UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
	V.)	Cr. No. 21-10354-WGY(sss)
)	
5.	ERIC CORREIA,)	
	a/k/a "Bubba,")	
	Defendant)	

GOVERNMENT'S SENTENCING MEMORANDUM

On April 29, 2024, ERIC CORREIA, also known as "Bubba," pleaded guilty to Counts Two and Thirty-Seven of the above-captioned third superseding indictment charging him with conspiracy to participate in Cameron Street, a violent racketeering enterprise, in violation of 18 U.S.C. § 1962(d), and distribution of marijuana, in violation of 21 U.S.C. § 841(a)(1). CORREIA pleaded guilty pursuant to a plea agreement tendered under Rule 11(c)(1)(B) where he admitted that in connection with his participation in the racketeering enterprise, he committed an attempted murder with life-threatening injuries (ECF Nos. 725-726).

The government respectfully requests that this Court sentence CORREIA to 192 months in prison and three years of supervised release. To further the Cameron Street enterprise, CORREIA attempted to assassinate a gang rival; committed a brazen robbery with a firearm in the heart of Cameron Street territory; and distributed marijuana to an individual CORREIA believed was associated with Cameron Street, but who was in reality a cooperating witness. CORREIA deserves every day of the government's recommended sentence.

The Cameron Street Enterprise. For decades, Boston and surrounding communities have been wracked by murders and other acts of violence committed by and against youths whose families had historical ties to Cape Verde, an island nation off the coast of Portugal. Over time, different designations have been used to identify different factions but the adversaries have always

maintained a roughly consistent geographic area of concentration. One faction is primarily based in Dorchester, in the vicinity of Bowdoin Street, Geneva Avenue, Cameron Street, and Hancock Street. The other faction is based near Uphams Corner on the Dorchester – Roxbury neighborhood line, primarily centered in and around Wendover Street, separated from their Dorchester rivals by Columbia Road, a major Boston thoroughfare.

During a two-year investigation by the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") and the Drug Enforcement Administration ("DEA"), agents identified CORREIA as a member of Cameron Street, a criminal enterprise that used violence, threats of violence, and intimidation to preserve, protect, and expand its territory and enhance its prestige, reputation, and position in the community. Agents obtained information about the gang from cooperating witnesses who were associated with Cameron Street. Through the use of consensual recordings, Title III interceptions, search warrants, and evidence seized by state and local law enforcement, agents determined that Cameron Street members possessed and used firearms to commit murder and assault rivals, especially their chief rival, another Boston gang known as NOB (for Norton, Onley, and Barry Streets, sometimes referred to as Wendover). Agents learned that Cameron Street members distributed controlled substances, committed armed robberies and home invasions, and engaged in human trafficking to generate income for the enterprise.

Members of Cameron Street refer to themselves as "Cam," "C," "Camily," and "Body Bag Boys" to describe the gang. Some members obtain and display jewelry or tattoos with "3-1-1-3," which refers to the third, first, and thirteenth letters of the alphabet ("C," "A," "M") (on the left, co-defendant and Cameron Street leader ANTYONY CENTEIO wearing "3113" jewelry, on the left, a "3113" tattoo from co-defendant KENNY ROMERO, a/k/a "KG"):



Some members of the gang mark their bodies with tattoos or wear logos for sports teams that feature the letter "C," including, for instance, the Montreal Canadiens (CORREIA, far left), or Cleveland or "KC" from Major League Baseball's (formerly) Cleveland Indians and Kansas City Royals (co-defendant KEIARRI DYETTE, center and right). "KC" signifies "Killa Cam":



Members of Cameron Street regularly post videos or use social media applications to promote Cameron Street, celebrate murders and other violent crimes committed by Cameron Street, and denigrate gang rivals, in particular NOB/Wendover. Members of Cameron Street have

been recorded or captured in songs as they wear Cameron Street attire, discuss Cameron Street members who were murdered, discuss the importance of carrying and using firearms, brag about money made from drug trafficking and how to evade capture by "the feds," and most importantly, celebrate violence committed by Cameron Street ("Killer Cam," "Body Bag Boyz," and "NOBK," for "NOB Killas") and promise to target any NOB/Wendover member for death.

