me, woo-woo. A'ight nigga. Pushing on some young niggas, Bodo [PH] nigga. You feel me?
CHS:	Mm-hmm.
PUELLO:	I don't give a fuck. The good thing is, bro, [AUDIO BREAKS] so they still like ... you feel me, bro. Like, just do the probation time too. Probably give me like three (3) or some shit. Wah-wah-wah. Do a foursome or shit like that.

	But I should be good. I don't think I'm gonna do that much time. [U/I] that nigga, [U/I].
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627. PUELLO states that he is not worried about being charged, because he can do the jail time. PUELLO says that he will do about three or four years in prison (“I’mma do like two and a half (2.5) for three (3), ‘cause nigga, I do my time, I don’t know if I, I do a three (3) full [STAMMERS] three (3) or four (4) that’s [U/I], dude, you feel me”). PUELLO then states he is going to continue shooting the rivals (“Nigga, I’m on that ass”, “I can’t give no passes”). PUELLO also notes that shooting the rivals made him feel excited, happy, and, overall, good (“I do my adrenaline when I had that shit and then I seen him, is that [U/I] uff, all that shit, ‘cause I had blood [U/I] and I feel good nigga, I feel like happy when I had that shit, that shit makes you feel good”).

PUELLO:	[U/I] long story short, um, I’mma be, I’mma do like two and a half (2.5) for three (3), ‘cause nigga, I do my time, I don’t know if I, I do a three (3) full [STAMMERS] three (3) or four (4) that’s [U/I], dude, you feel me.
CHS:	Yeah.
PUELLO:	Nigga, I’m on that ass, and then woo-woo, you feel me. At the end of the day my brother I’mma [U/I] that shit. I got... Bro, is that... everything bro, is that I can’t give no passes, I see, I see, I do my adrenaline when I had that shit and then I seen him, is that [U/I] uff, all that shit, ‘cause I had blood [U/I] and I feel good nigga, I feel like happy when I had that shit, that shit makes you feel good, nigga. Like...

iv. Cooperating Witness Information

628. CW-39 provided information about the October 19, 2024, shooting at Acqua Lounge. PUELLO told CW-39 that PUELLO was driving with a Trinitarios member named “Lil Baby” and saw Nongo. PUELLO told CW-39 that they circled the block and PUELLO shot twice at Nongo from the car.

W. 10/26/2024 - RECORDING OF YORRO TRAVELLING TO MAINE TO DELIVER DRUGS

FILENAME: 2024-10-26_15-38-34

629. On October 26, 2024, YORRO was captured on a consensual recording with a cooperating witness during a drug delivery to Maine. According to the cooperating witness, YORRO delivered approximately 200 grams of cocaine and 200 grams of fentanyl to a trap house during this trip. In the recording, YORRO discusses the logistics of supplying trap houses in Maine and the Trinitarios operations generally in Maine.

630. The recording begins with the cooperating witness asking YORRO for the address to key into the navigation system. YORRO explains that they will going up to Jay, Maine, and they discuss going by way of Route 26 (“J-A-Y”). They agree that they will not be going to see GEOVANE FERNANDES, A/K/A “SPOOKY,” who is in Maine selling drugs in the area of Oxford, Maine. YORRO explains that Oxford and Portland have high conviction rates for drug crimes and it would be bad if they were arrested for fentanyl in those areas (“That’s the highest conviction rate that they got for drugs. Oxford and Portland...Nah, if you get popped over there with some Fentanyl”).

CHS:	Where do you want me to put the GPS to?
YORRO:	Put it nigga to, to Maine, nigga.
CHS:	Just Maine?
YORRO:	Yeah, Jay, nigga.
CHS:	Oh. ¿Jade? ¿J-A-D-E?
YORRO:	No, like, J-A-Y.
CHS:	Oh... Damn, fucker... you’re getting me involved, dude. Man, this is two (2) hours away... It looks like it is going through.
YORRO:	We’ve been involved for a long time.
CHS:	It looks like its Route twenty-six (26)... [PAUSE] Look, this is going towards Route twenty-six (26) man, that’s how you wanna do it?
YORRO:	We not going to see Spooky [F], right?
CHS:	Hell no.
YORRO:	We don’t pass through that route.
CHS:	Oh.
YORRO:	That route is Oxford. [LAUGHS]
CHS:	Spooky lane. Shadow of the valley ...
YORRO:	Of the tough niggas.

CHS:	[LAUGHS] Of the tough niggas.
YORRO:	[U/I], nigga. That's the highest conviction rate that they got for drugs. Oxford and Portland...Nah, if you get popped over there with some Fentanyl [U/I].

631. YORRO asks if the cooperating witness wants to be paid up front or can wait to be paid after the drugs they are delivering are sold. YORRO explains that he is bringing the drugs up and leaving them here and that his contact is going to give YORRO \$2,000 for an outstanding debt ("Cause I'ma bring that shit up and just leave it there.", "He's gonna give me two (2) bands that he owes me."). YORRO offers to give the cooperating witness \$1,000 for driving him and the drugs to Maine ("we gonna get paid either way," "I'm saying to eliminate the wait. If you need the money, I can give you the band (1,000) up front").

YORRO:	Another thing, you want me to pay you right then and there, or you wanna wait?
CHS:	For what?
YORRO:	For your bread.
CHS:	For what bread?
YORRO:	'Cause I'ma bring that shit up and just leave it there.
CHS:	[U/I].
YORRO:	He's gonna give me two (2) bands that he owes me.
CHS:	No, it's fine.
YORRO:	So, I could give you [U/I].
CHS:	Just give me whatever.
YORRO:	No, no, I'm telling that I could give the band for [U/I].
CHS:	It is up to you... it's up to you. If you need that bread, use it. You feel me?
YORRO:	Stupid, we gonna get paid either way. I'm saying to eliminate the wait. If you need the money, I can give you the band (1,000) up front.
CHS:	Oh. If not, that's fine. If not, If that doesn't bother you or nothing, that's fine, fucker... and you don't have to pay me neither man, because you already know.
YORRO:	No, you already know me.

632. YORRO says they are using his car and bringing up his drugs ("I'm using my car, bro. And buying my work"). YORRO informs the cooperating witness that he has only brought three people up to the trap houses that YORRO supplies and that YORRO has kept it private for

his own safety (“You’re the third (3rd) nigga I bring to [U/I], up here. I don’t bring people up here,” “I do it bro, for my own safety, bro.”).

YORRO:	Bro, I’m using my car, bro. And buying my work...
CHS:	[LAUGHS]
YORRO:	You’re only lending your [U/I], man.
CHS:	You know what I mean, man? C’m on. I’m doing my part. I’m going to give you twenty-five (25) for gas, fucker.
YORRO:	No, [U/I].
CHS:	[U/I]. We gotta invest in a fucking rental, bro. A good one.
YORRO:	Yeah, bro. [STAMMERS] But to do that, bro—I’m trynna tell you bro, I been maintaining. Why? Because these niggas is stupid. Niggas got the hidden compartments hot...
CHS:	Everything hot.
YORRO:	Everything hot.
CHS:	Instead of moving smart, nigga, how you should, so you could eat forever.
YORRO:	You’re the third (3rd) nigga I bring to [U/I], up here. I don’t bring people up here.
CHS:	You already know, I don’t wanna fuck [U/I] that shit.
YORRO:	No, I do it bro, for my own safety, bro. That way you know... “Hey, so and so, a red car is on its way over there.” [LAUGHS] [U/I] the door and just arrive.

633. The conversation then turns to internal politics of the Trinitarios. YORRO explains that he could be targeted by other Trinitarios (“somebody can come shoot at me, lurking or something, you know what they gonna do”), which would trigger intervention by New York factions of the Trinitarios (“They gonna go to New York... right?”). YORRO refers to a historical issue and states that if he would have killed another Trinitarios member named Moreno, an internal war would have started (“Because what if I would’ve killed Moreno?”, “what chair are they going to sit me down to talk”). YORRO explains that if he had killed Moreno, the only response would be further violence (“Because I would grab him and start shooting everybody up”).

YORRO:	Thank God over here there is [U/I]. I understand you. I just don’t politic shit that has to do with drastic measures. I never been that type of nigga.
CHS:	That’s the thing, though.
YORRO:	‘Cause at the end of the day, somebody can come shoot at me, lurking or something, you know what they gonna do? They gonna go to New York...

	right? They are going to let go [U/I], and ‘em niggas that was politicking is gonna laugh about the whole situation. “So much shit that Montaje [PH] spoke, look how they removed him.” So then, so they could talk...
CHS:	What you mean get you removed?
YORRO:	No, I mean in the sense that, you know what I mean? Because what if I would’ve killed Moreno? With what, with what...
CHS:	That’s what I’m saying, bro—
YORRO:	No, no, but with what chair are they going to sit me down to talk? Because I would grab him and start shooting everybody up...
CHS:	You can’t talk that way.
YORRO:	You know what I mean? Then, you can’t speak with a shot either. Because bullets do not have eyes.
CHS:	No, I understand.
YORRO:	You know what I mean? Then they want to fix the P [PH] with ignorance. That’s it, don’t you want to fix the problem, don’t you want to fix the problem? The both of you exiled. Who shot who? Exiled... You, exiled. Every—

634. YORRO discusses his ongoing issues with New York Trinitarios named Moreno and Fantasma who are operating in Lawrence. YORRO states that he and Fantasma need to sit down with the Generals of the Trinitarios in the Dominican Republic and agree that there will be no violence among the factions in Lawrence (“I’m a shake hands [STAMMERS] with this nigga... Fantasma and I’m going to sit down with the Generals from this shit. We are going to come to an agreement that nothing can happen”). YORRO states that this could be problematic because it would validate those who operate outside of the established chain of command (“Ten (10), thirty (30), fifty (50), a hundred (100) other niggas is gonna be like, ‘No, in Lawrence bro,’” “I burn some shit up, and I open up a table.”). YORRO describes the rule that a Chapter can only be opened by a General or a Supreme leader of the Trinitarios (“there it doesn’t say you have to open a Chapter? And it doesn’t it say you have to speak with a General or with a Supreme?”).

YORRO:	...And they do all of that. Listen to me, if you could do something, right? Like Moreno’s stuff, let’s suppose, I come and decide to, “Nah, it is fine, I’m a shake hands [STAMMERS] with this nigga... Fantasma and I’m going to sit down with the generals from this shit. We are going to come to an agreement that nothing can happen.” You know what’s gonna happen? Ten (10), thirty (30), fifty (50), a hundred (100) other niggas is gonna be
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	like, “No, in Lawrence bro, they’ll do to me a [U/I], or whatever it is, and I burn some shit up, and I open up a table.” No, none of that. Just like you all respect the Patria over there, right? And something happens to one of the guys from your block from over there, we are not tolerating none of that shit, and niggas is gonna get their way, just like that, “On papers, in such and such thing it says that if you use an [U/I] arm with a Trinitario...”
CHS:	[U/I] it would be use against you.
YORRO:	And there it doesn’t say you could assume.
CHS:	Never.
YORRO:	And there it doesn’t say you have to open a Chapter? And it doesn’t it say you have to speak with a General or with a Supreme?

635. The cooperating witness reports that YORRO is correct, but that YORRO also has to respect orders made by the Supreme Leader of the Trinitarios, who is Leonides Sierra, a/k/a “Junito.” YORRO states that if he were to kill Fantasma right now, without having spoken to Junito, he would continue to be the first in Lawrence (“I shoot Fantasma and I kill him bro, and Junito never spoke to me and the first in Lawrence would be me”).

CHS:	No, but you know that... But it is fine, the other rule says that you have to obey and respect the orders taken by the supreme boss.
YORRO:	Right now if I shoot Fantasma and I kill him bro, and Junito never spoke to me and the first in Lawrence would be me.
CHS:	Is that Junito has never—you know why Junito has never spoken with you?
YORRO:	He missed... he missed...
CHS:	You know why Junito doesn’t speak with you?
YORRO:	Because I’m not interested in speaking to him either.
CHS:	Exactly.
YORRO:	You know what I’m trying to tell you?
CHS:	Now, you see...

636. YORRO then comments that all the persons involved are validated Trinitarios with paperwork and position (“In my own right, everybody got their own paperwork, and they got their own position”). YORRO explains that Fantasma and Moreno are members of a closed chapter operating in Lawrence and they refuse to obey his decisions (“we talked to you about closing the chapter that it was weird, things were weird, and report with the guys and didn’t do it, over your dead body, and now look”).

YORRO:	[LAUGHS]... You get what I'm saying? In my own right, everybody got their own paperwork, and they got their own position. And I'm [U/I] my position, my position is one (1) of your niggas got out of place, you feel me? Out of line, where there's an open chapter or closed, it doesn't have to deal with you 'cause I don't discuss my private shit with people that's not active on my turf. Simple. I spoke to you niggas, I linked up with you niggas, I checked you niggas backgrounds... [STAMMERS] I showed love to you niggas, and you guys did a chest bump, we talked to you about closing the chapter that it was weird, things were weird, and report with the guys and didn't do it, over your dead body, and now look. Now, my Tribu, how am I wrong? You know what I mean?
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637. YORRO notes that in the event that people have issues he is going to choose violence against them ("I choose violence," "Na' yeah, I choose violence.").

YORRO:	There's a couple of people up there that are going to slip up there.
CHS:	There's a lot of things you could do that does not involve peace, listen to me.
YORRO:	I choose violence.
CHS:	It's knowing how to do it and that's it.
YORRO:	Na' yeah, I choose violence.

638. YORRO puts it plainly. As the leader of the Lawrence Chapter, he will "always choose violence" against anyone hurting the Trinitarios, even if they happen to be other Trinitarios ("anybody hurts any of my members I'm a always choose violence").

YORRO:	What I'm saying is, anybody hurts any of my members I'm a always choose violence... People are talking.
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639. YORRO then discusses the state of affairs with the Gangster Disciples. YORRO notes that for a time there were no shootings and no drama between the gangs ("zero shooting"). YORRO states that this occurred because he met with one of the leaders of the Gangster Disciples named Mula ("Cause I went and talked to Mula"). During the meeting, YORRO told them to stay in their territory and the Trinitarios will stay in their territory and everyone will avoid violence ("Stay in your side, I'ma stay on my side," "keep it cool"). This agreement came with a threat: if a Gangster Disciples "crosses the line" then it will be a full-blown war, with no talking or discussion ("If somebody from your side crosses the line, that's full-blown war, that's it, I'm not

talking after that, there's not gonna be no talking"). YORRO then notes that they are currently at war and there have been seven people shot because Mula was "talking shit" ("And now look, there's been four (4), five (5), six (6), seven (7) people shot because of Mula talking shit"). YORRO states that gang members from both sides have felt the benefit of peace for months – a time without worrying about shootings and both sides were able to profit ("you niggas had four (4), five (5), six (6), seven (7) months chilling, getting money, not worrying about nobody shooting. I don't gotta talk to you about something that's benefiting the peace."). YORRO compares that time to the current situation, which resulted from Trinitarios disrespecting the Gangster Disciples leading to violence ("Yo, Mula. What's going on?" "Oh, nah, man suck my dick." Here comes the boss and punches the dude", "he will see that agreement that niggas made... it had benefits until you- you failed").

YORRO:	Niggas walking in the projects...
CHS:	No shooting, nothing.
YORRO:	Zero (0) shooting, zero (0) not this not the third.
CHS:	Zero (0) drama.
YORRO:	Why? Cause I went and talked to Mula [PH]. Not on some personal shit, but I told them, "Yo..." You feel me? Stay in your side, I'ma stay on my side, that the both of us are hot. Regardless the fact, keep it cool, you feel me? If somebody from your side crosses the line, that's full-blown war, that's it, I'm not talking after that, there's not gonna be no talking. And now look, there's been four (4), five (5), six (6), seven (7) people shot because of Mula talking shit and that's what I be trynna tell niggas, until you don't put your word... as an action, as in like, "Oh, yeah, okay. You are not okay with the decision that I make, I don't gotta be okay with you niggas. Because you niggas had four (4), five (5), six (6), seven (7) months chilling, getting money, not worrying about nobody shooting. I don't gotta talk to you about something that's benefiting the peace. Now, if there's a problem, they are pressuring them, they are disrespecting them, the guys are saying this and that... "Yo, Mula. What's going on?" "Oh, nah, man suck my dick." Here comes the boss and punches the dude- "phoon-phoon-phoo." And he will see that agreement that niggas made... it had benefits until you- you failed.

640. YORRO discusses the nature of his leadership and how he issues orders. YORRO states that he does not do Chapter meetings because those meetings involve far too many people

and they result in leaks (“You don’t do no meetings because at the meetings that’s where... the biggest leaks are at those meetings. You are thirty (30), fifteen (15) guys on that side”). YORRO prefers a direct approach, speaking with the shooters directly: “You niggas got a mission to do here, get it done, don’t tell nobody.”

YORRO:	 What fucking meeting? You don’t do no meetings because at the meetings that’s where... the biggest leaks are at those meetings. You are thirty (30), fifteen (15) guys on that side... “You niggas got a mission to do here, get it done, don’t tell nobody...”
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641. YORRO states that his control over the gang has solidified and that no shootings will take place without a green light (“nothing can happen, nothing, nothing, not even a single grain of salt, bro, would move. You know why? Unless is a full-blown light”). YORRO states that there is a full green light on the Gangster Disciples and that any Trinitarios member can shoot or kill them if they feel like the time is right (“right now the light is super on. Whoever- whoever in their hearts feels like something gotta get done it’s gonna get done”).

YORRO:	The streets right now... nothing can happen, nothing, nothing, not even a single grain of salt, bro, would move. You know why? Unless is a full-blown light, like right now the light is super on. Whoever- whoever in their hearts feels like something gotta get done it’s gonna get done.
CHS:	And that’s it.
YORRO:	And that’s it. You feel me? And then we deal with the consequences later and explain to me what happened later, and all that shit later.

642. YORRO explains that the missions and orders are issued in a manner where the shooters exercise their own free will in participating (“It’s not having control... from the play when it is about to get done. Everybody needs to have their free will for what they are going to do”). YORRO puts the onus on the members to orchestrate the shooting or murder, which undermines the shooter’s willingness to snitch on YORRO if the plan that the shooter thought was a good idea goes south (“if you feel like things are getting ugly, that you can’t do it, in your own conscience, why you’re gonna snitch on me if it was something that you thought it was a good plan”). YORRO

compares this to a situation where he directed a mission for MONTILLA to complete and that they did not discuss specifics (“if I set you up with something to execute, like I did to Rico. That’s why Rico [knows] to not talk to me about no drills”).

YORRO:	It's not having control... from the play when it is about to get done. Everybody needs to have their free will for what they are going to do. That's why I tell the guys, if you feel like things are getting ugly, that you can't do it, in your own conscience, why you're gonna snitch on me if it was something that you thought it was a good plan? Now, if I set you up with something executive, like I did to Rico [F]. That's why Rico [knows] to not talk to me about no drills. Nothing...
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643. YORRO then discusses the members and says they should focus on their own abilities and not boast about skills that they do not have, such as driving, shooting or stealing cars (“you know you can’t drive, don’t say you can”, “If you can’t shoot, don’t shoot. Now, if you can steal a car, when there’s a time to steal a car, you steal it”). Under YORRO’s leadership, each member has to play their particular role (“that’s the role that you gotta play. You don’t want to shoot, nor steal cars, and what do you do, man”). YORRO states that each member needs to contribute to the Trinitarios ability to operate effectively (“we’ll give you your blessing, but you need to contribute with something.”).

YORRO:	... Not supposedly for nobody, if you know you can't drive, don't say you can...
CHS:	Uh-huh.
YORRO:	...If you can't shoot, don't shoot. Now, if you can steal a car, when there's a time to steal a car, you steal it...
CHS:	And that's it.
YORRO:	...Without excuses, and that's the role that you gotta play. You don't want to shoot, nor steal cars, and what do you do, man?" "Oh no bro, I truly love the P, but I'm all about my family." "No is cool, we'll give you your blessing, but you need to contribute with something."

644. YORRO states that he still has five more years as the leader of the Lawrence Chapter (“I made that clear and made sure to these niggas. I got a five (5) year run.”).

YORRO:	There's no vote, though. I made that clear and made sure to these niggas. I got a five (5) year run.
CHS:	Bro, who the fuck do you think you are, bro?
YORRO:	Nigga... figure it out. These niggas is going to figure it out.

645. YORRO then discusses drug trafficking in kilogram quantities. YORRO describes his operation and suggests that the cooperating witness sell two kilograms and use a runner to move the drugs (“cause you could have two (2) keys and if you have something going on like I do, you move it and it’s a selfish thing, and you could employ somebody and take less risks”).

YORRO:	You don’t have the people to distribute. You understand how I’m telling you it is?
CHS:	Of course.
YORRO:	You have the...
CHS:	I know the real niggas that got the real plugs, but I don’t have—but I don’t have the niggas that’ll buy the kilos... I know...
YORRO:	No, not even buy the kilos, ‘cause you could have two (2) keys and if you have something going on like I do, you move it and it’s a selfish thing, and you could employ somebody and take less risks.

X. 11/1/2024 - RECORDING ABOUT SELLING DRUGS WITH ABIGAIL ARIAS

FILENAME: 2024-11-01_20-09-55

646. On November 1, 2024, ARIAS was captured on a consensual recording with a cooperating witness discussing the distribution of drugs in Maine. ARIAS describes an individual named “Bret” who used to come to ARIAS when ARIAS was on an ankle monitor (“His name is Bret”, “he used to come a lot to see me”). ARIAS suggests that they could stay with one of his customers in Bath, Maine (“I can go to Bath”, “We can stay there”). ARIAS explains that the guy who owns the house will have customers come through to buy \$200 or \$100 amounts (“and he knows people that comes with two hundred (200) bucks buddy, a hundred (\$100) dollars”).

ARIAS:	His name is Bret [PH]. Those were the people that used to take care of me when I had an ankle monitor.
CHS:	[COUGHS] Bret?
ARIAS:	...he used to come a lot to see me. Yeah, Bret, that’s his name.

CHS:	What that nigga is in Bath [PH]?
ARIAS:	Nah, nah, nah... Bath is another place that we can go to, you feel me? I can go to Bath, and at Bath's I have—In Bath I got like... Right now I only have contact with one (1) person from Bath.
CHS:	Uh-huh.
ARIAS:	You feel me? We can stay there... he's not a guy that is supposedly breaking it, nor has money, but it is a place we could go to Bath...
CHS:	And hustle...
ARIAS:	...And seat there, and from there meet whom we have to meet, and he knows people that comes with two hundred (200) bucks buddy, a hundred (\$100) dollars. But the bag will go that way, bro.
CHS:	Of course, that's what matters.

647. ARIAS goes on to explain that he would be able to sell 3.5 grams of cocaine or multiple eight-balls of cocaine per day (“three and a half of up”, “or a ball today”). ARIAS also would be able to do two sales of fentanyl per day as well (“I would do a play, two plays of down”). ARIAS then explains that YORRO (“Johnny”) would be also stay there. ARIAS further notes that he has another location, but he left those people one-half of an ounce of cocaine, and they did not pay him (“the last time I was there, I left them half (1/2) an ounce and they didn’t pay me”).

ARIAS:	Listen, when I started in Bath... I started that way buddy; in a day three and a half (3.5) of up [PH], or a (1) ball today, I would sell two (2) balls today, I would wait until tomorrow, tomorrow I would sell two (2) more. I would do a play, two (2) plays of down... I would do it bro, and like that the bag would go in two (2), three (3), four (4) days, you feel me? But I would have the mentality that I gotta do two (2), three (3), four (4) days to break that bag. You know? Boom. So, that's an option that I have buddy, but that option is not the best one I have right now because I have to go over there and really build it. You feel me? Yeah, the place is there, but we gotta really build that. And when I mean build it is like, I don't have somebody there that's... breaking it, there you really have to look for people, you know? I have two (2) or three (3) people there, but those aren't really people that are going to bring us money like that...
CHS:	Uh-huh.
ARIAS:	...they are going to bring us money in the sense... that maybe we could meet two (2) or three (3) people, other than that, we gonna have to do what we gotta do. And how I already did it when I went there. I went there with just one (1) customer, with the same one. Where I'm telling we could stay, he's an old man. And he introduced me to everybody, bro. I met some people that

	I had the other trap there, that I took Johnny [PH] once over there. And Johnny was staying in Bath... I don't know if you remember, remember?
CHS:	Uh-huh.
ARIAS:	There, where Johnny was staying at, those people bro, with that guy I'm telling you about, and those people, those people is another place I can, that I could drive to them, and just drive to them, and just talk to them, but the last time I was there, I left them half (1/2) an ounce and they didn't pay me. So, I haven't gone back to them. I left it in trust, "Look, I don't want to stay here," I told them. "I just want to see if you help me out, here is half (1/2) an ounce. Call me once you're ready." And you already know, that was...

648. ARIAS says that he provided customers with bad fentanyl on two occasions ("you gave him trash down twice (2), and then they went somewhere else", "Yes, straight up", "I already gave them two (2) batch, that I gave them a (1) batch that was ugh, but it had a bad taste, and I gave him another one that had straight bad taste, you feel me"). ARIAS explains that he gave them fentanyl that he mixed with other drugs and it had a bad taste ("the other one that I gave them, I gave them mixed with, with another work. So, it had that bad taste, but it had the taste of the other shit").

CHS:	So, you gave him trash down twice (2), and then they went somewhere else.
ARIAS:	Yes, straight up. Just like that. But buddy, they hit me up, because I told them, "Look, I'm waiting for something, I'm- there are issues in Mexico, and those places..." So, they think like if I'm capping, you feel me? I already gave them two (2) batch, that I gave them a (1) batch that was ugh, but it had a bad taste, and I gave him another one that had straight bad taste, you feel me? 'Cause the other one that I gave them, I gave them mixed with, with another work. So, it had that bad taste, but it had the taste of the other shit.
CHS:	What the fuck do you mean bad taste?
ARIAS:	Bro, 'cause look, so...
CHS:	They be sniffing it?
ARIAS:	They smoke that shit and burn it, and that taste they taste it...
CHS:	They be smoking it, my nigga?
ARIAS:	Yeah, they put aluminum, and the aluminum burns it below—[INHALES]...
CHS:	Oh nah, 'em niggas is extra right now, ain't [U/I] anymore...
ARIAS:	And so, look... look, imagine this weed... [INHALES]...
CHS:	I know, niggas do it with perc thirties (30s), bro.
ARIAS:	...Yeah, so they— [INHALES]...
CHS:	Aluminum foil, a little tube, and a lighter...

ARIAS:	Yeah, yeah, and that's it.
CHS:	I know.
ARIAS:	So yeah, they do that, if they see how the work burns, how the shit is... and that's it, because they smoke it that way, they know the taste of what you bring them. Let's say I take them this same weed twice (2), they know what weed you bringing them already. 'Cause of the taste. So, if I bring them the same weed twice (2), and I go and take him another weed, a Don Murphy [PH], and I don't take them the Sprinkles, let's say I take them a thirty (30) pack, and I don't take them the Sprinkle...

649. ARIAS describes how he gave bad fentanyl to his customers and lost them (“And I lost ‘em, bro. I lost ‘em bro, for the last two (2) weeks, I lost my cutties”). ARIAS told the customers that there is a drug war and was having difficulty with his supply (“I gave you two (2) batches, I told you there is a war over there, and you guys aren’t paying attention to me, you guys think like I am lying”). ARIAS explains that he was collecting \$4,000 or \$5,000 every two or three days from selling in Maine and the customers only wanted a consistent quality supply of drugs (“They are giving me four thousand (\$4,000), five thousand (\$5,000) dollars... cash money, every two (2)- every fucking three (3) days bro, they don’t wanna gamble with their money”). ARIAS agrees that he could make \$50,000 in about ten days (“You could literally make fifty thousand (50,000) in, in ten (10) days”, “Quick, right away. If you don’t spend”).

ARIAS:	But I gave them that shit twice (2) like that bro, and nothing has arrived, buddy. Nowhere. And I lost ‘em, bro. I lost ‘em bro, for the last two (2) weeks, I lost my cutties. And they hit me up today, they hit me up yesterday, “Yo, this, and this, and this...” And I told him, “Listen, honestly, honestly... I don’t know, you guys think that I am like a scumbag because I gave you two (2) batches, I told you there is a war over there, and you guys aren’t paying attention to me, you guys think like I am lying, that this and that, and that that’s not their problems, that you guys can get through another way. I told them it is fine, get it somewhere else. I told them I was waiting and... and just now it was that”—I told them I got something, you know, because I have other people around that gets some white shit that they called it, supposedly Hell Cake [PH], cool. And those people told me that they were going to get something today or tomorrow, so I’m waiting. I told them I had something two (2), three (3) days ago, and they called me this morning, “Yo, listen... we’ll go straight to you, but, just make sure you use the same shit, like the first time...”
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CHS:	Like you always had...
ARIAS:	Yeah. "Like the first time you gave me something different, we just gonna stop going through you. Like completely". They just want that good work, man. They don't want to gamble...
CHS:	Oh shit...
ARIAS:	...They are giving me four thousand (\$4,000), five thousand (\$5,000) dollars... cash money, every two (2)- every fucking three (3) days bro, they don't wanna gamble with their money.
CHS:	That's major money, nigga.
ARIAS:	Huh?
CHS:	That's major money.
ARIAS:	You feel me? They don't want to be going back and forth. They want to take those four (4), five thousand (\$5,000) dollars and that there is not back and forth. Buddy, those people saw me...
CHS:	You could literally, you could literally ...
ARIAS:	...like ten (10) times and I was crazy.
CHS:	...You could literally make fifty thousand (50,000) in, in ten (10) days.
ARIAS:	Quick, right away. If you don't spend...

650. ARIAS explains that CABRERA had a customer in Maine named Jordan who would buy smaller quantities but would buy consistently ("Trenzo had Jordan. Jordan would come and buy from him"). This customer would buy two or three times per week and CABRERA would make \$3,000 each transaction ("He would come two (2) or three (3) times a week. He would come for example today, three thousand (3,000)... two (2) days after three thousand (3,000) more. Three (3) days after more... four thousand (4,000) more"). ARIAS explains that if the drugs are high quality the sales will come quickly ("the most fire the work is, the more they'll come").

ARIAS:	Of course, of course, of course... Look an example, Trenzo had Jordan. Jordan would come and buy from him, for example, wouldn't buy a lot buddy, but what happens? He would come two (2) or three (3) times a week. He would come for example today, three thousand (3,000)... two (2) days after three thousand (3,000) more. Three (3) days after more... four thousand (4,000) more. That's it, that he'll probably will come, for example...
CHS:	It adds up. [COUGHS]
ARIAS:	Yeah... And the same thing, with those four (4), or five thousand (5,000) bucks that those people bring me... They bring me four thousand (4,000), five thousand (5,000) bucks, but they see me—shit is cool already, when shit is—they got some people buddy, that the most fire the work is, the more they'll

	come. “Yo, [STAMMERS] we are here, bro.” Bro, if you bring them some good shit, they come even faster. I swear, bro.
CHS:	Yeah, cause it sells faster, nigga...
ARIAS:	But it is cool, I understand. But I’m saying some places bro, not even if you bring them fire, it is not the same consistency. Like, you feel me? They don’t take the same time or more longer. The people from Lowell [PH], bro... These people are...

651. ARIAS describes his mixture of fentanyl to cutting agent that he uses to maximize profits. ARIAS would put 25 grams of pure fentanyl with 175 grams of cutting agent to make 200 grams (“I usually put twenty-five (25) of pure. To make two hundred (200) for them”, “I put twenty-five (25), and I make them two hundred (200) fire”). ARIAS explains that he sells the drugs at \$700 a stick, or seventy dollars per gram (“I’m giving them the work at seven”).

ARIAS:	...[STAMMERS] I usually put twenty-five (25) of pure. To make two hundred (200) for them...
CHS:	Twenty-five (25)... twenty-five (25) pure out of two hundred (200) grams, nigga?
ARIAS:	Yeah. Boom. I make it for them that way. I put twenty-five (25), and I make them two hundred (200) fire.
CHS:	You gotta put like thirty (30), nigga.
ARIAS:	Nah, nah, nah, because with, with good work buddy, there is no gamble. You feel me? I’m giving them the work at seven (7).
CHS:	You’re scared to kill them?
ARIAS:	Everybody— no, you can’t get them used to so low buddy, because after that’s what makes you lose in your business. Because once you lower it more, buddy... you’re getting them used to it.

652. ARIAS says he sells cocaine to make baseline money (“the up you get your money”) and sells fentanyl to push the limit of his profits (“the down is some shit that you play with it”). ARIAS says the more you cut the fentanyl the more money you can make (“the more you touch it the more you make type shit”).

ARIAS:	...Once you go down [STAMMERS] that’s the good thing of the down buddy, because the down—okay, the up you get your money, and is some shit like almost for sure. But the down is some shit that you play with it.
CHS:	I know.
ARIAS:	So, the less you play with it, the more money.

CHS:	‘Cause is a gamble, nigga.
ARIAS:	Yeah, so the down is like the less you touch it, the more you make.
CHS:	You gotta mix it right.
ARIAS:	I mean, the more you touch it the more you make type shit.

653. ARIAS states no customer has died on him, but does explain how one customer fell out (“but one fell—like this, boom”). ARIAS panicked and grabbed all of his drugs and left (“I panicked buddy, I grabbed everything right away”, “Pick up Flaco, let’s go.”). Another customer tried the drugs and overdosed within five minutes (“He went to buy some drug, and tried it right there, buddy. And he fell right there on the living room. He tried it right there, and five (5) minutes later, he dropped on the floor”).

CHS:	Yo, I got a question, bro. A drug addict has never died to you up there?
ARIAS:	No, but one fell—like this, boom!
CHS:	Yo, look...
ARIAS:	[STAMMERS] That they put the thing uh, [STAMMERS]...
CHS:	The Narcan.
ARIAS:	Dude, I panicked buddy, I grabbed everything right away...
CHS:	[LAUGHS] You thought that you kill the nigga...
ARIAS:	I picked everything up, phoon, phoon [ONOMATOPOEIA] ... “Pick it up.” I think I was with... who was I with? I think I was with Flaco. “Pick up Flaco, let’s go.”
CHS:	[LAUGHS]
ARIAS:	I? You think I’m joking, buddy. I panicked, yo, bro.
CHS:	[LAUGHS] Nah, you too weak for that, gang.
ARIAS:	That scared me, bro. “Pick up bro, come.”
CHS:	Nigga said, “Pick up. We outta here... I think the nigga died.”
ARIAS:	Nah, he was type of lost... Oh! And one time ask Flaco too, one fell bro, that he hit himself with the table. Boom! And then fell on the floor, like u-u-u... I’m like, “This nigga tripping, nigga”. He went to buy some drug, and tried it right there, buddy. And he fell right there on the living room. He tried it right there, and five (5) minutes later, he dropped on the floor. He was sitting in a chair and hit himself with the table and [STAMMERS]... buddy, he hit himself hard. Yeah, bro. But not for nothing buddy, listen to me bro, not for nothing, this round, if you listen to me buddy, and we help each other out... we can make a lot of money...

654. ARIAS states that they should bring an ounce or an ounce and a half so that they do not need to travel back and forth to serve the customers (“An (1) ounce, an ounce and a half (1.5)”, “so buy an (1) ounce. So we don’t be back and forth”).

ARIAS:	How much you wanna... bring up?
CHS:	I’m asking you. You want me to bring an (1) ounce? You want me to bring more?
ARIAS:	An (1) ounce, an ounce and a half (1.5).
CHS:	Trynna grab fifty (50) grams? But I don’t wanna be going up there nigga, with more drugs than we gonna sell, nigga. And then supposedly have to leave it longer...
ARIAS:	Nah, so buy an (1) ounce. So we don’t be back and forth.

Y. 12/9/2024 – RECORDING OF PAULA-CABRAL DISCUSSING ENTERPRISE AFFAIRS AND ORDERS THE MURDER OF AN INDIVIDUAL BELIEVED TO BE A COOPERATING WITNESS

655. On December 9, 2024, PAULA-CABRAL and YORRO were captured on a lengthy consensual recording with a cooperating witness discussing the operations of the Trinitarios. Five portions are set forth below, showing PAULA-CABRAL’s leadership and command over the Massachusetts Trinitarios as State Supreme prior to his arrest in February 2025.

656. The first portion of the recording captures PAULA-CABRAL discussing recent disrespect among members of the Lawrence Chapter and involvement of New York Chapters in the affairs of Massachusetts. The second portion involves PAULA-CABRAL discussing snitches and a juvenile Trinitarios member that he ordered beaten for cooperating with law enforcement. During the third portion of the recording, PAULA-CABRAL directs YORRO and the cooperating witness to kill an individual who was falsely claiming to be a member of the Trinitarios and was suspected of cooperating in a prior federal case. During the fourth portion of the recording, PAULA-CABRAL describes a recent incident in which YOLDARI TEJEDA CORONADO, A/K/A “NONOY” stole drugs, and PAULA-CABRAL had to order TEJEDA to return the drugs. In the fifth portion of the recording, PAULA-CABRAL discusses his plans to have leaders,

including himself and Chapter Leaders use “Flags” or underbosses to relay messages and directives which reduces the potential that leaders are prosecuted because they are not issuing orders to the members in person.

i. Discussion of Recent Disrespect and Gang Politics

657. The beginning of this conversation concerns XAVIER PUELLO, A/K/A “BODEGA,” and a young Trinitarios associate known as “Woody,” who had disrespected a senior member of the Trinitarios by calling the senior member “goofy” because he was associating with a group of Trinitarios known as “ATR,” and other Trinitarios named “Brat” and “Drippy.” PAULA-CABRAL says that Woody (the “youngling”) “is looking to get killed” based on disrespecting senior members in that manner. PAULA-CABRAL asks the cooperating witness if he has “put a hit on him,” and the cooperating witness explains that they did not do so. Rather, the cooperating witness brought this issue to PAULA-CABRAL for his determination (“So, I want to know if you approve”).

PAULA-CABRAL:	Have you talked to your people? Have you talked to the guy, Yorro?
YORRO:	All that is a shit show, bro.
PAULA-CABRAL:	Hmm?
YORRO:	That’s a shit show. Those people don’t... [SCOFFS]
CHS:	Those younglings are all up their heads.
YORRO:	[U/I] So, that guy, the one [U/I] with me [U/I] I told him, the one that is here. Right?
PAULA-CABRAL:	Mm-hmm.
YORRO:	It doesn’t matter how you tell him [U/I]. [BACKGROUND: NOISE] We have to let it go; I don’t go about bugging. I don’t be bugging. [U/I]
PAULA-CABRAL:	Facts. But what are they implying?
CHS:	But I don’t go about bugging.
YORRO:	No bro, is just that you guys kill each other.
CHS:	No.
PAULA-CABRAL:	But what is it that they are saying [U/I]?
CHS:	The thing that happened was because Bodega was doing a live, and I got into the live, and some guy named Woody [PH] was watching and he sent a laughing emoji. I didn’t say anything.

PAULA-CABRAL:	Woody?
CHS:	Yes. So, the guy...
PAULA-CABRAL:	The, the [U/I] Chiquito's?
CHS:	Yes, yes, you know. So, the guy ended the live, and I called him, and I tell him, "Man, but ask him what he was laughing about." So, when he called him, he says like, "No, my man, I fuck with you, game, but [SMACKS LIPS] that nigga [REDACTED] goofy and all, you know." That apparently... I be fucking with the ATR niggas, with Brat [PH] and Drippy [PH]. And I say...
PAULA-CABRAL:	But the problem is because of that?
CHS:	Yes. So, I said, "Shit..."
PAULA-CABRAL:	And that problem with ATR has—has been [U/I].
CHS:	So, I said, "Shit bro, but tell the dude that I have nothing against him, but tell him that we will talk with Mr. King then, if he wants, since he is a Tribu."
PAULA-CABRAL:	That youngling is looking to get killed.
CHS:	No, but it's about respect. [SCOFFS]
PAULA-CABRAL:	[SCOFFS] You put a hit on him.
CHS:	No, I'm crazy. You get me? [LAUGHS] So, I want to know if you approve.

658. PAULA-CABRAL asks what exactly happened since the incident occurred. The cooperating witness says that the young Trinitarios are not showing respect, and PAULA-CABRAL says they should set things straight so there is no misunderstanding. The cooperating witness explains that the Trinitarios member to whom Woody reports understands the situation ("even their guy Duarte [PH] knows what's up"). PAULA-CABRAL explains that he believed things were set right when they had spoken all together with LUIS JEFFREY SANTANA, A/K/A "SOPITA" ("everyone was on the same page. You saw we spoke—we spoke [U/I] when we met up with Sopita"). PAULA-CABRAL then explains that he heard some New York Trinitarios learned of this issue and had called over to the Lawrence Chapter looking for a price to commit violence against Woody ("those people were the ones who called over—over there to the people from New York, asking for the guy, the guy let them know about the price"). PAULA-CABRAL notes that he had to stop this incursion into Lawrence by New York Trinitarios because the

Lawrence Chapter is under his authority (“extending the hand further over there to have like some power in that place. Boom that guy was told what his place is”, “the one in Lawrence is one of mine”).

