

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

SHPENDIM HAXHAJ, :

a/k/a "White Mike,"

YELTSIN BELTRAN, :

a/k/a "Yells,"

BORIS BELTRAN, :

a/k/a "Bebe,"

JEREMY CEDENO, :

a/k/a "Jerm,"

FRANCISCO ORTEGA, :

a/k/a "Fresh,"

IVIS PERDOMO, :

a/k/a "Light," and

LUCAS CHAJECKI, :

a/k/a "Luc Luc,"

Defendants.

x

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COUNT ONE

(Racketeering Conspiracy)

**(SHPENDIM HAXHAJ, YELTSIN BELTRAN, BORIS BELTRAN, JEREMY CEDENO,
FRANCISCO ORTEGA, and IVIS PERDOMO)**

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, and others known and unknown, were members and associates of the Young Bronx Money Getters, also

known as "YBMG" ("YBMG" or "the Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder and narcotics trafficking.

2. YBMG operates, among other locations, in and around the Bronx, New York.

3. YBMG, including its leadership, membership, and associates, constituted an "enterprise," as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the Enterprise and participated in the unlawful and other activity in furtherance of the conduct of the Enterprise's affairs.

4. From at least in or about 2006 up to and including in or about 2021, members and associates of YBMG were engaged in a series of disputes with rival crews and other individuals adverse to the Enterprise (generally, the "Opposing Crews"). During these disputes, members and associates of YBMG committed shootings and assaults against members and associates of the

Opposing Crews.

5. Certain members and associates of YBMG committed and agreed, attempted, and threatened to commit acts of violence to protect fellow members and associates of the Enterprise. These acts of violence included murder and assaults intended to retaliate against members of Opposing Crews or to otherwise promote the standing and reputation of YBMG.

6. Certain members and associates of YBMG also participated in the sale of controlled substances to enrich themselves and the gang.

Purposes of the Enterprise

7. The purposes of the Enterprise included the following:
- a. Preserving and protecting the power and profits of the Enterprise through acts involving murder, assault, and other acts of violence and threats of violence.
 - b. Promoting and enhancing the Enterprise and the activities of its members and associates.
 - c. Keeping victims and potential victims in fear of the 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 Enterprise.
 - e. Enriching the members and associates of the Enterprise through, among other things, acts involving the

distribution and sale of controlled substances, including heroin, cocaine, and marijuana.

Means and Methods of the Enterprise

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

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand the Enterprise's criminal operations, and in connection with the rivalries with members of the Opposing Crews.

b. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and assault, against members of the Opposing Crews.

c. Members and associates of the Enterprise obtained, possessed, and used firearms.

d. Members and associates of the Enterprise engaged in criminal acts to fund the Enterprise and enrich its members, including distribution of controlled substances, including heroin, cocaine, and marijuana.

The Racketeering Conspiracy

9. From at least in or about 2006, up to and including at

least in or about 2021, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs One through Eight above, namely, YBMG, an enterprise 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 18 U.S.C. § 1962(c), to wit, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Sections 1961(1) and 1961(5) of Title 18, United States Code, consisting of:

a. Murder, attempted murder, and conspiracy to commit murder, chargeable under the following provisions of state law: New York Penal Law, Section 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting).

b. Offenses involving the distribution of controlled substances, including heroin, cocaine, and marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

10. It was a part of the conspiracy that each of the

defendants agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Notice of Special Sentencing Factors

Narcotics

11. From at least in or about 2006 up to and including in or about 2021, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," 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.

12. The controlled substances that SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, conspired to distribute and to possess with the intent to distribute were (1) 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); and (2) 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).

Murder

13. On or about August 16, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," and BORIS BELTRAN, a/k/a "Bebe," the defendants, with intent to cause the death of another person, caused the death of such person, and aided and abetted the same, in the Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that HAXHAJ, YELTSIN BELTRAN, and BORIS BELTRAN hired another person to kill one of YBMG's rivals and the hired killer shot and killed Isael Lagares.

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

COUNT TWO

(Narcotics Conspiracy)

(SHPENDIM HAXHAJ, YELTSIN BELTRAN, BORIS BELTRAN, JEREMY CEDENO, FRANCISCO ORTEGA, and IVIS PERDOMO)

The Grand Jury further charges:

14. From at least in or about 2006 up to and including in or about 2021, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," 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.

15. It was a part and an object of the conspiracy that SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," 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).