For instance, CORREIA posted an image of his birthday cake to Facebook included a reference to "Eric Snoww," his vanity name on the public-facing portion of his Facebook page, and references to "3113" and "Body Bag Boyz."



CORREIA also performed in a rap video where he referred to the December 1, 2017, murder of NOB/Wendover associate Natalino Gomes, who was shot and killed in Peguero's Market at 218 Bowdoin Street in Dorchester. CORREIA and another Cameron Street member, co-defendant CLAYTON RODRIGUES, released "Fuck the Opps" in July 2019. CORREIA raps:

Smoke him in a blunt, now he layin' six feet [under]
Cuz that's [unintelligible] body bag boys, bitch [we] stay on backs
Smokin' mad Nat, he ain't comin' back
.40 hit his head, he turned into a pack

Agents know that it is a common sign of disrespect to name a murdered gang rival as a type or grade of marijuana to smoke, so "Smokin' mad Nat" is a way for Cameron Street to claim responsibility for Gomes's murder. Second, Gomes was killed by a .40 caliber firearm, and .40 caliber shell casings were recovered from the murder scene, a fact that was not publicly released.

See Final Pre-Sentence Report, dated November 1, 2024 ("PSR"), at ¶¶ 15-21.

Several cooperating witnesses who were themselves associated with Cameron Street identified CORREIA as a member of the gang. During the investigation, agents developed evidence proving that CORREIA personally committed several acts to further the Cameron Street enterprise. At his Rule 11 hearing, CORREIA admitted to committing the following three acts:

CORREIA's 2019 Attempted Murder of NOB/Wendover Member. On March 21, 2019, Boston Police officers responded to a call for a person shot at 39 Claybourne Street in Dorchester. Units arriving on scene located a crime scene with ballistic evidence and shattered glass on Claybourne Street but no victim. A few minutes later, officers saw a rented gray 2019 Chevrolet Traverse with bullet damage near the scene of the shooting.



Officers stopped the car and found Victim No. 14, an NOB/Wendover gang member. Victim No. 14 and his girlfriend said that as they prepared to leave 39 Claybourne Street, they were shot at by an unidentified person who approached their car from behind. Victim No. 14 was suffering from multiple gunshot wounds and said to the officers who first found him, "Please don't let me die." Officers transported Victim No, 14 to Boston Medical Center where he had surgery.¹

The attempted murder was captured on a residential surveillance camera. As Victim No. 14 and his girlfriend walked down the sidewalk toward their car, the video captured a man wearing a hooded sweatshirt emerging between houses on the other side of the street:

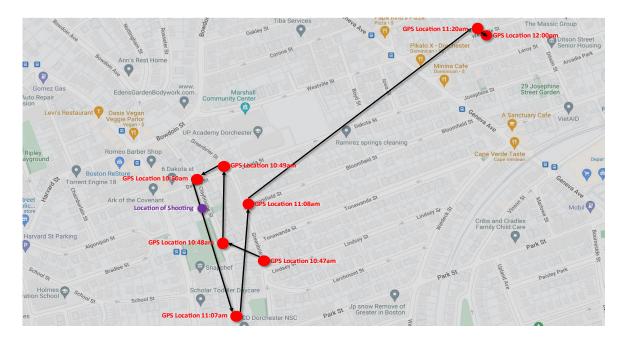


The man fired into Victim No. 14's car as Victim No. 14 sped away.