PAULA-CABRAL:	But what happened?
CHS:	So, now these younglings want to uh, stay in that clout, that they can.
PAULA-CABRAL:	But that’s fine, in conclusion, what do you want to do to those guys? So, you want to set things straight so that there’s no more misunderstanding, so that...?
CHS:	No, that... even their guy Duarte [PH] knows what’s up. You get me?
PAULA-CABRAL:	Yes.
CHS:	He knows what’s up. Or he doesn’t have the courage, the face to tell them the way he talked to me, or is he a two-face, and he tried to do something to me, because I’m ready for whatever he wants.
PAULA-CABRAL:	No, but tell me, that, that of... that shouldn’t get up to that point, really.
CHS:	But I’m telling you, I know... I know something, Viejo (Old man), I’m not a backstabber or anything, but, my man, I know where all those guys live, and they don’t know even where I stay.
PAULA-CABRAL:	He—the dude talked to you. Because everyone, everyone was on the same page. You saw we spoke—we spoke [U/I] when we met up with Sopita.
CHS:	Of course, yes.
PAULA-CABRAL:	Because the word that youngling brought down here was... “Talk to [REDACTED], [REDACTED] gave me the green light.” So, that was not the only youngling that came down here. But of course, the one, the one to talk on your behalf was him.
CHS:	Mm-hmm.
PAULA-CABRAL:	But there were other people that also came from New York that were in Boston, that—I told you about it that day. That he was supposedly saying that, that [STAMMERS] in Lawrence there are four (4) chapters reporting to him. I already know it’s a lie because over here is... here is not like New York.
CHS:	Mm-hmm, I know it’s not.
PAULA-CABRAL:	[U/I] You get me? So those people were the ones who called over—over there to the people from New York, asking for the guy, the guy let them know about the price, what were they looking for? You know... extending the hand further over there to have like some power in that place. Boom that guy was told what his place is, and he stopped. So, when that young guy, Fantasma (Ghost) came, that he started to say... because Avispa (wasp) [PH] first called me...

PAULA-CABRAL:	He tells me, “[U/I] are over there.” I asked, “But where? [LAUGHS] Because... because the one in Lawrence is one of mine.”
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659. PAULA-CABRAL explains the internal gang politics he is facing with New York making incursions into Massachusetts and the issues regarding Woody. PAULA-CABRAL then refers to his discussion of this matter with the leaders in the Dominican Republic (“y’all are saying that y’all are in the Three fifty-seven (357), but then in Dominican Republic, all of them people say no”). PAULA-CABRAL references the fact that he extended his protection to a prominent New York Trinitarios member named ‘Avispa’ when ‘Avispa’ came to Massachusetts (“So, another thing that’s happening is, regarding Avispa’s problem, and Avispa knows it, because I told you the first time, I told him in the Dominican Republic, to Chaca [PH], also when I got with Chaca over there in Capotillo’s. I told him, ‘Bro, Avispa is going to Massachusetts, and nobody can put a hand on him’”).

PAULA-CABRAL:	Buddy, besides, aside from everything...
YORRO:	He beat up [U/I].
PAULA-CABRAL:	...what he did was... what he did wrong was that when you went to talk to him, in good terms at first, “Bro look, you have a problem that you have to come clean over there, after it’s all clear, okay... but I need that to stop.” The face he showed to this one was of everything being fine, but behind his back, he went and made a mess.
CHS:	I’m clear on that.
PAULA-CABRAL:	So, that’s when dude said, “Alright.” [SNAPS FINGERS]
CHS:	That is what he is doing to the Superiors in the Bronx.
PAULA-CABRAL:	You get me? So, that was... I spoke with Malicia that time, I spoke will all those people, and I said, “Bro, I don’t have a problem with Shorty... You all are saying that Sure are in the Three fifty-seven (357)” We talked about that.
YORRO:	Uh-huh.
PAULA-CABRAL:	That is something that y’all have to make clear, because y’all are saying that y’all are in the Three fifty-seven (357), but then in Dominican Republic, all of them people say no. So, y’all can’t come to an agreement, because here is the Second in the United States, but the Third Universal is in Dominican Republic. So, y’all don’t come to an agreement.” So, another thing that’s happening is, regarding

	Avispa's problem, and Avispa knows it, because I told you the first time, I told him in the Dominican Republic, to Chaca [PH], also when I got with Chaca over there in Capotillo's. I told him, "Bro, Avispa is going to Massachusetts, and nobody can put a hand on him."
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660. The cooperating witness acknowledges the protection will safeguard Avispa. Then PAULA-CABRAL states that his protection in Massachusetts also extends to Avispa's rival, "Shorty," as well. PAULA-CABRAL states that when "Shorty goes to Massachusetts," "nobody can put a hand on him" either. PAULA-CABRAL compares the control over the violence he exerts in Massachusetts to the wanton violence taking place in New York: "that problem is theirs, they will kill each other in New York." PAULA-CABRAL explains how the territory is divided. As he explains, "Mass Pike [PH] up to Vermont, which is what belongs to us; nothing will happen there, there is no disrespect there."¹⁸

CHS:	But nobody is going to put a hand on him.
PAULA-CABRAL:	Shorty goes to Massachusetts, and nobody can put a hand on him.
CHS:	No one is going to put a hand on him
PAULA-CABRAL:	So, that problem is theirs, they will kill each other in New York.
CHS:	And that's it.
PAULA-CABRAL:	But from Mass Pike [PH] up to Vermont, which is what belongs to us; nothing will happen there, there is no disrespect there. Y'all are the ones that need to work your situation because the chapters don't have the problem, the problem is between two (2) people, which is Shorty and Avispa.
CHS:	And that's it.

ii. Discussion of PAULA-CABRAL Ordering Violence Against a Juvenile Trinitarios Associate for Cooperating

¹⁸ CW-3 provided information concerning this feud between New York and New Jersey Trinitarios and the confirmation of territory by the leadership in the Dominican Republic. CW-3 stated that the leaders from New York reached out to Massachusetts leadership, led by PAULA-CABRAL to ask that Massachusetts Trinitarios fall underneath New York. CW-3 learned that the Trinitarios leadership in the Dominican Republic became involved and denied the merger and gave specific areas of responsibility to the two groups.

661. PAULA-CABRAL then begins discussing an individual named “Wilson” that got arrested for controlled substances concealed in a hidden compartment. PAULA-CABRAL states that Wilson was not a Trinitarios member when he went to state prison, but when he came out, he had been blessed in while incarcerated. After he was released, Wilson called PAULA-CABRAL and asked him if he needed drugs and that he had them available (“Wilson on the phone, and I say, ‘What’s up, my bro? How are you? You know, let me know if you need a fifty (50) and stuff, I’ll get it for you because you are one of ours.’”).

PAULA-CABRAL:	Grande Chimi. I sang what I had, and I met Wilson that day. And we talked about making a collaboration. It was one of those days that we became friends. Wilson gets locked up because Wilson had a hidden compartment and like three (3) bucks were left showing out from the compartment.
CHS:	[LAUGHS]
PAULA-CABRAL:	[U/I]...and this...
CHS:	Boom [ONOMATOPOEIA], and they found everything.
PAULA-CABRAL:	...that’s how he was caught.
CHS:	And he went to jail.
PAULA-CABRAL:	Boom [ONOMATOPOEIA], he was sent to state prison. Wilson was not a Tribu.
CHS:	Uh-uh.
PAULA-CABRAL:	You get me? So, Wilson comes out...
CHS:	[U/I]
PAULA-CABRAL:	...the catch him with the... on of his baby-mama’s, not his wife from over there since jail, no, another one with whom he has a son with, that I know her through Rondon [PH], through Rondo’s wife and... she is telling me about Wilson and one day she calls me with Wilson on the phone, and I say, “What’s up, my bro? How are you? You know, let me know if you need a fifty (50) and stuff, I’ll get it for you because you are one of ours.” “No, man, I’m good, for real, bro. Thank you, but I’m here, you know, dude. Seven (7).” I was like...
CHS:	[LAUGHS]
PAULA-CABRAL:	That’s it, bro, that you know...
CHS:	What do you mean Seven (7)? [LAUGHS] What the fuck?
PAULA-CABRAL:	When I left [U/I] ...a lot. When he comes out, he tells me—I said, Wilson is a Seven (7).” I said, “Wilson, we have a problem, and you know [U/I] the truth. Where did you come up with that... with that mess?” That supposedly some people sworn him in. But who sworn

	him in? Regardless, I started hanging out with Wilson, do you know when it was? Right there. After all that time, since I had got together with Wilson; and Wilson comes up with that. Then Wilson brought some people, God forbid... I told him, "Wilson, "What's up?" I have to talk with you, because if you were outside and you don't have problems, why does it bother you? That's why [I/I] was in jail, dude. I caught him I said, "No, no, you are nothing, bro." And then he gets locked up again. "No, I don't say anything ..."
CHS:	Yes, no, but look, that's a big problem that, that, "No, that I'm a Tribu from Middleton." And you, "Who are you?" "No, that... so-and-so, that..."

662. PAULA-CABRAL states that Wilson is snitching in jail and that he sent multiple Trinitarios into protective custody in order to confront Wilson. PAULA-CABRAL says he sent two Trinitarios to go after the guy in jail ("Once I sent Ixa and Rubio (Blonde) over there, dude, after that, the guy... Ixa and Rubio went to jail; they saw him, that guy, in, in, in PC, in Middleton").

PAULA-CABRAL:	Bro, bro, that's a big problem, he is the one snitching right now in there.
CHS:	Now look...
PAULA-CABRAL:	That guy was a Tribu in jail, dude, but the guy was.... The guy told us, that no, that we were—we weren't Tribu because we didn't open our doors for him because he [STAMMERS] for eight (8) months he was trying to get closer to us and you can see the whole mess he made, snitching. You understand? So, that's why I told the guys... To Ixa [PH], Ixa hit me up one day, like, "So... Gallo (Rooster) hit me up."
YORRO:	See how that went.
PAULA-CABRAL:	You know who is Gallo? "Gallo hit me up, Gallo is Tribu, he is in Lynn, this and that, he wants to meet you..." I said, "Dude, you go meet him, but don't give, don't give [U/I] nothing." Once he goes there and calls me from there, I'm lying. Once I sent Ixa and Rubio (Blonde) over there, dude, after that, the guy... Ixa and Rubio went to jail; they saw him, that guy, in, in, in PC, in Middleton. That same guy, in PC.
YORRO:	Who is Ixa? Who is Ixa?
PAULA-CABRAL:	Hmm? Prenda (Bling), they call him Prenda. Supposedly, Prenda.

663. PAULA-CABRAL says he also went to a Department of Youth Services facility to visit with a juvenile Trinitarios associate who was facing charges ("I was going to DYS to visit the

young guy as if I were his uncle. I was going to DYS, but I was waiting... I couldn't get his, his papers. He is a minor"). PAULA-CABRAL states that he falsely claimed to be the juvenile's uncle in order to visit him ("I was going to DYS to visit the young guy as if I were his uncle"). The juvenile Trinitarios member came to the visit and provided the paperwork about the case to PAULA-CABRAL and told PAULA-CABRAL he would not cooperate ("he came out and he handed me the papers. He said, 'I don't talk.'"). PAULA-CABRAL told the juvenile Trinitarios member that the Trinitarios would help him, once they find out what happened. PAULA-CABRAL later pressed the juvenile Trinitarios member for the paperwork, but it was not provided ("I couldn't get his, his papers. He is a minor."). PAULA-CABRAL ultimately obtained the paperwork concerning the juvenile Trinitarios associate, and it appeared that the juvenile Trinitarios associate made an identification ("The papers come, his signature in the photo"). PAULA-CABRAL then ordered the Trinitarios to commit violence against the juvenile. He did so via text message, issuing the order using coded language to make it seem like they should celebrate his birthday ("I told them via text, 'hey, [U/I] celebrate that young guy's birthday and take off his mask because he's nothing for the family. You know what you have to do. I don't have to tell you anything because you have been doing it longer than I have.'").

PAULA-CABRAL:	Because when they have to do things, they have to... when they have to do things, they don't do them, and then they want to do stuff. I said, "Bro, y'all young guys..." Bro, I was going to DYS to visit the young guy as if I were his uncle. I was going to DYS, but I was waiting... I couldn't get his, his papers. He is a minor. It is either his dad or his mom, or him.
CHS:	On the legal side.
PAULA-CABRAL:	Flap [ONOMATOPOEIA], he came out and he handed me the papers. He said, "I don't talk." "Bro, relax, we will help you. Let's find out what happened." Because what I wanted to do was check and see, boom [ONOMATOPOEIA], where is the stuff. The young guy [U/I] again, "I will get the papers," but kept hiding them. The papers come, his signature in the photo. I told them via text, "hey, [U/I] celebrate that young guy's birthday and take off his mask

	because he's nothing for the family. You know what you have to do. I don't have to tell you anything because you have been doing it longer than I have." Oh, but the young guy was a snake, and he was sent to... to leave the block with, with a guy named Piri [PH] [U/I] to, to fight with the guy that snitched, so that could be settled. He was given a chance. [U/I]
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iii. Discussion of PAULA-CABRAL Ordering YORRO and the Cooperating Witness to Kill an Individual Falsely Claiming to be a Trinitarios Member

664. The recording continues on to discuss individuals present in Middleton House of Correction. YORRO mentions the situation involving an individual who he identifies by their street name. I am familiar with this individual and know that this individual was widely and falsely reputed to be a cooperating witness while in Middleton House of Correction. I will refer to this individual as VICTIM-CW.

665. The cooperating witness explains that they heard about VICTIM-CW and asks PAULA-CABRAL if he knows the individual. PAULA-CABRAL states that he does and identifies VICTIM-CW by their town of origin and race. The cooperating witness explains that the story heard by the cooperating witness is that VICTIM-CW is claiming to be a Trinitarios member ("He is saying that he's a Tribu") and that he is under PAULA-CABRAL ("he is saying in there he is Tribu from [Redacted], that he's under you"). Before CW-20 can even explain, PAULA-CABRAL tells the cooperating witness and YORRO to kill VICTIM-CW because he is a cooperating witness ("Kill him. brother.... ...that dude is a snitch, bro"). PAULA-CABRAL goes on to say that he believes VICTIM-CW cooperated against FatZ, which I know to be a reference to VINCENT CARUSO, A/K/A "FATZ," a Lynn gang member and pill manufacturer who was federally prosecuted and sentenced to 250 months ("that dude is a snitch, bro. The dude is not... Do you remember the fat guy that went to jail, SlimFatz", "The one, that one, that dude. That's [VICTIM-CW]").

YORRO:	[VICTIM-CW] is there.
CHS:	There's, there's a new story that... that got to my ears two (2) days ago, that there's some guy named [VICTIM-CW]. Do you know...?
YORRO:	[VICTIM-CW], the [U/I] from [Redacted].
CHS:	He is saying that he's a Tribu.
PAULA-CABRAL:	A, a black dude?
CHS:	I don't know, he is saying in there he is Tribu from [Redacted], that he's under you, and the...
PAULA-CABRAL:	No, oh...
CHS:	...and the dudes said that he is in there recording all the dudes...
PAULA-CABRAL:	Kill him. brother...
CHS:	...with a cable.
PAULA-CABRAL:	...that dude is a snitch, bro. The dude is not... Do you remember the fat guy that went to jail, SlimFatz?
CHS:	Yes, the pill one.
PAULA-CABRAL:	A... the pill one. Do you remember the [Redacted]?
CHS:	Yes, yes.
PAULA-CABRAL:	The one, that one, that dude. That's [VICTIM-CW].
CHS:	That's the...? Look, and they were saying that supposedly there's a Tribu from [Redacted]...
PAULA-CABRAL:	No, bro.
CHS:	...that was recording the Tribus.

666. PAULA-CABRAL says that there is currently one Trinitarios member in Middleton from Salem named "Ivan" who is facing firearms charges because he slapped his wife and she told the police where two firearms were located ("he got locked up because he slapped his wife. The wife told the police where the stash was, and they found two (2) pistols"). PAULA-CABRAL reiterates his order to have the Trinitarios kill VICTIM-CW if he is in Middleton ("But that young guy, if he is talking with the guys over there, if [VICTIM-CW] is there, tell them to tear him up, tell them yes, that he is hum and to tear him up").

PAULA-CABRAL:	The only Tribu from Salem that's in there is the pretty brother. The only one; Ivan, that he will be released soon too, but he got locked up because he slapped his wife. The wife told the police where the stash was, and they found two (2) pistols. You get me? But that young guy, if he is talking with the guys over there, if [SHIZZY] is there, tell them to tear him up, tell them yes, that he is hum and to tear him up.
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YORRO:	[U/I]
PAULA-CABRAL:	Don't give me that bullshit. He is out, I know.
CHS:	There they are telling me that he is in there recording the dudes...
PAULA-CABRAL:	He was [U/I]
CHS:	...in the cell, that he is a snitch and that he was cell Tribu.
PAULA-CABRAL:	No, bro, no.
CHS:	And he was mentioning your name.
PAULA-CABRAL:	No, that's... But, but that young guy doesn't know me.

iv. Discussion about Resolving Drug Thefts

667. PAULA-CABRAL discusses YOLDARI CORONADO TEJEDA, referring to him by his street name "Nonoy." PAULA-CABRAL states that TEJEDA is a thief and explains that he told TEJEDA that a Trinitarios member named "Vitico" snitched on the First of the Boston Chapter ("in Boston; Nonoy, he is a kid that has a lot of knowledge. Nonoy is a thief", "Vitico snitched on the First"). PAULA-CABRAL explains the situation: he heard about a robbery committed by TEJEDA where two kilograms of drugs were stolen that were worth \$60,000 ("No, two (2) items of sixty thousand (\$60,000) dollars."). The victim of the robbery told PAULA-CABRAL that they have a video of the theft and the license plate of the car involved in the theft comes back to TEJEDA's girlfriend ("The kid showed me the video", "The car's plate stuff. It is the woman, it is Nonoy's woman").

PAULA-CABRAL:	Then look, in Boston; Nonoy, he is a kid that has a lot of knowledge. Nonoy is a thief...
CHS:	Hardcore.
PAULA-CABRAL:	I told Nono', "Nonoy ..."
CHS:	He's being hardcore.
PAULA-CABRAL:	...Vitico snitched on the First." Because I put Vitico, he did a robbery that got to us. I was in Miami and some people that aren't even Tribus called me, "Bro, they took four (4) items of sixty thousand (\$60,000) dollars." No, two (2) devices of sixty thousand (\$60,000) dollars.
CHS:	Yes.
PAULA-CABRAL:	They took it. And he went in his woman's car, in a Lexus, the kid told me.
CHS:	Yes.

PAULA-CABRAL:	The kid showed me the video. I told him, “Bro...”
CHS:	That’s his car [LAUGHS]...
PAULA-CABRAL:	I’m watching the baseball game, and he tells me, “Bro, I have a buddy that is a cop, and he gave me the name of...”
CHS:	The car’s plate stuff. It is the woman, it is Nonoy’s woman...
PAULA-CABRAL:	[U/I] I looked her up on Facebook and it is his woman. And when I saw—I know his woman...

668. PAULA-CABRAL explains he had to tell the victim that he would try to resolve the situation and get the drugs returned (“Buddy, you already did what you have to do. Leave that in my hands. I’m not going to promise that your stuff will be found but let me see what I can do”). PAULA-CABRAL contacted TEJEDA and TEJEDA claimed that he only took one brick (“When I called him, “But I’m here in Miami.” Yo, but stop by, I’m right here, I’m here.” And he stopped by”, “No, that he took one”). PAULA-CABRAL states that because of the theft, TEJEDA asked if PAULA-CABRAL was going to identify him as the thief (“You’re going to snitch?”, “That’s exactly what he told me.”). PAULA-CABRAL told TEJEDA that he did not intend to so long as the victim is given the drugs back (“he wants [U/I] at least, that the money won’t be gone”), and ultimately one kilogram got returned (“Bro, one (1) of them got there”). The victim lost somewhere between \$27,000 or \$29,000 (“at twenty-seven (27), somewhere at twenty-nine (29)”). PAULA-CABRAL explains that getting the kilogram returned is something that he usually does not like to do (“I don’t like to get involved in shit like that”), but because it was a Trinitarios robbery, he had to intervene (“because it is our guys, and I will take action.”).

PAULA-CABRAL:	And I told him, “Buddy, you already did what you have to do. Leave that in my hands. I’m not going to promise that your stuff will be found but let me see what I can do.”
CHS:	He’s not going to let go, not even one (1).
PAULA-CABRAL:	No, he didn’t let anything go. And at the end, he... listen, he was in Miami. When I called him, “But I’m here in Miami.” Yo, but stop by, I’m right here, I’m here.” And he stopped by. And bro, I started talking to...
CHS:	Happy, that he is bad ass, that he is smashing...

PAULA-CABRAL:	“No, my man...” “No, that he took one [U/I],” that’s what he told me.
CHS:	[STAMMERS] And you were like, “Fuck...”
PAULA-CABRAL:	I go, “Vitico, this and that, and this...”
CHS:	Dude...
PAULA-CABRAL:	And he saw the video, “The kid told me that it was you.”
CHS:	And I imagine his heart dropped.
PAULA-CABRAL:	...[U/I]. He told me, “Damn, my bro...”
CHS:	“And what’s up? You’re going to snitch?”
PAULA-CABRAL:	That’s exactly what he told me.
CHS:	[LAUGHS]
PAULA-CABRAL:	“Yo, he’s going to snitch?” I told him, “No, he wants [U/I] at least, that the money won’t be gone...” Bro, one (1) of them got there... He was [U/I] was at twenty-seven (27), somewhere at twenty-nine (29). I told him, “Shit, dude...” I don’t like to get involved in shit like that, because it is our guys, and I will take action.

669. PAULA-CABRAL then elaborates on the current situation in Boston. A Trinitarios member gave another member one kilogram of drugs for safekeeping (“there was a Tribu that gave another a kilogram, so he could put it away”). Supposedly, TEJEDA was planning to steal it, and ultimately it did go missing (“supposedly Nonoy, another one that was from Noventa (90) was going to pinch him. At the end, like, the shit went missing”). PAULA-CABRAL explains that this is a “whole drama” and YORRO laments that the entire Trinitarios enterprise could be exposed over a drug issue (“The family [U/I] for a drug situation”).

PAULA-CABRAL:	No, Nonoy is a kid, look, there’s a problem going on in Boston right now. So, what happened was that there was a Tribu that gave another a kilogram, so he could put it away, and supposedly Nonoy, another one that was from Noventa (90) was going to pinch him. At the end, like, the shit went missing.
CHS:	[LAUGHS] It got lost...
PAULA-CABRAL:	You already know, there’s a whole drama going on, the First [I/I], the Third...
CHS:	[LAUGHS]
PAULA-CABRAL:	You already know. Then, he tells me...
CHS:	You imagine, Low. Me doing some shit like that, for those guys, bro... What would you do, bro?
PAULA-CABRAL:	Damn, bro...

YORRO:	The family [U/I] for a drug situation...
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v. Discussion of Organizing Leaders Behind “Flags”

670. A later portion of the recording involves PAULA-CABRAL discussing recent issues that arose when AARON DIAZ LIRANZO, A/K/A “SOSA,” was arrested for convenience store burglaries. PAULA-CABRAL states that DIAZ LIRANZO’s arrest was described by the police as hitting the “jackpot” since DIAZ LIRANZO was believed to be the “biggest Trinitario from Lynn.” Once the police said that the Lynn Trinitarios members ran to him in jail and wanted to be close to him.

PAULA-CABRAL:	...And once I see it, every time I’m going to meet with them, talking with a prisoner through camera bro, through video. That’s not right, I told Sosa. Sosa is really hot in Massachusetts. You know what the police said when they got the Sosa? “Jackpot. We got the biggest Trinitario from Lynn.”
CHS:	Oh shit.
PAULA-CABRAL:	Of Lynn or Massachusetts. Something like that the guy said.
CHS:	[COUGHS]
PAULA-CABRAL:	And the guys from Lynn went to [U/I] ... running.
CHS:	To talk to him.

671. PAULA-CABRAL explains that when law enforcement raided DIAZ LIRANZO’s residence at 6:00 AM, PAULA-CABRAL was in the Dominican Republic (“when they broke in at six (6:00) in the morning, I’m in Santo Domingo”). PAULA-CABRAL says that he had a firearm with a silencer in his residence (“I have some shit here, that has something quiet”)¹⁹ and that he asked his cousins to take the gun out of the house (“Hey, come to the house and take everything out.”) because he feared he was being raided as well (“What if I got raided too? I was not going to be here but they would have been caught”).

¹⁹ This rifle with a silencer owned by PAULA-CABRAL would later be recovered on February 19, 2025, from the residence of JAMES JIMENEZ during the takedown of the first phase of Operation Paper Machetes.

PAULA-CABRAL:	Bro, when they broke in at six (6:00) in the morning, I'm in Santo Domingo. I have some shit here, that has something quiet... I have to tell my cousins... one lives in Lawrence, and the other one lives in South West [PH]. "Hey, come to the house and take everything out." He doesn't have to come here to the house. What if I got raided too? I was not going to be here but they would have been caught.
CHS:	Of course.
PAULA-CABRAL:	Why? Because the guys, I was selling some shit, do you remember, tabaco?
YORRO:	Uh-huh.
PAULA-CABRAL:	Some papers that are like... that are like loose leaf [PH].
CHS:	Uh-huh.
PAULA-CABRAL:	But it's called uh... Havana... Havana Leaf...
CHS:	Oh okay. Uh-huh.
PAULA-CABRAL:	...That's from New York. I was working with that guy to bring that shit over here. And I, boom [ONOMATOPOEIA] and the guys would come up all the time to buy me boxes. You know, woo-woo. And every time the guys would come, the last thing I told him was, "Dude, stop talking with prisoners through the phone, I'm telling you for the fifth time. That you haven't gone to jail, it is going to be a problem after." Bro, ever since Sosa went to jail, all the CO's got to him and told him, "What's up? Are you the boss from here? You're the boss in Massachusetts? Why the guys have to be bringing you soup and shit all the time? Why you? If the guys never [U/I]? He's hot. The Sosa came out, and just so you know Sosa was not involved with the shit of breaking in stores, something that's so stupid, man.... supposedly stealing tickets [U/I]...
CHS:	[U/I] ticket, what the fuck?
PAULA-CABRAL:	Bro, that shit is federal. You can't play with that money, with the federal's money.

672. PAULA-CABRAL explains that the police were watching the Trinitarios ("they were, watching"), and that is why he did not hang out with them publicly ("Then, the guys get upset when I tell them I don't want to go out to the club with you because"). PAULA-CABRAL says that he keeps a very low profile, and that he will not screw himself over by explaining his every move to the Trinitarios ("If I tell you how you move, and you don't take care of yourself, I'm not going to screw myself with you, bro"). The cooperating witness then says that a lot of the Trinitarios are aware that PAULA-CABRAL is the State Supreme ("a lot of people are saying that

you are Massachusetts Supreme”). PAULA-CABRAL says that he plans to set up a system where everyone has a ‘flag’ or underboss to relay orders, which will conceal who the actual leaders are (“Let’s propose to do something so everybody has a flag everywhere. So everybody won’t be looking to just one person”).

PAULA-CABRAL:	[U/I] they were, watching. Then, the guys get upset when I tell them I don’t want to go out to the club with you because [U/I]...
CHS:	We have to be careful, bro.
PAULA-CABRAL:	You feel me?
CHS:	If they want to move...
PAULA-CABRAL:	If I tell you how you move, and you don’t take care of yourself, I’m not going to screw myself with your, bro. And I am not- and because of that I am not a bad person.
CHS:	That’s what I’m saying, a lot of people are saying that you are Massachusetts Supreme.
PAULA-CABRAL:	Then, this is what’s going on, bro... That’s the noise, dude. The noise. I told this one a long time ago. Let’s propose to do something so everybody has a flag everywhere. So everybody won’t be looking to just one person.

Z. 12/17/2024 – RECORDING OF YORRO, CABRERA AND CRISPIN DISCUSSING THE CONSPIRACY TO MURDER MULA

673. On December 17, 2024, YORRO, CRISPIN and CABRERA were captured on a consensual recording with a cooperating witness discussing the details of a plan to kill members of the Gangster Disciples. The specific targets were prominent members of the Gangster Disciples, identified as “Mula,” “Static,” “Chana,” and “Juice.” Mula in particular was targeted because he was believed to have orchestrated the death of Trinitarios member Alan Jimenez, a/k/a “Montana.” As noted above, the death of Montana is a significant event in the history of the Lawrence Chapter of the Trinitarios.

674. In the recording, YORRO, CRISPIN, CABRERA, and a cooperating witness discuss the coordination of the murder of Mula by paying Trinitarios from New York to kill him. During the conversation, they discuss the price and CRISPIN suggests that if they have \$2,500, he

will put up the rest of the money (“if you got twenty-five hundred (2,500), I got the rest, set that up”). The cooperating witness says the murder plot can begin when they travel to New York and confirm the plan (“All we gotta do is bro go up to New York, and speak with the niggas in person, and then let them know is for sure.”). CRISPIN replies that he does not want to deal with the New York Trinitarios directly (“At the end of the day, I don’t know niggas. I ain’t gonna go talk to no nigga that I don’t know”) but confirms that he has the money to contribute to the cost to hire the killers (“but the money there. The money is there for”). CABRERA states that the Trinitarios from New York offered to do the murder for free (“Nigga, I told him about paying him. He told me straight up”, “He told me straight up, ‘You don’t gotta pay me shit’”).

CRISPIN:	Yo, [REDACTED]. Na’, [REDACTED]... What’s the word? Set that up...
YORRO:	Nigga, the nigga that can [U/I]...
CRISPIN:	If you got twenty-five hundred (2,500), I got the rest, set that up.
CHS:	All we gotta do is go to New York, we gotta go now ... Monty, I put the twenty-five (25). Everything, bro. I gotta do it.
CHS:	All we gotta do is bro go up to New York, and speak with the niggas in person, and then let them know is for sure.
CRISPIN:	A’ight, that’s on you, I don’t know ‘em niggas. So, my face ain’t, ain’t that. That’s, that’s you.
CHS:	It is the same niggas you were there talking to the other time.
CRISPIN:	At the end of the day, I don’t know niggas. I ain’t gonna go talk to no nigga that I don’t know...
CABRERA:	That nigga was on my back about that shit.
CRISPIN:	...[U/I] that’s you niggas, but the money there. The money is there for—
CABRERA:	Nigga, I told him about paying him. He told me straight up...
CRISPIN:	For sure.
CHS:	He’ll do it for free.
CABRERA:	He told me straight up, “You don’t gotta pay me shit”.
CRISPIN:	He’s still getting pay.
CHS:	You know why...
CRISPIN:	He’s still getting pay.
CHS:	‘Cause these niggas...
CRISPIN:	Any nigga would say, nah, nah— Of course a nigga is gonna say that, but he’s still getting pay, trust.

675. The group continues discussing the conversation with Trinitarios from New York who would commit the murder for hire. CABRERA states that he told them the Lawrence Chapter was gathering money to pay for Mula to be killed (“Brodie, no funny shit, I haven’t even told niggas to go do anything. But [U/I].”, “I was like, there’s some money in the air going around for that.”). CABRERA recalls that one of the hitmen was offended that the Lawrence Trinitarios would offer money to commit the murder (“Don’t disrespect me like that, my heart. You’re crazy? For money nigga.”). CABRERA states that the hitman he was talking to made a call to a Trinitarios member named “Suave” and asked Suave if he wanted “to go to Boston and kill some guy, boom and come back?”

CABRERA:	Yeah... When I told the nigga, when I told the nigga, “Yo. Niggas...” I was like, “Brodie, no funny shit, I haven’t even told niggas to go do anything. But [U/I].” I was like, “there’s some money in the air going around for that.” He was like, “Yo, my heart. Don’t disrespect me like that, my heart. You’re crazy? For money nigga, nigga, that was a TNT [PH], my heart.” Like that, dead ass, and then he called that other nigga Suave...
CHS:	Uh-huh.
CABRERA:	He was like, “Suave, what’s up? ...” He didn’t even said you’re willing to... “Yo, Suave... Nigga, in a couple of days, what’s up? Do you want to go over there to Boston?”
CHS:	“No, but you know Tribu, whatever you want.”
CABRERA:	“Do you want to go to Boston and kill some guy, boom [U/I] and come back?”

676. The conversation then returns to the logistics of the murder. CRISPIN suggests that the murder would be easy to accomplish and that the hitmen would only need a driver who knows the area to get them around (“so easy, bro. All they need is a driver and that’s it. Like a driver from out here”). CABRERA states that the only stop the hitmen will need to make on their way back to New York is to dispose of the firearms (“Throw ‘em blicks away and go back to the city”). CRISPIN then suggests that the group travel to New York the following day and confirm the plan with the hitmen (“when we going to New York, tomorrow nigga, to talk to these niggas, what we

doing, nigga? Yo, bro', na', that's the one we need right there, I promise you niggas that's the one we need right there, brodie"). CRISPIN states that they need to be sure they create an alibi for themselves by going to the Encore casino, which will capture them on camera when the murder takes place ("we have to be in Encore, my brother. We have to be where there is a thousand (1,000) cameras").

CRISPIN:	Nigga, and that [U/I] is so easy, bro. All they need is a driver and that's it. Like a driver from out here. You feel me?
CHS:	That's not a nigga from up there.
CABRERA:	But you don't think they don't know how to get around, though?
CHS:	They don't need to know how to get around.
CRISPIN:	They go back to the city.
CHS:	They go back to the highway. They go back home.
CABRERA:	Throw 'em blicks away and go back to the city.
CHS:	Go right to PA and everything, regular.
CRISPIN:	[STAMMERS] end of story like that?
CHS:	Yeah, just like that. They'll leave on the same stolie [sic], they don't give a fuck. They come down here in cars that are stolen, or they brought plates, and just bring them down like that.
CRISPIN:	Nigga, what's up nigga? [U/I] when we going to New York, tomorrow nigga, to talk to these niggas, what we doing, nigga? Yo, bro', na', that's the one we need right there, I promise you niggas that's the one we need right there, brodie. And whenever that shit is gonna happen we gonna get Payan [PH] on Encore nigga, with a thousand (1,000) cameras. You feel me? "I was in Encore." I swear God brodie, that's what we need. [STAMMERS] and it has to be that we have to be in Encore, my brother. We have to be where there is a thousand (1,000) cameras.
CRISPIN:	Twin, you gotta be in Encore too. You heard?
CABRERA:	[U/I]
CHS:	He rode with me one night.
CRISPIN:	Nah, but you could be setting it up, but you gotta be in Encore, my brother. You have to, cause nigga...
CHS:	You have to.
CRISPIN:	All of us, I promise you...
CHS:	Ya gonna be the first niggas that are gonna get investigated.

677. CRISPIN asks when the murder will be set up and what the hitmen need to get the plan in motion ("Like on some realistic shit, what's up? When we setting this shit up for? What do

they need, or like, what do they need?”). CRISPIN suggests that the hitmen should use their own driver without involving anyone from Lawrence which will allow them to travel directly back to New York after the murder (“If we can keep it all New York niggas, and they drive straight to New York”).

CRISPIN:	Like on some realistic shit, what’s up? When we setting this shit up for? What do they need, or like, what do they need?
CHS:	For you to go- well, not you, for us to go over there. Let them know is for real and bring them down.
CABRERA:	[U/I]
CHS:	Exactly... see, he’s a driver.
CRISPIN:	But that’s what I said, you feel me...
CHS:	But then again, I’m a keep it a hundred (100) with you, bro...
CRISPIN:	That’s why I said a driver from here... but you niggas keep going straight to New York, you feel me...
CHS:	I’m a keep it a hundred (100)... I’m a keep it one hundred (100) from you, bro... do not put Yopi in that... Trust.
CRISPIN:	Na’, listen. If we can keep it all New York niggas, and they drive straight to New York...
CHS:	That’s the best.
CRISPIN:	I feel like that’s the most cool way...
CHS:	Yeah, bro.
CRISPIN:	... [STAMMERS] that stolie gonna get lost, nigga.
CHS:	You gotta understand bro...
CRISPIN:	That stolie is lost.
CHS:	God forbid nigga, God forbids... Yopi was the one that really told on this shit, and then you put him to do something like that, the whole time he is setting that up with the police, bro...
CRISPIN:	I know, we said that it was all New York niggas...
CHS:	You feel me? Bro... Yo, the best thing is that- how you think niggas back in the days, they’ll send niggas to kill somebody, and then kill that nigga too.

678. CRISPIN discusses the potential that multiple days might be needed to commit the murder. CRISPIN asks what the plan would be if the hitmen do not find Mula on their first day in Massachusetts (“What do you think are the chances of ‘em niggas coming down, and is gonna be that first day they come down that they gonna catch him?”). CRISPIN confirms that he knows where Mula lives but Mula might not come outside for the entire day (“Until he comes out ‘cause

he could have his days where he stays in the crib all day, you feel me?”). CABRERA says that he has never actually seen Mula leave his residence (“I never see that nigga leave anywhere.”).

CRISPIN:	But for example, like... are they deciding [PH] to stay over here for a few days cause for [U/I]...
	[VOICES OVERLAP]
CHS:	They decide if they stay here for a (1) week.
CRISPIN:	What do you think are the chances of ‘em niggas coming down, and is gonna be that first day they come down that they gonna catch him?
CHS:	You know where he lives at?
	[VOICES OVERLAP]
CRISPIN:	What if he stays in the crib...
CHS:	You know where he lives at?
CRISPIN:	Of course. Nah, nah, that’s not a problem.
	[VOICES OVERLAP]
CHS:	Then that’s it.
CRISPIN:	That’s not a problem, I’m saying...
CHS:	They gonna wait outside his house.
CRISPIN:	Nah, that’s a fact. Until he comes out ‘cause he could have his days where he stays in the crib all day, you feel me?
CHS:	Nah, nah, that’s cool.
CRISPIN:	Or I’m bugging, or you see his whip leave, he’s leaving everyday type shit?
CABRERA:	That nigga [U/I]. I never see that nigga leave anywhere.
CHS:	I’ve seen that nigga in a... in a SUV.
CABRERA:	He must be parked somewhere [STAMMERS] and [U/I] back and forth...

679. As the conversation continues, the group drives past Mula’s residence (“Nah, he lives right there nigga, in the buildings right there.”). CRISPIN identifies the door that he knows Mula uses, which they are all familiar with from an earlier incident (“she came out, he comes out that same door.”). CABRERA then agrees that it is perfect and the hitmen can wait by the nearby trucks, parked with their vehicle on (“Smoking... parked. Deadass. Like that, the whole time. As soon as he gets there”).

CHS:	You told me you know where he lives at.
CABRERA:	Nah, [STAMMERS] he knows...
CHS:	He don’t live in South, right?
CABRERA:	Nah, he lives right there nigga, in the buildings right there. Across the street from...

CHS:	Santander?
CABRERA:	Yeah.
CHS:	Hm...
CABRERA:	But, um, nigga where we went to go pick up- uh, you was in the car, we went to go pick up that [U/I] from that bitch, that she came out, he comes out that same door.
CHS:	That's perfect.
CABRERA:	Yeah... That the members can wait by 'em trucks.
CHS:	Yeah, 'cause they right here parked... smoking.
CABRERA:	Smoking... parked. Deadass. Like that, the whole time. As soon as he gets there, [U/I]
CHS:	And that's it. Go back to the city, and their gonna live like regular shit.

680. CABRERA and CRISPIN discuss the potential of the hitmen robbing Mula of his jewelry as well if he is wearing it ("if they out here on a good day, 'cause", "He might have his jewelry on"). CABRERA suggests they could conduct the murder as if it were actually intended to be a robbery ("They can ran up on him... take that shit off like is a robbery").

CABRERA:	And, and, and... [BALBUCEA] if they out here on a good day, 'cause...
CRISPIN:	He might have his jewelry on.
CABRERA:	...on a good day he be having his jewelry on a Monday, Thursday, Wednesday, that don't even matter.
CHS:	Look, just take good pictures of the nigga...
CABRERA:	They can ran up on him... take that shit off like is a robbery, and then [U/I] down.
CHS:	Take good pictures of the nigga, because I have it on my thing, nigga...
CRISPIN:	Yeah, he's on videos and some motions... he's on [U/I] videos.
CHS:	This nigga barely be posting sometimes...
CRISPIN:	Yeah, he don't post pictures of himself.
CHS:	He posted his son today, he deleted it.
CABRERA:	Nah, yeah, but that nigga... that nigga right there man...
CHS:	'Cause you see the young niggas right there too. You can put them young niggas [U/I]
CABRERA:	If we had [U/I] would be perfect, I mean, the only [U/I] we got is the [U/I] crib.
CHS:	And then I got one (1) that is in South, by your mom's house. That's where his aunt lives... You heard?
CABRERA:	I could've swear [sic] it was his past crib with his mom.

681. The cooperating witness suggests that they should get a stolen car prepared in advance. CABRERA and CRISPIN then try to locate a car they had previously stolen and parked

nearby (“Yo, is that stolie still around or not?”, “Where is it at again? Right there”). CABRERA then proposes another location where they will leave the stolen car and identifies it so CW-20 can relay the information to the hitmen (“They can get drop off around there and then go into the train tracks and walk by the train tracks and we have the Habibi parked over there, like behind the lot”).

CHS:	He lives on the street over... Bro, the best way gang is... bring the niggas down here, have the blicks already in the stolie, you feel me? But that's another thing, we can't... bring 'em niggas, or have our phones going out to the city...
CRISPIN:	Nah, it is a fact. Nah, but we don't need... But, I mean, shit...
CHS:	'Cause ya can ya leave your phones here, and I'll take my phone only, or I'll leave my phone too cause I don't need none of that. We put the GPS on the thing...
CRISPIN:	And what's up? We gotta get 'em the stolie or you're saying, they are coming down with the stolie?
CHS:	It is best if we just get it... ya don't still don't have it?
CRISPIN:	I think we do.
CABRERA:	Yo, is that stolie still around or not?
CRISPIN:	Hm?
CABRERA:	Or you don't know? The Habibi... Where is it at again? Right there by, by... by that crib, right? Over there, by that side [U/I]?
YORRO:	Uh-huh.
CHS:	Look, guys...
YORRO:	There's another one around there.
CHS:	'Cause look gang... That's why five (5) stars plus is the best. No real name, no number, no nothin'. Straight cash transaction. Where you wanna be left?
CABRERA:	We'll leave those guys there, for them to come and to get in- we gotta put that car...
CHS:	No bro, we are going to leave those guys somewhere that doesn't have cameras and for them to walk to the Habibi.
CABRERA:	That's what I'm saying, though.
CHS:	Yeah.
CABRERA:	[U/I] right here, like on that spot up there, nigga with twin... Remember when Twin was living was living up with Mickey [PH]?
CHS:	Yeah.
CABRERA:	A'ight. They can get drop off around there and then go into the train tracks and walk by the train tracks [BALBUCEA] and we have the Habibi parked over there, like behind the lot. Literary we have the Habibi parked behind the lot on that little street, you see that little street where Dariel [PH] got shot?

