



COUNT ONE  
(Racketeering Conspiracy)

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, and others known and unknown, were members and associates of the Black Mob, a criminal organization whose members and associates engaged in, among other things, acts involving murder, assault, narcotics trafficking, and robberies. The Black Mob operated principally in the Bronx, New York, Queens, New York, and Brooklyn, New York.

2. The Black Mob, including its leadership, membership, and associates, constituted an "enterprise" (hereinafter "Black Mob Enterprise"), as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Black Mob Enterprise constituted an ongoing organization

whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Black Mob Enterprise. At all times relevant to this Indictment, the Black Mob Enterprise was engaged in, and its activities affected, interstate and foreign commerce. CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, participated in the operation and management of the Black Mob Enterprise and participated in unlawful and other activity in furtherance of the conduct of the Black Mob Enterprise's affairs.

#### PURPOSES OF THE ENTERPRISE

3. The purposes of the Black Mob Enterprise included the following:

a. Preserving and protecting the power of the Black Mob Enterprise and its members and associates through acts involving murder, other acts of violence, and threats of violence.

b. Promoting and enhancing the Black Mob

Enterprise and the activities of its members and associates.

c. Keeping victims and potential victims in fear of the Black Mob Enterprise and its members and associates through acts and threats of violence.

d. Providing assistance to members and associates who committed crimes for and on behalf of the gang.

e. Enriching the members and associates of the Black Mob Enterprise through, among other things, robbery and the distribution and sale of narcotics, including heroin, fentanyl, cocaine base, cocaine, oxycodone, alprazolam, and marijuana.

#### MEANS AND METHODS OF THE ENTERPRISE

4. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Black Mob Enterprise were the following:

a. Members and associates of the Black Mob Enterprise committed, conspired to commit, and attempted to commit acts of violence, including acts involving murder, to protect and expand the Black Mob Enterprise's criminal operations, and against rival gang members.

b. Members and associates of the Black Mob Enterprise used physical violence and threats of violence,

including acts involving murder and robbery, against others, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the Black Mob Enterprise promoted and celebrated, in music and on social media, the criminal conduct of the Black Mob, namely narcotics distribution, acts involving violence, and the use of firearms.

d. Members and associates of the Black Mob Enterprise obtained, possessed, and used firearms.

e. Members and associates of the Black Mob Enterprise sold narcotics, including heroin, fentanyl, cocaine base, cocaine, oxycodone, alprazolam, and marijuana.

#### The Racketeering Conspiracy

5. From at least in or about 2016, up to and including the present, in the Southern District of New York and elsewhere, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, and others known and unknown, being persons employed by and associated with the

racketeering enterprise described in Paragraphs One through Four of this Indictment, namely, the Black Mob, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Black Mob Enterprise through a pattern of racketeering activity as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. multiple acts involving murder, in violation of New York Penal Law, Sections 125.25 (murder in the second degree), 110.00 (attempt to commit a crime), 105.15 (conspiracy in the second degree), and 20.00 (accessory liability);

b. multiple acts involving robbery, in violation of New York Penal Law, Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy in the fourth degree), 110.00 (attempt to commit a crime), and 20.00 (accessory liability);

c. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to the interference with commerce, robbery, or extortion); and

d. multiple offenses involving the felonious

manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, including heroin, fentanyl, crack cocaine, cocaine, oxycodone, alprazolam, and marijuana, in violation of the law of the United States, namely, Title 21, United States Code, Sections 812, 841, and 846, and Title 18, United States Code, Section 2.

6. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Black Mob Enterprise.