CW-3 testified that he woke up on March 21, 2019, to approximately nine missed calls from CORREIA. When CW-3 called CORREIA back and explained he had been asleep, CORREIA told CW-3 he had seen Victim No. 14 on Clayborne Street. CORREIA told CW-3 he

¹ <u>See</u> Count Two, ¶ 10(bb), identifying the victim of this shooting as Victim No. 14. In addition to testimony from cooperating witnesses identifying Victim No. 14 as a member of NOB/Wendover, Victim No. 14 pleaded guilty to being a member of the NOB/Wendover RICO conspiracy. <u>See United States v. Teixeira et al.</u>, Cr. No. 20-10197-LTS.

was on GPS monitoring as a condition of release from a state court case and CORREIA knew he would be identified if CORREIA shot Victim No. 14. CORREIA then began to call other Cameron Street members to tell them he had seen Victim No. 14. CORREIA told CW-3 not to worry because "Lo" (Cameron Street member CLAYTON RODRIGUES) answered his phone and shot the victim. GPS data for CORREIA from Massachusetts Probation Electronic Monitoring (ELMO) department verified that CORREIA was located on Claybourne Street before Victim No. 14 was shot at 39 Claybourne Street. Beginning around 10:50 a.m. through 11:07 a.m., CORREIA circled Claybourne Street. From 11:20 a.m. to 12:00 noon, CORREIA was located several blocks away. Victim No. 14 was shot at approximately 11:41 a.m.



PSR, ¶¶ 24-28.

CORREIA Robbery Near Cameron Street. On July 20, 2019, two Boston Police officers responded to a call for an armed robbery at Hancock and Howe Street in Dorchester, near Cameron Street. When they arrived, they spoke to Victim No. 6 who said he had been robbed on top of the stairs on Downer Avenue with a firearm by two men who he knew: CORREIA and another

Cameron Street member.² Victim No. 6 told officers that CORREIA had fled up Howe Street. Officers were able to locate and detain CORREIA and Victim No. 6 identified him as one of the two men who robbed him. Victim No. 6 later testified before a Suffolk County Grand Jury and identified CORREIA and called him by his nickname "Bubba."

From preserved Facebook messages, agents determined that Victim No. 6 initially intended to purchase marijuana from Cameron Street member DEVANTE LOPES and LOPES arranged for Victim No. 6 to purchase from CORREIA. Victim No. 6 ordered four ounces of marijuana from CORREIA for \$450 and they arranged to meet "up the steps," stairs that connect Downer Avenue to Hancock Street. Victim No. 6 sent a message to CORREIA when he arrived at the meeting location. CORREIA got into the back seat of Victim No. 6's car, put a gun to his head, pulled the keys out of the ignition, and said, "give me the money or I'll blow your head off." The victim saw CORREIA with "a black gun. Small and stuff." CORREIA said, "You know what's up, the time we on." CORREIA took the \$450 that Victim No. 6 brought to buy marijuana and a Rolex watch. PSR, ¶¶ 29-31.

CORREIA Distributed Marijuana. On March 9, 2022, CORREIA sold 29 packages of marijuana weighing 311 grams to an individual CORREIA believed was associated with Cameron Street but who was in reality a cooperating witness. PSR, ¶ 32.

Calculating the Guidelines. Probation concluded that CORREIA was in criminal history category ("CHC") II. PSR, ¶ 47. As noted above, CORREIA admitted to committing the March 2019 attempted murder of the NOB/Wendover rival in his plea agreement and at his Rule 11 hearing and further admitted that the victim suffered life-threatening injuries (ECF No. 725-726). In addition to the acts discussed above, Probation also assessed that CORREIA had committed a

² <u>See</u> Count Two, ¶ 10(e).

second attempted murder with an associate of Cameron Street in Roxbury on October 2, 2017. PSR, ¶ 23. After grouping those two shootings, Probation concluded that CORREIA's total offense level ("TOL") after acceptance of responsibility was 36, PSR, ¶ 44, and his guideline sentencing range ("GSR") was 210-262 months in prison. PSR, ¶¶ 47, 95. If the Court used only the admitted attempted murder to establish CORREIA's offense level, with the agreed-upon criminal history category of II, CORREIA's GSR would be 168-210 months in prison.