682. CRISPIN then reiterates that he wants the murder to occur promptly (“I’m tired of really sucking that shit up”) and states that he wanted Mula to be killed during the last time they tried to do it (“Last time I really wanted it to happen”, “last time I really wanted it to happen, but niggas set that up through the legwork”). CRISPIN says “let’s really get this shit done. You feel me?” CABRERA suggests they can travel to New York tomorrow to arrange the murder (“We can go tomorrow”).

CRISPIN:	That shit can happen whenever nigga, bro. I’m tired of really sucking that shit up and [U/I] forget about this shit. Last time I really wanted it to happen.
CHS:	You know I’m not the type of nigga, you feel me?
CRISPIN:	Nah, nah, I’m saying, last time I really wanted it to happen, but niggas set that up through the legwork... let’s plan this shit out, how we gonna do this shit, let’s really get this shit done. You feel me?
CHS:	Uh-huh, so you already know. I’m ready whenever you’re ready to go.
CABRERA:	We can go tomorrow.

683. The group continues to drive around and tries to locate the stolen vehicle. CABRERA asks YORRO where he parked the vehicle and they look for it (“Ya parked it right there?”, “Nah, I parked it right here”).

CABRERA:	Ya parked it right there?
YORRO:	Nah, I parked it right here.
CHS:	You didn’t answer his question, blood.
CABRERA:	You parked it right there in that lot?
YORRO:	In the curve, yeah. That’s my sister’s crib, though. Nobody goes back there. I’mma call this nigga, uh...
CHS:	And Mula lives far from here?
YORRO:	Nigga... isn’t it the car right here?
CHS:	Don’t say that.
YORRO:	It is.
CHS:	Don’t say that...
CRISPIN:	[U/I] back plate all scratched up.
YORRO:	Oh, that’s the fucking one that was tryinna [U/I], and you said, “Yo. We should take this shit.” Like why would he park that car there? I told this nigga, um, to move it.
CHS:	Ya niggas gotta move that shit to a spot close to Mula’s crib.

684. They continue to discuss the proper placement for the stolen vehicle to be used in the murder (“That’s where they originally had, that’s what I’m saying that spot was better”). CRISPIN notes that they cannot park the stolen vehicle near their residences (“that shit gotta get out of that crib way before they do anything because that shit is gonna be too hot”). CABRERA reiterates the point and advises the group to be wary of police identifying historical locations where the stolen vehicle was parked before the murder (“that’s a fact. I’m just saying backtracking that shit, or whatever it does”).

CRISPIN:	That’s where they originally had, that’s what I’m saying that spot was better.
CHS:	Nah, that is very much better. I’m saying, cause this spot, I think got cameras on that building, in that lot.
CRISPIN:	Oh, nah, that’s a fact, that’s a fact.
CHS:	Cause... you already know.
CRISPIN:	Every block by my crib got cameras.
YORRO:	Bro, everywhere I looked [U/I] park it on the sidewalk.
CABRERA:	On the sidewalk?
YORRO:	Yeah. Like on the street.
CHS:	Oh, ‘cause you seen the red one right there?
YORRO:	Yeah.
CRISPIN:	Na’, but that shit gotta get out of that crib way before they do anything because that shit is gonna be too hot. [PAUSE] can have it park on the crib, and then have that shit for a spin or some shit.
CABRERA:	The thing is that Habibi been in the hood for so long that is a mayhem.
CHS:	That shit is not even being looked for.
CABRERA:	Nah, nah, that’s a fact. I’m just saying backtracking that shit, or whatever it does. You feel me?

685. The cooperating witness suggests that they should have young Trinitarios steal license plates from similar vehicles to give the stolen car a fresh plate (“I even would have the young niggas out there stealing the plates niggas, from the same V”). The cooperating witness goes on to say that they should not provide too many details and that they should keep it a close circle of who knows about the mission (“I don’t wanna know nothin’ about that, after we go up and we

do what we do... I don't wanna know nothing about it. Because you know, Tribu shit. Only the people involved and the ones that are going to do it, are the ones that need to know about it, you feel me, my heart?"). The cooperating witness then asks CABRERA what time they are heading up to Maine to deliver drugs and CABRERA responds that it will be after he wakes up.

CHS:	Nigga, I even, I even would have the young niggas out there stealing the plates niggas, from the same V. So, when they come, they just put a fresh plate on it. You feel me? And it is around Christmas' time too, and out of town plates would be super valid out here. At the end of the day bro, however ya niggas think is best, is on ya. I want- I don't wanna know nothin' about that, after we go up and we do what we do... I don't wanna know nothing about it. Because you know, Tribu shit. Only the people involved and the ones that are going to do it, are the ones that need to know about it, you feel me, my heart? You feel me? But we can't talk to no [U/I], no nothin', bro.
CRISPIN:	Hell no, that's spoken between the niggas in this V right here, bro...
CHS:	And that's it, bro. Nobody could know, no [U/I], none of that.
CRISPIN:	And 'em niggas gotta get up outta here ya. Niggas is chilling.
CHS:	You feel me? We can't even know... [U/I] ... [PAUSE] Yeah, what's up, what time we going tomorrow?
CABRERA:	Up north?
CHS:	Uh-huh.
CABRERA:	To be honest with you, I be waking up around two (2:00), three-ish (3:00).
CHS:	A'ight.

i. 1/10/2025 - RECORDING OF RIKY MONTILLA AND XAVIER PUELLO DISCUSSING CONSPIRACY TO MURDER RIVAL GANG MEMBERS

FILENAME: 2025-01-10_15-02-39

686. On January 10, 2025, MONTILLA and PUELLO were captured on a consensual recording with a cooperating witness discussing their participation in the conspiracy to murder rival gang members. In particular, MONTILLA describes two prior efforts to kill rival gang members. The first was to target Nongo, an effort that CABRERA arranged, where MONTILLA would be the shooter.

687. The cooperating witness asks MONTILLA about the prior plan and whether it was YORRO or CABRERA that had sent MONTILLA to kill Mula and Static. MONTILLA asks which time and whether the cooperating witness is referring to an incident in the club (“Which day? In the club?”). The cooperating witness relays the basic facts to orient MONTILLA: that MONTILLA and a Trinitarios member named ‘Ruby Rosa’ were given a stolen vehicle with guns inside and that they were supposed to kill Mula and Static but MONTILLA froze up (“sent you and Ruby Rosa to go get the stolie and the guns was in there. And to go whack Mula and Static and supposedly you niggas froze up”).

CHS:	Yo, my brother, between us, was it OG Low that sent you that day to fuckin’... to go do that shit to... to go kill Mula and Static? Or was it Trensi?
MONTILLA:	Which day? In the club?
CHS:	I don’t know if it was the club, nigga. Like them niggas be talking shit sayin’ supposedly that they sent you and... was it Ruby Rosa?
MONTILLA:	Mm-hmm.
CHS:	That they sent you and Ruby Rosa to go get the stolie and the guns was in there. And to go whack Mula and Static and supposedly you niggas froze up.

688. MONTILLA replies that the story is not right. Specifically, the stolen vehicle did not have any guns in it (“There was no guns in that car, gang”). MONTILLA states that CABRERA directed MONTILLA to bring the stolen car from Dracut and told MONTILLA to park it on the north end of the projects (“This nigga makes me bring the... the Habibi from Dracut. Tells me park right here, like on the northend of the... the projects”). MONTILLA states that they were supposed to meet but twenty minutes passed, CABRERA did not show up, and no one came to meet them (“when I park, we’re supposed to meet there. Where the fuck... twenty (20) minutes passed, where’s Trensi at? None of them niggas are there”). MONTILLA states that he drove off and called and told them where he parked the car (“I called them, “yo, listen...” Bro, you [U/I] I parked the the habibi on Market”).

MONTILLA:	Listen, on Fundita, they can put it out in front of me. There was no guns in that car, gang. I'm just a nigga with a felony, I'm not gonna do whatever they tell me to do. This nigga makes me bring the... the Habibi from Dracut. Tells me park right here, like on the northend of the... the projects. Gang, when I park, we're supposed to meet there. Where the fuck... twenty (20) minutes passed, where's Trens at? None of them niggas are there. I took off, I'm like, bro... I called them, "yo, listen..." Bro, you [U/I] I parked the the habibi on Market [PH]... on Market.
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689. MONTILLA states that he had PUELLO pick him up because he had been driving around for too long in a stolen car ("Bodega, pick me up, because these guys are hot, and I'm driving around the whole city with a Habibi"). The cooperating witness asks when MONTILLA was told where Mula was located ("when he told you supposedly Mula was at?"). MONTILLA replies that this mission was not targeting Mula or Static, rather it was targeting Nongo ("they didn't speak about Mula or Static, gang. They said Nongo"). Specifically, they told MONTILLA that "Nongo in Acqua right now."

MONTILLA:	Im like, "Yo, Bodega, pick me up, because these guys are hot, and I'm driving around the whole city with a Habibi."
PUELLO:	I bumped into you in South.
MONTILLA:	Yeah, we bumped into in South. Right here, that we did a U-turn, err, and went to Market Street.
CHS:	And when he told you supposedly Mula was at?
MONTILLA:	Nigga, they didn't tell... they didn't speak about Mula or Static, gang. They said Nongo, dead dawgs, bro. They said "Nongo is in Aqua right now". If I'm lying, I'm flying, bro. The messages are here, bro.
CHS:	And then they had you pick up the stolie in Dracut...
MONTILLA:	In... in Dracut.

690. MONTILLA states that they drove him to Dracut to get the stolen car and they were following him in their vehicle ("they was following me, 'cause they dropped me off at Dracut. They was following me"). MONTILLA was supposed to wait for them to arrive and he was left waiting with no phone or guns in a stolen car ("I'm waiting for them, twenty (20) minutes passed. Oh, and they leave me with no phone, bro. They left me there with nothing. No poles, no phone,

nothing”). MONTILLA says CABRERA was supposed to travel to his house in New Hampshire, retrieve firearms, and bring them down to MONTILLA (“Trensi was supposed to go to his house in... listen where... To New Hampshire. To go get guns to bring them down”).

CHS:	And have you meet up and then they never showed up?
MONTILLA:	No, they was following me, ‘cause they dropped me off at Dracut. They was following me. They’re like, “Oh, wait for me in... right there.” So, when I’m waiting for them, twenty (20) minutes passed. Oh, and they leave me with no phone, bro. They left me there with nothing. No poles, no phone, nothing. With a Habibi. Bro, a stolen car bro, it had been stolen for four (4) weeks.
CHS:	So, how the fuck was y’all supposed to kill Nongo?
MONTILLA:	‘Cause Trensi was supposed to go to his house in... listen where... To New Hampshire. To go get guns to bring them down. That’s an hour right there, bro. Just waiting.

691. The cooperating witness explains that YORRO and CABRERA are claiming that MONTILLA failed to act (“they over here jackin’ that... that they got you the stolie, the guns. That everything was there, the niggas was outside and that you was parked right there and that y’all didn’t do shit”). MONTILLA replies that he was with YORRO and that in fact they planned to do a shooting at Acqua twice (“We did that shit twice, bro”).

CHS:	You waited a whole hour, bro, in a stolen car?
MONTILLA:	Ask Bodega where it was – Bodega, where was the [U/I] of that Habibi?
CHS:	And they over... they over... they over... they over here jackin’ that... that they got you the stolie, the guns. That everything was there, the niggas was outside and that you was parked right there and that y’all didn’t do shit. Supposedly, you and this nigga, Ruby Rosa.
MONTILLA:	The one time that me [U/I] at Aqua - Low can’t talk shit ‘cause I was with Low. We did that shit twice, bro.

692. MONTILLA explains that, during the first incident where they targeted the rivals, MONTILLA was only in possession of a .38 caliber revolver (“We did that shit twice. The first time, I had a thirty-eight (38), bro.”). MONTILLA explains that CRISPIN and CABRERA walked into a nightclub named Kapikua and when they get inside they saw Nongo (“YB and Trensi, they’re

going into... from Kapikua to Aqua. That's what I'm trying to tell you. When they going in, Nongo is there"). MONTILLA states that CRISPIN and CABRERA left, called him, and asked MONTILLA if he was ready to kill Nongo ("They call me, "yo, what's up? You ready to do it right now?"). MONTILLA states that he called Ruby Rosa and agreed to do the mission ("I call Ruby Rosa [U/I]. "I'll hop on with you.")). MONTILLA states that he thought they were going to give him a serious weapon, such as a fully automatic handgun, because he did not want to do a club shooting with a revolver ("I'm like, "I need a switch or something. I'm not walking with a six (6) shot to a d— to a club, gang.")). MONTILLA states that they waited in the stolen car in front of Acqua for about two and a half hours and Nongo never came out ("we're parked at... in front of Aqua for like at least two (2) or an hour and a half", "Nongo never came out"). MONTILLA then notes that they took \$300 for the stolen car from a Trinitarios associate named "Yayi."

MONTILLA:	We did that shit twice. The first time, I had a thirty-eight (38), bro.
CHS:	'Cause that nigga was jackin' that it was Mula and Static.
MONTILLA:	Bro, I'ma tell you how it happened. Straight up. And if you want you can [U/I]...
CHS:	So, Mula was never there?
MONTILLA:	Dead dawgs, Mula was never there. Look... [SMACKS LIPS] YB and Trensi, they're going into... Kapikua or Aqua. That's what I'm trying to tell you. When they going in, Nongo is there. What do they do? U-turn, err, reverse. They call me, "yo, what's up? You ready to do it right now?" I'm like, [SMACKS LIPS] I got like [U/I] on me. I'm like, "Yeah, nigga. What's up? Matter fact hold on." Fum, I call Ruby Rosa [U/I]. "I'll hop on with you." Alright, okay, let's go." I'm thinking they're going to give me a strong one, because [U/I] is mine. They pass me a revolver. "Oh, you gonna walk up to the door in the club." I'm like, "I need a switch or something. I'm not walking with a six (6) shot to a d— to a club, gang. Matter fact... where [U/I] the car, I'm going to tell you, they started to look [U/I]] just to get back from [U/I]. I'm not gonna hold you, they [U/I] [SMACKS LIPS] [U/I]. And when we go from where... we're parked at... in front of Aqua for like at least two (2) or an hour and a half. Fum, fum, fum, getting ready. Nongo never came out. The run went to shit. Like two (2) days later. "Oh, shit. Bro, Nongo is here again, bro Come, come, come." So, why they don't say that they didn't even pay for the habibi. They stole Yayi those three hundred (300) for the Habibi. Why

	they don't say shit like that? That YB [U/I] them and didn't give them the three hundred (300).
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693. The cooperating witness asks for clarification. MONTILLA replies that an individual named Yayi obtained the stolen car from some young gang members from Dracut known as the Kingwoods ("Yayi looked for some youngins from... from... from... they're called "The Kingwoods", from Dracut, nigga"). The Kingwoods told CRISPIN it would be \$500 for a stolen Audi and CRISPIN replied that he only had \$300 and they got the stolen car from the Kingwoods, but CRISPIN called MONTILLA asking why MONTILLA did not pay for the stolen car ("YB calls me, 'Nigga, why the fuck [U/I] didn't pay that nigga?' 'Oh, I don't know about that. You didn't give the money to me, YB.'").

CHS:	He... he had to pay Yayi [PH] for the stolie
MONTILLA:	Bro, some youngins from... from... no, no, it wasn't Yayi, bro. Yayi looked for some youngins from... from... from... they're called "The Kingwoods", from Dracut, nigga.
CHS:	Mm-hmm.
MONTILLA:	They said, "Oh, found... for an Audi, give me five hundred (500)." And YB says, "Listen, right now I got three hundred (300)." YB gives them the three hundred (300) there. YB calls me, "Nigga, why the fuck [U/I] didn't pay that nigga?" "Oh, I don't know about that. You didn't give the money to me, YB." Because I am already [U/I]. The dudes are already looking for problems for the Habibi, gang.

694. MONTILLA then replies that YORRO knew better than to bring up the issue that last time they were all together because he knew that they failed to provide MONTILLA with guns for the mission ("he knew that there were no guns").

MONTILLA:	Low was acting like he didn't know, bro. "Why you think that day – on dead... why you think [I/I], I'm not talking about that day." You saw what he said, "I'm not talking about that, I'm talking about the other day." Because he knew that there were no guns, bro. Why they didn't bring it up right there... right there next to me... in front of you... me and you? Because he knew brother, he gonna look stupid as fuck. There was no [SMACKS LIPS] Bodega [U/I]. At Market, there was no [U/I] there...
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695. MONTILLA disputes the claims by YORRO, CRISPIN and CABRERA that he had a gun and confirms that the stolen car was a red Hyundai (“I didn’t have a gun on me, I didn’t even have not even a nail clipper on me”).

MONTILLA:	I didn’t have a gun on me, I didn’t even have not even a nail clipper on me, brodie so that I can be guessing [U/I] a Habibi, bro. When there’s no drop.
CHS:	And you know it’s crazy ‘cause niggas is goin’ use the Habibi again, right? Was it a red Hyundai?
MONTILLA:	Yeah, a red Hyundai.

696. MONTILLA notes that CABRERA needs to answer for what happened in the club with Nongo at the club (“How the fuck the opps call you out in front of the bottle girls. They about to just clown you, nigga. Nigga, him and Nongo walk in the club, “yo, lets go fight, bro, come on.”). MONTILLA then notes that he had the address of another rival gang member named ‘Hollywood,’ who was Nongo’s best friend and is claiming to be a Trinitarios killer (“I have a screenshot of the addy of Hollywood, bro. [I/I] on Nongo’s best friend right now. See, that nigga is super G Trini K”). MONTILLA claims that when he asked if he could conduct the mission, MONTILLA was directed to not act, claiming that the issue was with Nongo (““What we doing?” ‘No, bro, the beef is with Nongo.’”).

MONTILLA:	No, but Trensi needs to show his face for that. How the fuck the opps call you out in front of the bottle girls. They about to just clown you, nigga. Nigga, him and Nongo walk in the club, “yo, lets go fight, bro, come on.” The bottle girls get in between. Argh! On some fry shit, nigga. You... you understand me, bro? Supposedly they wanted to get Mula whacked. Why not [U/I] ... alright, bro... Bro, whoever said that nigga went... damn my phone died, bro. I have a screenshot of the addy of Hollywood, bro. [I/I] on Nongo’s best friend right now. See, that nigga is super G Trini K. “What we doing?” “No, bro, the beef is with Nongo.” [PAUSE] [U/I] the habibi. [LAUGHS] And Yi [PH] didn’t want to get in with the gun that day. He done too much already.
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AA. 12/17/2024 – RECORDING OF CRISPIN DISCUSSING MURDER OF WITNESSES

697. On December 17, 2024, CRISPIN was captured on a consensual recording with a cooperating witness and a number of other Trinitarios members, including YORRO and CABRERA. During the conversation, the group discuss the recent arrest of JEREMY FELIX, A/K/A “PEPE” for a shooting where he was the driver for GEOVANE FERNANDES, A/K/A “SPOOKY.”

698. This is a reference to the June 3, 2024, shooting discussed above for which FELIX was arrested (“For driving for Spooky [PH]... shooting. And then he’s probably just going to plead it out. Spooky already got picked up”). They then discuss another shooting committed by FERNANDES at the Attika nightclub that he committed with XAVIER PUELLO, A/K/A “BODEGA” (“And that shit with Bodega and this nigga that was some in the moment shit too, [U/I]... Right after the club, yeah... No, no, that was not something even after. Cause Bodega was the one that shot at Nongo [PH]...”). This is a reference to the August 15, 2024, shooting in Lawrence discussed above. The group generally complains about people getting arrested and others cooperating with police.

YORRO:	The nigga you recorded...
CRISPIN:	Oh, okay, Petete...
GROUP:	[EVERYONE TALKING AT ONCE] [U/I]
CRISPIN:	Oh, nah, nah, the feen nigga, the [U/I]. Man, nah, that’s spicy though... What’s Pepe locked up for?
CHS:	I’m telling you, bro.
CABRERA:	For some dumb shit.
CHS:	For driving for Spooky [PH]... shooting. And then he’s probably just going to plead it out. Spooky already got picked up, I just talked to him now, earlier.
CRISPIN:	Damn, ‘em niggas got caught, like, that was some informant shit?
CHS:	Yeah. [U/I]. And then, he did another shit... coming out of Attika [PH] with Bodega.
CRISPIN:	[U/I]

CHS:	Nah. I wish I did... Yeah, bro...
CRISPIN:	And that shit with Bodega and this nigga that was some in the moment shit too, [U/I]...
CHS:	Right after the club, yeah... No, no, that was not something even after. Cause Bodega was the one that shot at Nongo [PH]...
CRISPIN:	Okay.
CHS:	... with this nigga Little Baby driving and shit.
CRISPIN:	[U/I] did some other shit?
CHS:	Nah, 'cause first it was the [U/I], then it was at Attika, and then Bodega shot at Blue Lounge. So in between Pepe, Spooky and Bodega, they did three (3) shootings in that month... There's mad [U/I], bro. [U/I] mad niggas too... niggas getting looked out hard, I imagine. Look at how that nigga said that their own niggas is ratting on that murder, that's crazy.

699. CRISPIN mentions that the prosecution is offering a Trinitarios member a sentencing range of ten years in prison to life ("they want to offer that nigga ten (10) years [U/I] life"). YORRO comments that the offer is similar to what was offered to "Bibi," referring to Jeffrey Tapia, who was a Trinitarios member convicted of murder in state court. The cooperating witness notes that they also made the same offer to "Nano," referring to YANUEL MEJIA, A/K/A "NANO PROBLEMA," who is charged with the murder of Ewdy Lopez, a/k/a "Timmy Brook." CRISPIN asks if MEJIA would have taken that deal before multiple cooperating witnesses were disclosed ("He would've taken that sentence before that- before that nigga was able to rat, type shit. Right?").

CRISPIN:	Damn nigga, that's crazy that they want to offer that nigga ten (10) years [U/I] life.
YORRO:	Just like Bibi [PH], bro.
CHS:	They wanted to give Bibi ten (10). He said nah, he listened to people.
CRISPIN:	So, if he would've said yeah...
CHS:	The same shit with Nano.
CRISPIN:	...He would've taken that sentence before that- before that nigga was able to rat, type shit. Right?

700. The conversation then turns to cooperating witnesses and informants. CRISPIN is particularly hateful of those who would cooperate with the government. CRISPIN states that cooperators and “Niggas like that gotta get killed slowly nigga.”

CRISPIN:	What the fuck is wrong with this world, bro. What the fuck, nigga. Damn, nigga. Niggas like that gotta get killed slowly nigga, like... God damn.
CHS:	Bro, I’m just saying bro.
CRISPIN:	By some shit, nigga. Yo, bro, what nigga?
CABRERA:	I be dumb...

701. CRISPIN requests the murder of any cooperating witness that is set to testify against him: “Yo, brodie listen... if I ever get locked up for some shit, I got a rat on my case, please kill that nigga, bro.” CRISPIN states that he will “pay whatever after the case” is concluded, but tells the other Trinitarios, “[p]lease kill the nigga, though. If I ever got a rat on my case, kill that nigga if it is some serious shit. Get the nigga out of here. You feel me.” The cooperating witness replies, “you wouldn’t want us to do that.” CRISPIN repeats it again and notes that he will compensate them (“You will have the payment later nigga. Like damn.”). The cooperating witness again says CRISPIN wouldn’t want to do that (“You wouldn’t want us to do that.”). The cooperating witness informs CRISPIN that this will only result in greater prison time and refers to the circumstances of another Trinitarios member receiving a substantial sentence for intimidating witnesses in relation to the murder of Edward Javier. CRISPIN reiterates that because he is telling them to conduct the murder now, before he is charged, that law enforcement will not be able to prove anything (“I don’t give a fuck; they can’t prove I’m doing nothin’. I’m telling you niggas right now.”).

CRISPIN:	Yo, brodie listen... if I ever get locked up for some shit, I got a rat on my case, please kill that nigga, bro. I’ll [U/I], I’m a pay whatever after the case. Please kill the nigga, though. If I ever got a rat on my case, kill that nigga if it is some serious shit. Get the nigga out of here. You feel me?
CHS:	[STAMMERS] you wouldn’t want us to do that.
CRISPIN:	You will have the payment later nigga. Like damn.

CHS:	You wouldn't want us to do that.
CRISPIN:	[STAMMERS] you said I wouldn't?
CHS:	No.
CRISPIN:	Believe me, I would.
CHS:	Joaquín, just got fifteen (15) years for intimidating a witness just because he couldn't get...
CRISPIN:	But listen... But listen to me... I don't give a fuck; they can't prove I'm doing nothin'. I'm telling you niggas right now.
CHS:	On top of whatever you're getting...

702. CRISPIN again tells his fellow Trinitarios to kill any cooperator against – “From this day right now, if I ever get thing, kill that nigga.” CRISPIN says he will not be discussing the issue over the phone, and the prosecution will not be able to prove it (“I wouldn't be talking that through the phone”, “Believe me, they can't prove that”). The cooperating witness responds, “I promise you, YB... as much as I love you bro, I would not do that to you.” They continue to discuss the propriety of killing cooperating witnesses and CRISPIN states that if the cooperating witness was not willing to kill a hypothetical cooperating witness against CRISPIN, then the cooperating witness does not love him (“so then you don't love me”).

CRISPIN:	I'm telling niggas right now. I wouldn't be talking that through the phone, I'm telling ya niggas right now. From this day right now, if I ever get thing, kill that nigga. Believe me, they can't prove that.
CHS:	I promise you, YB... as much as I love you bro, I would not do that to you.
CRISPIN:	They can't prove that.
CHS:	They don't need to prove it.
CRISPIN:	Nah, so then, so then you don't love me...

703. CRISPIN then puts the issue simply -- if the Trinitarios “kill that nigga,” referring to the hypothetical cooperator, then they will continue to be friends (“You kill that nigga and we Gucci, man”). CRISPIN states that he is certain that Trinitarios of the Lawrence Chapter would be willing to commit the murder for him (“Trust, [U/I] the hood would be on it like that”, “Trust, the hood”). CRISPIN says, “Buddy, niggas gonna end up killing their witnesses, I promise you, bro.”

CRISPIN:	You kill that nigga and we Gucci, man.
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CHS:	This nigga, Juankin... posted this nigga's paperwork, and they picked him up.
CRISPIN:	Trust, [U/I] the hood would be on it like that...
CHS:	No, they didn't—
CRISPIN:	Trust, the hood [U/I]...
CHS:	You will get away with it, like that.
CRISPIN:	There's niggas... Trust me, bro. There's niggas like Bibi, and these niggas. Buddy, niggas gonna end up killing their witnesses, I promise you, bro.

704. CRISPIN explains that they need to kill the witness properly (“You just gotta do that shit right”), meaning that they should leave nothing to trace it to the person on trial. CRISPIN reiterates his point that once the witness is murdered then the prosecution will fall apart (“And as long you’re getting through my nigga, niggas is beating cases, bro. That’s just how the game goes, nigga. [LAUGHS] No cap buddy, that’s just... like nigga, once that witness ain’t there, nigga, who they got? You feel me?”; “once that witness ain’t there, nigga, who they got? You feel me? If that nigga couldn’t take the stand and say, “Ratata did that shit.” Who they got? Nobody. The case, the case won”).

CRISPIN:	[I/I]. Is hot as shit. You just gotta do that shit right. And as long you’re getting through my nigga, niggas is beating cases, bro. That’s just how the game goes, nigga. [LAUGHS] No cap buddy, that’s just... like nigga, once that witness ain’t there, nigga, who they got? You feel me? If that nigga couldn’t take the stand and say, “Ratata did that shit.” Who they got? Nobody. The case, the case won. Literally bro.
CHS:	Nah, but you know what’s crazy.
CRISPIN:	Trust buddy... [STAMMERS] if that nigga on the phone, supposedly talking about, “Yo, kill this nigga. Was this nigga telling on me”. [STAMMERS] he got no idea who it was. They brought that shit on him on some [U/I]...

BB. JANUARY 2025, CONTROLLED PURCHASE OF FIREARMS FROM DIAZ LIRANZO, MONTILLA AND ALMANZAR AND RELATED ACCUSATIONS AGAINST DIAZ LIRANZO

705. In December 2024 and January 2025, CW-47 made a series of controlled purchases of drugs and firearms from AARON DIAZ LIRANZO, A/K/A “SOSA.” These controlled purchases were audio-video recorded and subject to physical and electronic surveillance. At the

time of the purchases, DIAZ LIRANZO was the Primera, or First, of the Lynn Chapter. CW-47 arranged the purchases through DIAZ LIRANZO who was present for all of the transactions.²⁰ Two of the transactions took place in January 2025 and MONTILLA provided the firearms that DIAZ LIRANZO then sold to CW-47.

706. The first transaction took place on January 6, 2025, with MONTILLA present in the vehicle with an undercover taskforce officer, who was also in the vehicle with CW-47 and DIAZ LIRANZO.

707. The second transaction took place on January 13, 2025, and ALMANZAR was present in the vehicle and captured on video. After the January 13, 2025, transaction, investigators conducted a car stop of the vehicle that was involved in the transaction and identified the occupants. The timing and circumstances of the car stop caused MONTILLA to accuse DIAZ LIRANZO to a second cooperating witness of cooperating with federal law enforcement. MONTILLA raised these accusations to senior members of the Lawrence Chapter, and those conversations were recorded by the second cooperating witness.

708. Based on the accusations by MONTILLA against the leader of the Lynn Chapter, the cooperating witness contacted PAULA-CABRAL, who was then the Supreme of Massachusetts, to address the allegations by MONTILLA against DIAZ LIRANZO. These calls between MONTILLA and PAULA-CABRAL were also recorded.

i. 1/6/2025 - Controlled Purchase of Firearm from DIAZ LIRANZO and MONTILLA

²⁰ DIAZ LIRANZO has since pleaded guilty to RICO Conspiracy. DIAZ LIRANZO was held accountable for these transactions at sentencing and is serving a fourteen-year sentence.

709. On January 6, 2025, CW-47 arranged to purchase a firearm from DIAZ LIRANZO for \$900. The deal was set up on consensually recorded calls and included DIAZ LIRANZO sending a picture of the firearm. The transaction was audio-video recorded, and investigators have reviewed the recording. CW-47 agreed to meet DIAZ LIRANZO in Lawrence on Greenwood Street where MONTILLA was known to reside. CW-47 was driven to the meeting location by a federal taskforce officer (“TFO”).

710. The TFO parked the vehicle anticipating that CW-47 would exit and be directed to DIAZ LIRANZO’s vehicle. Instead, DIAZ LIRANZO, MONTILLA, and a Trinitarios associate entered the vehicle with CW-47 and the TFO. MONTILLA sat in the rear passenger side of the vehicle, and the Trinitarios associate sat behind the driver’s seat. MONTILLA and the Trinitarios associate were wearing balaclava style masks.

711. The Trinitarios associate was in possession of the firearm and handed it to DIAZ LIRANZO. DIAZ LIRANZO racked the firearm and handed it to CW-47. CW-47 then handed DIAZ LIRANZO the \$900. MONTILLA showed CW-47 and the TFO other firearms that were for sale, including a 1911 handgun with a demon handle for \$700, a Glock 31, and an assault rifle with a scope for \$1,500. DIAZ LIRANZO and the Trinitarios associate are visible on the recording. MONTILLA is not visible on the recording. CW-47 later learned from DIAZ LIRANZO that “RICO,” who investigators know to be MONTILLA, was the supplier of the firearm.

712. The firearm purchased during this transaction was later identified as a Tisas 1911A1 Tanker .45 caliber firearm, with two magazines, and 15 rounds of .45 caliber ammunition. Photographs of the firearm and magazines follow:



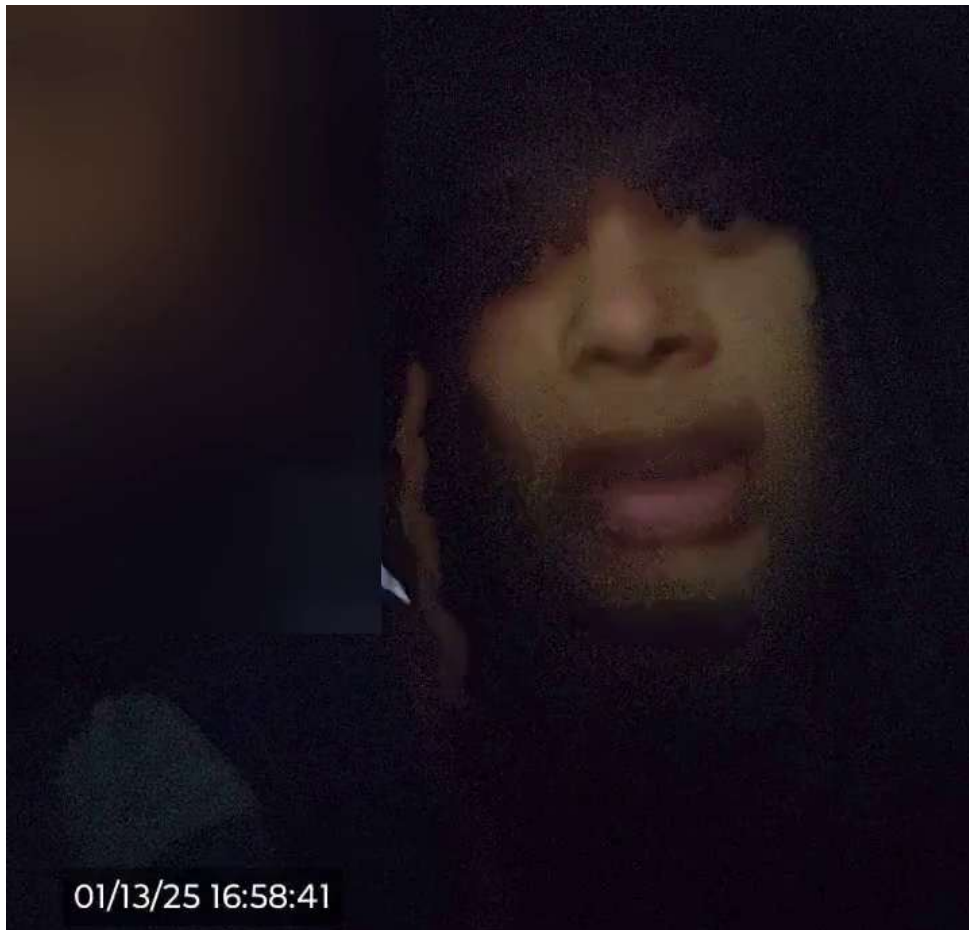
ii. 1/13/2025 - Controlled Purchase of Firearm from DIAZ LIRANZO and ALMANZAR

713. On January 13, 2025, CW-47 arranged to purchase two firearms from DIAZ LIRANZO for \$2,500. The deal was set up over a series of recorded calls before the transaction. The transaction was audio-video recorded and investigators have reviewed the recording. CW-47 agreed to meet DIAZ LIRANZO on Cambridge Street in Lawrence. CW-47 arrived at the location and entered the front passenger seat of a vehicle being driven by DIAZ LIRANZO.

714. The vehicle traveled to 71 Cambridge Street and ALMANZAR and the Trinitarios associate from the prior transaction were observed exiting 324 South Union Street and entering the rear of the vehicle being driven by DIAZ LIRANZO. The Trinitarios associate had a bag containing a rifle and showed it to CW-47 and then gave the bag to CW-47. ALMANZAR handed a pistol to CW-47. CW-47 then provided ALMANZAR with the \$2,500. While in the vehicle, the group discussed obtaining additional firearms and identified “RICO,” referring to MONTILLA, as the supplier of the firearms.

715. The firearms were later identified as a Springfield Hellcat Pro 9mm pistol, a Spikes Tactical .556 caliber rifle with a Vortex Strike Eagle scope, and twelve rounds of 9mm ammunition.

716. ALMANZAR and the Trinitarios associate exited the vehicle and entered 324 Union Street. A few minutes later, a Honda Accord bearing Mass. Registration #4LSA83 arrived in front of 324 Union Street. ALMANZAR and the Trinitarios associate approached the Honda Accord on the passenger side and interacted with the occupants for approximately two minutes. AMLANZAR and the Trinitarios associate separated from the Honda Accord, and the Honda Accord departed the area. ALMANZAR is visible in the video of the transaction. At the time of this transaction, ALMANZAR was on federal pretrial release for drug offenses. A still image of ALMANZAR during the transaction follows.



717. Investigators maintained surveillance of the Honda Accord. After approximately twenty minutes investigators conducted a car stop of the Honda Accord. Investigators identified the occupants and the rear passenger-side occupant of the Honda Accord was RIKY MONTILLA, A/K/A “RICO.”

718. Photographs of the firearms purchased during this transaction follow.



719. A cooperating witness provided a photograph of MONTILLA holding the AR-15 rifle that was sold on January 13, 2025, and a second rifle, while in a trap house in Maine. This

photograph was also located in MONTILLA's Instagram account data. That photograph follows and the same features of the rifle, including the Vortex brand scope, the two-point strap, stock, barrel shroud, and front sight post can be seen.



720. The photographs of the purchased rifle and the one held by MONTILLA in the Instagram photo follow, formatted for comparison.



721. The Hellcat Pro 9mm firearm was identified as having been trafficked by a group of Maine drug traffickers who were receiving drugs from Trinitarios associate NILBEL VENTURA-AMARO, A/K/A “NINO,” A/K/A “MEGAMIND.”

722. As noted above, VENTURA-AMARO himself was a victim of the Trinitarios, who later kidnapped and robbed him for selling drugs in Maine without their protection. ISIAH MEDINA, A/K/A “ICE,” a Trinitarios associate, and RODDERITH PERALTA, A/K/A “MAGO,” were charged with kidnapping VENTURA-AMARO in June 2025. *See United States v. MEDINA & PERALTA*, Docket No. 25-cr-10302-NMG. VENTURA AMARO is also charged with drug and

firearm offenses in this District. *See United States v. Bimpson, et. al.*, Docket No. 26-MJ-7162-JCB.

iii. 1/14/2025 - Recording of MONTILLA

FILENAME: 2025-01-14_14-04-14

723. On January 14, 2025, MONTILLA was captured on a consensual recording with a cooperating witness discussing the suspicious circumstances of the traffic stop that took place after the firearms transaction on January 13, 2025. MONTILLA suspected DIAZ LIRANZO of cooperating with law enforcement and reported the suspicion to a cooperating witness. Because DIAZ LIRANZO was then the leader of the Lynn Chapter, the cooperating witness arranged for MONTILLA to report the information to PAULA-CABRAL, the State Supreme, who would review the allegations and take further steps.

724. After some preliminary discussion, MONTILLA recounts the police interaction. MONTILLA noted that the officers knew his name and gang affiliation and that a Chelsea Police officer was part of the stop in a location outside of Chelsea.²¹

MONTILLA.	So yes, man, [U/I] the [U/I], he like, “Hey yo Rico, how [U/I]?” [U/I] [BACKGROUND: NOISES] That’s what he practically told me, bro. The Chelsea police, like, “Who are you? The other cop said, “Oh, you don’t know Rico Trinitario [PH]? He has some nice guns for his age, I heard.”
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725. The cooperating witness then called PAULA-CABRAL and requested an audience to address the issue. PAULA-CABRAL states that he will be available after work (“when I get out of work”). The cooperating witness advises that PAULA-CABRAL that they will come to PAULA-

²¹ I am aware that a Chelsea TFO was part of the team that stopped MONTILLA and was wearing identifiers for Chelsea Police. This attire inadvertently revealed the fact that a federal task force was involved.

CABRAL's residence with two witnesses ("I am going to stop by with him and his two (2) witnesses, because something strange happened last night").

CHS:	What's going on?
PAULA-CABRAL:	What's going on?
CHS:	Nothing, it's cool. Can you talk?
PAULA-CABRAL:	Yes. [U/I].
CHS:	To see if...
PAULA-CABRAL:	[U/I].
CHS:	If... if you have time today or in the next few days to talk about something that happened with... with this guy, something with a guy over here.
PAULA-CABRAL:	Of course, brother. Today, when I get out of work.
CHS:	Oh, that's fine. Let me know. I am going to stop by with him and his two (2) witnesses, because something strange happened last night.
PAULA-CABRAL:	Okay.

726. After some further discussion, PAULA-CABRAL acknowledges that he knows MONTILLA ("I already know who it is"), and the cooperating witness requests that PAULA-CABRAL call him to set up a meeting to address the issue ("Call me, brother, so we can get together, please").

PAULA-CABRAL:	Right, right, right, right, yes, yes. I already know who it is.
CHS:	Yeah, no lie, brother.
PAULA-CABRAL:	[U/I].
CHS:	Call me, brother, so we can get together, please.
PAULA-CABRAL:	[U/I].
CHS:	Yes, yes. Call me right here.

727. The call ends, and MONTILLA and the cooperating witness continue discussing the car stop. MONTILLA recounts that the officers were making fun of him ("that nigga was trolling"). MONTILLA states that the officers told him that he was under investigation for a transaction taking place in South Lawrence, which MONTILLA identifies as the location he provided to DIAZ LIRANZO ("You under investigation for a transaction that happened in South Lawrence.' That addy I gave that goofy ass nigga."). MONTILLA then acknowledges that his

runners sold DIAZ LIRANZO two guns the day before, one of which he identifies as a Hellcat Pro (“They sold him two (2) blicks yesterday. A Hellcat Pro and then the other shit”). MONTILLA then confirms the total price of \$2,500, with \$1,600 being for the rifle and \$900 for the Hellcat (“sixteen hundred (1600) for the other shit, and a... nine hundred (900) for the other one”).

