

Dec 6, 2018

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDACASE NO. 18-20946-CR-GAYLES/OTAZO-REYES

21 U.S.C. § 848
21 U.S.C. § 846
21 U.S.C. § 856(a)(1)
18 U.S.C. § 924(o)
18 U.S.C. § 1956(h)
18 U.S.C. § 36
18 U.S.C. § 924(c)(1)(A)(ii) and 924(c)(1)(A)(iii)
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
26 U.S.C. § 5861(d)
18 U.S.C. § 1957
18 U.S.C. § 924(c)(1)(A)(i)
21 U.S.C. § 843(b)
18 U.S.C. § 1951(a)
18 U.S.C. § 922(g)(5)(B)
18 U.S.C. § 924(d)(1)
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)
21 U.S.C. § 853
31 U.S.C. § 5317(c)(1)

UNITED STATES OF AMERICA

vs.

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
HECTOR SALGADO,
a/k/a "Teto,"
ISSAC LEAL,
a/k/a "Chico Black,"

a/k/a "King Felony,"
JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"
PETER RODRIGUEZ,
a/k/a "Hot Boy,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
ELIZABETH LEGON,
a/k/a "Eli,"
RICARDO PEREZ-CASTRO,
ORLANDO LORENZO,
ROBERTO GARCIA,
MIGUEL HABER,
PEDRO RENE GONZALEZ,
a/k/a "Pete,"
EDUARDO BOBADILLA-OROL,
a/k/a "Chupa,"
GILBERT CRUZ BAEZ,
a/k/a "Bori,"
ALAIN TERRY,
a/k/a "Youngin,"
RONALD REYES-MELO,
a/k/a "Cueyo," and
CHARLIE GONZALEZ,

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1
Continuing Criminal Enterprise
(21 U.S.C. § 848)

From on or about December 7, 2013, through on or about October 30, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz," and
BERNARDO QUINONEZ,
a/k/a "Macho,"

did unlawfully, knowingly and intentionally engage in a continuing criminal enterprise in that the defendants knowingly and willfully violated Title 21, United States Code, Sections 841(a)(1), and

846, as alleged in Counts 2, 15, 18, 19, 21, 23, 27, 28, 31, 35, 36, 37, and 57 of this Indictment, which counts are incorporated herein by reference, which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et seq., undertaken by defendants **ULYSSES CABRERA** and **BERNARDO QUINONEZ**, in concert with at least five other persons with respect to whom defendants **ULYSSES CABRERA** and **BERNARDO QUINONEZ** occupied a position of organizer, supervisor and manager, and from which continuing series of violations defendants **ULYSSES CABRERA** and **BERNARDO QUINONEZ** obtained substantial income and resources.

Furthermore, the defendants **ULYSSES CABRERA** and **BERNARDO QUINONEZ** were principal administrators, organizers, supervisors and leaders of the criminal enterprise, which involved possession with intent to distribute and distribution of mixtures and substances containing 500 grams or more of cocaine, a schedule II controlled substance; a detectable amount of cocaine base, commonly referred to as "crack cocaine," a schedule II controlled substance; and a detectable amount of marijuana.

All in violation of Title 21, United States Code, Section 848.

COUNT 2
Conspiracy to Possess with Intent to Distribute Controlled Substances
(21 U.S.C. § 846)

From on or about December 7, 2013, through on or about October 30, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"

HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"
PETER RODRIGUEZ,
a/k/a "Hot Boy,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
ELIZABETH LEGON,
a/k/a "Eli,"
MIGUEL HABER,
GILBERT CRUZ BAEZ,
a/k/a "Bori," and
ALAIN TERRY,
a/k/a "Youngin,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and with persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

The controlled substance involved in the conspiracy attributable to **ULYSSES CABRERA, BERNARDO QUINONEZ, RAFAEL QUINONEZ, HENRY FELICIANO-TORRES, DANIEL QUINONEZ, MARVIN MELENDEZ-REYES, VICTOR SMITH, ISSAC LEAL, JOSE LUIS DIAZ, ROGELIO RAMOS, PETER SIMO, GILBERT CRUZ BAEZ,** and **ALAIN TERRY,** as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