16. The controlled substances that SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, conspired to distribute and possess with intent to distribute were: (1) 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); (2) 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); and (3) mixtures and substances containing a detectable amount 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 Use, Carrying, and Possession)

**(SHPENDIM HAXHAJ, YELTSIN BELTRAN, BORIS BELTRAN, JEREMY CEDENO,
FRANCISCO ORTEGA, and IVIS PERDOMO)**

The Grand Jury further charges:

17. From at least in or about 2006 up to and including in or about 2021, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking conspiracy charged in Count Two of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime, 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

(Murder in Aid of Racketeering Activity)

(SHPENDIM HAXHAJ, BORIS BELTRAN, and LUCAS CHAJECKI)

The Grand Jury further charges:

18. At all times relevant to this Indictment, YBMG, as more fully described in Paragraphs One through Eight of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, including its leadership, its

membership, and its associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which 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 above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, chargeable under the laws of the State of New York and punishable by imprisonment for more than one year; and offenses involving narcotics distribution in violation of Title 21, United States Code, Sections 841 and 846.

20. On or about August 16, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and LUCAS CHAJECKI, a/k/a "Luc Luc," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from YBMG, and for the purpose of gaining entrance to and maintaining and increasing position in YBMG, an enterprise engaged in racketeering activity, as described above, knowingly murdered Isael Lagares and aided and abetted the same,

that is, with the intent to cause the death of Lagares, did cause the death of Lagares, and under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death to another person and thereby cause the death of Lagares, to wit, members of YBMG, including HAXHAJ and BORIS BELTRAN, hired CHAJECKI to kill a member of one of YBMG's Opposing Crews, and CHAJECKI then shot and killed Isael Lagares in the Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT FIVE
(Murder for Hire)
(SHPENDIM HAXHAJ, BORIS BELTRAN, and LUCAS CHAJECKI)

21. On or about August 16, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and LUCAS CHAJECKI, a/k/a "Luc Luc," the defendants, did travel in and cause another person to travel in interstate and foreign commerce, and did use and cause another person to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in the death of Isael Lagares, and aided and abetted the same, to wit, HAXHAJ and BORIS BELTRAN offered CHAJECKI money and other consideration

to kill a member of one of YBMG's Opposing Crews, and CHAJECKI then shot and killed Isael Lagares in the Bronx, New York.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT SIX
(Murder-for-Hire Conspiracy)
(SHPENDIM HAXHAJ, BORIS BELTRAN, and LUCAS CHAJECKI)

22. In or around August 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and LUCAS CHAJECKI, a/k/a "Luc Luc," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate and foreign commerce, and to use and cause another to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in the death of Isael Lagares, to wit, HAXHAJ and BORIS BELTRAN offered CHAJECKI money and other consideration to kill a member of one of YBMG's Opposing Crews, and CHAJECKI then shot and killed Isael Lagares in the Bronx, New York.

(Title 18, United States Code, Section 1958.)

COUNT SEVEN

**(Use of a Firearm Resulting in Death)
(SHPENDIM HAXHAJ, BORIS BELTRAN, and LUCAS CHAJECKI)**

23. On or about August 16, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and LUCAS CHAJECKI, a/k/a "Luc Luc," 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 murder charged in Counts Four and Five of this Indictment, knowingly did use and carry, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was discharged, and in the course of that crime did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, HAXHAJ and BORIS BELTRAN offered CHAJECKI money and other consideration to kill a member of one of YBMG's Opposing Crews, and CHAJECKI then shot and killed Isael Lagares in the Bronx, New York.

(Title 18, United States Code, Sections 924(j)(1) and 2.)

COUNT EIGHT

**(Violent Crime in Aid of Racketeering)
(YELTSIN BELTRAN)**

The Grand Jury further charges:

24. Paragraphs 18 and 19 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

25. On or about December 24, 2017, in the Southern District of New York and elsewhere, YELTSIN BELTRAN, a/k/a "Yells," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from YBMG, and for the purpose of gaining entrance to and maintaining and increasing position in YBMG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, knowingly attempted to murder an individual, and aided and abetted the same, to wit, YELTSIN BELTRAN shot a member of one of YBMG's Opposing Crews in New York, New York, in violation of New York Penal Law, Sections 125.25, 120.10, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and

2.)

COUNT NINE
(Firearms Use, Carrying, and Possession)
(YELTSIN BELTRAN)

The Grand Jury further charges:

26. On or about December 24, 2017, in the Southern District of New York and elsewhere, YELTSIN BELTRAN, a/k/a "Yells," the defendant, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the assault and attempted murder in aid of racketeering charged in Count Eight of this Indictment, 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 firearm was brandished and discharged.

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

COUNT TEN
(Violent Crime in Aid of Racketeering)
(IVIS PERDOMO)

The Grand Jury further charges:

27. Paragraphs 18 and 19 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

28. On or about December 23, 2019, in the Southern District of New York and elsewhere, IVIS PERDOMO, a/k/a "Light," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from YBMG, and for the purpose of gaining entrance to and maintaining and increasing position in YBMG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, knowingly attempted to murder an individual, and aided and abetted the same, to wit, PERDOMO shot two people in a nightclub in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 120.10, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (5), and 2.)