MONTILLA:	Nigga, that nigga was trolling.
CHS:	Just so you know that.
MONTILLA:	That nigga said, “You under investigation for a transaction that happened in South Lawrence.” That addy I gave that goofy ass nigga.
CHS:	What you sent that nigga, bro?
MONTILLA:	I sent the addy but he didn’t meet that day, ‘cause then this nigga called him and said, “Nah, lets meet somewhere else.” [U/I] or whatever, I don’t know, I don’t know what happened there.
CHS:	But he got to sell him the shit?
MONTILLA:	They sold him two (2) blicks yesterday. A Hellcat Pro and then the other shit.
CHS:	And he gave him sixteen hundred (1600), then he linked up with you?
MONTILLA:	No, no, no, sixteen hundred (1600) for the other shit, and a... nine hundred (900) for the other one (1). They [U/I].
CHS:	And then nigga, he linked up with you in Trey’s V?
MONTILLA:	Nah, nah, nah, nah. And then...
CHS:	How do they come to you? That’s what I wanna know.
MONTILLA:	Listen, Forty-five (45) minutes later passed. I linked these niggas up in an alley, where there’s no cameras, I took the money and I bounced.
CHS:	Uh-huh.
MONTILLA:	Not even two (2) words. Bounced. I go to Family Dollar, I put five (500) hundred in the cashapp, Trey sent me five hundred (500), I sent it to mine. A band. Whatever, when I go to my crib Family Dollar, the niggas is already waiting for me, bro.
CHS:	Damn.
MONTILLA:	I see all the cars... and I’m like, “what’s up with all this commotion at my house?” [U/I]
CHS:	A street that’s dead.
MONTILLA:	You understand me, brother? So many cars, brother, and they had like a light on or something weird bro.

728. MONTILLA then explains that one of the officers told MONTILLA that he is under investigation and the officer suggests that they were aware that MONTILLA shot at a woman (“Don’t worry, you’re under investigation, you lil’ [I/I]. You think you get to shoot at bi – you think

it's good to shoot at females?"). MONTILLA then identifies the female as "that bitch" who is the sister of another individual. The cooperating witness asks if MONTILLA grazed her in the head, and MONTILLA acknowledges that he did shoot her and says she was associating with rival gang members ("she's smoking fully that other shit, nigga, I'm just... You know I was tweaking out, nigga").

MONTILLA:	Nigga, but listen. You know what this nigga said, dawg. "Don't worry, you're under investigation, you lil' punk bitch. You think you get to shoot at bi – you think it's good to shoot at females? that bitch Buba, [I/I] sister.
CHS:	Nigga, you grazed her in the head, nigga?
MONTILLA:	Right there, [U/I]. "Cause she came on... she's smoking fully that other shit, nigga, I'm just... You know I was tweaking out, nigga. And that dude was saying that to my yesterday, bro. . That dude was saying that to me yesterday. I got pissed off, bro. I told myself to be quiet.
CHS:	You have to be careful, nigga.
MONTILLA:	I plead the fifth, [U/I], I plead the fifth.
CHS:	They already talking about crimes you know you did.
MONTILLA:	You feel me, my nigga.

729. MONTILLA reiterates that he sold DIAZ LIRANZO a Hellcat Pro and ALMANZAR sold DIAZ LIRANZO a firearm as well ("I sold him a [U/I] and a Hellcat Pro. And JB sold him one, bro"). MONTILLA notes that previously DIAZ LIRANZO was in the car with "that white boy," presumably referring to the TFO who was in the car.

MONTILLA:	I sold him a [U/I] and a Hellcat Pro. And JB sold him one, bro.
CHS:	Yesterday too?
MONTILLA:	Yeah. [U/I].
CHS:	Oh.
MONTILLA:	Actually, he came with that white boy. And then yesterday he came the other nigga, dolo in a different car supposedly from last time. I [U/I].

730. The cooperating witness then explains how the presentation to PAULA-CABRAL will proceed. The cooperating witness explains that MONTILLA is basically accusing DIAZ LIRANZO of being a rat ("You're gon' go in there accusing a nigga of being a rat") and the circumstances require MONTILLA to be organized with the proof that he has but to not say that

DIAZ LIRANZO is a snitch directly (“when we go over there, you need to talk with all the proof that you’ve got, and never call him a snitch”). MONTILLA then agrees he does not want DIAZ LIRANZO to be there when he accuses him (“Hell no! You crazy, nigga”).

CHS:	...I’m drop you tigras off and then I want you niggas to stay super low key. I’m pick you up when the sun goes down. He gets out of work at four (4:00). Then I’m taking my forty-five (45) minutes- an hour, wait for him to get home. And then we gon’ go over there. And listen to me, Rico. I’m tell you this shit again. You’re gon’ go in there accusing a nigga of being a rat; get this through your mind, right? So when we go over there, you need to talk with all the proof that you’ve got, and never call him a snitch.
MONTILLA:	No, no, I already know.
CHS:	Okay. You gotta be like, “Listen bro, I’m worried and I feel like I had to bring it to your attention especially because of what’s... what’s been going on out here. You feel me my brother. Yesterday woo, woo, woo... and then how the fuck these niggas right here woo, woo, my brother, and they [U/I], c’mom my brother, like that... that’s funny, bro. so like, what’s going on?” You feel me? Do you even want that nigga to be there?
MONTILLA:	Who?
CHS:	Sosa.
MONTILLA:	Hell no! You crazy, nigga.

iv. 1/14/2025 – Recording of MONTILLA and PAULA-CABRAL

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731. Later that night, the cooperating witness, PAULA-CABRAL, and MONTILLA conducted a three-way call to discuss the situation with DIAZ LIRANZO. MONTILLA identifies himself (“It’s Rico, brother”) and they begin the discussion.

MONTILLA:	What’s up, brother?
PAULA-CABRAL:	What’s up?
MONTILLA:	[U/I] brother.
PAULA-CABRAL:	But look here, who, who’s there?
MONTILLA:	It’s Rico, brother.
PAULA-CABRAL:	[U/I], Rico?
MONTILLA:	Yes, [U/I]. How are you?
PAULA-CABRAL:	We’re alive, thank God, that’s what’s important.
MONTILLA:	Amen, thank God. What’s up, brother?

732. MONTILLA discusses the first gun transaction on January 6, 2025. MONTILLA explains that during the deal DIAZ LIRANZO was present in the car with “a very strange white dude,” which is a reference to the federal taskforce officer who was inadvertently present for the transaction. MONTILLA states that he called DIAZ LIRANZO and complained that a white guy (who was in fact the TFO) was there (“I just came out of jail and you are bringing me a white dude?”). PAULA-CABRAL asks where he met the white dude and MONTILLA explains that the deal took place in front of MONTILLA’s residence (“Sosa brought him to my crib”).

MONTILLA:	Oh yeah. Nah, so look, brother...
PAULA-CABRAL:	Tell me.
MONTILLA:	About like a week ago, right?
PAULA-CABRAL:	Uh-huh.
MONTILLA:	Allegedly, I we- I went with Sosa ... and... to sell something to a dude, brother, and Sosa brought me a very strange white dude. And then after, I was full of hate, man, and that does because I did it in front of my house. Full of hate, brother, I called him and said to him, “Sosa, what kind of little kiss [PH] are you on, I just came out of jail and you are bringing me a white dude?” “Oh no brother, I didn’t know. But yes, the white dude was strange.” He said it himself, out of his mouth.
PAULA-CABRAL:	But that’s fine. But, where... where did you meet that white dude??
MONTILLA:	Sosa brought him to my crib.
PAULA-CABRAL:	And he didn’t tell you where he met the dude?
MONTILLA:	So allegedly, Lowell and now from Lynn. So listen, listen...

733. MONTILLA then explains the circumstance of the second gun transaction. MONTILLA explains that YORRO told MONTILLA that DIAZ LIRANZO was looking for a rifle, suggesting that DIAZ LIRANZO involved YORRO in the transaction (“Low [PH] says to me, He wants a long thing”). MONTILLA then brought down a serious rifle and a smaller handgun (“I brought down a psychopath thing, brother, some crazy shit and a... a small one”). MONTILLA states that he received \$2,500 through a runner and that MONTILLA specified a location for the

transaction that only MONTILLA, the runner, and DIAZ LIRANZO knew (“dude gives me two Five (2-5). Not to me, I sent a person to a spot that he only knows, bro”).

PAULA-CABRAL:	Uh-huh.
MONTILLA:	... After that, I was coming down from somewhere, fum, Low [PH] says to me, “He wants a long thing.” I brought down a psychopath thing, brother, some crazy shit and a... a small one. Boom, and dude gives me two Five (2-5). Not to me, I sent a person to a spot that he only knows, bro. The messages are there because I have them.
PAULA-CABRAL:	Uh-huh.

734. MONTILLA explains that, after picking up the money, stopping at Family Dollar, and putting some money on CashApp, MONTILLA went to his house and the police were waiting for him and pulled him out of the car (“when I opened the door, brother, they were already waiting for me”). PAULA-CABRAL asked if they found the money on him, and MONTILLA replies that they did but that the police did not take it (“but they didn’t do shit. Like they seen my money, fum, they seen it, okay, they put it back in my pocket”).

MONTILLA:	Only he knows that spot. When I sent the person over there, the person squared everything up, fum, fum, he met up with the dude, and then left, okay. I come afterwards, like forty (40) minutes, and stopped by the youngster, picked up the... the money, fum, I went... I went to my house. I stopped at Family Dollar, put some money in CashApp, fum, when I head to my house, fum... when I opened the door, brother, they were already waiting for me, mad cars, and police lights, fum, normal cars like that, State Police from Chelsea, from Revere, from everywhere, bro. They cornered me. Fum, “illegal transactions, is [U/I] tampering your car [PH] is under investigation. Hop out the car. Everybody got [U/I]?” They pull me out, they see the money, and you already know, they got all excited, you know [U/I] to count everything. Then they started to [U/I] everybody...
PAULA-CABRAL:	Did they find money on you?
MONTILLA:	Nigga, yeah, but they didn’t do shit. Like they seen my money, fum, they seen it, okay, they put it back in my pocket. They started writing things down on a little notebook, they also asked dude what his name was, then there... then there is a person calling me from jail... and they’re like, “Oh, who is calling you, Nano?” I tell them, “What the fuck? No.” Fum, all set. Then they started telling us a

	bunch of stuff, brother. He told me, “Oh, Trinitario...” Mad shit, a lot, brother. That he was investigating us, brother, supposedly because of that transaction...
PAULA-CABRAL:	Uh-huh
MONTILLA:	...that the car is going to be in the investigation regardless, and then they searched us, brother, and let us go and I head to my house and when I was in my house...

735. PAULA-CABRAL then asks if the police took the car, and MONTILLA states they did not. PAULA-CABRAL then asks MONTILLA if he called DIAZ LIRANZO after the transaction (“Did you call... did you call Sosa after that?”). MONTILLA replies that he did call DIAZ LIRANZO about the police, and DIAZ LIRANZO said it was strange and would get back to MONTILLA, but DIAZ LIRANZO did not call him back (“Yeah. And he told me like, ‘Oh no, that’s strange. I’m a get back to you.’ And he still hasn’t got back to me”).

PAULA-CABRAL:	Did they take the car?
MONTILLA:	No, no. then, when I went to my house, bro, then I leave from my house again, with a friend of mine to go smoke. When I’m smoking my mother hits me up, “The police are here again.” I said, “What the fuck?” I also have the messages there. If you want, I’ll show them to you, brother.
PAULA-CABRAL:	What did they say when you... when they went to your moms?
MONTILLA:	No they didn’t pull up on my mom. They were outside planning something, like all of them, like four (4) cars outside, like that, brother, the same cars. And they walked through my... through my backyard, like that, fum, and they walked back.
PAULA-CABRAL:	Did you call... did you call Sosa after that?
MONTILLA:	Huh? Yeah. And he told me like, “Oh no, that’s strange. I’m a get back to you.” And he still hasn’t got back to me, You feel me? No communication, none, of that.
PAULA-CABRAL:	You don’t have to contact him for nothing, for real. It’s fine. All is... it’s over. But you don’t have to contact him [U/I] nothing with him.

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736. MONTILLA then begins to play the recording of the car stop and narrates what took place to PAULA-CABRAL and the cooperating witness. At one point they make a particular

comment upon the fact that a law enforcement officer from Chelsea was present (“Where’s that nigga from Chelsea? The white boy. That nigga that said, “Yo, it’s cold out here.” Oh, look at him right there. That nigga is from Chelsea, you heard?”).

MONTILLA:	This video is mad long, look, bro. Look, look, look, what he’s asking me, look, look.
	[PAUSE]
RECORDING:	[U/I]
CHS:	We can’t hear that, Rico.
RECORDING:	[U/I] whatever. That’s not going to be on.
RECORDING:	Nah, I told him, “Text me.” And then [U/I] called and was like, “Look, dude said that tomorrow we were for... we’re late for tomorrow and that [U/I].
PAULA-CABRAL:	Uh... of the cars that were outside, bro, did you see a...
MONTILLA:	Um...
PAULA-CABRAL:	...a gray Chevy Equinox?
MONTILLA:	Nigga that was... that’s the one that pulled up on me and the nigga said, “What’s up, Rico?” That other dude, bro. [I/I].
PAULA-CABRAL:	But was it like a silver Equinox?
MONTILLA:	A silver Chevy, gang. Like police style, with a little dark tint.
PAULA-CABRAL:	Oh so those are like Equinox, is like kind of small one.
MONTILLA:	Nigga, it’s like that... a small SUV and then they pulled up in an F-150 pulled up too.
PAULA-CABRAL:	Did you check the plates or not?
MONTILLA:	Nah, nah, gang. Nigga, look, look, look, look, we got video, look.
PAULA-CABRAL:	[U/I].
MONTILLA:	Look at how those dudes were dressed, bro. Those were policemen, saying they were not a cop.
PAULA-CABRAL:	Uh-huh.
MONTILLA:	[U/I]. Look, that dude was messing with me a lot, bro. Where’s that nigga from Chelsea? The white boy. That nigga that said, “Yo, it’s cold out here.” Oh, look at him right there. That nigga is from Chelsea, you heard?
PAULA-CABRAL:	Uh-huh.
MONTILLA:	Where’s the nigga from Revere, though? That bitch ass nigga that was next to us. Look at him right there. The nigga that took my phone. Look at me right there, they have me cornered, bro, look at the phone there. Go back so you can see how they cornered me in the car.
PAULA-CABRAL:	No, no. Yes, yes, I am checking it out.
MONTILLA:	Look there, they got me pinned in the car, dude. Took my phone. That’s all in front of my crib, nigga. Look at how they parked normal

	in front of my house, like that, look. That is my house. Those are their cars, bro. They went back there, through that alley, bro. Looking for me and shit. [PAUSE] Nigga, right in front of ma' dukes. Some disrespectful shit.
PAULA-CABRAL:	Man, [U/I] those people don't care about that.
MONTILLA:	No, I know nigga. But they had me in Family Dollar and didn't do anything to me, and as soon as I got to my house, I got off, bro, and that's when they cornered me.

737. PAULA-CABRAL advises MONTILLA to erase the conversation with DIAZ LIRANZO and not send him anything (“erase everything, you know, erase the conversation you have with the dude”, “don't send him anything”). PAULA-CABRAL states that MONTILLA should not communicate with any of the Trinitarios who are on release from the burglary case (“don't be in touch with any of those dudes that just got out from that case”).

PAULA-CABRAL:	Bro, uh... erase everything, you know, erase the conversation you have with the dude. Erase everything from the dude, don't send him anything, nothing, man, because that is very strange, really. That is very strange. Don't communicate with those people, bro. Yo, after I came out of there, brother, I haven't gotten in touch with him. Life stuff. But brother, don't be in touch with any of those dudes that just got out from that case. With none of them, bro, none of them; not with him nor with... with West [PH].
MONTILLA:	[U/I].
PAULA-CABRAL:	With nobody, that shit is too weird.
MONTILLA:	No cap. I deleted everything with that [I/I].

738. The cooperating witness then explains that DIAZ LIRANZO was calling to the Lawrence Chapter seeking two kilograms of cocaine (“he was calling down here, brother, wanting to buy supposedly two (2) of those whole ones”). PAULA-CABRAL tells the cooperating witness and MONTILLA to block all the Trinitarios who are on release (“brother, block these dudes right now. For... you have nothing for anybody”).

CHS:	And he was calling down here, brother, wanting to buy supposedly two (2) of those whole ones.
PAULA-CABRAL:	Nah brother, block these dudes right now. For... you have nothing for anybody, bro [U/I].

MONTILLA:	Niggas I don't speak to.
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739. The cooperating witness asks if DIAZ LIRANZO deals in cocaine and that he was asking for kilograms about a week ago (“looking for two (2) of those whole ones, like a week ago, on this side”). PAULA-CABRAL explains that DIAZ LIRANZO was selling counterfeit Percocet and conducting phone thefts (“To me, when he was in the middle, he was dealing with the blues and dealing with the phone stuff”) but PAULA-CABRAL did not know him to deal in large quantities of drugs like whole kilograms (“I had never heard him like [U/I]. And now supposedly... asking for... [U/I]”). The cooperating witness then explains that DIAZ LIRANZO is also asking about prices for bottles of lean (“asking around to see for how much I have the bottles of lean for”).

CHS:	So, I didn't... you understand me? I didn't comment because I don't know about that over there. I don't know if he deals with that. That's why I wanted to talk to you.
MONTILLA:	I'ma keep it... I'ma keep it a hunnit' with you...
CHS:	But he was supposedly looking for two (2) of those whole ones, like a week ago, on this side.
MONTILLA:	My nigga, I am going to be honest with you, right now...
PAULA-CABRAL:	To me, man, I don't know. [U/I] those people came out. To me, when he was in the middle, he was dealing with the blues and dealing with the phone stuff. I had never heard him like [U/I]. And now supposedly... asking for [U/I].
CHS:	That is what I'm telling you, brother.
MONTILLA:	I'ma keeping it right with you, brother. [U/I] because I know that they are already coming, they call me, and then those people keep me in a car ... [U/I].
CHS:	Like... like... like asking around to see for how much I have the bottles of lean for...

740. PAULA-CABRAL states that MONTILLA should not communicate with anyone, drop Snapchat, drop social media and that SOPITA (referring to LUIS JEFFREY SANTANA) will contact him to bring some items (“Try not to have communication with anybody. Drop Snapchat, drop social media, drop everything right now. Try not to move, understand. If you need anything, I'll talk to Sopita so he can bring you a couple of H”).

PAULA-CABRAL:	Brother, try to get your foot out, really. Try not to have communication with anybody. Drop Snapchat, drop social media, drop everything right now. Try not to move, understand. If you need anything, I'll talk to Sopita so he can bring you a couple of H [PH] up there.
MONTILLA:	Yo, facts, no bullshit.
CHS:	You, you already know, Rico, zero defamation or anything, keep it quiet between us, we already know...
PAULA-CABRAL:	So that [U/I] finds out what's really going on.

741. PAULA-CABRAL tells MONTILLA that no one involved in the transaction should discuss it (“those people that were there with you, nobody should talk about that”). PAULA-CABRAL suggests that if they are using DIAZ LIRANZO as a cooperator, he knows how to operate and if he knows the Trinitarios suspect him, he will move faster (“once he knows... he knows... he’ll know how to operate, he knows that we are clever, and if he... finds out, understand, he’s going to move faster”). PAULA-CABRAL then advises the cooperating witness and MONTILLA that “right now nobody can be trusted.”

PAULA-CABRAL:	No, and those... those people that were there with you, nobody should talk about that...
CHS:	Nah, I told him what’s up.
PAULA-CABRAL:	Because if there is an investigation and there is something, and they are using him for that, once he knows... he knows... he’ll know how to operate, he knows that we are clever, and if he... finds out, understand, he’s going to move faster.
CHS:	You understand me? ‘Cause then he’ll dare to take the stand on niggas. It is better that one moves quietly and avoid issues, man.
PAULA-CABRAL:	Of course, man. Even you right now [U/I], even for [U/I] had an inspection and one really checks what’s happening. Try not to talk to anybody, bro, right now nobody can be trusted, brother.
MONTILLA:	Alright brother.
PAULA-CABRAL:	You understand me?

742. PAULA-CABRAL states the police will be tracking DIAZ LIRANZO (“put a tracker on him, brother, to see who he meets with”). PAULA-CABRAL indicates that he will send the cooperating witness his new phone number (“I am going to send you uh... my new math so

you have it”). PAULA-CABRAL then states that it is beneficial that MONTILLA did not do the transaction himself and that MONTILLA should keep the runner who delivered the guns close (“good thing is; that you guys didn’t do the transaction. Whoever you sent” “whoever you sent, keep that kid, on hand”).

PAULA-CABRAL:	Brother, from now on they are going to put a tracker on him, brother, to see who he meets with, who he is with, what he is doing, who he goes around with, brother. Right now, nobody can be trusted.
CHS:	That’s big facts, bro.
PAULA-CABRAL:	Alright. I am going to send you uh... my new calculator so you have it.
CHS:	You know it, brother, we’ll talk soon, we’ll get together and talk better.
PAULA-CABRAL:	Yes, let’s... we are going to get together, we’re going to get together. Let’s see how we do it... to get together but outside of the area.
CHS:	No, of course, brother, and do something chilling, Top golf, something weird.
PAULA-CABRAL:	Of course. No, no, no, let’s do it. Uh Rico, keep yourself, you know.
MONTILLA:	You know it.
PAULA-CABRAL:	Under the four (4) faith, with three (3) point relatives, that...
PAULA-CABRAL:	The good thing is, you know what the good thing is; that you guys didn’t do the transaction. Whoever you sent...
MONTILLA:	[U/I].
PAULA-CABRAL:	...whoever you sent, keep that kid, on hand.
MONTILLA:	Nah, little bro is good, trust me, bro.
PAULA-CABRAL:	Nah, he’s good bro, but now that they are giving time to anyone, brother... I don’t trust anybody, brother.

743. PAULA-CABRAL suggests that many people are betraying the gang and there cannot be any surprises (“everybody is turning, bro, and we don’t want surprises”). MONTILLA then explains that he sold DIAZ LIRANZO a gun himself during the first transaction (“I sold him one (1). Me, bro. Me, in a car, the first time”). PAULA-CABRAL explains that they did not catch him during the first deal and that the police probably thought he would do the second transaction himself as well (“Maybe they thought that... that you were going to do it too”). MONTILLA comments that the second transaction was a large firearm (“That’s some big ass shit, bro”).

PAULA-CABRAL then reiterates that the police are focused on him, otherwise they would have stopped the runner (“they are set on you because, if not, they would have taken Menor”). MONTILLA then reminds PAULA-CABRAL to have LUIS JEFFREY SANTANA, A/K/A “SOPITA,” contact him (“talk to this dude, tell him to hit me up”), and PAULA-CABRAL agrees (“I’m going to call him shortly”).

PAULA-CABRAL:	The kid is yours and all, brother, but at [U/I] of time, right now everybody is turning, bro, and we don’t want surprises, really. I can’t explain... this is a notice, brother, if it can’t be [U/I].
MONTILLA:	Brother, what I am trying to tell you is that I sold him one (1). Me, bro. Me, in a car, the first time, bro.
PAULA-CABRAL:	Exactly, but that wasn’t the transaction where you got caught, it was the other one. Maybe they thought that... that you were going to do it too.
MONTILLA:	That’s some big ass shit, bro, trust.
PAULA-CABRAL:	And those were the [U/I] that you told me that you [U/I]. Understand, because if you [U/I] hand to hand, they fuck you up. You understand me, because they are set on you.
CHS:	Let them.
PAULA-CABRAL:	For some shit, they are set on you because, if not, they would have taken Menor. They were set on you. You gotta be careful with that.
MONTILLA:	Nah, but talk to this dude, tell him to hit me up, you heard?
PAULA-CABRAL:	Alright, alright, I’m going to call him shortly.

CC. 2/22/2025 – RECORDING OF YORDALI YORRO DISCUSSING PHASE ONE OF OPERATION PAPER MACHETES

FILENAME: 2025-02-22_19-52-33

744. A few days after the February 19, 2025, takedown of Operation Paper Machetes targeting the Lynn Chapter, YORRO was captured on a consensual recording with a cooperating witness discussing the Lawrence Chapter with other Trinitarios members. YORRO tells the group that he has received information from a female law enforcement source that there is takedown coming for the Lawrence on Chapter on Monday (“One of the women that work there fuck with them, heavy. “Hey Low, take everything out of your crib, state is coming for Lawrence on Monday”).

YORRO:	Listen, I feel it. His P-O told him...
CHS:	Bro'...
YORRO:	...One of the women that work there fuck with them, heavy. "Hey Low, take everything out of your crib, state is coming for Lawrence on Monday. So, what I'm trying to tell you is this, right; whatever you got going on [I/I].

745. YORRO says he had advised ENMANUEL PAULA-CABRAL (referred to as "Few" which is short for "Nelfew") to disappear and head to the Dominican Republic ("Cause I told Few, go to D-R. Disappear"). This took place after the prior state investigation of the Trinitarios for convenience store burglaries resulted in arrests. YORRO states that he told PAULA-CABRAL that he suspected "Sosa" (referring to AARON DIAZ LIRANZO) and "Wes" (referring to WESTYN LANTIGUA) of being informants because they were released from jail on the burglary case ("You have a breach in your set the minute that they let Wes and Sosa out of jail. You have a breach.").

YORRO:	Of course. That's why... of course. Of course, bro', because you have to keep... you have to be ready for whatever comes. It was known what was coming with those people, bro'. 'Cause I told Few, go to D-R. Disappear. You have a breach in your set the minute that they let Wes and Sosa out of jail. You have a breach.
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746. YORRO explains that the takedown happened because the six Trinitarios who were arrested for convenience store burglaries were cooperating ("six (6) damn dudes that couldn't hold twenty-seven (27) charges of robbing scratch tickets. So, they talked, and they sat down and snitched on everybody").

YORRO:	Bro', this is all, six (6) damn dudes that couldn't hold twenty-seven (27) charges of robbing scratch tickets. So, they talked, and they sat down and snitched on everybody, and they involved themselves in the same shit. And that is how it went, bro'. Because of a few scratch tickets!
CHS:	It's crazy how [I/I] confidential witness, [I/I]...
YORRO:	... [U/I]... dudes with weird names [U/I]... bro'. These dudes over some scratch tickets. Like, you're not listening to how this shit is, bro'. For some scratch tickets, my nigga!
CHS:	Are you listening to this [U/I]? [CHUCKLES]

YORRO:	For some scratch tickets!
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747. YORRO notes that he hopes all of the Lynn Chapter are sentenced federally and transferred to the prison with the overall leader of the Trinitarios, LEONIDES SIERRA, A/K/A “JUNITO,” and they can explain to him why the entire Chapter is serving twenty years because of some scratch tickets (“I hope that they send them all to La Roca [PH], bro’. So that they sit down and explain to Junito that because of some scratch tickets”).²²

YORRO:	Bro’, an indictment over some scratch tickets!
CHS:	They even involved the ones in Lawrence.
YORRO:	Bro’, and you know what? I hope that they send them all to La Roca [PH], bro’. So that they sit down and explain to Junito that because of some scratch tickets...
CHS:	[U/I]
YORRO:	There, they’re going to add twenty (20) more years.

748. YORRO then explains that when the members of the Lawrence Chapter are arrested they need to kill the snitches immediately because the cooperators will be moved (“I hit him there, bro’, listen, they’re going to send him to another place. So, we gotta make a mess. That day”, “A lot of stabbings, bro’”). YORRO states that they will pretend to be friendly to the cooperating witnesses and invite them to share a meal (“Yo, yo, come over here, we’re going to make some food.” And we invite the six (6) of them that are snitching”). Once they are in the cell, YORRO states they will lock the door and with two knives stab and kill the cooperating witnesses (“we lock that door with those two (2) knives, bro’ and we stab”).

YORRO:	... “Come here”.
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²² LEONIDES SIERRA, A/K/A “JUNITO,” is the former national leader of the Trinitarios, who investigators believe continues to exert considerable influence and control over operations in the United States. SIERRA is currently serving a nineteen-year federal prison sentence for running the Trinitarios enterprise from prison while serving a state murder sentence. See <https://www.justice.gov/usao-sdny/pr/national-leader-trinitarios-gang-sentenced-manhattan-federal-court-19-years-prison>.

CHS:	[U/I] [LAUGHS]
YORRO:	From the moment I hit him there, bro', listen, they're going to send him to another place. So, we gotta make a mess. That day, a...
CHS:	Yeah.
YORRO:	... a single mess.
CHS:	[U/I]
YORRO:	A lot of stabbings, bro'. "Yo, yo, come over here, we're going to make some food." And we invite the six (6) of them that are snitching and we lock that door with those two (2) knives, bro' and we stab [U/I].

749. YORRO then explains that he knows he will be going to prison one day ("I know that one day I'm going to jail but [U/I]. But, listen, [U/I] over there, you know"). Despite the inevitability of his incarceration, YORRO says that he will kill all of the snitches who put the Trinitarios in jail ("I know that one day I'm going to jail", "the dudes that set us up, to finish killing them all off", "All of them, all of them, that have snitched one way or another.").

YORRO:	[U/I]... I'll tell you something, [REDACTED]. I know that one day I'm going to jail but [U/I]. But, listen, [U/I] over there, you know, [U/I]...
CHS:	[U/I]
YORRO:	[U/I]
CHS:	[U/I]
YORRO:	[U/I]... the dudes that set us up, to finish killing them all off.
CHS:	That's what we're going to do.
YORRO:	All of them, all of them, that have snitched one way or another. [U/I]

DD. 3/19/2025 – AMBUSH OF RICHARD PENA BY MEMBERS OF THE GANGSTER DISCIPLES AT THE GYM

750. Investigators are familiar with Methuen Police report #25-06141. According to the police report, on March 19, 2025, at 11:45 AM, Methuen Police responded to a gym on Pleasant Valley Street in Methuen, Massachusetts for a report of a fight in progress.

751. Employees told police that a member of the gym named RICHARD PENA was attacked by multiple individuals. Both individuals began punching PENA and then all three parties left the gym. Officers reviewed the surveillance video of the incident. In the video, PENA appears

to confront an individual in the vestibule of the gym and they begin trading blows. Then, the two individuals run off to a vehicle in the parking lot.

752. Multiple cooperating witnesses told investigators that during this incident PENA was attacked by multiple members of the Gangster Disciples, including Chana.

- a. CW-3 provided information about this incident. CW-3 stated that PENA and Chana are in a dispute because PENA started dating Chana's girlfriend. CW-3 stated that a few months before the murder of Del Rosario, a number of Gangster Disciples members, including Chana, attacked PENA outside of a gym in Methuen.
- b. CW-20 provided information about this incident. CW-20 learned that PENA was attacked at the gym by rival gang members Chana, Mula, and Nongo. PENA told CW-20 about the incident.
- c. CW-48 provided information about this incident. PENA told CW-48 about the fight. PENA stated that he was fighting with Chana outside of the gym and then Nongo jumped into the fight as well. PENA stated that Nongo punched PENA in the eye. CW-48 stated that this incident reignited hostilities between the Trinitarios and the Gangster Disciples.
- d. CW-53 provided information about this incident. PENA told CW-53 that PENA and Chana had been enemies for a long time and that the gym incident caused PENA to seek Chana's murder.

EE. 3/22/2025 – ATTEMPTED MURDER OF NATE BDK AND AJ

753. Investigators are familiar with a shooting committed by multiple Trinitarios taking place on March 22, 2025, in Lawrence, Massachusetts. This shooting targeted rival gang members and took place following a confrontation in an autobody shop. Among those targeted was a Gangster Disciples members named "Nate BDK," who was previously targeted in other shootings described above, and "AJ." RIKY MONTILLA, A/K/A "RICO," JAYDEN MUNIZ, A/K/A "ANUELITO," and another Trinitarios associate were identified as the participants.

i. Initial Police Response

754. According to Lawrence Police Report #25001409, on March 22, 2025, Lawrence Police responded to 242 Broadway for a report of shots being fired. Witnesses interviewed by Lawrence Police reported that a shooting took place on Broadway. Witnesses also reported at least one occupant of a black Range Rover got out of the vehicle while it was in traffic on Broadway and began firing in the direction of another vehicle. Multiple other vehicles were struck by gunfire.

755. A victim who had been struck by gunfire was interviewed at the hospital. The victim is known by the street name “AJ” and reported a past history as a member of the Gangster Disciples. AJ reported getting out of his friend’s vehicle when he was shot in the leg. The victim would not provide the name of his friend. AJ reported he ran back to the vehicle and they drove off. At the scene, officers recovered nine .357 caliber shell casings and one projectile.

ii. Surveillance Video

756. Lawrence Police gathered surveillance video capturing the shooting incident. The video reveals that the black Range Rover was in traffic and the gray BMW was across the street.

757. It appears that an individual wearing clothing consistent with the Trinitarios associate was operating the Range Rover. As the Range Rover sits in traffic, the operator’s attention is directed to the left of the frame and the Range Rover pulls out of view.



758. The gray BMW parks at the corner and three individuals, including AJ and another Gangster Disciple member named “Nate BDK,” exit the BMW and direct their attention toward the Range Rover. A still image of the BMW parking and the occupants exiting follows, with their attention drawn to the Range Rover across the street.



759. An individual later identified as RIKY MONTILLA exits the passenger-side of the Range Rover, raises his arms, and fires in the direction of the BMW. A still image from a

surveillance camera on the corner follows, which depicts MONTILLA at the rear of the Range Rover with his arms raised firing in the direction of the BMW and its occupants.



760. The occupants of the BMW, including AJ and Nate BDK, duck and run back into the BMW, with one occupant appearing to be injured. Once the occupants are inside, the BMW drives off and takes an immediate right.



761. The Range Rover appears to then make a U-turn and follows the BMW.



762. The Range Rover was identified to be registered to the brother of the Trinitarios associate. The Trinitarios associate was identified through review of surveillance video as being the driver of the Range Rover during the shooting incident. The Range Rover bearing Massachusetts registration 3JXC42 was located and searched pursuant to a search warrant on March 25, 2025. Inside the Range Rover, investigators located “a Bible” that was later determined to in fact be a covert firearm holster/case. Images of the firearm holster/case below:



iii. Further Investigation

763. Investigators learned that this shooting was believed to have been precipitated by a confrontation between the Trinitarios and a Gangster Disciples member in an auto body shop in Lawrence near the location where the shooting took place. Investigators further identified the auto body shop to be on West Street.

764. Investigators interviewed the owner of the auto body shop who reported that a black Range Rover was in the shop for repair and three males were waiting for the repairs to be completed. During this time, another customer entered to pay for past repairs. The owner reported that the other customer was then attacked by the three males.

765. Investigators obtained video surveillance from the auto body shop. The three males waiting for the Range Rover to be repaired were identified as MONTILLA, JAYDEN MUNIZ A/K/A “ANUELITO” and the Trinitarios associate. MONTILLA, MUNIZ and the Trinitarios associate are part of the Lawrence Chapter of the Trinitarios. A still image from the video follows, which depicts MONTILLA outlined in the red box, MUNIZ outlined in the blue box, and the Trinitarios associate outlined in the green box:



766. Around 1:00 PM, while MONTILLA, MUNIZ, and the Trinitarios associate are waiting, an individual entered the shop. After reviewing the video, investigators identified the male who came to pay for repairs as “Nate BDK,” a member of the Gangster Disciples.

767. When Nate BDK enters the shop, MONTILLA recognizes Nate BDK and taps the leg of the Trinitarios associate. Once alerted to Nate BDK being in the shop, MONTILLA, MUNIZ and the Trinitarios associate stand up and confront him. The owner the auto body shop comes out to the lobby, separates the males, and brings Nate BDK into the office area.



768. MONTILLA, MUNIZ, and the Trinitarios associate then go behind the counter to confront Nate BDK, who flees and is reported to have driven away in his BMW. MONTILLA, MUNIZ, and the Trinitarios associate then get into the Black Range Rover and leave the area.

769. During this interaction, MONTILLA can be seen pulling out a phone. I know that MONTILLA in fact filmed a video that he posted to Snapchat depicting this confrontation with Nate BDK. I have reviewed the video. In the video, MONTILLA can be heard taunting Nate BDK and telling him to “come here” and calling him a bitch. A still image from the video depicting Nate BDK behind the door to the employee area of the auto body follows.



770. Investigators learned from cooperating witnesses that this confrontation at the auto body shop was the basis for the shooting that took place approximately 3 hours later.

771. Investigators located an Instagram post by MONTILLA, who posted a screen capture from a post by MUNIZ. The post is a photograph of Nate BDK in the auto body shop during the confrontation with MONTILLA, MUNIZ and the Trinitarios associate, with a caption superimposed stating "When u see DEATH!"



iv. Recordings of MONTILLA and the Trinitarios associate

772. During the course of the investigation, MONTILLA, and the Trinitarios associate were captured discussing the shooting on multiple recordings.

a. First Recording on 3/22/2025

FILENAME: 2025-03-22_16-24-35

773. On March 22, 2025, shortly after the shooting took place, MONTILLA and the Trinitarios associate were captured on a consensual recording discussing the shooting with a cooperating witness. During the recording, MONTILLA asks for someone to pick him up, and describes what took place. MONTILLA states he saw AJ and Nate BDK fall from the gunfire (“That’s when I saw AJ fall, on dead, he fell, on my mother, he fell, bro. BDK fell also.”). MONTILLA also states that he is going to get rid of his phone (“Alright. I’m probably gonna get rid of my phone too.”).

CHS:	Bro, what’s going on, bro. What’s up with that craziness, bro?
MONTILLA:	Look what I thought. The dude says to me, “Anuel [U/I], I’m lost, I’m lost, I’m on [I/I] Beacon, I’m lost. When I see that AJ [U/I] towards Anuel. I said, “Oh shit!” Fuck, dude! That’s when I saw AJ fall, on dead, he fell, on my mother, he fell, bro. BDK fell also. The guy that was in the back, he didn’t fall, that’s the one that [U/I] on AJ, bro. [U/I]. That’s when i said, “Oh shit, I have [I/I], hold on” and I went back.
CHS:	Nigga, that shit was on Broadway, nigga?
MONTILLA:	Nigga, it was Beacon [PH]. [BACKGROUND: YORRO: Hello?]
CHS:	Nigga, you gotta go to Maine today. I called Rani to see if he could get you a ride.
MONTILLA:	Nigga, I need that shit asap.
CHS:	Bro, just don’t be telling anybody, bro, that you are here...
MONTILLA:	Nah, nah, nah. No, not yet.
CHS:	Alright, bro. I’mma leave the door unlocked. Imma be here waiting for you, bro.
MONTILLA:	Alright. I’m probably gonna get rid of my phone too.
CHS:	Alright.

b. Second Recording on 3/22/2025

FILENAME: 2025-03-22_18-08-16

774. Later, on March 22, 2025, MONTILLA and the Trinitarios associate were captured on a consensual recording discussing the shooting. MONTILLA states that they dropped off MUNIZ and circled back to pick him up. When they got to the area to pick up MUNIZ, Nate BDK pulled up (“we circled around to pick him up my nigga”). MONTILLA states that he was on the

phone will MUNIZ coordinating the pickup when MUNIZ alerted MONTILLA to the gray BMW that had just pulled up to where he was (“Anuel is like, Yo I’m in the same spot where you dropped me off,” that’s exactly when BDK pulled up, ‘Bro look to the side.” Anuel... Anuel shut it, said, ‘Oh shit. Hold on’’). MONTILLA then states that Nate BDK saw him and then AJ was going straight to MUNIZ (“BDK sees me. AJ go straight to Anuel. AJ is walking towards me”). MONTILLA states he jumped out of the Range Rover and Nate BDK saw him, while AJ was focused on MUNIZ (“I came out, BDK sees me. AJ go straight to Anuel”). MONTILLA states that he first shot at AJ and then when AJ fell, he started shooting at Nate BDK and the other occupant who came out of the back seat (“So, I started going to AJ... fuck, when AJ falls and I see, I started *blowing at BDK* and that nigga in the backseat, just jumping”). MONTILLA notes that the individual in the back seat was jumping (“that nigga in the backseat, just jumping. That nigga hopped up in the back seat”). MONTILLA explains that they already dropped off MUNIZ but MONTILLA is concerned that police will search his residence and find evidence (“He got dropped off he is good. I just don’t want them to search his crib.”).

CHS:	He hopped out and you shot him?
LOSCANO:	We dropped off Anuel.
MONTILLA:	No, we dropped off Anuel, we circled around to pick him up my nigga, and when we got to the light, Anuel is like, “Yo I’m in the same spot where you dropped me off,” that’s exactly when BDK pulled up, “Bro look to the side.” Anuel... Anuel shut it, said, “Oh shit. Hold on” I came out, BDK sees me. AJ go straight to Anuel... AJ is walking towards me, ‘cause what I am focusing first is on AJ, right? So, I started going to AJ... fuck, when AJ falls and I see, I started <i>blowing at BDK</i> and that nigga in the backseat, just jumping. That nigga hopped up in the back seat. [UI]
CHS:	Where’s Anuel right now?
MONTILLA:	He got dropped off he is good. I just don’t want them to search his crib.

775. MONTILLA and the Trinitarios associate then discuss the circumstances of the vehicles. They note that their car was “boxed in” and that the cars in front started moving but the

car next to them was not moving. MONTILLA notes that as the shooting unfolded, he threatened to shoot another individual who he identified as “Whichi” (““You wanna get shot too, you bitch ass nigga?””).