The controlled substance involved in the conspiracy attributable to **ULYSSES CABRERA, BERNARDO QUINONEZ, RAFAEL QUINONEZ, HENRY FELICIANO-TORRES, DANIEL QUINONEZ, MARVIN MELENDEZ-REYES, VICTOR SMITH, ISSAC LEAL, JOSE LUIS DIAZ, ROGELIO RAMOS, PETER SIMO, GILBERT CRUZ BAEZ,** and **ALAIN TERRY**, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of cocaine base, commonly referred to as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

The controlled substance involved in the conspiracy attributable to **ULYSSES CABRERA, BERNARDO QUINONEZ, RAFAEL QUINONEZ, MARVIN MELENDEZ-REYES, VICTOR SMITH, ISSAC LEAL, PETER RODRIGUEZ, MIGUEL HABER, ELIZABETH LEGON, GILBERT CRUZ BAEZ,** and **ALAIN TERRY**, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(D).

COUNT 3

**Maintaining an Establishment for Distribution of Controlled Substances
(21 U.S.C. § 856(a)(1))**

From in or about January 2018, and continuing to in or about June 2018, exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz," and
MIGUEL HABER,**

did knowingly maintain a place, that is, the premises located at 1329 NW 6th Street, Apartment 7, in Miami, Florida 33125, for the purpose of manufacturing, distributing and using controlled substances, that is, marijuana, in violation of Title 21, United States Code, Section 856(a)(1), and Title 18, United States Code, Section 2.

COUNT 4
Conspiracy to Possess with Intent to Distribute Cocaine
(21 U.S.C. § 846)

From in or about June 2017, the exact date being unknown to the Grand Jury, through on or about October 30, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

GILBERT CRUZ BAEZ,
a/k/a "Bori," and
ALAIN TERRY,
a/k/a "Youngin,"

did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

The controlled substance involved in the conspiracy attributable to **GILBERT CRUZ BAEZ**, and **ALAIN TERRY**, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 5

**Conspiracy to Possess a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(o))**

From in or about October 2017, the exact date being unknown to the Grand Jury, through in or about October 30, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

**GILBERT CRUZ BAEZ,
a/k/a "Bori," and
ALAIN TERRY,
a/k/a "Youngin,"**

did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury, to use and carry a firearm during and in relation to a drug trafficking crime, which is a felony prosecutable in a court in the United States, that is, a violation of Title 21, United States Code, Section 846, as set forth in Count 4 of this Indictment, in violation of Title 18, United States Code, Section 924(c); all in violation of Title 18, United States Code, Section 924(o).

COUNT 6

**Conspiracy to Possess a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(o))**

From in or about October 2017, the exact date being unknown to the Grand Jury, through on or about October 30, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"**

a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and with persons known and unknown to the Grand Jury, to use and carry a firearm during and in relation to a drug trafficking crime, which is a felony prosecutable in a court in the United States, that is, a violation of Title 21, United States Code, Section 846, as set forth in Count 2 of this Indictment, in violation of Title 18 United States Code, Section 924(c); all in violation of Title 18, United States Code, Section 924(o).

COUNT 7
Conspiracy to Commit Money Laundering
(18 U.S.C. §1956(h))

From in or around October 2017, and continuing through in or around June 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho,"
JOSE LUIS DIAZ,
a/k/a "Lil Cuz," and
PETER RODRIGUEZ
a/k/a "Hot Boy,"

did knowingly and willfully combine, conspire, confederate, and agree with other persons

unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Section 1956, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

(b) to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections, 846 and 841(a)(1), and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; both punishable under the laws of the United States.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 8
Conspiracy to Commit Money Laundering
(18 U.S.C. §1956(h))

From in or around February 2018, and continuing through in or around June 11, 2018, in

Miami-Dade County, in the Southern District of Florida, the defendant,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"

did knowingly and willfully combine, conspire, confederate, and agree with other persons known to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Section 1956, that is to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections, 846 and 841(a)(1), and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; both punishable under the laws of the United States.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 9
Drive-by Shooting
(18 U.S.C. § 36)

On or about October 30, 2017, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**GILBERT CRUZ BAEZ,
a/k/a "Bori,"**

with the intent to injure and maim, did knowingly and intentionally fire a weapon, that is a pistol, into a group of two or more persons, and in the course of such conduct, caused grave risk to a human life, done in furtherance of a major drug offense, that is a conspiracy to distribute Schedule II controlled substances, that is, a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 846, as alleged in Count 4 of this Indictment; all in violation of Title 18, United States Code, Section 36(b)(1) and Title 18, United States Code, Section 2.

