

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

CARMELO VELEZ,
a/k/a "Jugg,"
CHRISTOPHER RODRIGUEZ,
a/k/a "Taz,"
LUIS SEPULVEDA,
a/k/a "Red,"
EMMANUEL BONAFE,
a/k/a "Eazy,"
ALBERTO BORGES,
a/k/a "AB,"
JUAN HERNANDEZ,
a/k/a "Guerra,"
JESUS HERNANDEZ,
a/k/a "Goldo,"
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,"
DIEGO MATEO,
a/k/a "Casa,"
JUPANKY PIMENTEL,
a/k/a "Panky,"
WILLIAM GONZALEZ,
a/k/a "Bori,"
MARK WOODS,
a/k/a "Smokey,"
RICARDO RICUARTE,
a/k/a "Nino,"
RAUL CUELLO,
a/k/a "2B,"
and
PAUL CUELLO,
a/k/a "Flip,"

Defendants.

- - - - - X

:
: SEALED
: SUPERSEDING
: INDICTMENT
:
: S5 19 Cr. 862 (VEC)

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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," the defendants, and others known and unknown, were members and associates of the Latin Kings, including the Black Mob tribe, a criminal organization whose members and associates engaged in, among other things, acts involving murder, assault, narcotics trafficking, fraud, and robberies. The Latin Kings operated principally in the Bronx, New York, Queens, New York, and Brooklyn, New York.

2. The Latin Kings, including its leadership, membership, and associates, constituted an "enterprise" (hereinafter "Latin Kings 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 Latin Kings Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Latin Kings Enterprise. At all times relevant to this Indictment, the Latin Kings 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," the defendants, participated in the operation and management of the Latin Kings Enterprise and participated in unlawful and other activity in furtherance of the conduct of the Latin Kings Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Latin Kings Enterprise included the following:
 - a. Preserving and protecting the power of the Latin Kings Enterprise and its members and associates through

acts involving murder, other acts of violence, and threats of violence.

b. Promoting and enhancing the Latin Kings Enterprise and the activities of its members and associates.

c. Keeping victims and potential victims in fear of the Latin Kings 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 Latin Kings Enterprise through, among other things, fraud, 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 Latin Kings Enterprise were the following:

a. Members and associates of the Latin Kings Enterprise committed, conspired to commit, and attempted to commit acts of violence, including acts involving murder, to protect and expand the Latin Kings Enterprise's criminal

operations, and against rival gang members.

b. Members and associates of the Latin Kings Enterprise used physical violence and threats of violence, including acts involving murder, robbery, and assault, against others, including in particular rival gang members and rival narcotics traffickers.

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

d. Members and associates of the Latin Kings Enterprise obtained, possessed, and used firearms.

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

f. Members and associates of the Latin Kings Enterprise committed robberies.

g. Members and associates of the Latin Kings Enterprise committed frauds.

h. Members and associates of the Latin Kings Enterprise committed arsons.

The Racketeering Conspiracy

5. From at least in or about 2012, 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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 Latin Kings, including the Black Mob tribe, 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 Latin Kings 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);

d. multiple acts indictable under Title 18, United States Code, Section 1029 (relating to fraud and related activity in connection with access devices), 1343 (relating to wire fraud), and 1344 (relating to financial institution fraud);

e. 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 Latin Kings Enterprise.

Notice of Special Sentencing Factors

7. From at least in or about 2012, 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a

"Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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, Sections 1962(d) & 1963.)

COUNT TWO
(Narcotics Conspiracy)

The Grand Jury further charges:

9. From at least in or about 2012 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," 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," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," 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," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," 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," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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 2012, 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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, some of which were brandished and discharged.

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

COUNT FOUR
(Firearms Offense)
(STEVENS and BONAPARTE)

The Grand Jury further charges:

13. From at least in or about 2015, up to and including the present, in the Southern District of New York, 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)(1)(A)(i) and 2.)

COUNT FIVE
(Assault with a Dangerous Weapon in Aid of Racketeering)
(WOODS)

The Grand Jury further charges:

14. At all times relevant to this Indictment, the Latin

Kings Enterprise, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

15. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

16. In or about 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from

the Latin Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, WOODS robbed a marijuana dealer at gunpoint in the Sunset Park neighborhood of Brooklyn, New York, in violation of New York Penal Law Sections 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT SIX

(Use of a Firearm in Furtherance of Crime of Violence)
(WOODS)

The Grand Jury further charges:

17. In or about 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon charged in Count Five of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished.

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

COUNT SEVEN

(Assault with a Dangerous Weapon in Aid of Racketeering)
(VELEZ, RODRIGUEZ, SEPULVEDA, BONAFE, JESUS HERNANDEZ, PIMENTEL,
WOODS)

The Grand Jury further charges:

18. At all times relevant to this Indictment, the Latin Kings Enterprise, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

19. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

20. On or about October 7, 2018, 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," EMMANUEL BONAFE, a/k/a "Eazy," JESUS HERNANDEZ, a/k/a "Goldo," JUPANKY PIMENTEL, a/k/a "Panky," and MARK WOODS, a/k/a "Smokey," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Latin Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, VELEZ, RODRIGUEZ, SEPULVEDA, BONAFE, JESUS HERNANDEZ, PIMENTEL, and WOODS slashed rival Latin Kings gang members in East Flatbush, Brooklyn, in violation of New York Penal Law Sections 120.00(1), 120.05, 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT EIGHT

(Assault with a Dangerous Weapon in Aid of Racketeering)
(WOODS)

The Grand Jury further charges:

21. At all times relevant to this Indictment, the Latin Kings Enterprise, as described in paragraphs 1 through 4 of this

Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

22. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

23. On or about December 16, 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Latin

Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, WOODS robbed a Mahjong parlor in Brooklyn at gunpoint, in violation of New York Penal Law Sections 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT NINE

(Use of a Firearm in Furtherance of Crime of Violence)
(WOODS)

The Grand Jury further charges:

24. On or about December 16, 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon charged in Count Eight of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished.