MONTILLA:	For real. The car sounded like [U/I], and he parked it, brother. The car was parked like this. [U/I], brother. It was even trapped in.
LOSCANO:	Mm-hmm.
MONTILLA:	It wasn’t even trapped, boxed in.
LOSCANO:	The car in front of us start moving, nigga. The car next to us isn’t moving...
MONTILLA:	And then with the shit, you don't know who I saw, man. Whichi [PF]. “What? You wanna get shot too, nigga?” [LAUGHS] “You wanna get shot too, you bitch ass nigga?” [U/I]. [LAUGHS]

c. Third Recording on 3/23/2025

FILENAME: 2025-03-23_00-31-14

776. The next day, MONTILLA and YORRO were captured on a consensual recording discussing the recent shooting. MONTILLA asks YORRO if he has spoken to one of the prominent Gangster Disciples leaders named Nongo following the shooting (“You call Nongo”). YORRO replies that he has (“Uh-huh”). They then discuss the recent shooting and MONTILLA notes that he was trying to kill the rival gang member (“I was trynna kill his ass nigga.”). MONTILLA states that they caught the rival gang members near Haverhill Street and they called the rival gang members (“look, we caught him at Haverhill Street. Him and Static. Yo, I called him [U/I]. I’m a spin back”).

CHS:	And Nongo [PH] hasn’t called you back?
UM2:	That nigga [U/I].
CHS:	Okay.
MONTILLA:	You call Nongo [I/I?
YORRO:	Uh-huh.
CHS:	That’s my bestie...
MONTILLA:	[U/I].
UM2:	[STAMMERS] One day, one day, one day...

MONTILLA:	I think this nigga Woody is just there, mad quiet... listening to everything ...
UM2:	Yo, you know what Rico done the other day...
MONTILLA:	drowned.
CHS:	For real?
UM2:	Yo, you know Rico done one day?
MONTILLA:	I was trynna kill his ass nigga.
UM2:	Bro, Rico got in a...
MONTILLA:	[U/I], look, look, we caught him at Haverhill Street. Him and Static. Yo, I called him [U/I]. I'm a spin back. [U/I].

777. The group then discuss the fact that YORRO spoke with Nongo about the incident and the Gangster Disciples are not counting it, because one of their members was only shot in the leg (“supposedly Johnny, got him whatever in the leg and that shit don’t count and I don’t know what else”, “You hit him in the leg?”, “That’s how you know he’s sick nigga... No, nigga...”, “No, Nongo was telling him”).

UM2:	My brother, listen, the thing is...
CHS:	Nah, tell ‘em what he said to you, supposedly, about, [STAMMERS] that supposedly Johnny, got him whatever in the leg and that shit don’t count and I don’t know what else.
UM2:	You hit him in the leg?
YORRO:	That’s how you know he’s sick nigga... No, nigga...
CHS:	No, Nongo was telling him.
UM2:	Oh.
YORRO:	[U/I].
MONTILLA:	And he just called niggas, who did he [U/I].
YORRO:	Those hollows.
MONTILLA:	[U/I].
YORRO:	Brodie, from right there, bro... [U/I].

778. The cooperating witness recounts the fact that MONTILLA called the cooperating witness after the shooting reporting that he killed two rival gang members, and showed the cooperating witness the extended magazine (“Rico. ‘Yo, my nigga, I just whacked this two (2) niggas, bro.’ Nigga showed me like, the—the extendo [sic] and, ‘I emptied this shit on that nigga.’ And I’m like, ‘Rico, I’ll call you right back.’”). MONTILLA acknowledges that he is a Gangster

Disciple killer (“GDK... word to my mother bro”) and that he will kill the rival gang member at any time or place, whenever he sees him (“If I see him one more time, I’m a do it. I don’t give a fuck where I see you. Blow at you, nigga”). YORRO then asks if the rivals came out of their car (“Oh, but they came out their car”). MONTILLA replies that the video of the shooting will capture the incident well, with the rivals getting out of the car (“Yo, bro, if the video ever comes out, I’m about to call ya niggas [U/I]. Nigga came out like—like a vibe, brother”). MONTILLA notes that he thought AJ was retired but was the first to get out of their vehicle and ultimately froze when the bullets started flying (“I’ve never seen AJ like that. I thought AJ was retired. He was the first one to get out the car. “Come to the car straight up nigga.” And right away he opened his eyes. You didn’t see him froze? Boom, he just dropped”). MONTILLA notes that AJ stood frozen realizing he was trapped by the gunfire (“AJ stood in the corner, like that, frozen, damn I’m trapped”).

CHS:	Nigga said, with the three-five-seven (3-5-7), nigga. Pow. Pow. Pow.
UM2:	Nigga, but you know I found weed, [U/I]...
CHS:	Yo, is funny because this nigga, is literary, like a... one of ‘em Chiraq goons, like hot, YN niggas.
UM2:	Who?
CHS:	This nigga, Rico. “Yo, my nigga, I just whacked this two (2) niggas, bro.” Nigga showed me like, the—the extendo [sic] and, “I emptied this shit on that nigga.” And I’m like, “Rico, I’ll call you right back.” Yo, this nigga, bro... crazy nigga.
MONTILLA	“GDK... word to my mother, bro. If I see him one more time, I’m a do it. I don’t give a fuck where I see you. Blow at you, nigga.”
YORRO:	Oh, but they came out their car...
MONTILLA:	Bro, word to my mother. Yo, bro, if the video ever comes out, I’m about to call ya niggas [U/I]. Nigga came out like—like a vibe, brother, bro...
CHS:	Like if he’s a lion.
MONTILLA:	Bro, no, you should have seen AJ. I’ve never seen AJ like that. I thought AJ was retired. He was the first one to get out the car. “Come to the car straight up nigga.” And right away he opened his eyes. You didn’t see him froze? Boom, he just dropped.
YORRO:	[U/I].
MONTILLA:	That’s what I’m saying. AJ stood in the corner, like that, frozen, damn I’m trapped.

v. Cooperating Witness Information

779. Multiple cooperating witnesses provided information concerning the March 22, 2025, shooting.

- a. CW-3 provided the following information concerning the March 22, 2025, shooting. CW-3 learned that MUNIZ and two other Trinitarios members conducted a shooting targeting Gangster Disciples members named Nate BDK and AJ. CW-3 later learned that MONTILLA did the shooting and that MUNIZ did not fire during the incident.
- b. CW-20 provided the following information concerning the March 22, 2025, shooting. MONTILLA told CW-20 that MONTILLA had shot at Nate BDK and AJ while driving in a vehicle with LASCANO ROSARIO. MONTILLA stated that he “left AJ on the floor” and had fired all the bullets in the magazine at the rival gang members. MONTILLA stated the incident happened on Broadway in Lawrence. MONTILLA also described jumping Nate BDK earlier in the day at an auto mechanic’s shop.
- c. CW-39 provided the following information concerning the March 22, 2025, shooting:
 - i. CW-39 stated that the confrontation took place between MONTILLA, JAYDEN MUNIZ, and the Trinitarios associate and Nate BDK in the auto body shop. They confronted Nate BDK, who was a rival gang member with the Gangster Disciples. CW-39 reported that MONTILLA and MUNIZ were in possession of firearms while in the auto body shop. CW-39 reported that Nate BDK hid behind the mechanics when confronted. MONTILLA told Nate BDK that if he did not fight the Trinitarios they would find him and shoot him.
 - ii. After the confrontation in the auto body shop, MONTILLA, MUNIZ, and the Trinitarios associate remained together in the Range Rover. At some point, they went to get a drink. The Trinitarios associate and MONTILLA dropped MUNIZ off to go inside of a store. As they were waiting for MUNIZ, the Trinitarios associate observed a BMW pulling up on the other side of the road. The BMW parked and Nate BDK exited. MONTILLA then exited the vehicle and began firing at Nate BDK.
- d. CW-50 provided information concerning the March 22, 2025, shooting.
 - i. CW-50 learned about the shooting from MONTILLA and MUNIZ. MONTILLA and MUNIEZ told CW-50 that MONTILLA and

MUNIZ went to buy food and that MONTILLA had two guns at the time. MUNIZ asked to hold one of the guns. MONTILLA told MUNIZ that if he is going to hold it, he must use the gun. MONTILLA saw Gangster Disciple member Nate BDK in a car near Methuen Street in Lawrence. MONTILLA shot at Nate BDK, and then MUNIZ came out of the market he was in and also shot at Nate BDK.

FF. 4/16/2025 – SHOOTING IN PARIS, MAINE

780. Investigators learned about an incident taking place in Paris, Maine, on April 16, 2025. Multiple cooperating witnesses described a shooting and high-speed chase that took place where one Trinitarios faction led by RICHARD PENA targeted a trap house operated by RIKY MONTILLA. Members and associates working for PENA traveled from a trap house controlled by PENA to a trap house controlled by MONTILLA and opened fire. At the time of the shooting, MONTILLA was conducting a firearm sale and fled in a vehicle with the customers and multiple firearms.

781. In the aftermath of the shooting, Maine law enforcement engaged in a high-speed chase of the vehicle containing MONTILLA. During the chase, MONTILLA discarded an AR-15 rifle, and the vehicle was disabled by spike strips.

i. Initial Police Response

782. According to report from Paris, Maine Police and Maine State Police, on April 16, 2026, officers responded to a report of shots being fired in the area of Park Street in Paris, Maine. Maine State Troopers responded within a few minutes. On the way, a responding Trooper observed a vehicle heading away from the residence at high speed and began following it. Shortly thereafter a high-speed chase ensued.

783. During the chase, the Trooper observed a rifle being thrown out of the window of the vehicle he was pursuing. The pursuit continued and ultimately concluded when a deputy with

the Androscoggin's Sheriff's Department engaged a spike strip and disabled the vehicle, which crashed. Four occupants of the vehicle were taken to the hospital. One of the occupants was RIKY MONTILLA, who provided a false name and was not identified. At the time, MONTILLA was wanted for a warrant charging the March 22, 2025, shooting described above.

784. During a search of the disabled vehicle and the surrounding area, officers recovered a Glock 19X 9mm handgun and .223 caliber rifle in the area consistent with where the Trooper had observed the rifle being thrown.

785. The next day, law enforcement executed a search warrant at the trap house controlled by MONTILLA that was located on Park Street in Paris, Maine. During the search, officers recovered several ounces of drugs, including methamphetamine and crack cocaine, and drug distribution paraphernalia, such as baggies and a blender. In the driveway, officers recovered 9mm and .40 caliber casings. The property at Park Street contained a residence and a trailer. The trailer had a bullet hole in the side. Inside the residence, officers located a Glock firearm box for a Glock 19X 9mm firearm that matched the firearm recovered from the disabled vehicle.

786. The owner of the premises was interviewed and stated that they permitted Dominican drug dealers from Massachusetts to utilize the residence. The owner told officers that they received 100 grams of cocaine or crack cocaine per week from the Dominican drug dealers to allow them to deal at the residence. The owner identified a photograph of RIKY MONTILLA as one of the drug dealers who had stayed at the Park Street residence.

ii. Cooperating Witness Information

787. Multiple cooperating witnesses provided information concerning the April 16, 2025, shooting incident in Paris, Maine.

- a. CW-20 provided information about the April 16, 2025, shooting in Paris, Maine. CW-20 stated that MONTILLA told CW-20 that PENA coordinated a

shooting that targeted MONTILLA in Maine. This shooting took place prior to a high-speed car chase that MONTILLA described to CW-20.

- b. CI-38 provided information about the April 16, 2025, shooting in Paris, Maine. CI-38 stated that PENA authorized the shooting of MONTILLA over Facetime. CI-38 heard PENA issue the order for MOTA to shoot MONTILLA. CI-38 stated that MOTA and other Trinitarios associates got a ride to MONTILLA's trap house and opened fire at MONTILLA. CI-38 stated that PENA ordered the shooting because MONTILLA convinced one of the younger Trinitarios associates working for PENA to start working for MONTILLA, stealing and drugs and money from PENA.
- c. CW-39 provided information about the April 16, 2025, shooting in Paris, Maine. CW-39 worked under MONTILLA selling drugs at a trap house in Maine controlled by MONTILLA. While in Maine selling drugs, MONTILLA enticed a young Trinitarios associate to stop selling drugs for PENA, and to start working for MONTILLA. MONTILLA made this transition appear to be a kidnapping and sent messages to PENA suggesting that MONTILLA had kidnapped the Trinitarios associate. In response to this, CW-39 believed that PENA and others working for him shot up MONTILLA's trap house. PENA called CW-39 shortly after the shooting and reported that they had shot up the trap house. At the trap house, MONTILLA was in possession of an assault rifle and a Glock 19. MONTILLA had obtained the assault rifle from one of the drug customers. At the time PENA and his associates shot at the trap house, MONTILLA was in the process of selling a firearm to three unidentified males. When MONTILLA was shot at, he fired back and then got into the gun-customer's car and drove away. MONTILLA called CW-39 shortly after the shooting and reported what had happened. MONTILLA would later tell CW-39 that he got into a car chase with police and threw the assault rifle out of the window before the car crashed.
- d. CW-48 provided information about the April 16, 2025, shooting in Paris, Maine. CW-48 stated that PENA and HECTOR MOTA, A/K/A "BEBO," controlled a trap house in Paris, Maine, and a Trinitarios associate was working for them in that trap house. MONTILLA convinced the Trinitarios associate working in the trap house to steal PENA's and MOTA's drugs and money, which were valued at \$10,000. At the time, MONTILLA showed MOTA the drugs and money that he caused the associate to steal, stating "Thank you for the work, this shit is fire." MOTA, who was in his senior year at Lawrence High School at the time, received this information while in class. While at high school, MOTA spoke with PENA about the theft of the drugs and money and PENA told MOTA to "do some shit," which meant to retaliate. MOTA then made contact with other Trinitarios associates and organized a retaliatory shooting from the high school. CW-48 stated that MOTA left Lawrence and travelled to a trap house that he controlled and met with three Trinitarios associates, including DEREK MERCADO. CW-48 stated that MOTA formed a

plan where the group would travel to MOTA's trap house and open fire at MONTILLA's trap house. MOTA provided firearms to the associates and obtained a ride from MOTA's trap house to MONTILLA's trap house. MOTA, MERCADO and two other associates then walked through the woods to MONTILLA's trap house. One of the weapons they utilized was a fully automatic UZI machinegun. When they observed MONTILLA, they opened fire. After firing, MOTA, MERCADO, and the associates got a ride back to MOTA's trap house.

GG. 4/29/2025 – RECORDING OF JUSTANE GARCIA DESCRIBING SHOOTING AT RIVAL GANG MEMBERS

788. On JUSTANE GARCIA, A/K/A "J BILLZ," was captured on a consensual recording with a cooperating witness. During the recording, GARCIA discusses an incident where he shot at rival gang members outside of a nightclub. GARCIA identifies the individuals he shot at as: (1) "MENA," who is ALES MENA, A/K/A "SHUBILL," ; (2) "Hugo," a/k/a "Juice," who is Hugo Del Rosario (a member of the Gangster Disciples who, on September 13, 2025, would be killed by Trinitarios members outside of a nightclub; discussed below); (3) Chana, a member of the Gangster Disciples; and (4) MENA's little cousin, who is an associate of the Gangster Disciples.

789. GARCIA explains that Chana contacted GARCIA in the club and GARCIA rebuffed him, telling Chana, "I don't fuck with you, Nigger!" After GARCIA paid the bill he saw three individuals with hoodies coming inside and heading towards where he was ("we pay the tab, boom, boom, boom! I see three dudes, little bro, that were coming in because to where I was, I could see outside", "I also see three dudes with hoodies"). GARCIA explains that Chana tells GARCIA to come down from the VIP section and says they are going to get him after the club ("they like, 'No, we're going to get you after the club!'").

GARCIA:	Chana's telling me he fucks with me, I'm like, "Hmm!" I don't fuck with you, nigger! I'm telling him, I'm like, "Nothing of that, little bro, you're telling me like this, [UI] outside of the club"—
CHS:	Uh-huh . . .

GARCIA:	I'm like, "Fuck with you—
CHS:	[OV] Uh-hum.
GARCIA:	--I'm looking at him like . . . yeah, "All right, nigger."
CHS:	A stupid ass, right?
GARCIA:	[UI] they—
CHS:	[spitting sound]
GARCIA:	--they start asking for the tabs; we pay the tab, boom, boom, boom! I see three dudes, little bro, that were coming in because to where I was, I could see outside—
CHS:	Uh-huh?
GARCIA:	--it was a day party, so the window's open. [clicking sound] So, I also see three dudes with hoodies. I'm like, "Oh shoot, who's that?" They come in front of my section and started tweaking and I'm "Nigger, calm down, nigger from the—" 'cause I'm in [sic] the top of the—
CHS:	[OV] Uh-hum . . .
GARCIA:	--VIP. He's like, "Come down, nigger! Come down nigger!" I'm like, "None of that, little brother, you think I'm dumb, nigger?" an-and they like, "No, we're going to get you after the club!" So, what do I do? And I go, "Whoa, since they passed m-my way—

790. GARCIA explains that he jumps down from VIP and runs from the rival gang members since he was outnumbered three to one ("I jumped down", "I'm basically by myself versus three niggers", "as soon as I come outside, I run, nigger. It's on Common Street"). GARCIA runs to the car and gets his gun and loads a round into the chamber ("I run, nigger, to my car, ooh, I open it, I lock it, grab the blick from the passenger, cocked it"). When the rival gang members come outside, he turns on the laser beam attached to his firearm ("When they start coming out, they u—like they—I turn on the laser right away").

CHS:	[OV] Uh-hum.
GARCIA:	-- <i>I jumped down. I jumped off—</i>
CHS:	[OV] Wow!
GARCIA:	-- of the VIP. Boom! And they feel it, like I jumped down and they looked back and I'm like, "come one chase me". [raucous chatter in the background] Okay, pay me, I know that I don't owe anything. So, I'm by—I'm basically by myself versus three niggers.
CHS:	[OV] Ooh, uh-huh!
GARCIA:	I'm like, come and get me. Boy, nigger! When I—as soon as I come outside, I run, nigger. It's on Common Street.

CHS:	[chuckles]
GARCIA:	I run, nigger, to my car, ooh, I open it, I lock it, grab the blick from the passenger, cocked it, nigger—these dudes had still not come out. When they start coming out, they u—like they—I turn on the laser right away.

791. GARCIA points the gun at the rival gang members (“And I point it at them”). GARCIA identifies the three rival gang members as “Hugo” (referring to Hugo Del Rosario, a/k/a “Juice”), ALES MENA, a/k/a “Shubill,” and Shubill’s cousin. GARCIA states that he fired three times at the rival gang members (“when I saw those people passing, I shot three bullets without thinking”, “I let these niggers get me tight and I shot three bullets at them!”).

GARCIA:	And I point it at them... at him, nigger; so, the nigger’s is like this.
CHS:	[snorts] Ducking already, yeah.
GARCIA:	Yeah—
CHS:	[coughs]
GARCIA:	Uh, nigger, the three of them ducked. Hugo [PH], Mena [PH], and-and the-the-the cousin of . . . Hugo, Whose it’s [PH] cousin the-the thing—
CHS:	What Mena? Mena, the chubby one that-that—
GARCIA:	Yes.
CHS:	What the fuck?
GARCIA:	A chubby white one. Mena—
CHS:	[OV] [coughs]
GARCIA:	--Mena, that’s Hugo’s—
CHS:	[coughs]
GARCIA:	--that’s Shoe’s-Shoe’s little cousin. So, it was him, Shoe and Juice [PH].
CHS:	Hmmm . . .
GARCIA:	Flooring it, little brother, when I saw those people passing, I shot three bullets without thinking. Pah-pah-pah! When I shot gang, I’m like, “Yo, I’m going to jail, gay nigger!” That’s the first thing I thought, I’m like, “I’m a dumbass, nigger! I let these niggers get me tight and I shot three bullets at them!”

792. GARCIA says that this turned into a shootout on Common Street and identifies the incident as taking place in the summer (“I’m in the middle of Common Street”, “in summertime”). GARCIA runs back to his vehicle and sees the rivals start firing back, using vehicles for cover (“they start blowing back”, “he’s under the car shooting over the-over the car”).

GARCIA:	Yeah, bro! I shot three bullets, little brother. So, once I popped, puah! The first thing that crossed my mind is, "I'm going to jail." I'm like, "Damn! I'm a idiot I'm in the middle of Common Street—
CHS:	[OV] [UI].
GARCIA:	--in a shirt, nigger, in summertime, no hoodie, nothing—I'm going to jail!
CHS:	[scoffs]
GARCIA:	Nigga, I run to my car and I [UI] off. When I [UI] off, pft—they start blowing back; but I see Shoe--
CHS:	[guttural sound]
GARCIA:	--that he's under the car shooting over the-over the car.
CHS:	[scoffs]
GARCIA:	Oh, I'm like, "This nigger didn't—bah!" He was shooting there, and I passed him by the side like this.
CHS:	[scoffs] [laughs]
GARCIA:	And no—he didn't hit my car even once, bro. Never!
CHS:	[coughs] He's very dumb. To shoot at you [UI], so-so that you—so you know they got guns. So, you run up on 'em.
GARCIA:	[OV] So that—yeah, but you know that they shot back too.
CHS:	[OV] No, no, no! So, you don't run up on 'em!
GARCIA:	Yeah! I'm like, "Yeah, you know what I was thinking?" Run up on them—
CHS:	[scoffs]
GARCIA:	--the first time. When they was coming out the club, I'm like—
CHS:	So, so, they did it, nigger, yeah, yeah.
GARCIA:	--"Should I just shoot this nigger right here?"
CHS:	Nigger, they ain't stupid [UI] you let off, nigger.
GARCIA:	No, but that nigger was shooting straight like this, bro.
CHS:	[UI].
GARCIA:	Pow! Pow! Pow! Over the car, with his head down. He was not looking to see where he was going to shoot. With his head down!
CHS:	[UI].
GARCIA:	But the gun—I could see it in the air like this, "Plah!" it was exploding—
CHS:	[OV] Upwards.
GARCIA:	-- <i>everything was going up.</i>
CHS:	Uh-huh!
GARCIA:	<i>The sparks was up; it wasn't going straight.</i>
CHS:	The same, nigger, to scare you, ah!
GARCIA:	[OV] <i>Yeah, I'm like, "This nigger's a bitch!"</i>

793. GARCIA states that after the shooting one of the rival gang members called him, and GARCIA asked why he was shooting in the air ("He called me afterward, 'Nigga, you know

what time it is? Why you ain't blow back?' 'Little bro, you shot at the air!'). GARCIA says that of the three shots he fired he hit their car twice ("Of the three shots, I hit the car twice").

GARCIA:	He called me afterward, " <i>Nigga, you know what time it is? Why you ain't blow back?</i> " "Little bro, <i>you shot at the air!</i> "
CHS:	<i>The fucking air, you dumbass, nigga!</i>
GARCIA:	[OV] " <i>Ah, you didn't hit no cars in the parking lot, you ain't hit my car, you ain't shit!</i> "
CHS:	[UI].
GARCIA:	No [UI]! [chuckles]
CHS:	[chuckles]
GARCIA:	And-and their car had—
CHS:	[coughs]
GARCIA:	--two hits. Of the three shots, I hit the car twice.
CHS:	[OV] The car.
GARCIA:	<i>They was running</i> [sound of chimes] <i>to a car.</i>
CHS:	Uhm!
GARCIA:	<i>You feel me? So, I'm putting the gun so they can run into the bullets. You feel me? I hit the car, nigger, twice!</i>
CHS:	And-and-and it was their car.
GARCIA:	<i>Yeah</i> , their car was hit, <i>yeah</i> , all of it.
CHS:	And that Hugo— <i>that's crazy!</i> Hugo and Mena, <i>nigga, nigga!</i> <i>What the fuck happened over here, nigger?</i>
GARCIA:	<i>Yeah.</i>
CHS:	Because Hugo is not about that life not one bit. And neither is Mena.

794. GARCIA says that the rival gang members have never successfully attacked him ("they never get me"). GARCIA compares himself to other Trinitarios associates who have been attacked, such as "Ice," referring to ISIAH MEDINA ("They beat him up. Shoe, the nigger; Hugo struck him from behind, Shoe threw him, they jumped him"). GARCIA also notes that the rivals attacked "Richie," referring to RICHARD PENA ("Then they took Richie"). Based on this, GARCIA states that the rivals tell him that he will be the next to be targeted ("You next, you, you next!"). GARCIA says that is why he always carries a knife with him ("At times I am in that, I always got a knife.").

GARCIA:	No, [chuckles] they never get me.
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CHS:	[UI]? [chime sounds]
GARCIA:	Uh, no, Ice [PH]!
CHS:	Oh! [scoffs]
GARCIA:	They beat him up. Shoe, the nigger; Hugo struck him from behind, Shoe threw him, they jumped him [UI].
CHS:	[siren sounds in the background] In the club?
GARCIA:	In [UI]. Then they took Richie [PH] and they [UI] [chuckles], uh? [laughs] They only tell me, “You next, you, you next!” I’m like, “Is that all?”
CHS:	[OV] I been there.
GARCIA:	At times I am in that, I always got a knife.

795. GARCIA says that “Blade,” referring to PENA, was jumped at the gym (“Blade got jumped nigger in the thing—in the gym”) and that they caught him coming out of the gym and they jumped him (“They caught that nigger”, “coming out the gym, they jumped him”).

GARCIA:	Nah! Blade got jumped nigger in the thing—in the gym.
CHS:	[blowing his nose] wasn’t at the club? Coming out of the club?
GARCIA:	In the gym—
CHS:	[blowing nose loudly] [UI] yes-yes?
GARCIA:	[UI]. They caught that nigger like six-nine—
CHS:	[UI]?
GARCIA:	--coming out the gym, they jumped him.

HH. 5/3/2025 – RECORDING OF YORDALI YORRO DISCUSSING EXTORTION

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796. On May 3, 2025, YORRO and GARCIA were captured on a consensual recording with a cooperating witness discussing YORRO’s vision for the Trinitarios to make money in the city by extorting nightclubs, businesses, and music performers with violence and threatening their licenses to operate and sell alcohol.

797. YORRO begins by explaining that law enforcement is scrutinizing the Trinitarios heavily and that the leaders need to avoid attention (“We gotta just... disappeared”, “Completely, for a little bit, just... completely like, nobody could be like on some, like, Ah! ‘Cause at the end of the day, them niggas is just looking for... at somebody”).

YORRO:	You not understanding.
CHS:	So... no, no, no, no, like, I...
YORRO:	What I'm trynna tell you is...
CHS:	I'm telling everyone the same thing, when they come to me with that shit, I'm like, not...
YORRO:	But look. It's that you gotta do, you ain't got no exit, bro. You, you're not understanding what I'm trynna tell you. Right now...
CHS:	Mm-hmm.
YORRO:	We gotta just... disappeared.
CHS:	Mm-hmm.
YORRO:	You feel me? Completely, for a little bit, just... completely like, nobody could be like on some, like, Ah! 'Cause at the end of the day, them niggas is just looking for... at somebody.

798. YORRO explains that any activity in the Essex Street Projects will draw police attention and that they are watching senior members in particular (“You tee up with niggas in the projects”, “They watching, gang”, “they just wanna put a face to something”). YORRO makes it clear that arrests and cooperation by a senior member would result in a ‘domino effect’: if “[o]ne nigga go down, we all go down.”

YORRO:	You tee up with niggas in the projects. Dig. They watching, gang.
CHS:	Mm-hmm. [SMACKS LIPS] I know that [U/I] ...
YORRO:	You feel me? And they just wanna put a face to something. A—this is what we coming down to. You hear what I'm saying?
CHS:	Mm-hmm.
YORRO:	And right now is not the time to lose. 'Cause it goes, just a domino effect. One nigga go down, we all go down.

799. YORRO explains that he is trying to organize and assemble the most effective and trustworthy Trinitarios into a “super team.”

YORRO:	You get what I'm saying, bro? Just, bro, I'm trying to just... niggas don't understand, I just want to have a super team, nigga. Like a motherfucking...
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800. YORRO goes on to describe what he envisions for the Trinitarios and it amounts to organized extortion and monetized violence that will allow the Trinitarios to stay quiet and off the street. For instance, YORRO states that the Trinitarios will ensure that drug dealers can only sell marijuana that they get from Trinitarios (“You want some weed? You better get it from here,

nigga.”). If the drug dealers do not get their weed from the Trinitarios they will be robbed and forced to buy their marijuana from the Trinitarios (“‘You get robbed.’ ‘You want some Q, nigga?’” “You run it from here or you get robbed.”).

YORRO:	And we just stay quiet, my brother on the lay low. “You want some weed? You better get it from here, nigga.”
CHS:	Mm-hmm.
YORRO:	“You get robbed.” “You want some Q, nigga?”
CHS:	[LAUGHS] What?
YORRO:	You run it from here or you get robbed.”

801. Under YORRO’s leadership, the Trinitarios will also extort musical performers that come to Lawrence and the nightclubs that pay for them. If someone were to come to Lawrence wearing expensive jewelry, that performer would be required to “check-in” with the Trinitarios or get robbed (“Oh, you performing nigga?”, “Your jewelry nigga? You gotta check in with the niggas.”). YORRO explains that the performer would be forced to check-in or pay the Trinitarios ten percent of the earnings (“You feel me? If not, nigga, ten percent (10 %).”).

YORRO:	Your jewelry nigga? You gotta check-in with the niggas. Oh, you performing nigga? What’s the word?
CHS:	Mm-hmm.
YORRO:	You feel me? If not, nigga, ten percent (10 %).

802. GARCIA then chimes in, commenting that the target would have to keep \$50,000 on hand to pay the Trinitarios (“Yeah, you gotta keep fifty (50) on it.”). YORRO explains that the performer will need to send a bottle of liquor to his section in the VIP and \$1,000 (“You gotta send me a bottle to my section and uh, and a band.”). YORRO says the performer and nightclub will have to accommodate the Trinitarios being in the club for the performance with thirty gang members (“And we in this, nigga, thirty (30) deep, what’s the word”). YORRO describes this level of extortion as “real money, gang shit.”

GARCIA:	Yeah, you gotta keep fifty (50) on it.
YORRO:	You gotta send me a bottle to my section and uh, and a band.

GARCIA:	Mm-hmm.
YORRO:	And we in this, nigga, thirty (30) deep, what's the word.
YORRO:	Bro, we gotta get on...
CHS:	Nigga, I [U/I].
YORRO:	...some gang shit, bro.
GARCIA:	Yeah.
YORRO:	On some real money, gang shit.

803. YORRO then focuses the conversation on the Acqua nightclub. YORRO states that he will talk to the owner ("I'm trynna talk to the nigga, the owner"). GARCIA suggests that YORRO could arrange a meeting so that the Trinitarios can go there as a group ("For a group of us to go there"). YORRO corrects GARCIA --- "Yo, my brother, No! You crazy? Bro, you're not understanding."

YORRO:	Acqua, bro.
GARCIA:	[U/I] give us [U/I], give us [U/I].
YORRO:	Nigga. Fuck that. I'm trynna talk to the nigga, the owner. And on some shit. Nigga, listen, bro...
GARCIA:	For a group of us to go there, [U/I].
YORRO:	Yo, my brother, No! You crazy? Bro, you're not understanding.

804. YORRO's plan is to approach the owners of another nightclub in Lawrence called Mir and tell them that the Trinitarios will take Club Acqua out of business, causing Club Mir's business to skyrocket ("Go talk to the owner of Mir and to tell them, What's up? You know that if we take Acqua out of business... out of circulation... your shit is gonna boom the fuck off for the summer."). YORRO will ask the owner of Mir to pay him \$50,000 to put Acqua out of business ("Make it happen, give me fifty (50).")

YORRO:	The guy from, from Acqua.
GARCIA:	Yes.
YORRO:	You know he's from Pequito.
GARCIA:	Yeah, fact, yeah.
CHS:	Yeah.
YORRO:	Those guys are Pequito, right? ¡Boom! Okay. Go talk to the owner of Mir and to tell them, What's up? You know that if we take Acqua out of business... out of circulation... your shit is gonna boom the fuck off...
GARCIA:	Mm-hmm.

YORRO:	...for the summer. What's the word? Make it happen, give me fifty (50).
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805. YORRO's plan is simple. One club will pay the Trinitarios \$50,000 and the Trinitarios will, as GARCIA comments, "turn" the other club "off." The clubs are close in proximity to each other and once the owners of Club Mir pay YORRO \$50,000 ("Give me fifty"), they can walk outside and watch the Trinitarios shoot everyone at Club Acqua: the Trinitarios will shoot everyone ("stand outside with a cup, nigga. See, see the show. Bouncer, everybody getting clapped"). This level of violence will close Acqua ("That shit gotta get closed"), leaving Mir as the only nightclub open for the summer.

YORRO:	Give me fifty (50), you know what I'm saying?
GARCIA:	We'll turn them off.
YORRO:	Give me fifty (50), nigga, and stand outside with a cup, nigga. See, see the show. Bouncer, everybody getting clapped.
GARCIA:	Mm-hmm.
YORRO:	That shit gotta get closed, nigga. [LAUGHS]

806. YORRO believes that the Trinitarios organization is at the "level" where they can commit violence and begin extorting legitimate businesses ("You gotta pay me, nigga. You know what I'm saying?", "Yo, pay me, nigga." "We at that level, my nigga."). GARCIA agrees ("That's a fact").

YORRO:	You gotta pay me, nigga. You know what I'm saying?
CHS:	[U/I].
YORRO:	Yo, pay me, nigga. Yo, B.
CHS:	[U/I].
YORRO:	We at that level, my nigga.
GARCIA:	That's a fact.

807. YORRO proposes that they ask for \$50,000 from the rival club in order to shutdown Acqua ("You give me fifty (50) bands", "To close Acqua? 'Cause this shit is gonna boom up."). GARCIA says that he has a number of Trinitarios under him that will do it for free ("I have... a few young guys that will do it for free").

YORRO:	You know what I'm saying? You give me fifty (50) bands...
CHS:	Of course, nigga. You understand me?
YORRO:	To close Acqua? 'Cause this shit is gonna boom up.
GARCIA:	I have...
CHS:	Alright.
GARCIA:	...a few young guys that will do it for free. [LAUGHS]
YORRO:	We good.

808. YORRO says they will pay the shooters \$25,000 and provide them with a firearm suitable for the purpose ("You give me twenty-five (25) and, and..." "The blick that's gonna get shit done."). GARCIA replies that he would provide the firearm free of charge ("Nah, I even throw in the blick, muchacho"). YORRO suggests that they would structure the payment as \$25,000 up front and \$25,000 after the shooting ("Twenty-five (25) upfront and the other twenty-five (25) when shit get done").

YORRO:	You give me twenty-five (25) and, and...
CHS:	Mm-hmm.
YORRO:	The blick that's gonna get shit done. You know what I'm saying?
CHS:	Yup.
GARCIA:	Nah, I even throw in the blick, muchacho.
CHS:	ourselves, because [U/I] to do too much, because, uh-huh.
YORRO:	No, bro. I, I grab them shit with a glove and give it back to you, "Here, you have that case in your hand. I don't know shit, nigga. I don't even know you, nigga."
GARCIA:	no cap.
YORRO:	Twenty-five (25) upfront and the other twenty-five (25) when shit get done, nigga, we lit.

809. YORRO suggests how they could doubly capitalize on the closing of Acqua. Specifically, YORRO states that they will sponsor a major musical artist to come to Club Mir once Club Acqua is closed down ("We go have this nigga go and bring a main artist," "To Mir's. Right after, nigga").

YORRO:	We go have this nigga go and bring a main artist.
CHS:	Mm-hmm.
YORRO:	To Mir's. Right after, nigga.
GARCIA:	Pop off.
YORRO:	On the weekend, nigga. so and so out here, nigga. Breaking news.

CHS:	[LAUGHS]
YORRO:	¿Qué lo qué?
CHS:	Muchacho.
YORRO:	Comes like a millionaire with fifty (50) bands, nigga.
GARCIA:	Mm-hmm.
YORRO:	[STAMMERS] and connect with the old man. I'm cool, nigga.
CHS:	[LAUGHS]
YORRO:	C'mon, my brother. I'm on some other shit, gang.

II. 5/29/2025 – RECORDING OF YORDALI YORRO, A/K/A “OG LOW,” DISCUSSING ORGANIZING THE TRINITARIOS, SHOOTING CLUBS CONTROLLED BY RIVAL GANGS, AND DISTRIBUTING CONTROLLED SUBSTANCES

810. On May 29, 2025, YORDALI YORRO was captured on a consensual recording with a cooperating witness discussing the state of the Trinitarios enterprise following the February 2025 arrests and Racketeering Indictment, and the Lawrence Chapter's relationship with the Gangster Disciples in Lawrence. This recording takes place shortly after YORRO was observed conducting a drug transaction with Chana, a ranking member of the Gangster Disciples. During the recording, YORRO makes references to his conversation with Chana during the drug transaction.

811. At one point in the recording, YORRO discusses the Gangster Disciples and Trinitarios sharing sources of drug supply. YORRO indicates that they need to corner the market on the drug customers (“fiends”) and that without the sources of drug supply that are controlled by the Trinitarios, the Gangster Disciples will not be able to make money (“In the real life, without us, they not eating.”). YORRO explains that he will make contact with the rivals and their sources of drug supply because drugs are how they will raise money for guns, ammunition, and vehicle rentals that will cause the Trinitarios to become prosperous (“that they bring this in and that’s how you get guns, that’s how you get ammunition”, “how you get the rentals” “That’s how you get—you make shit happen, right”). YORRO explains the Gangster Disciples either want a piece of the

20 kilograms of drugs that the Trinitarios are bringing in or they don't ("You niggas either want the 20 keys that come in, or you don't.").

YORRO:	Listen, I'll print all the papers out and I'll give it to you personally. You know what I'm saying? I'm 'bout to go link up with Shu, too. [sound] Unless you know what's the fucking word, you feel me? 'Cause them niggas, them niggas is not eating without us right now. Bro, we're grownups now. Things have changed. Now we have to get after the fiends and get after the money 'cause without them—In the real life, without us, they not eating.
CHS:	Yes, but you know there's a couple of them that have done a couple crazy things too, the dudes should sit down and talk to each other because—
YORRO:	Yes, but listen, that Shu... Shu, Chana [PH], uh... Mula, those are the dudes <i>that bring this</i> .
CHS:	Um-hum, um-hum
YORRO:	Brandon, Brandon's dad— <i>that, that they bring this in and that's how you get guns, that's how you get ammunition—</i>
CHS:	Um-hum.
YORRO:	-- <i>that's how you get the rentals</i> [PH].
CHS:	Um-hum.
YORRO:	<i>That's how you get—you make shit happen, right? If them niggas is in tune, right? "You niggas either want the 20 keys that come in, or you don't."</i>

812. YORRO explains that if the Gangster Disciples do not want to play by his rules, the Trinitarios will go shoot up Club Acqua, which is controlled by the Gangster Disciples, and shut down the club ("we go and shoot up Aqua and shut it down and then they just took a complete L all aboard"). YORRO explains that if it comes to a full war, the Gangster Disciples will be without drugs, contacts, and a nightclub ("They end up without food, without contacts, and without, without a club."). YORRO says that if it becomes open violence, the Trinitarios will still remain on top, will retain access to their drug supply, and the Trinitarios will continue to beat them in the streets ("And then, 'What are we going to do now?' You understand? And we are going to keep eating, in control...").

YORRO:	"And y'all figure it out," and we go and shoot up Aqua and shut it down and then they just took a complete L all aboard.
CHS:	[OV] <i>All a—all around, yeah.</i>

YORRO:	You know what I mean? They end up without food, without contacts, and without, without a club.
UM:	And without a club
CHS:	And without a club
YORRO:	And then, “What are we going to do now?” You understand? And we are going to keep eating, in control...

813. YORRO describes the fact that when he had a meeting with the leader of the Gangster Disciples, he was armed (“bro, I carry mine on me”). If the Gangster Disciple leader had thrown a punch at him, YORRO would have killed him in the street and faced the consequences (“If he throws a punch at me, I leave him dry right there, boom, and I do thirty.”). YORRO states that he originally set up the meeting as part of a drug transaction where he was going to personally sell 300 grams to the leader of the Gangster Disciples (“I don’t waste my time. I went to take him 300 grams. I told him, ‘Come on, I’ll make a play.’ I’m going to talk to him, boom!”). YORRO then explains what he really wanted as part of the agreement is for the Gangster Disciples to turn over a member of the Gangster Disciples named Nate BDK to the Trinitarios so that the Trinitarios can kill him (“Now, what I want is to come to an agreement, so they turn Nate over to me.” “Backdoor Nate. Nate BDK, you know what I mean?”).

YORRO:	[OV] No, bro, I carry mine on me. If he throws a punch at me, I leave him dry right there, boom! And I’ll do thirty (30). Fuck it. Because what I don’t... I don’t care about nobody. I went to take him 300 grams and I told him, “Come on, I’ll make the play myself. I’m going to talk to him.”
CHS:	Um-hum.
YORRO:	Forget about that. “No, that the little shady people.” Like... none of that, bro.
CHS:	Um-hum.
YORRO:	Now, what I want is to come to an agreement, so they turn Nate over to me. Backdoor Nate. Nate BDK, you understand?

814. YORRO then begins to speak about how he wanted the gangs to run in Lawrence. YORRO notes that the Lawrence Trinitarios have not killed or shot many rivals and that some innocent victims were in fact killed during the gunplay (“we don’t spank hella [PH] niggas”, “And

hella people who were even innocent went down, right?”). YORRO asks, rhetorically, whether the Lawrence Trinitarios were really at war with the rival gangs or if the Trinitarios are in fact at war with Federal law enforcement (“are we beefing with the opps right now? Or we beefing with the Feds?”). YORRO answers his own question, noting that in fact the Trinitarios are at war with Federal law enforcement (“We’re beefing with the Feds.”), and that they want drugs, guns, and violence to predicate their cases and investigations (“what the Feds want? Drugs, guns, and violence, right?”).