**COUNT 10
Brandishing and Discharging a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))**

On or about October 30, 2017, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**GILBERT CRUZ BAEZ,
a/k/a "Bori,"**

did knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 21, United States Code, Section 846, as charged in Count 4 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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

COUNT 11
Drive-by Shooting
(18 U.S.C. § 36)

On or about October 31, 2017, in Miami-Dade County, in the Southern District of Florida,
the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"

with the intent to injure and maim, did knowingly and intentionally fire a weapon, that is a pistol, into a group of two or more persons, and in the course of such conduct, caused grave risk to human life, done in furtherance of a major drug offense, that is a conspiracy to distribute Schedule II controlled substances, that is, 500 grams or more of cocaine, a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine," and a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 846, as alleged in Count 2; all in violation of Title 18, United States Code, Section

36(b)(1) and Title 18, United States Code, Section 2.

COUNT 12

**Brandishing and Discharging a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))**

On or about October 31, 2017, in Miami-Dade County, in the Southern District of Florida,

the defendants,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"**

did knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment, and in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

Pursuant to Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 924(c)(1)(A)(iii),

it is further alleged that the firearm was brandished and discharged.

COUNT 13
Drive-by Shooting
(18 U.S.C. § 36)

On or about November 2, 2017, in Miami-Dade County, in the Southern District of Florida,

the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"

with the intent to injure and maim, did knowingly and intentionally fire a weapon, that is a pistol, into a group of two or more persons, and in the course of such conduct, caused grave risk to human life, done in furtherance of a major drug offense, that is a conspiracy to distribute a Schedule II controlled substance, that is, 500 grams or more of cocaine, a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine," and a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States

Code, Section 846, as alleged in Count 2; all in violation of Title 18, United States Code, Section 36(b)(1) and Title 18, United States Code, Section 2.

COUNT 14

**Brandishing and Discharging a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))**

On or about November 2, 2017, in Miami-Dade County, in the Southern District of Florida,

the defendants,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"**

did knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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

COUNT 15
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about November 2, 2017, in Miami-Dade County, in the Southern District of Florida, the defendant,

BERNARDO QUINONEZ,
a/k/a "Macho,"

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

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

COUNT 16
Drive-by Shooting
(18 U.S.C. § 36)

On or about November 6, 2017, in Miami-Dade County, in the Southern District of Florida, the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"

DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "WORM,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"

with the intent to injure and maim, did knowingly and intentionally fire a weapon, that is a semiautomatic pistol, and an assault rifle, into a group of two or more persons, and in the course of such conduct, caused grave risk to a human life, done in furtherance of a major drug offense, that is a conspiracy to distribute a Schedule II controlled substance, that is, 500 grams or more of cocaine, a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine," and mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 846, as alleged in Count 2; all in violation of Title 18, United States Code, Section 36(b)(1) and Title 18, United States Code, Section 2.

COUNT 17

Brandishing and Discharging a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))

On or about November 6, 2017, in Miami-Dade County, in the Southern District of Florida,
the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,

a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"

did knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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

COUNT 18
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about November 9, 2017, in Miami-Dade County, in the Southern District of Florida,
the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho," and

**RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"**

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

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

**COUNT 19
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))**

On or about November 28, 2017, in Miami-Dade County, in the Southern District of Florida, the defendants,

**BERNARDO QUINONEZ,
a/k/a "Macho," and
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"**

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

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

COUNT 20
Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))

On or about November 29, 2017, in Miami-Dade County, in the Southern District of Florida, the defendant,

DANIEL QUINONEZ,
a/k/a "Julio,"

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

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

COUNT 21
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about December 7, 2017, in Miami-Dade County, in the Southern District of Florida, the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho," and
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"

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

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

COUNT 22
Possession of a Firearm and Ammunition by a Convicted Felon
(18 U.S.C. §§ 922(g)(1) and 924(e))

On or about December 17, 2017, in Miami-Dade County, in the Southern District of Florida, the defendant,

PEDRO RENE GONZALEZ,
a/k/a "Pete,"

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

COUNT 23
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about January 3, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho," and
RAFAEL QUINONEZ
a/k/a "Gigi,"
a/k/a "Big Junkz,"