COUNT ELEVEN
(Firearms Use, Carrying, and Possession)
(IVIS PERDOMO)

The Grand Jury further charges:

29. On or about December 23, 2019, in the Southern District of New York, IVIS PERDOMO, a/k/a "Light," the defendant, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the assault and attempted murder in aid of racketeering charged in Count Ten of this Indictment, 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 firearm was brandished and discharged.

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

COUNT TWELVE
(Violent Crime in Aid of Racketeering)
(SHPENDIM HAXHAJ and BORIS BELTRAN)

The Grand Jury further charges:

30. Paragraphs 18 and 19 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

31. On or about November 4, 2018, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," and BORIS BELTRAN, a/k/a "Bebe," the defendants, as consideration for the receipt of, and as consideration for a

promise and agreement to pay, a thing of pecuniary value from YBMG, and for the purpose of gaining entrance to and maintaining and increasing position in YBMG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, knowingly attempted to murder an individual, and aided and abetted the same, to wit, HAXHAJ and BORIS BELTRAN planned and carried out a shooting targeting members of one of YBMG's Opposing Crews in Queens, New York, in violation of New York Penal Law, Sections 125.25, 120.10, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT THIRTEEN
(Firearms Use, Carrying, and Possession)
(SHPENDIM HAXHAJ and BORIS BELTRAN)

The Grand Jury further charges:

32. On or about November 4, 2018, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," and BORIS BELTRAN, a/k/a "Bebe," the defendants, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the assault and attempted murder in aid of racketeering charged in Count Twelve of this Indictment, 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 firearm was brandished and discharged.

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

COUNT FOURTEEN
(Violent Crime in Aid of Racketeering)
(SHPENDIM HAXHAJ, BORIS BELTRAN, and JEREMY CEDENO)

The Grand Jury further charges:

33. Paragraphs 18 and 19 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

34. On or about June 7, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and JEREMY CEDENO, a/k/a "Jerm," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from YBMG, and for the purpose of gaining entrance to and maintaining and increasing position in YBMG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, knowingly attempted to murder an individual, and aided and abetted the same, to wit, HAXHAJ, BORIS BELTRAN, and CEDENO planned and carried out a shooting targeting members of one of YBMG's Opposing Crews in New York, New York, in violation of New York Penal Law, Sections 125.25, 120.14, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and
2.)

COUNT FIFTEEN
(Firearms Use, Carrying, and Possession)
(SHPENDIM HAXHAJ, BORIS BELTRAN, and JEREMY CEDENO)

The Grand Jury further charges:

35. On or about June 7, 2019, in the Southern District of New York and elsewhere, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and JEREMY CEDENO, a/k/a "Jerm," the defendants, willfully and knowingly, 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 and attempted murder in aid of racketeering charged in Count Fourteen of this Indictment, 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 firearm was brandished and discharged.

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

FORFEITURE ALLEGATIONS AS TO COUNT ONE

36. As a result of committing the offense alleged in Count One of this Indictment, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants 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, the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense alleged in Count One.

FORFEITURE ALLEGATIONS AS TO COUNT TWO

37. As a result of committing the controlled substance offense alleged in Count Two of this Indictment, SHPENDIM HAXHAJ, a/k/a "White Mike," YELTSIN BELTRAN, a/k/a "Yells," BORIS BELTRAN, a/k/a "Bebe," JEREMY CEDENO, a/k/a "Jerm," FRANCISCO ORTEGA, a/k/a "Fresh," and IVIS PERDOMO, a/k/a "Light," 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 said offense

and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

FORFEITURE ALLEGATIONS AS TO COUNTS FIVE AND SIX

38. As a result of committing the murder-for-hire offenses alleged in Counts Five and Six of this Indictment, SHPENDIM HAXHAJ, a/k/a "White Mike," BORIS BELTRAN, a/k/a "Bebe," and LUCAS CHAJECKI, a/k/a "Luc Luc," 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 constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, 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.

Substitute Asset Provision

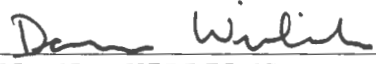
39. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 18 U.S.C. § 1963(m), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1963, and Title 21, United States Code, Section 853.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHPENDIM HAXHAJ,
a/k/a "White Mike,"
YELTSIN BELTRAN,
a/k/a "Yells,"
BORIS BELTRAN,
a/k/a "Bebe,"
JEREMY CEDENO,
a/k/a "Jerm,"
FRANCISCO ORTEGA,
a/k/a "Fresh,"
IVIS PERDOMO,
a/k/a "Light," and
LUCAS CHAJECKI,
a/k/a "Luc Luc,"

Defendants.

SUPERSEDING INDICTMENT

S3 21 Cr. 17 (KPF)

(18 U.S.C. §§ 924, 1958, 1959, 1962, 2;
21 U.S.C. §§ 841, 846.)

DAMIAN WILLIAMS

United States Attorney.

A TRUE BILL

Foreperson.

07/18/22 INDICTMENT FILED. ARREST WARRANT ISSUED

CF

G W G

VSMJ