YORRO:	We, we don’t spank hella niggas. And hella people who were even innocent went down..
CHS:	Um-hum.
YORRO:	Right? Now, this is the point, right? Are we gonna—are we beefing with the opps right now? Or we beefing with the Feds?
CHS:	Um-hum, and they’re on their way.
YORRO:	We’re beefing with the Feds.
CHS:	So then?
YORRO:	And what the Feds want [sic]? Drugs, guns, and violence, right?

815. YORRO states that he wants to change how the gangs in Lawrence operate. The gang members will keep their guns for protection (“leave the guns in the streets ‘cause everybody gotta protect them”) but they will stop shooting one another and stop killing one another (“we take violence and all the other fucked shit that come with it”, “The bodies and all this shit”). YORRO describes this approach as a “silent war” -- the Trinitarios will still shoot and kill the rivals if they disrespect the Trinitarios but it would only be for excessive acts of disrespect, which would also end the agreement for their shared drug supply (“The silent war is, ‘If you disrespect us, the, the eating line goes off’”, “And now we [sic] shooting at you, niggas.” And we got all the blicks because we buy all the blicks from them”).

YORRO:	If we eliminate at least two of those...
YORRO:	Violence... all that extra shit.

YORRO:	And leave the guns in the streets ‘cause everybody gotta protect them, but we take violence and all the other fucked shit that come with it...
CHS:	Um-hum.
YORRO:	The bodies and all this shit...
UM:	Free for all.
YORRO:	Free for all.
CHS:	They back off, they back off.
YORRO:	And we play the silent war. The silent war is, “If you disrespect us, the, the eating line goes off...”
CHS:	Um-hum.
YORRO:	“And now we shooting at you, niggas.” And we got all the blicks because we buy all the blicks from them...
UM:	And all the numbers.
YORRO:	All the numbers, we got—
CHS:	Um-hum.
YORRO:	You understand what I’m saying? Uh, it’s, it’s up here. Now we just . . . we’re trying to eliminate the shit from up here...

816. YORRO returns to the discussion with Chana. YORRO mentioned to Chana that the Gangster Disciples control Club Acqua and that Trinitarios are being shot and assaulted every time they go there (“You have Acqua, but every time one of my dudes goes to Acqua”, “there’s a problem”, “Are we all going to kill each other? And are we going continue this way”). YORRO explained this to Chana and noted that Nongo, Chana’s brother is the one causing problems on the street and the Trinitarios were going to kill him (“your brother is doing a lot of bullshit and right now, he’s the only one making noise on the street and we’re going to shoot him, bro”). YORRO states that he told Chana that he would shoot him right there and take his chain (“I don’t care. [scoffs] I’m here with you. I don’t care. I’ll shoot you and take your chain and that’s it, and I keep on walking.”).

UM:	What about Acqua?
YORRO:	That was another thing I told him, “Let’s find common ground.” You have Acqua, but every time one of my dudes goes to Acqua—
UM:	There’s a problem.
YORRO:	--there’s a problem.
CHS:	Um-hum.

YORRO:	You understand? So then, what are we going to do? Are we all going to kill each other? And are we going continue this way?
YORRO:	Oh, he's like, "Yeah, you know that it's just... certain people gotta play certain parts," and I was like, "You gotta play the part where you save your brother."
CHS:	Um-hum.
YORRO:	"Because your brother is doing a lot of bullshit and right now, he's the only one making noise on the street and we're going to shoot him, bro."
CHS:	Um-hum.
YORRO:	"Oh, no!" that, "Niggas can't tell me that they're gonna shoot my brother! I feel some type of way, blah, blah!"
CHS:	It's the truth, man.
YORRO:	"I don't care. I'm here with you. I don't care. I'll shoot you and take your chain and that's it, and I keep on walking."

817. As the conversation continues, YORRO notes that the Trinitarios could be moving significant quantities of drugs and making substantial sums, potentially selling up to 70 kilograms of drugs from a single shipment ("Find a way how to move 70 keys and forget about these dudes").

YORRO:	The thing is if nobody takes it... listen, if nobody takes the initiative... We, we gonna be here, all the time in the same cycle.
UM:	Same cycle all the time.
YORRO:	And I am not playing, like — "Nobody, like, the squad"—I'm not into that. I'm just looking at the bigger picture that if we grow, bro... I would like to have Trensita back on his prime, Guadi back on his prime . . . Everyone back on they [sic] prime and just sit down and move . . . 70 keys.
CHS:	Um-hum.
YORRO:	Find a way how to move 70 keys and forget about these dudes. These dudes...
UM:	They're not even worth it.

818. YORRO states that the rivals have small ambitions to look cool in Lawrence ("they want to be lit in Lawrence"). YORRO's aspirations for the gang are much larger. YORRO suggests that if they move silently for a while they can amass \$60,000 and they can pay some Boston shooters to murder all of the Gangster Disciples ("go to Boston, bro. To one of those blocks, one of those blood thirsty dudes... and you give them sixty (60,000) bucks to two (2) or three (3) of those young ones"). YORRO states they could even set up the rivals and situate the killers that they hire with a place to stay and stolen vehicles ("Bro, we have an AirBnB rented and a bunch

of Stoli.”). YORRO states it will only take \$40,000 or \$60,000, and they will be able to kill all the rival gang members (“Take 40, 60 and kill everyone.”).

YORRO:	<i>No, no, they don't look past their nose. Uh, they want to be lit in Lawrence. If they go elsewhere, they're not gonna be lit, so they're gonna come over here. It won't be in a year. It won't be in two. It won't be three, but when we all get our money up and we have sixty thousand (60,000) bucks and it's gone, it's gone.</i>
CHS:	Mmmm
YORRO:	The light goes off on people quickly... boom.
UM:	<i>Everybody lit.</i>
YORRO:	We go to Boston, bro. To one of those blocks, one of those blood thirsty dudes... and you give them sixty (60,000) bucks to two (2) or three (3) of those young ones.
CHS:	Yeah.
YORRO:	And there is no one left. The move is over.
CHS:	Dude.
YORRO:	“Bro, we have an AirBnB rented and a bunch of Stoli.”
CHS:	Um-hum. And there's some around there right now, that can get the move.
YORRO:	“Take 40, 60 and kill everyone.”

819. YORRO says the Gangster Disciples already targeted a Trinitarios associate named “Sosa” (“He already had a chance. He already touched one of my guys, which was Sosa. Sosa got hit, forget that.”). Sosa was one of the scammers on YORRO’s team, who was making money for the Trinitarios (“You had already messed with one of my guys who’s working and he’s...”, “he’s a scam nigga on my squad”). YORRO states that he will tell the Gangster Disciples to talk with their members and stay away from the Trinitarios operations or they will send multiple younger members to shoot and kill Nongo (“Talk to your brother. Stay away from me, bro. Talk to your brother because then I go and let loose three or four young ones on y’all, and we shoot Nongo”).

UM:	[UI] not even going under.
CHS:	That one is talking, uh-huh [UI] grown as nigga.
YORRO:	[UI]
CHS:	Of course, when you can talk, talking normal, calmly, boom, boom, and anyway one is—we still with the shit.
YORRO:	The thing is...
UM:	What?

YORRO:	I'm going to talk to Shu. <i>Fuck what he thinks.</i>
UM:	No, but [stutters] okay, but . . .
YORRO:	The thing is you are not understanding. The thing is you . . . there is, there is a <i>middleman</i> , and there is a <i>break-down man</i> , and there is a <i>plug</i> and there is the, the real one.
UM:	No, no, I understand.
YORRO:	You understand? <i>So, you just gotta--</i>
UM:	But you know, I don't want to make problems or anything, but . . . to the point of his brother and the <i>lit</i> thing and stuff, you know?
YORRO:	No, because the thing with his brother, he'll just understand it... when one <i>pu-- when you pull the plug.</i>
CHS:	Mm-hmm.
YORRO:	You understand? He already had a chance. He already touched one of my guys, which was Sosa. Sosa got hit, forget that. The scammer, the cousin of the guy who used to come to the house before, there in Hudson?
CHS:	I heard about that shit with Sosa, man,
YORRO:	Boom! And so, what happened? You had already messed with one of my guys who's working and he's...
UM	[U/I].
YORRO:	And he's and he's of the squad guys.
CHS:	Mm-hmm.
YORRO:	He... he is a scam, he's a scam nigga on my squad. Fuck that!
	[VOICES OVERLAP]
UM	That's what he knows.
YORRO:	He doesn't look for problems, he is not a gangster or anything like that.
UM1:	Mm-hmm.
CHS:	Mm-hmm.
YORRO:	He just gets money and he, and he likes music and . . . "Talk to your brother. Stay away from me, bro. Talk to your brother because then I go and let loose three or four young ones on y'all, and we shoot Nongo, and everyone will be happy because he is just being a nuisance on the street."

820. YORRO explains his plan to provide drugs to the Gangster Disciples members ("we are grabbing one fifty, we're going to give them 100") and adulterate those drugs substantially ("And I'll cut it a bunch"). YORRO expects that they will complain, but he knows that the Trinitarios need to exert control over the drug supply because a number of senior Gangster Disciples members who will readily commit violence or orchestrate others to do so were recently released from jail ("if we continue like this, soon we'll all kill each other", "there are a bunch of

dudes who has been released, and are low-key and they think we don't know it", "They, for real, are full of hate and they're our age. Those are the niggas we gotta worry about 'cause they pull strings"). YORRO then notes that the Trinitarios' agenda is to make money and avoid federal prosecution ("Everybody agenda here is getting money and being careful of the Feds."). YORRO compares that agenda to the Gangster Disciples agenda, which is to cooperate with federal law enforcement ("Their agenda over there is to work for the Feds.").

YORRO:	"Don't give anything to any of those guys from that crew. At least for a week." If we are grabbing one-fifty (150), we're given them one-hundred (100). That's what we have. You understand? There's nothing more or we could give you fifty (50) boy, we'll leave you dead in the water.
CHS:	[laughs]
YORRO:	You understand? That's it, and I'll put a lot of cut in it. Fourteen (14) grams of cut. [LAUGHS] So, you took fourteen (14)—fourteen (14) grams of cut in a "lump", in, in that shit.
CHS:	A thirty-five (35), a thirty-six (360, nigga. Damn.
YORRO:	Eat shit.
CHS:	[UI]
YORRO:	No, because I've done it to them... and the dudes <i>complain</i> , but I don't care because, at the end of the day, I know where this is headed.
CHS:	Um-hum.
YORRO:	And if we continue like this, soon we'll all kill each other. Because summer is coming and there are a bunch of dudes who has been released, and are low-key and they think we don't know it.
CHS:	Um-hum.
YORRO:	They, for real, are full of hate and they're our age. Those are the niggas we gotta worry about 'cause they pull strings. They're the ones that . . . that are, how do I say; four-forty (4-40). You understand? They are the ten-twos (10-2s). They recruit.
CHS:	Um-hum. [UI] <i>nigga is mad.</i>
YORRO:	And they, and they recruit, right? But they recruit with their own agenda. Everybody's agenda here is getting money and be careful with the Feds. Their agenda over there is to work for the Feds.

821. YORRO says his offer to Chana as part of the negotiations will be for a member of the Gangster Disciples to be sacrificed to the Trinitarios. YORRO indicates that it should be a senior member that will affect their morale ("What I want is a good back door. One good one, from

that side, that will hurt everyone.”). YORRO wants the hit to look like the Trinitarios were not responsible (“It didn’t came from us. We wasn’t even there. Nobody knows about nothing”), suggesting it could look like a fight and the rival gang member was just randomly shot (“as if it had been a fight”, “and they shot him, and he died”). YORRO emphasizes that the rival has to be killed (“But he has to be put to sleep.”).

YORRO:	What I want is a good back door. One good one, from that side that will hurt everyone.
CHS:	Um-hum.
YORRO:	A good one that they will not even expect. It didn’t came from us. We wasn’t even there. Nobody knows about nothing.
CHS:	Um-hum.
YORRO:	That shit just went on the street as if it had been a fight.
UM:	[OV] [UI]
YORRO:	It was a fight...
UM:	And they shot him.
YORRO:	[OV] [UI]—and they shot him, and he died.
UM:	[UI] A neutral one. A neutral.
CHS:	Um-hum.
YORRO:	But he has to be put to sleep.

822. YORRO then notes that after the Lynn investigation, federal law enforcement is clearly looking for the leader of the Lawrence Chapter (“They looking for a face for Lawrence right now.”). YORRO suggests that he will not be identified or caught because he does not talk to anyone and simply remains in his house (“I don’t talk to anybody, I don’t play with anybody, and I sit down in my house”). YORRO comments that law enforcement believed PAULA-CABRAL was in charge of the Trinitarios and following his arrest, they are looking to investigate who has taken over (“To them, to them Nelfew was the one running the show. What happens? In the time of them building the case on, on Nelfew”, “Who got the face?”).

YORRO:	They looking for a face for Lawrence right now. They are not going to find me. Why are they not going to find me? I don’t talk to anybody, I don’t play with anybody, and I sit down in my house if I don’t have anything to do.
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UM:	[UI]
YORRO:	<i>Listen to me. Over there, we don't know... what there is.</i>
UM:	[OV] [UI] [noise]
CHS:	Um-hum.
YORRO:	No, no, it's that, it's that—No, it's that he has, he has the <i>clout</i> [PH].
UM:	That's what I tell you. But [UI] without you trying.
YORRO:	[OV] No, listen, listen, listen.
CHS:	Um-hum.
YORRO:	To them, to them Nelfew was the one running the show. What happens? In the time of them building the case on, on Nelfew...
CHS:	Um-hum.
YORRO:	Who got the face?
UM:	Now you on clout. [noise]
YORRO:	Who got the face? Who got the, the, the trajectory? Who got the . . .? You know what I mean?

823. YORRO then comments about the first phase of Operation Paper Machetes and the paperwork from the case. YORRO states that federal law enforcement have no insight into the activities of the gang, noting that the leadership in the Dominican Republic was planning to give the Supreme position to LUIS JEFFREY SANTANA, A/K/A “SOPITA.” YORRO notes that SOPITA was arrested and they did not put him into the position and that he left Massachusetts. YORRO notes that the time is right to put people in leadership positions that will be a resource for the members (“Now is the time to put people in position in the big top that got a resource for the niggas.”). YORRO states that the leadership in Lawrence must be people with influence who can exploit the opportunity to make money through music and drug dealing (“And people with influence”, “We have the open lane to just become rich off one thing: music...” “And trapping...”). YORRO states that the entire gang has to participate and cooperate in order for this to be successful (“but everybody gotta play”, “Oh, you have the broom, I have the dustpan”).

YORRO:	What I'm saying is that the last final word...
UM:	[aside] Wait, wait, wait... [chuckles]
[UM1]	On the paperwork from Lynn was that [noise]...
CHS:	Um-hum.

YORRO:	...that... [sound] Lynn, Salem, Lawrence, and Haverhill, but they don't know. But listen... Lynn and Haverhill, that they don't know what really cooked up before—
CHS:	Um-hum.
YORRO:	Because they wanted to give the Su [PH], the Su to, to, to Sopita—
CHS:	[OV] Um-hum.
YORRO:	--Sopita took a [UI], and they left him hanging. He ended up staying, boom, he left. Right now, everything is baking. Everything is baking, right? Now is the time to put people in position in the big top that got a resource for the niggas.
CHS:	[OV] Um-hum.
YORRO:	You feel me? And people with influence. You already, like, niggas don't get what the process is right now.
CHS:	[OV] Um-hum.
YORRO:	We have the open lane to just become rich off one thing: music...
CHS:	Um-hum
YORRO:	And trapping... but everybody gotta play—Oh, you have the broom, I have the dustpan, you—
CHS:	[UI]
YORRO:	But everybody gotta build something that we could all win, right now.

JJ. 7/21/2025 – YOLDARI TEJEDA CORONADO HOME INVASION

824. Investigators are familiar with a home invasion taking place in Lawrence on July 21, 2025, which targeted a drug dealer and resulted in the theft of large quantities of fentanyl. Based on information from a cooperating witness, investigators believe that this home invasion was committed by YOLDARI TEJEDA CORONADO, A/K/A “NONOY.”

i. Initial Police Response

825. According to Lawrence Police Report #25003853, on July 21, 2023, at approximately 1:31 AM, officers responded to the area of 19 Lenox Street for a report of a robbery. Officers spoke to the victims and learned about what took place.

826. One of the victims reported to officers that he was at a nightclub on Union Street and left the club at approximately 1:10 AM and then traveled to his house with a number of acquaintances. While his friends went upstairs, the victim stayed outside and two males approached him. One of the males pointed a gun to his head and demanded his jewelry. The males

then demanded that the victim bring them inside and said they were looking for “Sofia” because they had been sent to rob her. The victim brought the two males up to his apartment.

827. According to the victims, once inside, one of the males pointed a firearm at the people inside the apartment and forced them onto the floor. The two males took everyone’s jewelry and left the apartment.

828. The victim described the two males as wearing all black and masks. One of the males was carrying a black gun, and the other male held a black and green knife. The victim reported that the two males were driving an older model silver or white Honda CR-V.

ii. Further Investigation

829. Officers continued to investigate and learned that the victims suspected they were set up for robbery by a mutual acquaintance. Through pursuit of that avenue, officers determined that a gray Toyota Highlander was involved in the robbery. In particular, the gray Toyota Highlander was captured on surveillance picking up the mutual acquaintance from outside of the nightclub that the victims attended. The gray Toyota Highlander was captured on license plate readers in the area of the victim’s residence at the time of the robbery.

830. The gray Toyota Highlander was identified and determined to be a rental vehicle that had been rented by a woman now known to the mother of TEJEDA’s child. This woman had also been previously arrested in Maine as part of a drug investigation related to the Trinitarios drug operations.

831. During an interview with the woman by Lawrence Police, she told investigators that she had rented the car and allowed her friend “Papileta” borrow it. The woman reported that the car was towed because she could not make the upcoming payment and she provided the location of the vehicle to the person she rented it from. Aquino told investigators that a friend of

hers named “Nonoy” told her where the car was located, and that the person named “Nonoy” contacted her to tell her that the gray Toyota Highlander needs to be towed to Boston to fix some damage.

832. At the time of the interview on August 6, 2025, the woman was pregnant. The woman reported that the father of the child was in the Dominican Republic. A cooperating witness reported that TEJEDA, A/K/A “NONOY” was in fact the father of the child for which the woman was pregnant. The woman also stated that she did not know whether or not ‘NONOY’ and another person involved in the rental were “Trinis.”

iii. Surveillance Video

833. Officers obtained surveillance from the victim’s residence on Lenox Street. The video depicts the victim being assaulted and robbed outside of the residence by two assailants.

834. The first assailant is wearing light jeans, a black hooded sweatshirt, a blue hat, and a white ski mask covering his face and neck. The white ski mask would conceal the neck and any hairstyle of the first assailant, and the face mask would conceal any facial hair.

835. The second assailant is wearing black pants, a black hooded sweatshirt, and a black ski mask. The second assailant is clearly depicted holding a firearm.

836. In the image, the victim can be seen outlined in red, standing by the light pole. The first assailant walks into frame from the left and approaches the victim (outlined in red), followed by the second assailant. A still image depicting this follows.



837. The two assailants appear to rob the victim while standing near the light pole. The second assailant appears to be holding a firearm to the victim's back.



838. The two assailants then force the victim to the door of his apartment. As the first assailant comes closer to the camera, details of the blue hat can be observed. Those details include a white detail at the rear of the hat, a white detail at the top of the hat, and what appears to be a

sticker on the top of the bill. Additionally, there appears to be a tattoo along the top of the first assailant's wrist and thumb.



839. An interior video clip was also provided depicting the assailants forcing the victim into the apartment. As they climb the stairs, the blue hat worn by the first assailant is revealed to be a LA Dodgers hat, with the LA Dodgers logo in white and a sticker on the bill. A later clip from interior also shows the assailants exiting the building. During the second clip, the rear detail of the blue hat appears consistent with the Major League Baseball logo.



iv. Review of YOLDARI TEJEDA's Snapchat

840. Investigators reviewed YOLDARI TEJEDA's Snapchat account and observed images pertinent to this investigation.

841. Investigators located a series of images from December 2024, where YOLDARI TEJEDA can be observed wearing a blue hat that appears to be identical to the hat worn by the first assailant. The blue hat worn by TEJEDA has an MLB logo at the rear, a white detail at the top, and sticker on the bill. While the team logo cannot be observed, in one still image it appears that the logo at the front of the hat is white.



842. Investigators also located numerous photographs depicting a tattoo of a scorpion on TEJEDA's hand. The tattoo extends onto the top of his thumb, which is consistent with the markings observed on the first assailant.



843. Additionally, investigators located an image posted by TEJEDA to his Snapchat on July 21, 2025, a few hours after the robbery, which depicted TEJEDA in possession of a large quantity of cash.



844. Investigators reviewed TEJEDA's Snapchat for the time of Ashleylynn's interview, where she reported that the father of the child was in the Dominican Republic. TEJEDA's Snapchat at the time depicts a number of posts that show him in the Dominican Republic. For example, on August 12, 2025, TEJEDA posted a picture to his Snapchat with the caption "Peravia," which is a province in the southern of the Dominican Republic. This is consistent with Ashleylynn reporting that the baby's father was in the Dominican Republic at the time of her interview with Lawrence Police.



845. Investigators located a series of posts by TEJEDA on September 20, 2025, where he is shirtless holding a newborn baby in a hospital. This timetable is consistent with TEJEDA holding Ashleylynn's newborn baby and the timing of the posting is consistent with Ashleylynn's pregnancy coming to term.



v. Cooperating Witness

846. A cooperating witness provided information concerning the July 21, 2025, home invasion.

- a. CW-3 provided information about the July 21, 2025, home invasion. CW-3 told investigators that TEJEDA and his associate recently conducted a home invasion of an unknown drug supplier and stole large amounts of fentanyl. TEJEDA told CW-3 about the incident. TEJEDA told CW-3 that they utilized a silver Highlander during the home invasion.

KK. 8/15/2025 - POLICE SHOOTING IN RUMFORD, MAINE

847. Investigators are familiar with a shooting incident that occurred on August 15, 2025, in Rumford, Maine. During this incident, local Maine law enforcement attempted to stop a vehicle containing Trinitarios gang members. A high-speed chase ensued and the Trinitarios fired numerous rounds at the pursuing police cruisers. Through the investigation, in coordination with Maine local, state and federal law enforcement, the Trinitarios who were in the vehicle were identified as LUIS CABRAL, MARTIN TAVERAS and ESTERLIN GUTIERREZ. CABRAL,

TAVERAS and GUTIERREZ have been charged in the U.S. District Court for the District of Maine with Hobbs Act robbery, and firearm and drug offenses related to this incident.

i. Initial Police Response

848. Investigators are familiar with Rumford Police report #RP2503792, and an affidavit filed by federal law enforcement in the federal case in Maine, describing the robbery and shooting incident that took place in Rumford, Maine on August 15, 2025. *See United States v. Cabral, et al.*, District of Maine, Docket No. 2:25-cr-00162-JAW, ECF #3-1 (affidavit).

849. According to documents related to this incident, Rumford Police observed a Dodge Charger leaving a residence on Eaton Hill Road in Rumford. Officers attempted to stop the Charger, and a high-speed pursuit ensued. During the pursuit, the occupants of the Charger opened fire on the cruisers.

850. The Dodge Charger was later found abandoned. Along the route and in the area of the abandoned Charger, officers located phones, multiple firearms and drugs. Rifle caliber casings were recovered from the Dodge Charger. The firearms recovered by the responding officers included an AR-15 style rifle. Maine law enforcement agencies commenced a manhunt to locate the occupants of the Charger, with roadblocks and numerous units responding.

851. Multiple victims from the residence on Eaton Hill Road stated that they had just been robbed immediately prior to the pursuit and shooting. Officers responding to the incident located multiple Trinitarios associates nearby who were suffering from injuries they sustained during the robbery at the Eaton Hill Road residence.

852. Through the investigation, multiple witnesses identified LUIS CABRAL, A/K/A “MONO,” and MARTIN TAVERAS, A/K/A “FLEX,” as two of the males in the Dodge Charger at the time of the pursuit and shooting. A third Trinitarios member, ESTERLIN GUTIERREZ,

A/K/A “ESTERLIN,” was also identified through the recovery of his license from a phone located in the vicinity of the abandoned Charger. Multiple witnesses would later identify CABRAL and TAVERAS as participants in multiple armed robberies that preceded the high-speed pursuit and chase, including immediately prior to the incident.

853. Further investigation of the recovered cellular phones and witness statements revealed that CABRAL was supplying multiple individuals in Maine with fentanyl and cocaine. According to cooperating witnesses, CABRAL undertook multiple robberies, including the robbery of the residence on Eaton Hill Road immediately prior to the pursuit and shooting, in order to steal drugs and proceeds from Trinitarios associates who CABRAL believed had stolen his drug customers.

ii. 9/6/2025 - Recording of LUIS CABRAL Confessing to Incident

854. On September 6, 2025, CABRAL was captured on a consensual recording with a cooperating witness discussing drug distribution and the shooting in Rumford. In one portion of the conversation, the cooperating witness states that he will offer CABRAL drugs at his price (“I’ll have there whatever you want and I could give it to you at my price”) and also suggests that he has a young Trinitarios associate who wants to work in Maine with CABRAL selling drugs (“I have a young boy that wants to go up there.”). The cooperating witness offers for CABRAL to meet the young Trinitarios associate and get a sense for him (“I can introduce him to you tomorrow when we get together, and after that we spoke a blunt with him, so you could take a look at his behavior.”). CABRAL responds that any Trinitarios associate working for him only needs to focus on moving the drugs (“grab the work”) specifically, get the drugs, do the deals (“do the play”), and make the money (“get the money”).

CHS:	Yeah, I’ll have there whatever you want and I could give it to you at my price.
CABRAL:	Say no more.

CHS:	No, for a fact. Tribu, I also wanted to ask, what's going on, we are not going up there? I have a young boy that wants to go up there.
CABRAL:	Which one? Don't tell me is Deli [PH]?
CHS:	What freaking Deli you are talking about; I don't deal with rapist.
CABRAL:	Okay.
CHS:	Nah, nah, nah, it's a young guy that lives here, in the same building my mom lives; it's a white boy.
CABRAL:	So, let's work; that's cool.
CHS:	Nah, we are on it; if you want, I can introduce him to you tomorrow when we get together, and after that we spoke a blunt with him, so you could take a look at his behavior.
CABRAL:	go there, and the only thing he needs to do is grab the work, you know how it is.
CHS:	Nah, nah, okay.
CABRAL:	He's going to do the play, and get the money [U/I]

855. The cooperating witness explains that the worker will not steal the drugs and will pay the amount owed ("he doesn't steal, none of that"). CABRAL replies that "Rico," referring to RIKY MONTILLA, called and accused CABRAL of being a part of something that took place in Maine ("accusing me of being part of something that they did up there"). Investigators believe that to be a reference to the Paris, Maine shooting that occurred in April 2025 (described above). The cooperating witness explains that a Trinitarios member named Lil Baby was being accused of snitching.

CHS:	And he also has his Jordans; he is ready, [U/I] he doesn't steal, none of that.
CABRAL:	Oh, that's cool. The main thing is pay the mortgage and all. [U/I]
CHS:	Nah, nah, no cap, no cap. Nigga, that Deli nigga, I don't fuck with that nigga, all, all that bitch ass nigga, the Little Baby, nigga. Those niggas are thugs, at the end of the day, they did something bad to Spookie [PH], and they shot at Rico, and those are my dudes, so, I can't...
CABRAL:	Rico called me and he was telling me about that those niggas, are fucked up, they were accusing me of being part of something that they did up there, and he wanted to say that it was me and shit and that's not true; it's been a while since I went up there.

856. CABRAL explains that he had to send another Trinitarios member, who I know to be MARTIN TAVERAS, A/K/A "FLEX" ("them") to the Dominican Republic ("patio") because

“he shot at the cops whenever he wanted.”²³ CABRAL explains that there were three police cars chasing them (“three feds cars after the guys”). CABRAL says that he told TAVERAS about the police and told him to shoot when he says to shoot (“I told him, “Yo Flex, there are three (3) dudes, at the back, so whenever I tell you to shoot; shoot, because we are going to [U/I].”).

CABRAL:	Exactly to the place he was at, bro. Bro, look, didn't you hear what he did, bro? I had to send them to the patio, bro; he shot at the cops whenever he wanted.
CHS:	Shhhhhh...
CABRAL:	Bro, out of nowhere, boom, boom, Lil Baby's brother came out with some weird shit, “Oh, I'm in this house, this, and that.” Oh, you want to come with that, three (3) feds car parked after the guys. You understand? [U/I] my friend Flex, and I told him, “Yo Flex, there are three (3) dudes, at the back, so whenever I tell you to shoot; shoot, because we are going to [U/I].

857. CABRAL says he told TAVERAS to shoot at the police because he had a kilogram of drugs on him (“I have a kilo on me”) comprised of 500 grams of fentanyl (“500 bottom”), 500 grams of cocaine (“500 of the top”), and 50 grams in the trunk (“50 in the trunk”). CABRAL says they had five weapons in the car: a revolver, another two firearms, a 9mm firearm, and the .22 caliber (“We have the revolver that I have with me in the front, plus the other two (2) that we have, plus the nine (9), plus the twenty-two (22)”). The cooperating witness asks, “You shot at the cop?” and CABRAL replies, “Yeah bro, we shot at the cops; to the Feds. The Helicopter was on us.”

CABRAL:	Because I have a kilo on me. I have [U/I] and five hundred (500) bottom and five hundred (500) of the top, brother. So, you already know, because we have fifty (50) in the trunk. We have the revolver that I have with me in the front, plus the other two (2) that we have, plus the nine (9), plus the twenty-two (22); we are looking ugly, bro, and we are in Maine. Shoot. Bro, I swear the seven (7) bullet shots locked [poss. Jammed] on us.
CHS:	Pss... That, that was God.
CABRAL:	That was God, dude. We [U/I] and all, and we disable the [U/I].
CHS:	You shot at the cop?

²³ MARTIN TAVERAS would later be encountered in the Dominican Republic and deported to the United States to face an arrest warrant and federal charges in Maine related to this incident.

CABRAL:	Yeah bro, we shot at the cops; to the Feds. The Helicopter was on us.
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858. The cooperating witness says that the story sounds like the video game Grand Theft Auto (“GTA”). CABRAL responds that the police were looking for them for seven hours (“There were looking for us for seven hours, bro.”). CABRAL says they got through the incident like gangsters and did not get caught (“we came out like gangsters”). CABRAL says that law enforcement apprehended his drug addicts after the shooting, which I believe is a reference to the arrests and interviews of various witnesses described in the affidavit (“They got all my drug addicts, nigga, shit”).

CHS:	Yo! [CHUCKLES] Gangster. Nigga, GTA [PH], nigga.
CABRAL:	There were looking for us for seven (7) hours, bro.
CHS:	[BACKGROUND: UF: Can I come in?] [ASIDE: Yes, come in.]
CABRAL:	Listen bro, [U/I]
CHS:	[CHUCKLES] Oh shit, Tribu, that’s crazy, nigga.
CABRAL:	Nigga, we came out of there, not kidding around, we came out like gangsters.
CHS:	Bah, bah, bah. Oh shit, nigga.
CABRAL:	They got all my drug addicts, nigga, shit.

iii. Cooperating Witness Information

859. Multiple cooperating witnesses provided information concerning the August 15, 2025, Rumford, Maine robbery and shooting:

- a. CW-3 provided information about the August 15, 2025, shooting in Rumford, Maine. On August 16, 2025, CW-3 received text and audio messages from a Trinitarios associate known as “Sav” (whose identity is known to investigators) who was one of the robbery victims during the August 15, 2025, robbery and shooting. CW-3 provided the following information:
 - i. Trinitarios associates "Sav" and UM2 were robbed by Trinitarios gang members LUIS CABRAL (“Mono”), MARTIN TAVERAS (“Flex”) and other unknown individuals. “Flex,” “Mono,” and the others stole fentanyl and money from the victims. They threw "Sav" in a ditch and shot at him. Sav's arm was grazed and he went to the hospital. Following the armed robbery, “Flex” got into a shootout with law enforcement officers. Five individuals were involved in the robbery and shooting. Two of them were arrested in Maine and the

other three, including "Flex" and "Mono" got away. "Mono" claimed he was not present for the robbery or shooting.

- ii. The following are the Instagram Messages/text messages between Sav (via profile "flaxkodpl") and CW-3. Sav explains that CABRAL ("Mono") and MARTIN TAVERAS ("fmoney") came through his trap house with firearms, hit him, and tried to kill him ("mono kap fmoney capital n someone else came thru my spot wit like 13 blicks they shattered my skull n tried clapping me but missed"). Sav explains that he was grazed by the gunshot and just left the hospital ("im grased i js left the hospital"). Sav confirms that CABRAL ("Mono") and others who are Lynn Trinitarios members were the ones who conducted the robbery and shooting ("mono is the nigga my brotha usti chill wit n shit", "the other ones there lyn tribu").

Sav:	yo gang this lilbaby brother i cant get into my igo mono kap fmoney capital n someone else came thru my spot wit like 13 blicks they shattered my skull n tried clapping me but missed im grased i js left the hospital js now they took and broke my phone so icouldnt contactc noone
CW-3:	The what?
CW-3:	Who is them niggas?
SAV:	they dk the bros gnag mono is the nigga my brotha usti chill wit n shit that he short assf got 1844 tatted on his shoulderrs
SAV:	then the other ones there lyn tribu
CW-3:	Oh yea
SAV:	mono be in the esp all da time

- iii. Sav confirms that the incident happened a few hours ago ("couple hrs ago"). Sav states that they took drugs and money ("they didn't try gang they did they took all the work n bread"). Sav then explains in an audio message that they tied him up and he saw CABRAL's face and tried to explain that they are all Trinitarios ("Niggas done tie me up bro, you feel me? I see the nigga's face. So I'm telling the nigga 'yo gang this is not it, niggas is supposed to be united.'").

CW-3:	When this happened?
SAV:	11pm
SAV:	couple hrs ago
CW-3:	Yo was good with this niggas ?
CW-3:	What was they trying to do or take
SAV:	they didn't try gang they did they took all the work n bread thy pulled up on my deep asf i thought they were my niggas no cap
SAV:	Audio message: "Gang I swear it god gang. Like yo muddy that shit was crazy. Niggas done tie me up bro, you feel me? I see the nigga's face. So I'm telling the

	nigga ‘yo gang this is not it, niggas is supposed to be united. What’s good with you niggas?’ The nigga dam near broke my jaw gang.”
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- iv. Sav then confirms that it was CABRAL and TAVERAS (“You said flex and mono right?”, “yes”). Sav states that they stole his chain and watch, while they hit him with the firearm (“they snatched my chain everything i peeped flex cartier while they was hitting me wit da blick”). Sav explains that they were speaking in code and were wearing masks (“they was masked up speaking in code”). Sav then states that they tied him up, threw him in a ditch and shot him, grazing him in the arm (“they tied em up to then they threw me n a ditch n blew at me I got grased in the arm”).

CW-3:	You said flex and mono right?
SAV:	yes
SAV:	they snatched my chain everything i peeped flex cartier while they was hitting me wit da blick
SAV:	thats how i knew off rip
SAV:	they was masked up speaking in code
CW-3:	How many was of them?
SAV:	i seen like 7 of them but there was another one that tied up bro i was wit papeleta son they tied em up to then they threw me n a ditch n blew at me I got grased in the arm

- b. CW-20 provided information about the August 15, 2025, shooting in Rumford, Maine. Specifically, CW-20 heard from CABRAL about the August 15, 2025, shooting. CABRAL admitted to CW-20 that he was involved in the Rumford shooting and that TAVERAS also shot at police.

iv. Recordings of TAVERAS

860. Following this incident, investigators monitored TAVERAS’ Snapchat account. In a Snapchat video posted under the username “sevnthavexotics” and the moniker “Kandy Lane,” on or about August 26, 2025, TAVERAS filmed himself flashing Trinitarios gang signs with his thumb pointed upwards and pointer and middle finger extended. TAVERAS flashes another hand gesture typically used by members of the Gangster Disciples but pointing it towards the ground as a sign of disrespect. Members of the Trinitarios will do this openly to disrespect the rival gang. This recording was captured and I have reviewed it. A screen capture from the Snapchat video follows.



A screenshot of the video depicting TAVERAS flashing the Trinitarios gang sign.

861. In the video, FERNANDO TAVERAS states, “I made it home, baby. Ya heard? Tell the Feds to suck a dick, tell my PO to suck a dick. Nigga, come get me, ya heard? I’m right here, Nigga.” The next video that FERNANDO TAVERAS posted was inside of a vehicle driving on a road, with the text, “La Cana,” as seen below.



862. Law enforcement databases that track border crossings show no record of TAVERAS departing from the United States. Prior to the video being posted, however, CW-3 informed investigators that TAVERAS was planning to cross the border into Mexico to flee the country. Upon further investigation, investigators learned that TAVERAS departed from Mexico City to Santo Domingo on Arajet Airlines flight DM4101, on August 26, 2025, the same date that investigators believe TAVERAS posted the Snapchat video.

863. On or about August 31, 2025, CABRAL posted a video to his Instagram account, username “bandiii_a7m157.” The video is a cartoon of cows driving a vehicle being chased by

multiple police cars and driving down rural roads. The text that was super imposed onto the video reads: “Her: he’s probably out cheating...” and below it “The situation bro got us in rn (right now):” and at the very bottom of the video it says, “On my life” with several laughing emojis with the tagging of the Instagram account “fmoneyatm”. I believe that this post was made by CABRAL in reference to the shooting that took place two weeks prior. The “fmoneyatm” Instagram is known to be used by TAVERAS. A screenshot from the video follows:



864. I have reviewed historical cell site location information, including timing advance information (“CSLI”) for CABRAL’s cellular telephone ending in 9612. In particular, I reviewed the CSLI for August 15, 2025, at the dates and times pertinent to the home invasion, police chase and shooting in Rumford, Maine. The following is based on my preliminary review.

- a. Per information received from the FBI in Maine and the filed court documents in the Maine federal case, I know that the Rumford Police Department observed a Dodge Charger leaving 288 Eaton Hill Road at approximately 10:37 PM on August 15, 2025. A motor vehicle stop was initiated, the Dodge Charger attempted to flee, and a pursuit was initiated. The CSLI for the 9612 phone at approximately 10:02 PM places the phone in the vicinity of 288 Eaton Hill Road, Rumford, Maine.
- b. The CSLI for the 9612 phone shows that the phone continues to follow the path of the pursuit as it was described to me. In particular, I know from FBI Maine that the vehicle was abandoned in the vicinity of South Rumford Road near Big Rock Lane in Rumford, Maine. The CSLI for the 9612 phone places the phone in the vicinity of that location at approximately 10:44 PM.
- c. It was described above that one witness had told law enforcement that she had been requested to pick up “Shadow” in the vicinity of Route 232 at Thornton Lane in Rumford, Maine. The CSLI for the 9612 phone places the phone in the vicinity of that location at approximately 11:16 PM on August 15, 2025.

LL. 9/9/2025 – RECORDING OF JUSTANE GARCIA AND ANGEL SANTOS

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865. On September 9, 2025, JUSTANE GARCIA and ANGEL SANTOS were captured on a consensual recording with a cooperating witness. At the time of the recording, SANTOS had an active warrant on the Indictment charged in *United States v. Paula-Cabral, et al.*, which charged SANTOS with participating in two murders and multiple shootings. Shortly after the December 2023, murders that he committed in Lynn, Massachusetts, and while he was facing state charges, SANTOS fled the United States on foot through the Mexican border with his step-father, JANOY BATISTA, and flew to the Dominican Republic. SANTOS was later apprehended in the Dominican Republic in September 2025 and repatriated to the United States to face the pending charges. This recording was generated shortly before SANTOS’ apprehension.

866. In the recording, SANTOS asks GARCIA and the cooperating witness for a firearm (“What I need is a tool”). GARCIA asks how they can get a firearm to SANTOS (“You need a blick? Oh, oh. And uh-huh, bang. How can you get a blick over there?”), and the cooperating

witness suggests that an associate in the Dominican Republic may have one available (“one of my bro has one [U/I]. He’s supposed to be selling it but I, I gotta ask him how much, how much he’s asking”).

SANTOS:	What I need is a tool.
CHS:	Mm...
GARCIA:	What he said?
SANTOS:	Running my errands to grab a (U/I).
GARCIA:	You need a blick? Oh, oh. And uh-huh, bang. How can you get a blick over there?
CHS:	Um... one of my bro has one [U/I]. He’s supposed to be selling it but I, I gotta ask him how much, how much he’s asking.
GARCIA:	They’re selling a [U/I] around.
CHS:	That’s my brother. He’s a brother from...
CHS:	I can’t hear you; I can’t hear you.
SANTOS:	[BACKGROUND: (U/I).] [BACKGROUND: NOISES]
GARCIA:	What you said?
SANTOS:	I need a [U/I] to be able to make money, bro, because right now, I’m going down to [U/I] the spot, you know.
GARCIA:	Yeah.
SANTOS:	I have to go down with something, because...
GARCIA:	Yeah.

867. The cooperating witness reports that the .40 caliber firearm would cost 100,000 pesos (“One hundred thousand (100,000)”, “A forty (.40)”, “A forty (.40) for one hundred thousand (100,000)”). SANTOS responds that the price is too high (“A forty (.40) for one hundred thousand (100,000). that’s some crazy shit, you heard”). SANTOS says that the price is about \$2,600 in United States dollars (“Damn, two-thousand six-hundred (2,600)”, “Two-thousand six-hundred (2,600).”).

CHS:	One hundred thousand (100,000).
SANTOS:	(U/I).
GARCIA:	One hundred thousand (100,000). How much is one hundred thousand (100,000)?
CHS:	A forty (.40).
GARCIA:	A forty (.40) for one hundred thousand (100,000).
SANTOS:	A forty (.40) for one hundred thousand (100,000). that’s some crazy shit, you heard?
GARCIA:	How much is that?