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

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

COUNT 24
Possession of an Unregistered Firearm
(26 U.S.C. § 5861(d))

On or about January 8, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

EDUARDO BOBADILLA-OROL,
a/k/a “Chupa,”

did knowingly possess a firearm, that is, a shotgun having a barrel or barrels of less than 18 inch in length, as defined in Title 26, United States Code, Section 5845(a)(1), which firearm was not registered to the defendant in the National Firearm Registration Record, as required by Title 26, United States Code, Section 5841, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT 25
Possession of a Firearm by a Convicted Felon
(18 U.S.C. §§ 922(g)(1) and 924(e))

On or about January 17, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

EDUARDO BOBADILLA-OROL,
a/k/a “Chupa,”

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

COUNT 26
Possession of a Firearm by a Convicted Felon
(18 U.S.C. §§ 922(g)(1) and 924(e))

On or about January 29, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendant,

EDUARDO BOBADILLA-OROL,
a/k/a "Chupa,"

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

COUNT 27
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about January 31, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho," and
RAFAEL QUINONEZ
a/k/a "Gigi,"
a/k/a "Big Junkz"

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

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

COUNT 28
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about March 2, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendant,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"

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

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

COUNT 29
Money Laundering
(18 U.S.C. § 1957)

On or about March 4, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho," and
JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"

did knowingly engage and attempt to engage in a monetary transaction by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the cash purchase from Publix of Western Union money orders totaling approximately \$11,821, such property having been derived from specified unlawful activity.

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections, 846 and 841(a)(1), and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; both punishable under the laws of the United States.

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 30
Money Laundering
(18 U.S.C. § 1957)

On or about March 7, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho," and
JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"

did knowingly engage and attempt to engage in a monetary transaction by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, money orders totaling approximately \$15,500 made out to Golden Home II, LLC and deposited into Chase Bank account ending in 1020, such property having been derived from specified unlawful activity.

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections, 846 and 841(a)(1), and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; both punishable under the laws of the United States.

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 31
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about March 13, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi," and
JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"

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

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

COUNT 32
Maintaining an Establishment for Distribution of Controlled Substances
(21 U.S.C. § 856(a)(1))

From on or about March 24, 2018, and continuing to in or about June 2018, the exact date being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida,
the defendants,

BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz," and

**JOSE LUIS DIAZ,
a/k/a "Lil Cuz,"**

did knowingly maintain a place, that is, the premises located at 1111 SW 1st Avenue, Unit 2914, in Miami, Florida 33130, for the purpose of manufacturing, distributing and using a controlled substance, that is, cocaine and marijuana, in violation of Title 21, United States Code, Section 856(a)(1), and Title 18, United States Code, Section 2.

COUNT 33

**Possession of a Firearm and Ammunition by a Convicted Felon
(18 U.S.C. § 922(g)(1) and 924(e))**

On or about April 3, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

**ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"**

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

COUNT 34

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(i))**

On or about April 3, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,**

**a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm,"
MIGUEL HABER, and
ALAIN TERRY,
a/k/a "Youngin,"**

did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendants may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and 2.

**COUNT 35
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))**

On or about April 9, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

**ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"**

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

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

II controlled substance.

COUNT 36
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about May 1, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"

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

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved a mixture and substance containing 500 grams or more of cocaine, a Schedule II controlled substance.

COUNT 37
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about May 7, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"

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

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this

violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNTS 38-40
Money Laundering
(18 U.S.C. § 1957)

On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, the defendant,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"

did knowingly engage and attempt to engage in a monetary transaction by through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000 such property having been derived from specified unlawfully activity, as more specifically described below:

Count	Approximate Date	Monetary Transaction
38	May 7, 2018	Deposited approximately \$70,000 into Bank of America account ending in 8768
39	May 8, 2018	Transferred approximately \$63,400 to Citibank account ending in 3305
40	June 11, 2018	Provided to Title Company A with a wire transfer of approximately \$52,973.98 from a Citibank account ending in 3305 for the purchase of property located at 2951 NW 132 Terrace, Opa-Locka, Florida

It is further alleged that the specified unlawful activity is the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections, 846 and 841(a)(1), and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; both punishable under the laws of the United States.