<u>Argument</u>. CORREIA's attempted murder of a gang rival is among the most serious conduct catalogued in this investigation. There are only two reasons why CORREIA is not facing murder charges – random chance and the close proximity of the victim to excellent medical care.

Even in the context of an indictment replete with spectacular acts of violence, there is something chilling about CORREIA's conduct here. First, CORREIA located Victim No. 14, a gang rival, and targeted him for assassination. Next, he had the presence of mind not commit the murder himself, because he was on pre-trial release monitored by a GPS ankle bracelet. Instead, he called other Cameron Street members to commit the murder, all the while circling the neighborhood where Victim No. 14 was located, as confirmed by his GPS data. When Cameron Street member CLAYTON RODRIGUES arrived on scene, CORRIEA walked away, so that his GPS data would show him to be away from the crime scene. As Victim No. 14 and his girlfriend emerged from 39 Clayborne Street and entered their car, RODRIGUES, wearing a black hooded sweatshirt, creeped between parked cars, cut across the street, and fired several rounds at them from behind. Victim 14 and his girlfriend sped off. When found at an intersection a few blocks away, Victim 14 was suffering from multiple gunshot wounds and begged officers to save his life.

While this attempted murder is the most serious act of violence CORREIA was known to have committed, it is hardly the only one he committed. CORREIA put a gun to a victim's head

and robbed him of money and a watch while threatening to "blow his head off." And like many other Cameron Street defendants, CORREIA distributed controlled substances.

CORREIA's one adult conviction was a crime of violence that can also be traced to Cameron Street. In 2020, CORREIA was convicted in 2020 in Suffolk Superior Court of assault and battery with a dangerous weapon. The incident report described how CORREIA and several other Cameron Street gang members were caught on video from nearby surveillance cameras as they assaulted an individual connected to NOB/Wendover³ in the plaza outside Suffolk Superior Court. The report described how CORREIA and others were captured on video "collectively punching, kicking, and slamming the victim to the ground." See Exhibit 1 (incident report). CORREIA served 132 days in prison and was placed on probation for two years. PSR, ¶ 47.

It is easy to see how Cameron Street's steady accumulation of acts of violence, committed in public spaces and often in broad daylight, combined to make life intolerable for the community. These shootings, robberies, and assaults all translated into a well-founded fear of Cameron Street. This, in turn, translated into power for CORREIA and his associates.

Finally, even if this Court does not take CORREIA's 2017 attempted murder into consideration in calculating CORREIA's guideline range, it must be remembered that CORREIA committed the 2019 attempted murder, the 2019 robbery with a firearm, and the 2022 drug distribution to the cooperating witness while on pre-trial release from serious state court matters that were ultimately incorporated into this indictment. CORREIA's enormously violent conduct and flagrant disregard for court orders militates in favor of the government's sentencing recommendation.

³ In connection with the NOB/Wendover case, the courthouse attack victim was charged with and ultimately pleaded guilty to possession with intent to distribute fentanyl and being a drug user in possession of a firearm.

Conclusion. The government's 192 month recommendation serves the goals of 18 U.S.C. § 3553(a). The recommended sentence achieves general deterrence, in that it effectively communicates the real-world consequences of joining criminal conspiracies like Cameron Street. It serves to specifically deter CORREIA, something that many other judges have failed to accomplish before now. Most importantly, a 192 month sentence promotes respect for the law and

For these reasons, the government respectfully requests that this Court sentence ERIC CORREIA, a/k/a "Bubba," to 192 months in prison and three years of supervised release.

serves to protect the public from CORREIA.

Respectfully submitted,

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By: /s/ Christopher Pohl

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 9, 2024.

/s/ Christopher Pohl Christopher Pohl Assistant U.S. Attorney