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

COUNT TEN

(Assault with a Dangerous Weapon in Aid of Racketeering)
(WOODS)

The Grand Jury further charges:

25. At all times relevant to this Indictment, the Latin Kings Enterprise, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

26. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

27. On or about December 18, 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Latin Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, WOODS robbed a Mahjong parlor in Brooklyn at gunpoint, in violation of New York Penal Law Sections 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT ELEVEN

(Use of a Firearm in Furtherance of Crime of Violence)
(WOODS)

The Grand Jury further charges:

28. On or about December 18, 2018, in the Southern District of New York and elsewhere, MARK WOODS, a/k/a "Smokey," the defendant, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon charged in Count Ten of this Indictment, knowingly did use and carry firearms, and, in furtherance of

such crime of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished.

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

COUNT TWELVE

(Assault with a Dangerous Weapon in Aid of Racketeering)
(VELEZ, SEPULVEDA, WOODS)

The Grand Jury further charges:

29. At all times relevant to this Indictment, the Latin Kings Enterprise, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

30. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New

York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

31. In or about September 2019, in the Southern District of New York and elsewhere, CARMELO VELEZ, a/k/a "Jugg," LUIS SEPULVEDA, a/k/a "Red," and MARK WOODS, a/k/a "Smokey," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Latin Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, VELEZ, SEPULVEDA, and WOODS robbed a drug dealer in the Bronx at gunpoint, in violation of New York Penal Law Sections 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT THIRTEEN

(Use of a Firearm in Furtherance of Crime of Violence)
(VELEZ, SEPULVEDA, WOODS)

The Grand Jury further charges:

32. In or about September 2019, in the Southern

District of New York and elsewhere, CARMELO VELEZ, a/k/a "Jugg," LUIS SEPULVEDA, a/k/a "Red," and MARK WOODS, a/k/a "Smokey," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon charged in Count Twelve of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished.

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

COUNT FOURTEEN

(Assault with a Dangerous Weapon in Aid of Racketeering)
(WOODS, OSPINA)

The Grand Jury further charges:

33. At all times relevant to this Indictment, the Latin Kings Enterprise, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing

organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

34. At all times relevant to this Indictment, the Latin Kings Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951 and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

35. On or about January 12, 2019, in the Southern District of New York and elsewhere, EZEQUIEL OSPINA, a/k/a "Izzy," and MARK WOODS, a/k/a "Smokey," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Latin Kings Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Latin Kings Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, OSPINA and WOODS robbed a drug dealer in the Bushwick Projects in Brooklyn at gunpoint, in violation of New

York Penal Law Sections 120.14, 120.15, and 20.00.

(Title 18, United States Code, Section 1959(a)(3) and 2.)

COUNT FIFTEEN.

(Use of a Firearm in Furtherance of Crime of Violence)
(WOODS, OSPINA)

The Grand Jury further charges:

36. On or about January 12, 2019, in the Southern District of New York and elsewhere, EZEQUIEL OSPINA, a/k/a "Izzy," and MARK WOODS, a/k/a "Smokey," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon charged in Count Fourteen of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished and discharged.

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

FORFEITURE ALLEGATION AS TO COUNT ONE

37. 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo,"

EZEQUIEL OSPINA, a/k/a "Izzy," RAIMUNDO NIEVES, a/k/a "Double-
R," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky,"
WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey,"
RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and
PAUL CUELLO, a/k/a "Flip," 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

38. 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," EMMANUEL BONAFE, a/k/a "Eazy," ALBERTO BORGES, a/k/a "AB," JUAN HERNANDEZ, a/k/a "Guerra," JESUS HERNANDEZ, a/k/a "Goldo," 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," DIEGO MATEO, a/k/a "Casa," JUPANKY PIMENTEL, a/k/a "Panky," WILLIAM GONZALEZ, a/k/a "Bori," MARK WOODS, a/k/a "Smokey," RICARDO RICUARTE, a/k/a "Nino," RAUL CUELLO, a/k/a "2B," and PAUL CUELLO, a/k/a "Flip," 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


39. 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


AUDREY STRAUSS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CARMELO VELEZ, a/k/a "Jugg,"
CHRISTOPHER RODRIGUEZ, a/k/a "Taz,"
LUIS SEPULVEDA, a/k/a "Red," EMMANUEL
BONAFE, a/k/a "Eazy," ALBERTO BORGES,
a/k/a "AB," JUAN HERNANDEZ, a/k/a
"Guerra," JESUS HERNANDEZ, a/k/a
"Goldo," 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," DIEGO MATEO,
a/k/a "Casa," JUPANKY PIMENTEL, a/k/a
"Panky," WILLIAM GONZALEZ, a/k/a
"Bori," MARK WOODS, a/k/a "Smokey,"
RICARDO RICUARTE, a/k/a "Nino," RAUL
CUELLO, a/k/a "2B," and PAUL CUELLO,
a/k/a "Flip,"

Defendants.

SEALED
SUPERSEDING
INDICTMENT

S5 19 Cr. 862 (VEC)

(18 U.S.C. §§ 924(c), 1959(a), 1962(d), and 2;
and 21 U.S.C. § 846.)

AUDREY STRAUSS
United States Attorney

A TRUE BILL


Foreperson