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 41
Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))

On or about May 31, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

DANIEL QUINONEZ,
a/k/a "Julio,"
ELIZABETH LEGON,
a/k/a "Eli,"
RICARDO PEREZ-CASTRO,
ORLANDO LORENZO, and
ROBERTO GARCIA,

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

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

COUNT 42
Use of Communications Facility
(21 U.S.C. § 843(b))

On or about May 31, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

ROBERTO GARCIA,

did knowingly and intentionally use a communication facility, that is a two-way radio, in facilitating the commission of an act constituting a felony under Title 21, United States Code, Section 841, that is, possession with the intent to distribute a controlled substance, in violation of

Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2, as alleged in Count 42 of this Indictment; all in violation of Title 21, United States Code, Section 843(b).

COUNT 43
Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))

On or about June 9, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

ALAIN TERRY,
a/k/a "Youngin,"

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

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

COUNT 44
Possession of a Firearm and Ammunition by a Convicted Felon
(18 U.S.C. § 922(g)(1))

On or about June 11, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin," and
RONALD REYES-MELO,
a/k/a "Cueyo,"

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign

commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 45
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(i))

On or about June 11, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
BERNARDO QUINONEZ,
a/k/a "Macho,"
RAFAEL QUINONEZ,
a/k/a "Gigi,"
a/k/a "Big Junkz,"
HENRY FELICIANO-TORRES,
a/k/a "Mafia,"
DANIEL QUINONEZ,
a/k/a "Julio,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP,"
ISSAC LEAL,
a/k/a "Chico Black,"
a/k/a "King Felony,"
ROGELIO RAMOS,
PETER SIMO,
a/k/a "Worm," and
MIGUEL HABER,

did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendants may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 46
Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))

On or about June 20, 2018, in Miami-Dade County, in the Southern District of Florida, the

defendant,

**PETER SIMO,
a/k/a "Worm,"**

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

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

COUNT 47

**Possession of a Firearm and Ammunition by a Convicted Felon
(18 U.S.C. §§ 922(g)(1) and 924(e))**

On or about July 6, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

**PEDRO RENE GONZALEZ,
a/k/a "Pete,"**

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

COUNT 48

**Hobbs Act Robbery
(18 U.S.C. § 1951(a))**

On or about July 10, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**VICTOR SMITH,
a/k/a "OGP," and
HECTOR SALGADO,
a/k/a "Teto,"**

did knowingly and unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951(b)(1) and (b)(3), in that the defendant did take property from a person lodging at the Julia Motel, located at 3040 West Flagler Street, Miami, Florida 33135, a business and company operating in interstate and foreign commerce, against the will of that person, by means of actual and threatened force, violence, and fear of injury to that person, in violation of Title 18, United States Code, Section 1951(a).

COUNT 49

**Brandishing and Discharging a Firearm in Furtherance of a Crime of Violence
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))**

On or about July 10, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**VICTOR SMITH,
a/k/a "OGP," and
HECTOR SALGADO,
a/k/a "Teto,"**

did knowingly use and carry a firearm during and in relation to a crime of violence, and did knowingly possess a firearm in furtherance of a crime of violence, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 18, United States Code, Section 1951(a), as charged in Count 51 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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

COUNT 50
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about July 18, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

VICTOR SMITH,
a/k/a "OGP,"

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

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

COUNT 51
Drive-by Shooting
(18 U.S.C. § 36)

On or about July 27, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

GILBERT CRUZ BAEZ,
a/k/a "Bori," and
ALAIN TERRY,
a/k/a "Youngin,"

with the intent to injure and maim, did knowingly and intentionally fire a weapon, that is a pistol, into a group of two or more persons, and in the course of such conduct, caused grave risk to human life, done in furtherance of a major drug offense, that is a conspiracy to distribute a Schedule II controlled substance, that is, a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 846, as alleged in Count 4 of this Indictment;

all in violation of Title 18, United States Code, Section 36(b)(1).