UM4:	[BACKGROUND: (U/I). But you know, I told the guy one (1).]
CHS:	[U/I].
GARCIA:	Like, five-hunnit (500), right?
SANTOS:	<i>Damn</i> , two-thousand six-hundred (2,600)
GARCIA:	Two-thousand six-hundred (2,600).
CHS:	Yeah, shit is expensive in DR, bro.
GARCIA:	<i>Damn</i> .
CHS:	Hell yeah.
SANTOS:	[BACKGROUND: Yeah, it is expensive around here, to get it.]

868. GARCIA suggests that they buy the gun in Lawrence and send it to SANTOS in the Dominican Republic (“Them shit is crazy. It’ll be better to buy here and send it”). SANTOS responds that firearms are less expensive in the Dominican Republic (“but they’re less expensive here, for real”). The cooperating witness proposes that they gather a number of firearms and send them to the Dominican Republic to make a profit (“Why you think guys would grab ten (10) pieces and send them over there, nigga. They spend, let’s say as example; one thousand (1,000) or two-thousand (2,000) bucks, nigga, to... send them over there. And they can get a lot of money out of it over there”). GARCIA approves of the idea and suggests that they contact a Trinitarios associate named Omar, who has a number of pistols and a rifle (“Omar has about four (4) or five pistols over there and a rifle”).

GARCIA:	<i>Damn</i> . Them shit is crazy. It’ll be better to buy here and send it.
CHS:	Why, why, why you think guys are sending it?
GARCIA:	[LAUGHS].
CHS:	Yeah. Why you think guys are sending it?
SANTOS:	No, but they’re less expensive here, for real.
GARCIA:	Dude, that’s just some shit like that.
CHS:	Why you think guys would grab ten (10) pieces and send them over there, nigga. They spend, let’s say as example; one thousand (1,000) or two-thousand (2,000) bucks, nigga, to... send them over there. And they can get a lot of money out of it over there, bro. You crazy.
GARCIA:	<i>Hell yeah</i> . But we have to grab the thing. Dien [sic], you don’t talk to Omar?
CHS:	Oh yes, Omar has a few too.
GARCIA:	Omar has about four (4) or five pistols over there and a rifle.
CHS:	Yes. Yup.

869. GARCIA says he can buy SANTOS a firearm, because of their shared membership in the Trinitarios and because SANTOS is on the run (“I can buy you a piece. What I don’t know is, bro, I’ll buy you, I’ll buy you a gun for you, ‘cause, you feel me? You my brother, gang, and I know you in a tied situation”). GARCIA reiterates that he can buy SANTOS a gun but does not know how to get the gun to him in the Dominican Republic (“I’ll buy you a gun, but it’s like, my brother, how the—I don’t know how to send that shit, gang. I’m from here, I have never”).

GARCIA:	Because look, bro, I... I can buy you a piece. What I don’t know is, bro, I’ll buy you, I’ll buy you a gun for you, ‘cause, you feel me? You my brother, gang, and I know you in a tied situation. I’ll buy you a gun, but it’s like, my brother, how the—I don’t know how to send that shit, gang. I’m from here, I have never...
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870. SANTOS says he will shoot at anyone if they find him (“I’mma keep it real with you, nigga. I ain’t got no time, bro. If those people pull up, bro, I’m shooting them niggas, bro”). GARCIA advises SANTOS not to die like that (“You can’t go out like that, nigga.”). The cooperating witness similarly advises SANTOS that the third point of the warrior in the Trinitarios Magna Carta states that constant movement will keep him safe (“Nigga, nigga, tre’ (3) point is a warrior, bro, nigga, move, nigga, to move every so often and that’s it.”).

SANTOS:	Hey, bro. I’mma keep it real with you, nigga. I ain’t got no time, bro. If those people pull up, bro, I’m shooting them niggas, bro.
GARCIA:	Nah, nah.
CHS:	[LAUGHS]
GARCIA:	You can’t...
SANTOS:	[BACKGROUND: (U/I).]
GARCIA:	You can’t go out like that, nigga. [LAUGHS]
CHS:	Nah, to take it easy, nigga.
SANTOS:	[BACKGROUND: What nigga? You...]
CHS:	Nigga, nigga, tre’ (3) point is a warrior, bro, nigga, move, nigga, to move every so often and that’s it.
SANTOS:	[BACKGROUND: (LAUGHS)]
GARCIA:	No, don’t shoot at those people, pop. Don’t shoot at those people.

871. SANTOS reiterates that he has already made up his mind that he will not be apprehended (“Bro, I already made up my mind, gang, to be honest, bro”). SANTOS says that if they catch him, then he is caught, but if he is given time to prepare then he is shooting (“Trust me. If they get me, they got me. But if they give me time, you already know, I’m on, my nigga”). GARCIA notes that SANTOS has been moving smart since he went on the run (“Nah, but you’ve been moving smart, you’re the only one that’s zoom”), and SANTOS agrees that he is tactically minded (“You know me, nigga. I had always move like that. Tactical, gang”).

SANTOS:	Bro, I already made up my mind, gang, to be honest, bro.
GARCIA:	[LAUGHS] You made up your mind?
SANTOS:	Trust me. If they get me, they got me. But if they give me time, you already know, I’m on, my nigga
GARCIA:	Hell yeah. Nah, but you’ve been moving smart, you’re the only one that’s zoom.
SANTOS:	You know me, nigga. I had always move like that. Tactical, gang.
GARCIA:	Hell yeah, this nigga is smart as shit.

872. The conversation then turns to the recent arrest of a Trinitarios member named “Prieto” who faces deportation (“Prieto was grabbed by, allegedly, by immigration now”). GARCIA reports that when Prieto was arrested federal law enforcement began questioning him about the Haverhill Chapter and GARCIA (“The feds went and allegedly, asked him about me, that we, supposedly, opened a chapter in Haverhill, that the S.O.S. to Jay-Billz, woo, woo, woo. I’m like, “Oh shit.” I’m like, you know, I shut that down right away”). GARCIA reiterates the point that the federal agents who questioned Prieto mentioned GARCIA and the Haverhill Chapter (“They told Prieto just like that. They mentioned me and they mentioned the chapter and they mentioned everything”). GARCIA suggests that they know about the Haverhill Chapter from the Lynn Chapter members who were prosecuted (“But I think they know about that chapter, ‘cause of you niggas, bro.”).

GARCIA:	Bro, nigga, Prieto was grabbed by, allegedly, by immigration now.
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CHS:	Oh yeah, nigga, [STAMMERS]
GARCIA:	The feds went and allegedly, asked him about me, that we, supposedly, opened a chapter in Haverhill, that the S.O.S. to Jay-Billz, woo, woo, woo. I'm like, "Oh shit." I'm like, you know, I shut that down right away. S.O.S. zoom. Shutdown, my brother. You crazy, nigga, nobody jack that, nobody pulls nobody, you crazy. [LAUGHS].
SANTOS:	Nah.
GARCIA:	Of all of these guys who are being loud, and they're getting me involved, bro? You crazy.
SANTOS:	(LAUGHS) What the fuck? Nah, gang, you hot, nigga.
GARCIA:	Yeah, bro. They told Prieto just like that. They mentioned me and they mentioned the chapter and they mentioned everything.
CHS:	Mm.
GARCIA:	But I think they know about that chapter, 'cause of you niggas, bro.

873. SANTOS responds that his codefendants in the Lynn Chapter who were charged are not likely to withstand the federal charges and will snitch on the Trinitarios ("Those guys, those guys, like, never were... like, never were like that, bro. Those guys were not, like, like, able to withstand the heat, bro"). GARCIA acknowledges SANTOS' point and states his belief that someone is providing information to law enforcement ("you know what's up, that... I don't know who is, I don't know who is spilling the beans around here, but... I know somebody is mentioning, somebody is talking too much"). GARCIA notes that law enforcement knows about meetings on certain days and who was present ("how they know so much, muddy. Like that... that we did a meeting like, this day, that zoom. That so and so was present").

SANTOS:	That's not it, brodie. Those guys, those guys, like, never were... like, never were like that, bro. Those guys were not, like, like, able to withstand the heat, bro. Are you crazy?
GARCIA:	Yeah, [U/I], that shit, you know what's up, that... I don't know who is, I don't know who is spilling the beans around here, but... I know somebody is mentioning, somebody is talking too much. [LAUGHS]
SANTOS:	(LAUGHS)
GARCIA:	'Cause how they know so much, muddy. Like that... that we did a meeting like, this day, that zoom. That so and so was present. What you mean?

874. SANTOS tells GARCIA that a Trinitarios member named "Fuga" was the individual responsible for recording the meeting described in the first affidavit that took place on

December 1, 2024 (“El fuga, el fuga put a microphone in the meeting, bro”). GARCIA then asks if Fuga is a snitch, and SANTOS confirms it (“Fuga is not valid, right?”, “Nah, gang”).

SANTOS:	Manito. Manito, óyeme, óyeme. El fuga, el fuga put a microphone in the meeting, bro.
GARCIA:	Fuga is not valid, right?
SANTOS:	Nah, gang. (U/I).

875. SANTOS tells GARCIA and the cooperating witness that they need to wait for the discovery from the case to be provided (“You gotta, you gotta wait ‘til the papers comes out, bro”). SANTOS states that some people are reporting that LUIS ENRIQUE SANTANA, A/K/A “CHIKUITO,” is snitching (“They’re saying that (U/I), I don’t even know, gang. Niggas told me Chiquito is not valid”).

SANTOS:	Nah, gang. You gotta, you gotta wait ‘til the papers comes out, bro. Because, that’s what brodie is saying, bro, like, you understand me? They’re saying that (U/I), I don’t even know, gang. Niggas told me Chiquito is not valid. (U/I).
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876. GARCIA replies that he needs to know who is snitching because everyone is saying to free the Lynn Chapter members (“who’s not valid? Who’s not valid? So, I know to... ‘cause... these niggas be jackin’ like, free all them niggas”). GARCIA wants the valid gang members to be freed but also wants the snitches to stay in custody (“Nigga, I’m jackin’ free all the real niggas, keep the rats”). SANTOS responds that he is shooting on sight (“Nigga, I’m S.O.S.”) but will wait for the paperwork because has heard about multiple people snitching (“I have heard a bunch of stories, bro, what I’m going to do is; I’ll wait for the papers to come out and shit, to... you know”). GARCIA then asks SANTOS if he saw the papers about PAULA-CABRAL (“But you saw the papers, you saw what so and so said? Few is like, like, he spoke weird, right”).

GARCIA:	In, in, in, who’s not valid? Who’s not valid? So, I know to... ‘cause... these niggas be jackin’ like, free all them niggas. Nigga, I’m jackin’ free all the real niggas, keep the rats. [LAUGHS]
SANTOS:	Nigga, I’m S.O.S, nigga. I don’t know about them niggas. (U/I). (LAUGHS)]
GARCIA:	Damn, brodie. Yo, what they jackin’?

SANTOS:	Uh? Bro, those guys, to be honest, really honest... to be honest, gang. I have heard a bunch of stories, bro, what I'm going to do is; I'll wait for the papers to come out and shit, to... you know..
CHS:	Of course, it is a problem.
GARCIA:	But you saw the papers, you saw what so and so said? Few is like, like, he spoke weird, right?
SANTOS:	He's on that (U/I) shit.
GARCIA:	Right, right, bro. I didn't want to say because, you know, didn't wanna disrespect you, bro, but that shit, that nigga, that nigga... that nigga is crazy.

877. The cooperating witness confirms that GARCIA is referring to PAULA-CABRAL and GARCIA agrees (“Who? El goldo?”, “Nelfew”). GARCIA states that PAULA-CABRAL snitched and is not valid (“He snitched, my nigga. He's not valid. Like, I read that”, “This nigga ratted too fast”). The cooperating witness suggests that PAULA-CABRAL could provide a lot of information (“He's going to snitch a lot”).

CHS:	Who? El goldo?
GARCIA:	Nelfew.
SANTOS:	My man, bro, (U/I).
CHS:	Hell yeah, bro. He, bro, he got uh... [STAMMERS]
GARCIA:	He snitched, my nigga. He's not valid. Like, I read that, I'm like...
CHS:	Listen, listen.
GARCIA:	This nigga ratted too fast.
CHS:	If he... look, he, yeah, he dry snitch and he's going to snitch a lot.
SANTOS:	I don't know that.
CHS:	He's going to snitch a lot.

878. SANTOS states that if he sees PAULA-CABRAL he will shoot him (“I'll really boom at that nigga if I really see him”). SANTOS believes that most of the information that law enforcement knows is from PAULA-CABRAL (“like, most of the shit that they know is... I feel it's cause of that nigga”). SANTOS explains that PAULA-CABRAL would move very carefully, and would call him frequently with specific directives (“you know the guy used to move very tactical, bro. That like... zoom. Right away. The guy would call me like... ‘Listen...’”). GARCIA tells SANTOS that, even though SANTOS was moving carefully himself, SANTOS was telling

PAULA-CABRAL everything, which SANTOS agrees was the case (“the problem is, you were tactically moving, but you were telling him everything”, “Yeah, that was the thing”).

SANTOS:	(U/I), gang. I’ll really, bro, I’ll really boom at that nigga if I really see him, gang
GARCIA:	Hell yeah.
SANTOS:	Because, bro. So, the guy, bro... every—like, most of the shit that they know is... I feel it’s cause of that nigga, bro. ‘Cause I, bro.
GARCIA:	Bro, but they have you right here on here. It’s, it’s bro and then, you’re right here.
SANTOS:	Gang, bro.
GARCIA:	Like, what the fuck?
SANTOS:	You kno... you know the guy used to move very tactical, bro. That like... zoom. Right away. The guy would call me like... “Listen...”
GARCIA:	But the problem is, you were tactically moving, but you were telling him everything.
CHS:	Mm-hmm.
SANTOS:	Yeah, that was the thing.

879. SANTOS explains that he has been with PAULA-CABRAL since he was on his ninety-day probation before becoming a full member of the Trinitarios and SANTOS believed that PAULA-CABRAL was trustworthy (“I’ve been with that guy since I was a ninety (90), bro. So, I thought that nigga was, you feel me”). SANTOS notes that after the Lynn Chapter was exposed by PAULA-CABRAL, SANTOS will never be under a leader again (“after that shit, nigga. I ain’t being under nobody, nigga, you feel me?”). SANTOS explains that being part of a larger Chapter leads to cooperators snitching on the group (“for what? Like, so a guy like, flips on you like that, like, like, like it is nothing, bro”). GARCIA explains that he was under a Trinitarios member named “Empresario” and was running with CASTILLO GARCIA (“Chapa”) and that Empresario snitched on CASTILLO GARCIA (“That was happening to me, bro. I was running with, with Empresario and Chapa and those guys. And Didn’t Empresario went and snitched on Chapa? And like, I was under Empresario. I’m like, ‘What the fuck?’”).

GARCIA:	Trustily. And the guy there... spilled. zoom.
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SANTOS:	Yeah. Like, bro, I've been with that guy since I was a ninety (90), bro. So, I thought that nigga was, you feel me?
GARCIA:	Yeah.
SANTOS:	Like, top dog, you feel me?
GARCIA:	That's how it be, my nigga. That's how it be. Psst. Nigga, be crazy, niggas be like, psst.
CHS:	Psst.
SANTOS:	Nigga, after that shit, nigga. I ain't being under nobody, nigga, you feel me?
CHS:	[LAUGHS]
GARCIA:	Hell...
SANTOS:	Like that like... who? Are you crazy? And for what? Like, so a guy like, flips on you like that, like, like, like it is nothing, bro.
CHS:	Mm.
GARCIA:	Yeah.
SANTOS:	Hell no.
GARCIA:	And, and then you, you look weird, bro. That was happening to me, bro. I was running with, with Empresario and Chapa and those guys. And Didn't Empresario went and snitched on Chapa? And like, I was under Empresario. I'm like, "What the fuck?"

880. GARCIA says that they recently blessed in many new members who have yet to commit violence on behalf of the Trinitarios ("All those guys that we sworn in there... bro, to this day, this day, they still haven't done anything"). GARCIA says that these younger members were not supposed to get sworn in ("He knows that, in reality, them little niggas were not supposed to get sworn in").

GARCIA:	Bro, but look, look, look at all those guys, bro. All those guys that we sworn in there... bro, to this day, this day, they still haven't done anything.
SANTOS:	none of them? None of them? How come?
GARCIA:	The only one, the only that's valid there is Woody. Because Woody is always, you know, he's on with his piece and if he bumps into any pigs like out of nowhere and he will light them up and will do something stupid. But...
SANTOS:	(U/I).
GARCIA:	The others, bro. The others... Bebo, nigga, little Bebo, Tola, nigga, I don't know, brodie. I...
SANTOS:	And what's up with To'? Ye, what's up with that nigga?]
GARCIA:	There, he's around, he's around with Blade.
SANTOS:	Bro, bro.
CHS:	You heard, bro? I don't like that little nigga, for a reason.
GARCIA:	That guy thinks he's all of that. To be honest, bro, he was there when we did the sworn-in, that's why I talk, you feel me? He knows that, in reality, them little niggas were not supposed to get sworn in.

881. GARCIA says that they needed to bless in more members, because they needed the numbers (“We needed them to open”, “we needed numbers, bro”, “we needed niggas that was valid, gang, ‘cause we have mad niggas, but everybody was on probation”). GARCIA says that they needed active members in order to open the Haverhill Chapter (“How we gonna open a, a table or a chapter, bro, with nothing. How can we have a cabin?”, “With nobody”). GARCIA notes that the Haverhill Chapter was associating with members from the Lynn Chapter, and when those members were arrested, the Haverhill Chapter members were scared that they would be targeted next (“that’s why we went with the guys from Lynn. We was with them”, “then, it exploded, exploded, the thing exploded, in Lynn, ‘we were scared. Then, they mentioned us”).

SANTOS:	(U/I) to open, we needed them to open.
GARCIA:	We needed them to open.
CHS:	You heard?
GARCIA:	Even if it sounds bad, what we—we needed numbers, bro.
CHS:	Yeah, nigga.
GARCIA:	Like...
SANTOS:	(LAUGHS)
GARCIA:	We needed niggas... we needed niggas that was valid, gang, ‘cause we have mad niggas, but everybody was on probation.
CHS:	[SIGHS]
GARCIA:	Nobody is sworn-in. Like, damn. How we gonna open a, a table or a chapter, bro, with nothing. How can we have a cabin?
CHS:	With two (2) or three (3) people.
GARCIA:	With nobody.
CHS:	With two (2) or three (3) people.
GARCIA:	With nothing, bro.
CHS:	Upfront, you need eighteen (18) people just for, just for, just for cabin.
SANTOS:	(LAUGHS)]
GARCIA:	<i>Yeah</i> , that’s why we went with the guys from Lynn. We was with them.
CHS:	Yeah, because only to give the [U/I].
GARCIA:	And then, it exploded, exploded, the thing exploded, in Lynn, ‘we were scared. Then, they mentioned us.
SANTOS:	(LAUGHS).
GARCIA:	We like, “Oh shit.”

MM. 9/13/2025 – MURDER OF HUGO DELROSARIO IN LAWRENCE

882. Investigators are familiar with the murder of Hugo Del Rosario, a/k/a “Juice,” that occurred on September 13, 2025, in Lawrence, Massachusetts. This murder took place on Essex Street, across the street from Club Acqua at approximately 2:15 AM, shortly after the club had closed. This murder was committed by HECTOR MOTA and JEAN DELGADO, who targeted a member of the Gangster Disciples at the direction of RICHARD PENA, A/K/A “BLADE.” MOTA and DELGADO intended to kill a Gangster Disciple known to them as “Chana,” who was working at Club Acqua that evening but mistakenly killed Del Rosario.

i. Initial Police Response

883. According to reports from the Lawrence Police and the Massachusetts State Police, Lawrence Police responded to 154 Essex Street for reports of a shooting. When they arrived, they located the victim, Hugo Del Rosario, a/k/a “Juice,” deceased from a gunshot wound to the head. Del Rosario was found on the pavement on the driver’s side of a parked, black Honda Passport. The Passport was registered to the mother of an individual known as Chana. Both Chana and Del Rosario are both members of the Gangster Disciples.

ii. Crime Scene

884. At the scene, investigators recovered eight shell casings in 9mm and .40 caliber.

885. The black Honda Passport had been struck by numerous projectiles in the front right quarter, hood, and windshield.



iii. Surveillance Video

886. Investigators recovered video depicting the incident. Based on review of the surveillance videos, Chana's black Honda Passport is parked at 154 Essex Street facing toward Union Street. Video shows Chana wearing a white outfit, walking across from Club Acqua to the black Honda Passport. The following still images show Chana walking from Club Acqua and then Chana standing at the door of the black Honda Passport.

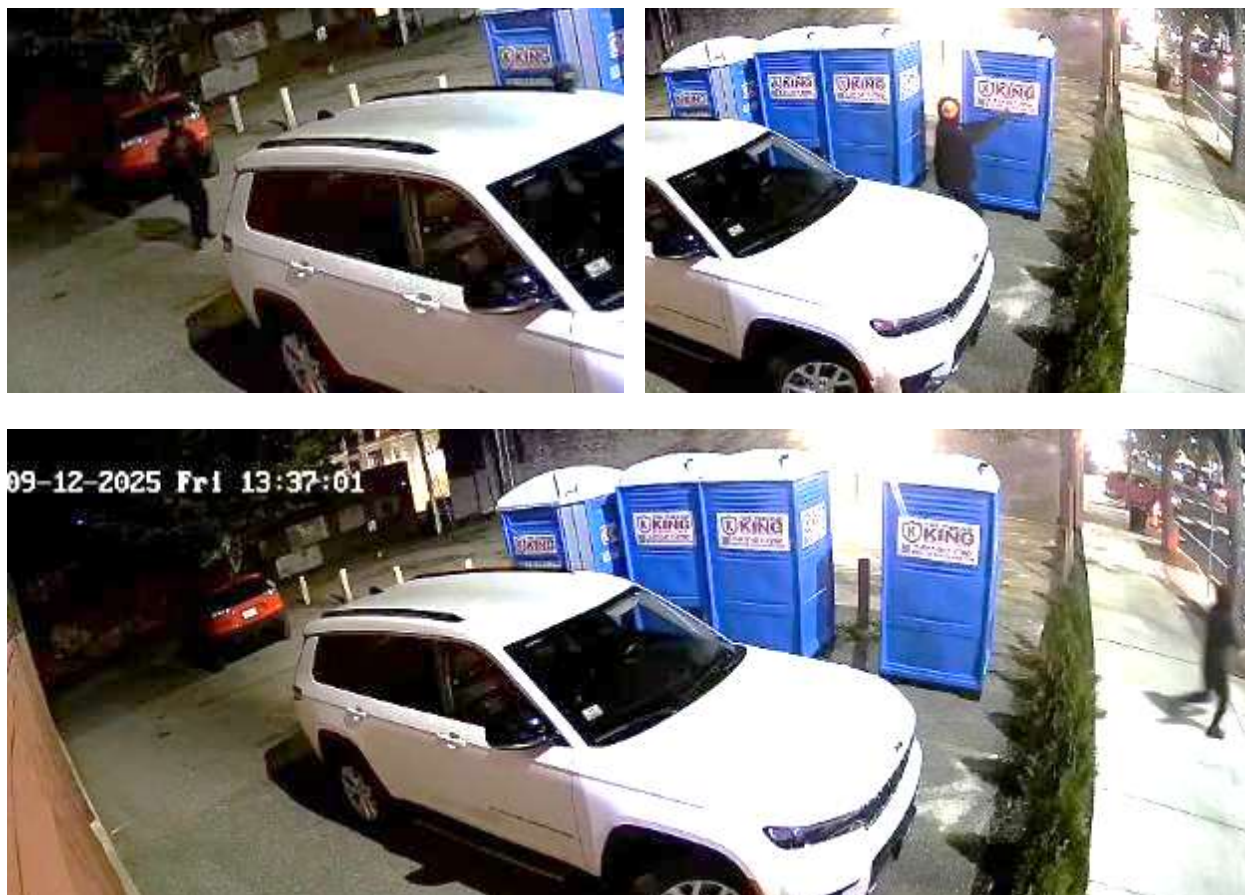


887. Shortly after Chana returns to the vehicle, Del Rosario is seen wearing a black and pink t-shirt, exiting Club Acqua and walking across the street toward the Honda Passport.



888. As Del Rosario approaches the vehicle, two individuals are seen exiting a red Jeep that was parked in a small parking lot on the side of 154 Essex Street. These individuals would be identified as HECTOR MOTA and JEAN DELGADO.

889. MOTA and DELGADO walk toward the Passport wearing dark clothing, masks, and gloves. As they approach the Honda Passport, MOTA and DELGADO each fire multiple rounds at the vehicle. MOTA and DELGADO can be seen wearing black and approaching Essex Street immediately prior to the shooting in the following still images.



890. As the rounds are fired, Chana runs from the vehicle. Then, two females also run from the vehicle.



891. After a few moments, Chana returns to the vehicle and pulls Del Rosario out of the vehicle. Chana then runs from the scene, leaving Del Rosario lying on the street. Responding officers can then be seen arriving to the area.

iv. Further Investigation

892. Further investigation identified the path of flight for the two shooters. After the shooting, MOTA and DELGADO ran back to the Jeep and both enter the Jeep on the driver's side. The two suspects are in the Jeep for approximately twenty-nine seconds, the flashing hazards to the Jeep are activated, and the break light goes on and off several times. The two suspects then exit the Jeep and flee down the pathway towards Mill Street.

893. Review of city cameras revealed that during the hours prior to the shooting the red Jeep was parked on Allyn Terrace in Lawrence. At 1:20 AM on September 13, 2025, a grey Nissan, later identified as registered to DELGADO with a Massachusetts Registration 6DHK84, parked on Allyn Terrace near the red Jeep. At 1:40 AM, MOTA and DELGADO got out of the grey Nissan and enter the red Jeep. The red Jeep then traveled to the murder scene.

894. Later in the afternoon on September 13, 2025, a black SUV arrived in the area of Allyn Terrace and dropped off two males who would be identified as MOTA and DELGADO. This vehicle was identified, and the female operator was identified to be MOTA's sister. MOTA's sister was interviewed. She stated that she dropped off MOTA and DELGADO so that DELGADO could retrieve his grey Nissan. Based on this interview, additional interviews were conducted with associates of DELGADO and MOTA. Through those interviews, phone numbers were identified for MOTA and DELGADO.

895. A female associate of MOTA was interviewed and she stated that she was contacted by MOTA on the morning of September 13, 2025, and MOTA requested that she order an Uber for him. MOTA requested the Uber take him from his grandmother's residence in South Lawrence (approximately 1.6 miles from the murder scene) to his residence in Haverhill. Records from Uber show that this trip took place at 4:30 AM on September 13, 2025.

896. In the surveillance video recovered during the investigation, one of the shooters was depicted placing a firearm under a storage container. That firearm would later be recovered and identified as a 9mm Smith & Wesson, model M&P, bearing serial number MPH9451.



897. This 9mm firearm was later identified as having fired the casings recovered from the scene of the murder. All of the .40 caliber casings were identified as having been fired by the same firearm that has not been recovered.

898. Further interviews and review of records led to the identification of MOTA and DELGADO as the shooters.

v. Hector Mota Phones

899. Investigators searched a black iPhone 13 that was recovered from a family member of MOTA. This phone was identified during the investigation as having been used by MOTA around the time of the murder of Del Rosario. Through a search of the “notes” application, investigators located a note created on September 14, 2025, at 11:18 PM. That note read as follows:

*I told bro put on his mask and gloves we looking for revenge
Spinning thru one way
we don't find the target we going for his mans
bitch nihhha hmu on ig cause I posted smoking on his manz
if that was me i would of told yo bro we hopping in that v
smith and Wesson got that 40 on me hop out let it speak
me and negritto hopping in that jeep spinning the whole whole week
young og
Brodie wants some breed I send em out of
lil bro said wants a belt
one location nigga brook street*

900. On October 24, 2025, MOTA was arrested in Maine on an unrelated matter. During the arrest, a cellular phone was seized and searched. In the phone, investigators located notes where MOTA discusses the details of the September 13, 2025, murder of Hugo Del Rosario.

- a. In one note created on October 14, 2025, MOTA describes being outside with someone targeting an individual who is disrespecting a friend of his (“We outside two deep just me and my flame nigga he speaking on”). Based on this disrespect, MOTA is committing violence (“bro so im spinning with the gang nigga”). MOTA states that he will come out of an alley and use a .40 caliber firearm to shoot the rival in the head (“pop out out the cut that 40 hit his brain nigga”). MOTA further identifies that the victim is referencing the Gangster Disciples by saying “yimmy,” which causes MOTA to kill him (“he was yelling out yimmy so I turn him into a strain nigga”). These details, including the use of a .40 caliber pistol, align with the details of the murder of Hugo Del Rosario. The full note follows:

*Who can I run too when I'm feeling this pain nigha
We outside two deep*

*just me and my flame nigga
 he speaking on bro
 so im spinning with the gang nigga
 pop out out the cut
 that 40 hit his brain nigga
 he was yelling out yimmy
 so I turn him into a strain nigga
 rompendo ot I fell in love with the game nigga
 I can never change nigga*

- b. In another note, created on October 1, 2025, MOTA states that he will keep conducting shootings until the target is dead (“Spin a nigga block we don’t stop till we know he dead”). MOTA then states that he was in a Jeep and that a .40 caliber firearm was used to kill someone (“I was sitting in that jeep lil nigga that 40 put em in bed”). I believe this is another reference to the details of the murder of Hugo Del Rosario, including the use of a stolen Jeep and a .40 caliber firearm. The full note follows:

*Spin a nigga block we don’t stop till we know he dead
 I was sitting in that jeep lil nigga that 40 put em in bed*

vi. Cooperating Witness Information

901. Multiple cooperating witnesses provided information concerning the September 13, 2025, murder of Hugo Del Rosario. That information is summarized below.

- a. CW-3 provided information about the September 13, 2025, murder of Hugo Del Rosario. CW-3 stated that a Gangster Disciples member Hugo Del Rosario, a/k/a “Juice,” was recently murdered outside of Acqua Lounge in Lawrence. CW-3 reported that Trinitarios members “Bebo” (known to be MOTA) and another unknown male conducted the shooting. CW-3 stated that the Trinitarios members were attempting to kill Gangster Disciple member “Chana” when he left the club. CW-3 reported that RICHARD PENA, A/K/A “BLADE,” directed “Bebo” and the unknown male to conduct the shooting. CW-3 reported that months ago, multiple Gangster Disciples, including “Chana,” jumped PENA outside of a gym in Methuen. CW-3 also reported that PENA and Chana have been feuding because PENA began dating Chana’s ex-girlfriend.
- b. CW-20 provided information about the September 13, 2025, murder of Hugo Del Rosario. CW-20 stated that YORDALI YORRO contacted CW-20 shortly after the murder of Del Rosario and that YORRO was celebrating. The following day, CW-20 was contacted by a Trinitarios member from New York to facilitate a deal between the owner of Acqua lounge and the Trinitarios Lawrence Chapter to ensure that the owner’s sons were not harmed.

- c. CW-48 provided information about the September 13, 2025, murder of Hugo Del Rosario.
- i. CW-48 stated that the intended target of the shooting on September 13, 2025, was Chana. CW-48 stated that PENA and CABRERA provided the information about Chana's vehicle and residence to MOTA in order to target him.
 - ii. CW-48 stated that the motive to kill Chana arose from Chana attacking PENA at a gym. CW-48 stated that an additional motive arose from Chana and another Gangster Disciples member having recently fired at JAMES CABRERA and CRISPIN while they were driving in North Andover. CW-48 stated that PENA and CABRERA both directed MOTA to kill Chana.
 - iii. CW-48 stated that MOTA had attempted to kill Chana on multiple occasions prior to September 13, 2025, by waiting at his residence in Lawrence and planning to shoot him when he came home after promoting at Club Acqua. CW-48 stated that MOTA had been unsuccessful in these efforts on three prior occasions because he did not see Chana. The first attempt involved MOTA, Jayden, and Spooky (not FERNANDES) going to Chana's residence with firearms and waiting for him to come home. The second attempt involved MOTA and ABIGAIL ARIAS going to Chana's residence with firearms and waiting for him to come home. CRISPIN provided MOTA and ARIAS with money for gas to commit the shooting on this occasion. The third attempt involved MOTA and DELGADO going to Chana's residence with firearms and waiting for him to come home.
 - iv. CW-48 stated that MOTA and DELGADO were the two shooters who killed Del Rosario. CW-48 stated that MOTA and DELGADO planned to kill Chana at his residence for a fourth attempt on the night of September 12, 2025, into the morning of September 13, 2025. CW-48 stated that shortly before the murder, PENA contacted MOTA and told MOTA that Chana's vehicle was in front of Club Acqua and parked on Essex Street. PENA directed MOTA and DELGADO to commit the murder in front of Club Acqua.
 - v. CW-48 stated that after the murder, PENA provided MOTA and DELGADO with three ounces of cocaine to sell in Maine. PENA also stated that DELGADO would get initiated into the Trinitarios for committing the murder even though Chana was not killed, because Del Rosario was a Gangster Disciple.

- d. CW-53 provided information about the September 13, 2025, murder of Hugo Del Rosario.
 - i. CW-53 stated that MOTA and DELGADO were the shooters who killed Del Rosario. CW-53 stated that the intended target of the shooting was Chana.
 - ii. CW-53 stated that prior to the murder PENA provided the address of Chana's residence and the description of Chana's vehicle to MOTA in order to use it to shoot and kill him. CW-53 stated that DELGADO and MOTA sat out and waited for Chana to come home but missed him.
 - iii. CW-53 stated that before the murder PENA called MOTA and DELGADO and directed them to kill Chana in front of the nightclub.
 - iv. CW-53 stated that after the murder PENA provided MOTA and DELGADO with approximately three ounces of cocaine to sell in Maine. PENA also stated that DELGADO would get initiated into the Trinitarios for committing the murder even though Chana was not killed because Del Rosario was still a member of the Gangster Disciples.

vii. 9/14/2025 – Recording of YORRO Discussing the Trinitarios Receiving a Payment After the Murder of Hugo Del Rosario

FILENAME: 2025-09-14-18-03-28

902. The day after the murder of Hugo Del Rosario at Acqua nightclub, the owner of Acqua made contact through a neutral third party in order to pay the Trinitarios to not conduct any more violence at Acqua and to not harm the club owner's son, who is an associate of the Gangster Disciples. On or about September 14, 2025, a cooperating witness received a call from the club owner who was going to deliver the money. The cooperating witness then called YORRO to discuss the developments, and this call was consensually recorded.

903. YORRO cautioned the cooperating witness about the meeting to receive the money being a setup. The cooperating witness explains that the money was being paid so that the Trinitarios would not kill the club owner's children ("What he wants is for us not to touch his kids

and that's it.”). YORRO agrees (“but yeah, it's all good”) and states his intention to exert control over Lawrence (“We're gonna bend the city or the city is gonna bend us. One or the other.”).

CHS:	I was on the phone with the nigga, brodie, that's going to give us the money, my guy.
YORRO:	[Redacted]. That.
CHS:	Huh?
YORRO:	Be careful, it's not a setup.
CHS:	What damn setup? Am I going to touch any money? Am I dumb? And that's that nigga, yo, it's, it's the owner of Acqua, bro.
YORRO:	[U/I].
CHS:	He confirmed it to me, brodie.
YORRO:	The [U/I].
CHS:	What he wants is for us not to touch his kids and that's it.
YORRO:	[I/I] but yeah, it's all good.
CHS:	[LAUGHS] Damn. Suge Knight-ass-nigga over here. What's up with you, nigga?
YORRO:	No, I already told you. We're gonna bend the city or the city is gonna bend us. One or the other.

904. The cooperating witness tells YORRO that the club owner is terrified about his family being targeted and wants to pay for their safety (“What he wants is for them not to do anything to his kids. He knows that he got himself into some shit”). The cooperating witness tells YORRO that he told the club owner that he needs to be “a man of his word,” and YORRO states that the club owner also should know not to play with him (“And not to play with me, bro.”). YORRO then tells the cooperating witness to relay the message that the meeting must be in person (“No, no, they need to meet with me in person”).

CHS:	No, that's it. Them niggas seen that message loud and clear, nigga. That nigga's song is... the father is really scared. The guy said to me, “My guy. You feel me, ‘cause they my family yay, you feel me? Ya, ah, ah. What he wants is for them not to do anything to his kids. He knows that he got himself into some shit, but please, that this...” I'm like, “Nah, I gotchu, brodie.” I'll call you, pay attention to your phone and tell those guys that what they want to accomplish, will be accomplished. What he needs to do is be a man of his word.”
YORRO:	And not to play with me, bro.
CHS:	And that's it.
YORRO:	You understand me? After that, “Boss, Look...”
CHS:	How far are you? I don't want to talk on the phone.

YORRO:	No, no, they need to meet with me in person. If not...
CHS:	I'll tell you, but pull up on me.
YORRO:	[U/I] I'm here, look.

905. As they discuss the circumstances of the meeting, YORRO states that he will go to Club Acqua and talk to the owner right where the murder took place in order to send a message (“I’m so gangsta that I would go and I’ll pull up where that shit happened to Hugo and I’ll talk to all of those guys.”).

YORRO:	What I’ve been telling the guys is to take it easy. [SMACKS LIPS] Shu, Shu is like...
CHS:	I think he would try to do something with money. I can light the [U/I]. [BACKGROUND: MUSIC] The only thing we need to do is... find out where we’re going to tell Jarod to go drop the money off. I trust him [U/I].
YORRO:	I’ll go, bro, right over there and I talk to the father, bro. I’m so gangsta that I would go and I’ll pull up where that shit happened to Hugo and I’ll talk to all of those guys.

906. YORRO suggests that the club owner and his family are going to cooperate with law enforcement (“They’re gonna tell, I know”). YORRO then explains that the last conversation with Chana and MENA was about Del Rosario and an incident where Del Rosario and Brandon were following him and aiming at him (“last conversation that I had with Chana and Shu were about Hugo, and the stupidity that he did to me with Brandon. That he was following me”, “aiming at me like, bang, bang, bang”). YORRO then spun around on Broadway and confronted them (“And I spun the block on them, right there on, on Broadway Street, you feel me”). YORRO explains that Chana knows that Del Rosario was targeted for the disrespect they showed to YORRO (“They were all at the club and I told Chana. I’m like, ‘Look at your man Hugo.’ So, in their head is like, ‘Damn, bro, this guy disrespected this guy, bro. Like that, for his stupidity and look, they smoked him.’”).

YORRO:	They’re gonna tell, I know.
CHS:	Come on, brodie. Be realistic, nigga. You’re admitting that you have—that you know something that...

YORRO:	That they know.
CHS:	Who gives a fuck what they know? It's what they can prove nigga.
YORRO:	No, no, no. Listen, the last conversation that I had with Chana and Shu were about Hugo, and the stupidity that he did to me with Brandon. That he was following me like, Foo! And aiming at me like, bang, bang, bang. And I spun the block on them, right there on, on Broadway Street, you feel me? And I pulled up like this. And slowdown the car like that with my bling, nigga. I'm like, "Yo, bro. I don't know what you niggas got going on, but I'm not that nigga." "Oh, you talk too much." I'm like, "A'ight. So, move from the back of the car then. 'Cause you talking with your head like a goose.... niggas talking like, with his head like uh, like this. "Nigga, you talk too much." I'm like, "No, alright, it's all good. Sorry." And then, the shit when... [U/I]. They were all at the club and I told Chana. I'm like, "Look at your man Hugo." So, in their head is like, "Damn, bro, this guy disrespected this guy, bro. Like that, for his stupidity and look, they smoked him." So, I already know for a fact that nigga Hugo... is in heaven right now. MalinSD, bro, you're calling on Facebook, we'll talk later.

907. YORRO and the cooperating witness discuss the fact that Trinitarios members are mocking the Gangster Disciples on social media (referring to them as Brook Street, Gangster Disciples ("Laughing faces like "cry brook.")). YORRO notes that this activity on social media has already effectively established the murder as having been committed by the Trinitarios ("They already put their stamp. That was this side", "That was this side.") and could result in an investigation ("now they're looking at Trenso", "they take two (2) or three (3) guys for questioning").

YORRO:	Things like this, I'm not paying attention to other people. These guys, Trensita and, and, and, [STAMMERS] Beast, bro.
CHS:	Need to stop their stupidity on social media.
YORRO:	Nah... I'm so—bro, we gotta, we... nah, bro. I'm not jacking them, bro. Not jacking them, bro. I'm going to tell them, bro. "You guys are around there, like that uh... and all of that. But you guys are like the majority of the guys doing things in, in the internet. Se I'm going to tell them that, bro.
CHS:	We need to stay away from social media, my guy.
YORRO:	Whoever gets upset with me. Grabbing that Beast shit... Trensita like, "Ah, ah, ah." And at the bottom the emoji. Laughing faces like "cry brook." Bro, What?
CHS:	And what's up with that nonsense? I saw it.
YORRO:	You understand me, bro? It's like, You guys are already...
CHS:	We are not going to give them an advice, we are old. They know what they're doing.
YORRO:	You already... nah. They already put their stamp. That was this side.

YORRO:	That, that Beast got everybody and their momma. And now they're looking at Trenso like, "Uh, ha, ha, ha. Uh, uh." You could...
CHS:	On his Snap.
YORRO:	You understand me?
CHS:	On his IG.
YORRO:	On his IG. You feel me like, that doesn't fly, because between the guys, right? And they take two (2) or three (3) guys for questioning, nigga.
CHS:	You think I don't know?
YORRO:	What's up? You understand? You guys are laughing, having fun, "What do you know about this?"

