

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MARCO PEREZ,  
SAID RIVERA,  
a/k/a "Tango,"  
a/k/a "Tiny,"  
DINOS PSIRROS,  
a/k/a "Gustavo,"  
a/k/a "Gus,"  
a/k/a "Domingo," and  
MORELOS DISLA,  
a/k/a "Mo,"

Defendants.

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SEALED INDICTMENT

12 Cr. ( )  
1 2 CRIM 6 8 8

COUNT ONE

The Grand Jury charges:

1. Since at least in or about November 2011, up through and including at least on or about September 2012, in the Southern District of New York and elsewhere, MARCO PEREZ, SAID RIVERA, a/k/a "Tango," a/k/a "Tiny," DINOS PSIRROS, a/k/a "Gustavo," a/k/a "Gus," a/k/a "Domingo," and MORELOS DISLA, a/k/a "Mo," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PEREZ, RIVERA, PSIRROS and DISLA agreed

together and with others to commit robberies of suspected narcotics and untaxed cigarette traffickers in the Bronx, New York.

(Title 18, United States Code, Section 1951.)

### COUNT TWO

The Grand Jury further charges:

2. On or about November 15, 2011, in the Southern District of New York and elsewhere, MARCO PEREZ, SAID RIVERA, a/k/a "Tango," a/k/a "Tiny," and DINOS PSIRROS, a/k/a "Gustavo," a/k/a "Gus," a/k/a "Domingo," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PEREZ, RIVERA, and PSIRROS impersonated law enforcement agents in order to rob a suspected untaxed cigarette trafficker of approximately \$200,000 and a quantity of untaxed cigarettes in the vicinity of 275 East Gunhill Road, Apartment 5D, in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

### COUNT THREE

The Grand Jury further charges:

3. On or about June 6, 2012, in the Southern District of New York and elsewhere, MARCO PEREZ, SAID RIVERA, a/k/a "Tango," a/k/a "Tiny," DINOS PSIRROS, a/k/a "Gustavo," a/k/a "Gus," a/k/a "Domingo," and MORELOS DISLA, a/k/a "Mo," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section

1951(b)(1), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PEREZ, RIVERA, PSIRROS and DISLA impersonated law enforcement agents in order to rob a suspected narcotics trafficker and others of approximately \$1,000 in the vicinity of 2022 Benedict Avenue and 2043 Benedict Avenue, in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

#### **COUNT FOUR**

The Grand Jury further charges:

4. On or about November 15, 2011, in the Southern District of New York, MARCO PEREZ, SAID RIVERA, a/k/a "Tango," a/k/a "Tiny," and DINOS PSIRROS, a/k/a "Gustavo," a/k/a "Gus," a/k/a "Domingo," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery charged in Count Two of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished.

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

#### **COUNT FIVE**

The Grand Jury further charges:

5. On or about June 6, 2012, in the Southern District of New York, MARCO PEREZ, SAID RIVERA, a/k/a "Tango," a/k/a "Tiny," DINOS PSIRROS, a/k/a "Gustavo," a/k/a "Gus," a/k/a "Domingo," and MORELOS DISLA, a/k/a "Mo," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States,

namely, the robbery and attempted robbery charged in Count Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished.

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

### **FORFEITURE ALLEGATION**

6. As a result of committing one or more of the offenses charged in Counts One through Three of this Indictment, MARCO PEREZ, SAID RIVERA, a/k/a “Tango,” a/k/a “Tiny,” DINOS PSIRROS, a/k/a “Gustavo,” a/k/a “Gus,” a/k/a “Domingo,” and MORELOS DISLA, a/k/a “Mo,” the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property that constitutes or is derived from proceeds traceable to the commission of one or more of the offenses alleged in Counts One through Three of this Indictment.

### **Substitute Assets Provision**



7. 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, third party;
- 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 981, Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

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

CONFIDENTIAL

  
PREET BHARARA   
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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**SEALED INDICTMENT**

12 Cr. \_\_\_\_ (\_\_\_\_)

(18 U.S.C. §§ 924(c)(1)(A)(ii), 924(c)(1)(C)(i), 1951, and 2.)

PREET BHARARA  
United States Attorney.

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