COUNT 52

**Brandishing and Discharging a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A)(ii) and (18 U.S.C. § 924(c)(1)(A)(iii))**

On or about July 27, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**GILBERT CRUZ BAEZ,
a/k/a "Bori," and
ALAIN TERRY,
a/k/a "Youngin,"**

did knowingly possess a firearm in furtherance of drug trafficking crime, an offense for which the defendant may be prosecuted in a court of the United States, specifically, a violation of Title 18, United States Code, Section 846, as charged in Count 4 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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

COUNT 53

**Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))**

On or about September 13, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ROGELIO RAMOS, and
PETER SIMO,
a/k/a "Worm,"**

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

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

COUNT 54
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(21 U.S.C. § 924(c)(1)(A)(i))

On or about September 13, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

ROGELIO RAMOS, and
PETER SIMO,
a/k/a "Worm,"

did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendants may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 55
Possession of a Firearm and Ammunition by a Convicted Felon
(18 U.S.C. § 922(g)(1))

On or about September 13, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

PETER SIMO,
a/k/a "Worm,"

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

COUNT 56
Possession of a Firearm by an Unlawful Alien
(18 U.S.C. § 922(g)(5)(B))

On or about September 13, 2018, in Miami-Dade County, in the Southern District of Florida, the defendant,

ROGELIO RAMOS,

being an alien admitted to the United States under a nonimmigrant visa, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(5)(B).

COUNT 57
Possession with Intent to Distribute Controlled Substances
(21 U.S.C. § 841(a)(1))

On or about October 9, 2018, in Miami-Dade County, in the Southern District of Florida, the defendants,

ULYSSES CABRERA,
a/k/a "Uley,"
a/k/a "Big Cuz,"
MARVIN MELENDEZ-REYES,
a/k/a "Homicide Marvin,"
VICTOR SMITH,
a/k/a "OGP," and
CHARLIE GONZALEZ,

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

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

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that

this violation involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

COUNT 58
Possession with Intent to Distribute Crack Cocaine
(21 U.S.C. § 841(a)(1))

On or about October 12, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendant,

PETER SIMO
a/k/a "Worm,"

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

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

COUNT 59
Possession with Intent to Distribute Controlled Substances
(21 U.S.C. § 841(a)(1))

On or about October 19, 2018, in Miami-Dade County, in the Southern District of Florida,
the defendant,

CHARLIE GONZALEZ,

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

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this

violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

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

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which one or more of the defendants as named in this Indictment, **ULYSSES CABRERA, BERNARDO QUINONEZ, RAFAEL QUINONEZ, HENRY FELICIANO-TORRES, DANIEL QUINONEZ, MARVIN MELENDEZ-REYES, VICTOR SMITH, HECTOR SALGADO, ISSAC LEAL, JOSE LUIS DIAZ, PETER RODRIGUEZ, ROGELIO RAMOS, PETER SIMO, ELIZABETH LEGON, RICARDO PEREZ-CASTRO, ORLANDO LORENZO, ROBERTO GARCIA, MIGUEL HABER, PEDRO RENE GONZALEZ, EDUARDO BOBADILLA-OROL, GILBERT CRUZ BAEZ, ALAIN TERRY, RONALD REYES-MELO, and CHARLIE GONZALEZ**, has an interest.

2. Upon conviction of any violation of Title 21, United States Code, Section 841(a)(1), 843(b), 846, 856(a)(1), or 848, as alleged in this Indictment, each defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or

derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

3. Upon conviction of any violation of Title 21 United States Code Section 848, each defendant shall forfeit any of her/his interest in, claims against, and property or contractual rights affording a source of control over, the continuing criminal enterprise.

4. Upon conviction of any violation of Title 18, United States Code, Section 36, 922(g)(1), 922(g)(3), 922(g)(5)(B), 924(c)(1)(A)(i), 924(c)(1)(A)(iii), or 924(o), or Title 26, United States Code, Section 5861(d), each defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in or used in the commission of the offense, or any violation of any other criminal law of the United States.

5. Upon conviction of any violation of Title 18, United States Code, Section 1956(h) or 1957, each defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the commission of the offense, or any property traceable to such property.

6. Upon conviction of any violation of Title 18, United States Code, Section 1951(a), each defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offense.

If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- 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 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property and, in addition, to require the defendant to return any such property to the jurisdiction of the court for seizure and forfeiture.

7. The property to be forfeited includes, but is not limited to: real property located at 2951 NW 132 Terrace, Opa-Locka, Florida 33054.

All pursuant to Title 18, United States Code, Section 924(d)(1), Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853.

A TRUE BILL

FOR PERSON



MARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



BREEZYE TELFAIR
ASSISTANT UNITED STATES ATTORNEY