908. The cooperating witness then explains that YORRO had called other Trinitarios shortly after the murder took place, which caused some issues ("Chi was super upset," "you called him at three (3) something in the morning, when that happened"). YORRO acknowledges that he made that call ("So what?").

CHS:	I was on the block there, Chi was super upset. Not even upset, just super worried. My bad I used the wrong word. Super worried.
YORRO:	For what?
CHS:	Oh, because you called him at three (3) something in the morning, when that happened.
YORRO:	So what?
CHS:	And he's like, "My nigga, since when this guy has called me at that time, bro? Bro, those guys need to drop that shit, bro. Trust me, bro." And he started...

909. YORRO explains that he called all the main Trinitarios right after the murder ("I'm calling everybody", "I'm call my main niggas, right?"). YORRO explains that he made the calls to alert the Trinitarios that the murder had just happened and that the Trinitarios need to be aware that the Gangster Disciples could retaliate if they are out and in proximity to rival gang members, such as in a nightclub ("I'll give you a call, just in case you in the, in the nightlife scenery right now, right"). YORRO states the Trinitarios could face threats from all different angles, because the murder had just taken place and anyone could now be targeting the Trinitarios ("This shit just went down and you don't know how people take certain shit").

YORRO:	I'm calling everybody, I'm calling the, my, my...
CHS:	To make sure, you don't know if he's calling you to make sure you good.

YORRO:	No, no, I'm...
CHS:	If he needs a perc.
YORRO:	I'm calling my main niggas, right? I'm calling my main niggas, everybody, I'll give you a call, just in case you in the, in the nightlife scenery right now, right? This shit just went down and you don't know how people take certain shit.
CHS:	It's true.
YORRO:	You understand me? I'm calling the, the right niggas.

910. YORRO explains that a Trinitarios gang member might not be paying attention if they were not informed about the recent incident, and the police or rival gang members could confront them ("Boom! And they grab you, because you didn't know."). YORRO states that he made the calls himself, and would have delegated the task to a spokesman, if one had been appointed ("if I had a speaker, that would've been his job, you feel me? But I gotta do it."). YORRO notes that he made the calls on his new phone number, which is presumably not known by the police ("At least I did it with my new number, nigga").

CHS:	We don't know that it happened right there at a gathering and it can explode right there in there.
YORRO:	And you sleeping. Boom! And they grab you. Because is that...
CHS:	Like, the GD are there but they are not doing anything, nigga, we're chillin' here, forget that.
YORRO:	Yeah. Boom! And they grab you, because you didn't know.
CHS:	And the noise of Juice getting killed and we there, they could way for us outside and... you already know.
YORRO:	You understand what I'm saying? That it is... it's the right thing. But... if I had a speaker, that would've been his job, you feel me? But I gotta do it. So, it's whatever. At least I did it with my new number, nigga.

911. The cooperating witness then spoke with an individual named "Jarod," who was facilitating delivery of the club owner's payment to the Trinitarios. YORRO is present for this call. The cooperating witness explains that the payment will end any future retaliation against the club and the family ("It's dead with that whole family", "And that whole business"). YORRO then states to Jarod that the payment is about respect and that so long as the victims do not disrespect

anyone there will be no problems (“if niggas don’t disrespect nobody with don’t disrespect nobody”).

CHS:	Yo.
JAROD:	Yo. What’s up?
CHS:	What’s up, handsome bro?
JAROD:	I’m chillin’, nigga.
CHS:	Nothing, you already know. That thing was resolved, now you have to do your part and that’s it.
JAROD:	Yo, already... I’ve been talking to his kid all day, I’m gonna make sure, yo, que nothing, he’s not gonna get out of pocket. Just, just, I just need your word as a man that... that just dead with him. Please, tell me there is no...
CHS:	Nigga, it’s... listen, brodie. It’s dead with that whole family.
JAROD:	Yeah, no cap.
CHS:	And that whole business.
JAROD:	So, there is no problem, nigga [U/I]
CHS:	Hold on.
	[BACKGROUND: CHIMES]
YORRO:	Yo, gan’ter.
JAROD:	Yo.
YORRO:	Yo, listen, brodie. Niggas... this, this is about respect, bro, at the end of the day, my brother... it’s like, if niggas don’t disrespect nobody with don’t disrespect nobody [I/I], bro.
JAROD:	Yeah, nah, no problem.

912. YORRO tells Jarod that the Trinitarios and Gangster Disciples will not be able to mediate their dispute if their side continues to disrespect the Trinitarios (“is no di’que... way of mediating things if one party... is gonna continue doing the same shit”). YORRO then states that Brandon, the son of the club owner is “a good nigga,” and the influence of rival gang members has him “fucked up.”

YORRO:	It could’ve been, there is no, there is, there is no di’que... way of mediating things if one party... is gonna continue doing the same shit, you feel me?
JAROD:	No, no, [U/I].
YORRO:	And, and, and, bro, and that nigga he is a good nigga, bro.
JAROD:	Yeah.
YORRO:	It’s the influence around him that got him fucked up.
JAROD:	It’s a big problem, [U/I].
YORRO:	No, but it’s all good, boss.
JAROD:	So, I’m...

CHS:	Nothing, you already know my handsome bro, just...
JAROD:	Yo, I love you. You know, anything you need from me, you know...

913. Jarod and the cooperating witness then discuss further details of the payment and assurances that the Trinitarios, through their leader YORRO, will provide (“let me know I’m with niggas right now and just, you know, let that nigga know what we just told you and... meet me up and the guy and... you call him”). Jarod indicates that he just arrived at the bank (“I just got to the bank right now. I’m a, I’mma have to set some things up”).

CHS:	Not Jarod, you know what’s up with me, brodie. Since little kids, brodie. You know, nigga, I don’t gotta ever lie to you or do no weird shit to you. That’s why I rather speak with you directly, instead of like... you know.
JAROD:	No, no, thank you. I appreciate it you. I love you. Anything you need, nigga, call me.
UM1	Nah, nah, for a fact. Just let me know I’m with niggas right now and just, you know, let that nigga know what we just told you and... meet me up and the guy and... you call him...
JAROD:	Alright.
CHS:	...if you want you can video call him and we can talk to him too.
JAROD:	Alright. Yo, bro, I’m boutta, I’m, I’m, I just got to the bank right now. I’m a, I’mma have to set some things up and then I... I’ll call you in a little bit.
CHS:	A’ight. Alright.
JAROD:	I’m like, “Bitch, I’mma be very clear, direct with him.”
CHS:	Nah, yeah. Exactly and if you need to call me, let me know.
JAROD:	A’ight, bro. Thank you, I appreciate it you.

914. YORRO then asks the cooperating witness if Jarod is “recording” the call. YORRO explains that they could face prosecution, either through a recording or individuals who are cooperating (“We could go down either way, nigga. Recording, niggas talking”).

CHS:	A’ight, with God.
JAROD:	Alright.
YORRO:	You don’t think them niggas is recording that shit?
CHS:	Recording what?
YORRO:	That.
CHS:	That’s Jarod.
YORRO:	I don’t give a fuck.
CHS:	Anybody records it, we know who we spoke with.
YORRO:	It don’t matter, nigga.
CHS:	What the fuck? That’s why I told you, nigga.

YORRO:	We could go down either way, nigga. Recording, niggas talking, nigga. I said...
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915. The cooperating witness then asks YORRO how he wants to do the money pickup (“now you just gotta let me know how you wanna do this”). YORRO replies, “[h]owever they want to do it.” YORRO then asks what they intend to do, asking whether they are going to just pass the Trinitarios “a bag of money” (“In the sense as like, what they gonna do? They just gonna pass niggas a bag of money? And, and that’s it, and that’s it.”).

CHS:	We don’t have to say too much. Now, nigga, now you just gotta let me know how you wanna do this.
YORRO:	However they want to do it, bro.
CHS:	Mm-mm.
YORRO:	In the sense as like, what they gonna do? They just gonna pass niggas a bag of money? And, and that’s it, and that’s it.
CHS:	And... you feel me?
YORRO:	Put that there, bro.

916. They then discuss options, including whether YORRO should directly inform the club owner that “everything is cool” with his son. YORRO dismisses that idea and does not trust the club owner, suggesting that he will send someone to pickup the money (“fuck trust the guy, nigga, I’ll send somebody to pick that, bro.”). The cooperating witness suggests doing the pickup out of town in a distant location (“could do it O, T, way, what you think, nigga”). YORRO again declines and jokingly states that he will pull up on the club owner with a mask and would be willing to do that right now (“I’ll pull up with... bro, I’m a thug, bro... I’ll pull up with my shiesty and [U/I] right now”).

CHS:	You can tell the dad, without showing your face, if you want to, listen... my boss, everything is cool like I told the guy. We already talked about it, your kid should not get involved with that and that’s that, because the... we are not about that with him and already with this, we spoke, man’s word, what you need to do is; to make sure they don’t start with their trash talking, on your son’s side, because this thing dies here. We don’t have to see him nor be in front of him or anything like that. Whatever you want, this is what I’m telling you, brodie. I’m telling you this because I say it to you in confidence, my guy. When have you see me go into something that I don’t really know for real? You think I’m going
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	to get involved in something like that? Let's talk, let's be realistic, brodie, if I know that I don't, that I can't trust my guy...
YORRO:	No, fuck trust the guy, nigga, I'll send somebody to pick that, bro. I don't even fucking...
CHS:	Brodie, that's what I'm telling you, how you wanna do it?
YORRO:	We could call...
CHS:	You could do it O, T, way, what you think, nigga? You're a tough-ass-gangster, nigga. Like, "Listen."
YORRO:	No.
CHS:	[LAUGHS]
YORRO:	I'll pull up with... bro, I'm a thug, bro... I'll pull up with my shiesty and [U/I] right now.

917. YORRO then notes that they will have share the money with those who committed the murder ("We're gonna have to break bread."). YORRO identifies the recipients of the cash as the shooter ("young nigga" or "Little bro") and PENA ("Richie"). YORRO indicates that he knows who committed the murder and that the shooter was subordinate to Richie ("Little bro." "What? The nigga that shot?" "And Richie."). YORRO states that paying a cut of the money being received from the club owner to PENA and the shooter is the "solid thing to do."

YORRO:	Yo, but I'm not gonna lie. We're gonna have to break bread.
CHS:	With who?
YORRO:	With the young nigga.
CHS:	'Cause I already got... this nigga...
YORRO:	Mm.
CHS:	Shorty was the one that called me, from New York. And I'm not giving him money, I went ahead of him.
YORRO:	Listen to me, brodie. We need to give... or you can give or whatever you wanna give...
CHS:	Just let me know who it is, and you know how I move; I'll give him bread too, I don't care, nigga. If he's gang, nigga, you know what's up, if he needs it, that's what it is.
YORRO:	Little bro.
CHS:	What? The nigga that shot?
YORRO:	And Richie.
CHS:	And Richie. Nah, we on them then, brodie.
YORRO:	Richie.
CHS:	It's whatever. My guy, look, I'll tell you this...
YORRO:	That'll be the solid thing to do.

918. The cooperating witness suggests that they give the shooter and PENA a total of \$15,000, and YORRO replies that they should only pay \$5,000 and \$5,000 (“Nah, you give them five (5) and five (5).”). YORRO advises the cooperating witness to make the payment without specifying why they are receiving the money (“Without any talk or anything”, “Come here. Take this. Take it easy, here take this. Shh, don’t open until your own time.”). The cooperating witness then notes that in the context of them receiving \$30,000, YORRO should tell the other Trinitarios to leave the club owner’s son alone, and stop instigating issues on social media (“niggas should at least let niggas know, quiet, my guy, that... to leave Brandon alone and leave those guys alone, for them not to talk about them”). YORRO replies that CABRERA and the other Trinitarios will not listen (“Trensita and them guys don’t listen, bro”).

CHS:	Look, I’ll be honest with you, brodie. If niggas gotta give them two (2) niggas that bread, you know I’mma do it, brodie, ‘cause I know them niggas, ya tu supiste. Feeling like them niggas they walls is closing in, nigga. So, if they need that money, nigga, to move, nigga, tu sabe que uno se lo va hacer.
YORRO:	This guy is chillin’.
CHS:	That’s thirty (30) racks, nigga. ¿What do you want to do?
YORRO:	Nothing, chillin’.
CHS:	To keep fifteen (15) and give them fifteen (15)?
YORRO:	Nah, you give them five (5) and five (5). Without any talk or anything. Like that Foo! “Way. Come here. Take this. Take it easy, here take this. Shh, don’t open until your own time.”
CHS:	No, one thing is, but you have to tell him. Nigga, I don’t know, brodie. I just feel like, niggas should at least let niggas know, quiet, my guy, that... to leave Brandon alone and leave those guys alone, for them not to talk about them and tell them some other bullshit.
YORRO:	Bro, Trensita and them guys don’t listen, bro. They don’t listen, bro.

919. YORRO then goes on to discuss what he intends to with the money. YORRO wants \$5,000 paid to each of the individuals who participated in the murder (“five (5) and five (5) to the... to these two (2) guys”). YORRO instructs the cooperating witness to take \$15,000 and “buy a kilo” and sell it (“And trap that shit”). YORRO explains that the price per kilo will increase to \$17,000 (“price is gonna go up to seventeen (17)”). YORRO tells the cooperating witness to save

the money, “build capital,” and purchase 500 grams of drugs to resupply each time (“save the money, you build capital and just re-up on a half (1/2) all the time. A half (1/2) all the time, a half (1/2) all the time”).

YORRO:	You guys, you guys don’t understand the plan.
CHS:	You don’t even know that I’m making plans with that money. [LAUGHS] You heard?
YORRO:	What I, what I, what I have to do is this, right? You need to do...
CHS:	“I’m going to yard, nigga.”
YORRO:	No, no, five (5) and five (5), bro. You grab... you grab...
CHS:	What five (5) and five (5), bro?
YORRO:	Listen to me, five (5) and five (5) to the... to these two (2) guys, fucker, listen to me... grab fifteen (15).
CHS:	And how am I, and how am I grabbing fifteen (15)?
YORRO:	Grab fifteen (15), because bro, listen to me, bro.
CHS:	And why do I have to grab more money?
YORRO:	Grab fifteen (15), buy a... uh, buy a kilo, bro. And trap that shit. Seat... that money you can’t see it, pop. You can’t see that money, that money is not for you to touch. The, the price is gonna go up to seventeen (17).
CHS:	[ONOMATOPOEIC SOUNDS] Brrr.
YORRO:	Right? Breakthrough, save the money, you build capital and just re-up on a half (1/2) all the time. A half (1/2) all the time, a half (1/2) all the time.

920. The cooperating witness expresses reluctance to take \$15,000 and only give PENA and the shooter \$10,000 (“If they find out that I took fifteen (15) for myself.”, “We only gave them ten (10).”). YORRO replies that no one will know anything about the money and that they will transfer it quickly (“No one knows anything. It’ll jump from one hand to another”). YORRO states that they will only provide the money and will not explain its purpose or where they got it from (“Because we didn’t talk to you, we only gave you that money”).

CHS:	If they find out that I took fifteen (15) for myself.
YORRO:	Nothing like that.
CHS:	We only gave them ten (10).
YORRO:	Nothing like that, bro. Nothing like that. No one knows anything. It’ll jump from one hand to another, zoom! Give that...
CHS:	And it dies there.
YORRO:	...guy. “Yo, why you? What, what, what’s all of these about?” “I don’t know nothing, my brother.” You feel me? “Enjoy your night, my brother.” And if it spreads out, at least you can say like, damn, the guys thought of me.

CHS:	Of course.
YORRO:	Because we didn't talk to you, we only gave you that money.
CHS:	Of course. And they said, "Damn. They got that from their own pockets."
YORRO:	You are not, you are not gonna wanna talk. If they find out, you're gonna say, "Damn, I'm an accomplice." [LAUGHS]
CHS:	[LAUGHS]
YORRO:	"I took that money without wanting to."
CHS:	Without wanting to. They don't know what was going on.
YORRO:	They sent to me five-thousand (5,000) and I [U/I] spent it.

921. The cooperating witness suggests giving PENA and the shooter \$15,000 and then YORRO and the cooperating witness can share the remaining \$15,000 ("If you want, we could even give them fifteen (15)." "you and I can share the other fifteen (15)."). YORRO rejects the idea and states that he is setting it up in case people talk about the money ("I'm giving you the sauce, in case they talk about the stuff"). YORRO makes it clear that the people receiving the money will not know where it came from, and will stay quiet ("The people receiving the money... they don't know where it came from and they're going to stay quiet").

CHS:	Nothing, my guy, I'll give it to them, my guy. I don't mind that. If you want, we could even give them fifteen (15).
YORRO:	Mm. I'm telling you, to the thing that...
CHS:	And you and I can share the other fifteen (15).
YORRO:	You need to listen, [CW-20]. [U/I] Why you like that, dude? Your head is blocked. I'm giving you the sauce, in case they talk about the stuff...
CHS:	No, I'm very clear about it.
YORRO:	You understand me? The people receiving the money... they don't know where it came from and they're going to stay quiet. You understand what I'm saying?

922. They then discuss other Trinitarios learning about the money and YORRO refocuses the conversation on the plan. YORRO wants the \$15,000 to become \$35,000 in three months ("I need to see that you turned those fifteen (15), nigga, into thirty-five (35) in the three (3) months.").

YORRO:	No, no, it's not about what I tell you. [CW-20] grasp and think that in... three (3) months plan from now. If that, that goes through... I need to see that you turned those fifteen (15), nigga, into thirty-five (35) in the three (3) months.
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923. YORRO then mentions that the Trinitarios have committed numerous acts of violence and failed to build their organization (“We start doing a bunch of crazy stuff and a bunch other stuff and we end up in, bro, taking out, taking out, taking out and not putting anything back”). YORRO does not want any of the other Trinitarios to get the money because they will start problems and end up in Acqua buying bottle service with the money -- essentially giving the cash back to the club owner who paid them in the first place (“Any of those guys get their hands on that money and that’s gonna be the muckery of the- of the last century”, “and they’re going to even be buying bottles over there in Acqua with that money”). YORRO also suggests that they check the money to ensure the bills are not marked and that there is no GPS tracker among the cash (“we need to check that money like, they’re not marked bills. Some weird stuff, uh, uh, uh... a GPS, anything”).

YORRO:	What did- did change? The... that’s where the issues start, when there are changes. We start doing a bunch of crazy stuff and a bunch other stuff and we end up in, bro, taking out, taking out, taking out and not putting anything back and the whole thing gets screw.
CHS:	[CHUCKLES]
YORRO:	Because, trust me. Any of those guys get their hands on that money and that’s gonna be the muckery of the- of the last century and everybody...
CHS:	I get it.
YORRO:	...is just going to make a mess, a movie and they’re going to even be buying bottles over there in Acqua with that money.
CHS:	No, but look, we already talked to the guy.
YORRO:	And we need to check that money like, they’re not marked bills. Some weird stuff, uh, uh, uh... a GPS, anything, bro. I’ll be... ten (10) steps ahead.

924. YORRO then explains his vision for the Trinitarios. YORRO wants the gang to be strong enough where they can hurt or kill anyone across Lawrence and the Trinitarios remain quiet about it (“Gang, if we build a strong shit where you could get touched anywhere, any, any type of harm can happen to you... and we’re just gonna stay quiet about it”). YORRO says that, if they can achieve that level of discipline and organization, the Trinitarios will run the city (“We run the

city.”). YORRO then describes a past incident where he pulled a gun on four guys on motorcycles (“Look at the, at the four (4) guys that I pulled the iron on now. Plus, these, these four (4) here”). YORRO states that at the time he was wearing a mask conducting a drug deal and was ready to shoot whoever gave him an issue (“I was at the park passing something to a guy there”, “And when they saw me”, “I’m down for trouble”).

YORRO:	Gang, if we build a strong shit where you could get touched anywhere, any, any type of harm can happen to you... and we’re just gonna stay quiet about it? We run the city. Look at the, at the four (4) guys that I pulled the iron on now. Plus, these, these four (4) here.
CHS:	The ones with, the one with the motorcycles?
YORRO:	Yes.
CHS:	That’s Pio, nigga.
YORRO:	Who?
CHS:	Pio. Pio is on the scooter, the little one.
YORRO:	Not, yea’. Oh so, that one.
CHS:	Mm-hmm.
YORRO:	I grabbed, bro, and I was at the park passing something to a guy there... Zoom! On the scooter and I’m sheisty-up. And when they saw me, they saw me from over there to where I was... since things are the way they are right now, things are grimey. I’m down for trouble.

NN. 12/17/2025 – CABRERA VERBAL ALTERCATION WITH NONGO

925. On or about December 17, 2025, investigators were informed by at least one cooperating witness that JAMES CABRERA had gotten into a verbal altercation outside of a nightclub with a member of the Gangster Disciples named Nongo, whose identity is known to me.

926. JAMES CABRERA then began posting on his social media account taunting the Gangster Disciples. Those posts included references to the September 13, 2025, murder of Hugo Del Rosario, and a direct reference to the fight itself.

927. In one post, JAMES CABRERA wrote that “Chana” watched Hugo Del Rosario get murdered and ran away (“Chana watched his mans get killed in cold n ran I wonder how he sleep at night knowing his boy got headtap n got left with his ass out”). The post also calls the

Brook Street Gangster Disciples liars and that they pretend to be tough to women, while noting that CABRERA is actually a tough guy (“Every brook nigga lie to females to sound tough im really like this in person”). I believe that this post was made in order to taunt the Gangster Disciples concerning the recent murder of Del Rosario and disrespect their membership. An image of the post follows.



928. In another post, JAMES CABRERA included a picture of himself inside of a nightclub with the caption, “The shout out in every club this my shit [M emoji] it ain’t the same when niggas see me in person I made Chana lil brother n Brandon jump into blue 2 night before

last night I'll post the vid." I believe that in this statement, CABRERA refers to the fact that the nightclub DJs in Lawrence shout out Montana (referred to by the M emoji). Then CABRERA states that he made Acevedo's brother and Brandon (the son of the Club Owner from Acqua) run from him into another nightclub (named "Club Blu") a few nights earlier. I believe that this post was made to taunt the Gangster Disciples and disrespect their membership. An image of the post follows.



929. CW-48 provided information concerning this altercation. Specifically, CW-48 told investigators that, a few days after the fight with Nongo, PENA contacted CW-48 and requested that CW-48 murder Nongo and offered CW-48 \$10,000 to kill Nongo. CW-48 declined to commit this murder.

OO. 5/21/2026 – RECORDING OF JAHIR DAVILA DISCUSSING THE MURDER OF COOPERATING WITNESSES

930. On May 21, 2026, JAHIR DAVILA, A/K/A “NANO FINESSE,” and another Trinitarios member named “Chi” were captured on a consensual recording with a cooperating witness. During the recording the group discuss the potential that a senior member of the Lawrence Chapter of the Trinitarios (the “Senior Member”) was cooperating with law enforcement. In particular, JAHIR DAVILA claimed to have paperwork from a federal case showing that the senior member was captured on a wiretap selling a firearm and was not charged, which DAVILA said showed that he cooperated.

931. During the recording, the cooperating witness suggests that DAVILA bring the paperwork to YORRO and let YORRO address the issue (“What you need to do is... Listen bro, listen, listen, listen, what you need to do, show Low the papers, right? Have him take care of the issue”). The cooperating witness states that they had previously discussed the issue about the Senior Member with YORRO and YORRO still placed the Senior Member in a leadership position (“You did it your way, and it came out wrong. I’m explaining it to you know, and look.” So, this is the reason why I want him to resolve the issue. Because, I told you not to put that guy.”).

CHS:	No bro; listen, bro... What you need to do is... Listen bro, listen, listen, listen, what you need to do, show Low the papers, right? Have him take care of the issue, because when I was in jail, I told Low, “Dude, take your thing...”
DAVILA:	I don’t give a fuck...
CHS:	Listen bro, listen, listen... I told him, “You take the shit and take control.” Right? And I told him, “Do me a favor, don’t put that man as part of the board, because...”

	don't do it." And he came out, and made a mess. When he went to jail, he put his head down...[STAMMERS] he came with his head down, saying, "Damn, my bad, this, this and that." The thing with Low is [STAMMERS] disaster happened in those three (3) months." And I told him, "You see." Now he is telling me, "Yo, give me the opportunity, please; just one more time." I told him, "Go back out, and take care of things, and the reason why I told you for you to do it, is because none of the youngsters get along with that man. I talk to each and one of the youngsters, individually, so I don't need to give you explanation for you to do something, just do it and that's it, I know why I'm telling you. You did it your way, and it came out wrong. I'm explaining it to you know, and look." So, this is the reason why I want him to resolve the issue. Because, I told you not to put that guy."
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932. DAVILA states that he also has previously addressed the issue with YORRO and told YORRO that he needs to fix the problem ("Yo Brodie, I told him, I told him. I told him, "Low, you are the one that needs to, woo. I'm telling you"). DAVILA implies that he has had the paperwork for a long time ("it's been a while since I have that in a drawer") and YORRO will need to deal with the Senior Member himself ("I'm telling you because you are the one that needs to take care of that"). DAVILA suggests that they could meet up with the Senior Member and give him a hotshot – specifically a pill that contains pure fentanyl ("Meet up with him, give him a pill, pure, [STAMMERS] Do it bro"). DAVILA states it would be normal for YORRO to meet up with the Senior Member given their relationship and that would be the time to kill him ("Brodie, meet up with him, go ahead", "Normally").

DAVILA:	Yo Brodie, I told him, I told him. I told him, "Low, you are the one that needs to, woo. I'm telling you..."
CHS:	Of course.
DAVILA:	"... because it's been a while since I have that in a drawer. I'm telling you because you are the one that needs to take care of that."
CHS:	Mm-hm.
DAVILA:	"Meet up with him, give him a pill, pure, [STAMMERS] Do it bro." And I... I told him, "Tween [PH]..." I said, "Bro, Imma tell you this one (1) time, I'm not going to repeat it, though."
CHS:	Mm-hm.
DAVILA:	Brodie, meet up with him, go ahead..." You feel me? Listen, I [U/I].
CHS:	Uh-huh.
DAVILA:	Normally.
CHS:	That's, that... that's your responsibility.

933. DAVILA then states that the Senior Member was captured on a wiretap selling a gun and was never charged, while DAVILA stole a car and was given two years in prison (“supposedly you are selling [U/I] a wiretap, and supposedly you are not in anything”, “they are going to give me two (2) years for stealing a car”).

DAVILA:	And supposedly [STAMMERS] supposedly you are selling [U/I] a wiretap, and supposedly you are not in anything.
CHS:	Mm-hm.
DAVILA:	And they are going to give me two (2) years for stealing a car.

934. DAVILA states that, while he is only twenty-two years old, he has spent almost six years in prison for the gang (“I’m twenty-two (22), and I’ve done five (5) years and a half, almost six (6) years, for him”). DAVILA recounts that, while he was in state prison, he went on a rampage stabbing rival gang members from the Bloods, Crips, Latin Kings, and other gangs (“I was Up State, we blew the Bloods; st...stabbing Bloods, Crips, Kings, and everybody, bro”). DAVILA states that he earned respect in prison for the amount of violence he committed (“When we got there, they said, “Yo bro, I give it to ya’ll, nigga. Whatever ya’ll niggas stand-behind a nigga, I give it to you.””).

DAVILA:	Listen [CHS], I’m twenty-two (22), and I’ve done five (5) years and a half, almost six (6) years, for him. You heard?
CHS:	Dude, nigga, no, no, no, no.
DAVILA:	Listen [CHS], I was Up State, we blew the bloods; st...stabbing Bloods, Crips, Kings, and everybody, bro. When we got there, they said, “Yo bro, I give it to ya’ll, nigga. Whatever ya’ll niggas stand-behind a nigga, I give it to you.”
CHS:	Yeah, bro.

935. DAVILA states that he even got a number of Trinitarios tattoos while in prison, including “700” for the Essex Street Projects, “301”, and “157” implying his loyalty to the gang (“I tattoo the seven hundred (700) on my face; three-o-one (301); one-five-seven (157) and I put

in a status, nigga. [U/I] my shit on the floor today, nigga, [U/I] with niggas”). But DAVILA states that he does not like prison (“To be honest, I don’t like to be inside”).

DAVILA:	[CHS], when I got over there, I was, you know, how...
CHS:	Mm-hm.
DAVILA:	I tat... I tattoo the seven hundred (700) on my face; three-o-one (301); one-five-seven (157) and I put in a status, nigga. [U/I] my shit on the floor today, nigga, [U/I] with niggas.
CHS:	Nigga, you won’t believe, nigga, they used to tell me all the gossip; the guys used to tell me all the gossips. Because they still call me.
DAVILA:	To be honest, I don’t like to be inside.
CHS:	Dude, nigga, no, no, no, that’s messed up, that’s messed up, nigga, dude, bro.
DAVILA:	But damn, I told the crazy one, and supposedly is because it’s getting hot, and the summer is coming up, and he...
CHS:	[ASIDE: (U/I). It’s good.]
DAVILA:	Listen. Listen. Listen, you know that, a forewarned soldier does not die in the war.

936. As the conversation returns to the Senior Member, DAVILA states that he did not want to cause problems but already could have killed the Senior Member (“to make noise nor anything like that. I could’ve been did that”). DAVILA says that the Senior Member is dangerous to the Trinitarios and is cooperating (“It’s true, though, that guy is dangerous, dude, right now, for real”, “Too dangerous, bro. But niggas just think like, “That’s a rat” like,”). DAVILA suggests that YORRO could decide to do nothing and will only advise the Trinitarios that they should stay away from the Senior Member (“But niggas just think like, ‘That’s a rat’ like, ‘Let’s keep him away from the crew.’ And that’s it.”). DAVILA does not think that would be a sufficient response – the Senior Member needs to be killed (“Nah, nigga, we need to take care of him, bro”) so he cannot testify against the Trinitarios (“So he doesn’t stand there to testify against all the guys”). Chi agrees that the Senior Member could bring all of them down if left alive (“that guy could bring all of us down, bro. For—I’m telling you.”).

DAVILA:	...to make noise nor anything like that. I could’ve been did that [sic].
CHI:	It’s true, though, that guy is dangerous, dude, right now, for real.

DAVILA:	Too dangerous, bro. But niggas just think like, “That’s a rat” like, “Let’s keep him away from the crew.” And that’s it. Nah, nigga, we need to take care of him, bro. So he doesn’t stand there to testify against all the guys.
CHI:	Bro, that guy could bring all of us down, bro. For—I’m telling you.
DAVILA:	You feel me?
CHI:	He’s part of the board and all of that.
DAVILA:	That’s why I thank God, boss, that I have never talked to him about things, like, woo... I give my trust to guys [U/I].
CHS:	I haven’t done anything, I haven’t done anything, nigga, I haven’t done anything with that guy either, nigga.
DAVILA:	You feel me? I’m not—Chi, you know, how I am, nigga, that I [U/I] for the guys, but I don’t expose myself completely...

937. DAVILA states that, if they are prosecuted federally, he is not going to cooperate to secure his own release (“What I do know is that, if we end up at the feds, we’re not doing what those Lynn guys are doing, they ratted and they’re free.”). Rather, DAVILA states that he plans to kill people in prison and murder those testifying against him (“I’ll be, I’ll be executing people inside there, for real.”).

DAVILA:	Boss, bro, I was going, I was going to bust this girl up right now and it went away, my mood is gone, bro, to bust that girl, man.
CHS:	[LAUGHS]
CHI:	No, dude, you... because when they told me that, I also got a little down. Because I said, “What you mean, bro?” It’s true, let me tell you something, I’ve been 44 telling nigga that, to myself. I’m like, “This nigga gotta be on some informant shit.”
DAVILA:	No. Yo, boss. What I do know is that, if we end up at the feds, we’re not doing what those Lynn guys are doing, they ratted and they’re free. I’ll be, I’ll be executing people inside there, for real.
CHI:	Yes, dude, loo... bro...
DAVILA:	You heard? [LAUGHS]
CHS:	[CHUCKLES]
CHI:	I’ll go crazy, bro.
DAVILA:	Listen, listen, listen, boss...
CHI:	Yo, bro...

938. DAVILA notes that he has a network of associates and members in jail that he could draw upon (“Look, my boss, look at the system that I still have here”). DAVILA says he means business (“I’m with the pre—and I mean business”). DAVILA states that if they are locked up he

will be able to make shanks anywhere and can get that weapon to anybody in jail to commit the violence and handle things (“If we go in, I know how to cut metal from anywhere”, “I’ll get a machete to [U/I] to anybody in jail... and you already know”).

DAVILA:	My boss look, look at the system I have still have on me, anyone that gets near me...
CHI:	Of course. [CHUCKLES]
DAVILA:	[CHUCKLES]
CHI:	No, for real. Yo, he knows—
DAVILA:	I’m with the pre—and I mean business.
CHI:	No, it is true, I’m clear.
DAVILA:	If we go in, I know how to cut metal from anywhere.
CHI:	Facts. No, you already know the system.
DAVILA:	I’ll get a machete to [U/I] to anybody in jail... and you already know.

VI. MURDERS COMMITTED BY THE MASSACHUSETTS TRINITARIOS

939. Over the past decade, the Massachusetts Trinitarios have committed numerous murders in furtherance of their criminal enterprise. To date, our investigation has identified more than fifteen (15) homicides that investigators believe the Trinitarios have committed in the past decade in Essex County, Massachusetts. Those Trinitarios murders that are currently referenced in materials filed in the United States District Court for District of Massachusetts, currently pending before the Essex Superior Court, or successfully prosecuted to guilty verdicts, include the following:

- a. The March 8, 2017, Murder of Juan Espinal in Lawrence, Massachusetts. As part of the federal investigation, evidence was developed that ANGEL CASTILLO-GARCIA (“CASTILLO”), ELVIS TRUJILLO and ROBERT SEVERINO participated in the murder of Juan Espinal. CASTILLO, TRUJILLO and SEVERINO were members of the Lawrence Chapter of the Trinitarios at the time of the murder. CASTILLO and TRUJILLO are charged federally with racketeering conspiracy and SEVERINO is charged in state court in connection with this murder. *See United States v. Elvis Trujillo*, Docket No. 24-10336-NMG; *Commonwealth v. Robert Severino*, Essex Superior Court, Docket No. 2477CR00493.²⁴

²⁴ ELVIS TRUJILLO, A/K/A “GORDO”, A/K/A “HONDURAS” (“TRUJILLO”) is charged separately with Conspiracy to Conduct Enterprise Affairs Through a Pattern of Racketeering Activity (also known as “Racketeering

- b. The April 16, 2017, Murder of Aracelys Valdez in Lawrence, Massachusetts. I am aware that Luis Rodriguez, a/k/a “Neno,” a/k/a “Fifi,” a member of the Lawrence Chapter of the Trinitarios, was charged with the murder of Aracelys Valdez and convicted of murder after a jury trial in Essex Superior Court on May 11, 2023. *See Commonwealth v. Luis Rodriguez*, Essex Superior Court, Docket No. 1777CR00306.
- c. The July 30, 2017, Murder of Jensey Hernandez, in Lawrence, Massachusetts. I am aware that Jeffrey Tapia, a member of the Lawrence Chapter of the Trinitarios, was charged with murder of Jensey Hernandez and convicted of murder after a jury trial in Essex Superior Court on June 29, 2022. *See Commonwealth v. Jeffrey Tapia*, Essex Superior Court, Docket No. 1777CR00599.
- d. The November 26, 2017, Murder of Mindy Tran in Lawrence, Massachusetts. As part of this federal investigation, evidence was developed that ANGEL CASTILLO-GARCIA and ELVIS TRUJILLO participated in the murder of Mindy Tran. *See United States v. Elvis Trujillo*, Docket No. 24-10336-NMG.
- e. The May 17, 2018, Murder of Nike Colon, in Haverhill, Massachusetts. I am aware that Eddy Almonte, a member of the Lawrence Chapter of the Trinitarios, was charged with the murder of Nike Colon and convicted, following a plea of guilty in Essex Superior Court on September 21, 2022. *See Commonwealth v. Eddy Almonte*, Essex Superior Court, Docket No. 1877CR00389.
- f. The September 3, 2018, Murder of Jaithian Amador, a/k/a “Jay EBK” in Lawrence, Massachusetts. As part of the federal investigation, evidence was developed that LUIS CRISPIN participated in the murder of Jaithian Amador.
- g. The March 30, 2020, Murder of Carlos Rivera, a/k/a “Chin,” in Lawrence, Massachusetts. As part of the federal investigation, evidence was developed that YANUEL MEJIA, A/K/A “NANO PROBLEMA,” discharged rounds at Carlos Rivera during the incident that resulted in his death. This homicide took place during a shooting between MEJIA and members of the Gangster Disciples.
- h. The May 14, 2021, Murder of Edward Javier in Lawrence, Massachusetts. I am aware that Adrian Corniel De La Cruz, a member of the Lawrence Chapter of the Trinitarios was charged with the murder of Edward Javier and convicted, following a plea of guilty in Essex Superior Court on September 25, 2024. *See Commonwealth v. Adrian Corniel De La Cruz*, Essex Superior Court, Docket No. 2177CR00297.

Conspiracy” or “RICO Conspiracy”), in violation of 18 U.S.C. § 1962(d). As part of that Indictment, TRUJILLO is alleged to have participated in the March 8, 2017, murder of Juan Espinal, in Lawrence, Massachusetts, and the November 26, 2017, murder of Mindy Tran, in Lawrence, Massachusetts. In approximately 2022, TRUJILLO agreed to deportation to his native Honduras following other state court firearms convictions.

- i. The December 31, 2021, Murder of Jumil Celladilla in Lawrence, Massachusetts. As part of this federal investigation, evidence was developed that JERVIS ALMANZAR, A/K/A “JB,” participated in the murder of Jumil Celladilla.
- j. The February 17, 2022, Murder of Ewdy Lopez, a/k/a “Timmy Brook” in Lawrence, Massachusetts. Presently, YANUEL MEJIA, A/K/A “NANO PROBLEMA,” a member of the Lawrence Chapter of the Trinitarios is charged with the murder of Ewdy Lopez in Essex Superior Court, Docket No. 2277CR00147. This state case is pending with a scheduled trial date in September 2026. As part of the federal investigation, evidence was developed that YANUEL MEJIA, JAHIR DAVILA, ENRIQUE DURAN, and RICHARD PENA participated in the murder of Ewdy Lopez.
- k. The September 2, 2023, Murders of Jandriel Heredia and Abraham Diaz in Lynn, Massachusetts. As part of the federal investigation, ENMANUEL PAULA-CABRAL, JUSTIN ALBA, TOMY SANCHEZ, DARWIN BATISTA, ABEL SEVERINO REYES, WARLY RUIZ, KELVIN LIRANZO ROMAN, MICHAEL MILIANO, YEFERSON VALLECILLO CAMBAR,²⁵ JAMES JIMENEZ, CARLOS CORNIELLE RAMIREZ and LEONARDO ESPINOZA, were charged with participating in the murders of Jandriel Heredia and Abraham Diaz.
- l. The December 27, 2023, Murders of Kyle Mel and Isaiah Acevedo in Lynn, Massachusetts. As part of this federal investigation, ENMANUEL PAULA-CABRAL, ANGEL SANTOS, and DAVID GARCIA, were charged with participating in the murders of Kyle Mel and Isaiah Acevedo.
- m. The September 13, 2025, Murder of Hugo Del Rosario in Lawrence, Massachusetts. As part of this federal investigation, HECTOR MOTA, JEAN DELGADO, and RICHARD PENA are charged with participating in the murder of Hugo Del Rosario.

CONCLUSION

940. In addition to the fifteen identified homicides, the Trinitarios are believed to be responsible for dozens of attempted murders, shootings, kidnappings, and robberies, a number of which are described in this affidavit.

²⁵ YEFERSON VALLECILLO CAMBAR, A/K/A “ILLUMINATI” (“VALLECILLO”) is charged separately with Conspiracy to Conduct Enterprise Affairs Through a Pattern of Racketeering Activity, in violation of 18 U.S.C. § 1962(d). *See United States v. Yeferson Cambar Vallecillo*, Docket No. 24-CR-10335-NMG.

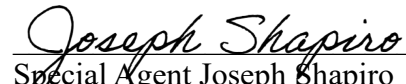
941. While the violence attributable to the Trinitarios organization is extensive, the risk to the cooperating witnesses and the risk of obstruction of justice presented by these Defendants is also substantial as well. Multiple recordings are contained in this affidavit where charged Defendants discuss the murder of cooperating witnesses. See Sections IV(C)(i) (TAVERAS stating he will check himself into protective custody to murder a cooperating witness after the takedown of the first phase), V(D) (attempted murder of Dennys Hilario-Dejesus), (I) (shooting of AV and efforts to dissuade attendance at court), (Y)(ii) (PAULA-CABRAL discussing ordering violence against a juvenile Trinitarios members in DYS custody for providing information to police), (AA) (recording of CRISPIN asking a cooperating witness to murder cooperating witnesses), (CC) (recording of YORRO discussing the murder of cooperating witnesses in custody), (OO) (recording of DAVILA discussing the murder of cooperating witnesses if charged federally).

942. This is not mere conjecture or hyperbole. In January 2026, a cooperating witness in this investigation was attacked and almost killed while in custody for providing information to law enforcement. Furthermore, in May 2026, two cooperating witnesses were attacked by two Trinitarios members while in custody. I am omitting further details of these incidents to preserve the identities of the cooperating witnesses.

943. Based on the foregoing, the Defendants charged in the Superseding Indictment present a risk of danger to the community, a risk of danger to specific individuals and for obstruction of justice and should be detained.

944. Lastly, as noted in this affidavit and in ECF #10-1, multiple Defendants in this case have fled the United States and were apprehended in the Dominican Republic. Therefore, the Defendants in the case also present a risk of flight from prosecution.

I swear that the foregoing facts are true to the best of my knowledge and belief, under the penalties of perjury on June 9, 2026.


Special Agent Joseph Shapiro
Department of Homeland Security
Homeland Security Investigations