#### Notice of Special Sentencing Factors

7. From at least in or about 2016, up to and including the present, in the Southern District of New York and elsewhere, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

8. It was a part and an object of the conspiracy, that CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute: (i) one kilogram and more of mixtures and substances containing a detectable amount of heroin; (ii) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl; (iii) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack"; and (iv) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO  
(Narcotics Conspiracy)

The Grand Jury further charges:

9. From at least in or about 2016 up to and including the present, in the Southern District of New York and



elsewhere, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DEESHUNTEE STEVENS, a/k/a "Kay," HECTOR BONAPARTE, a/k/a "June," and MICHAEL GONZALEZ, a/k/a "Wisdom," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

10. It was a part and an object of the conspiracy that CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DEESHUNTEE STEVENS, a/k/a "Kay," HECTOR BONAPARTE, a/k/a "June," and MICHAEL GONZALEZ, a/k/a "Wisdom," the

defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

11. The controlled substances that CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DEESHUNTEE STEVENS, a/k/a "Kay," HECTOR BONAPARTE, a/k/a "June," and MICHAEL GONZALEZ, a/k/a "Wisdom," the defendants, conspired to distribute and possess with intent to distribute were: (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (b) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); (c) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A);

(d) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); (e) a quantity of mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (f) a quantity of alprazolam, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (g) a quantity of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

COUNT THREE  
(Firearms Offense)

The Grand Jury further charges:

12. From at least in or about 2016, up to and including the present, in the Southern District of New York, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DEESHUNTEE STEVENS, a/k/a "Kay," and HECTOR BONAPARTE, a/k/a "June," the defendants, and others known and

unknown, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Two of this Indictment, knowingly did use and carry firearms, and, in furtherance of such drug trafficking offense, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

13. As a result of committing the offense alleged in Count One of this Indictment, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," and EZEQUIEL OSPINA, a/k/a "Izzy," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence

over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

14. As a result of committing the offense alleged in Count Two of this Indictment, CARMELO VELEZ, a/k/a "Jugg," CHRISTOPHER RODRIGUEZ, a/k/a "Taz," LUIS SEPULVEDA, a/k/a "Red," ANGEL LOPEZ, a/k/a "SB," CHRISTOPHER LUM, a/k/a "Un," EMMANUEL BONAFE, a/k/a "Eazy," CHRISTOPHER NELSON, a/k/a "Hype," JOSIAH VELAZQUEZ, a/k/a "Siah," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," HEINNER SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DEESHUNTEE STEVENS, a/k/a "Kay," HECTOR BONAPARTE, a/k/a "June," and MICHAEL GONZALEZ, a/k/a "Wisdom," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853,

any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense and any and all property used, or intended to be used, in any manner or part, to commit and to facilitate the commission of, said offense, including but not limited to a sum in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m); Title 21, United States Code, Section 853(p); and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1963; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON

Handwritten signature of Geoffrey S. Berman in cursive.

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GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

CARMELO VELEZ, a/k/a "Jugg,"  
CHRISTOPHER RODRIGUEZ, a/k/a "Taz,"  
LUIS SEPULVEDA, a/k/a "Red," ANGEL  
LOPEZ, a/k/a "SB," CHRISTOPHER LUM,  
a/k/a "Un," EMMANUEL BONAFE, a/k/a  
"Eazy," CHRISTOPHER NELSON, a/k/a  
"Hype," JOSIAH VELAZQUEZ, a/k/a "Siah,"  
ALBERTO BORGES, a/k/a "AB," JUAN  
HERNANDEZ, a/k/a "Guerra," JESUS  
HERNANDEZ, a/k/a "Goldo," HEINNER  
SOLIS, a/k/a "Juelz," EZEQUIEL OSPINA,  
a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a  
"Double-R," DEESHUNTEE STEVENS, a/k/a  
"Kay," HECTOR BONAPARTE, a/k/a "June,"  
and MICHAEL GONZALEZ, a/k/a "Wisdom,"

Defendants.

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SEALED  
INDICTMENT

19 Cr.

(18 U.S.C. §§ 924(c), 1962(d), and 2;  
and 21 U.S.C. § 846.)

GEOFFREY S. BERMAN  
United States Attorney

  
Foreperson

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