

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Cr. No. 21-10354-WGY(sss)
)
 7. DEVANTE LOPES,)
 a/k/a “D-Lopes,”)
 Defendant)

GOVERNMENT’S SENTENCING MEMORANDUM

On May 30, 2024, DEVANTE LOPES, also known as “D-Lopes,” pleaded guilty to Counts Two, Three, and Forty-two of the above-captioned third superseding indictment charging him with conspiracy to participate in a racketeering enterprise, in violation of 18 U.S.C. § 1962(d), conspiracy to distribute marijuana, in violation of 21 U.S.C. § 846, and possession with intent to distribute cocaine, in violation of 21 U.S.C. § 841(a)(1).

LOPES pleaded guilty pursuant to a plea agreement tendered under Rule 11(c)(1)(B) of the Federal Rules of Criminal Procedure. ECF No. 760. In his plea agreement, LOPES agreed that his base offense level (“BOL”) was 24, because 500 grams or more of cocaine was attributable to him. USSG §§ 2E1.1(a)(2) & 2D1.1(c)(8). LOPES also agreed to two sentencing enhancements: that he maintained a premises for the purpose of distributing controlled substances, USSG §§ 2E1.1(a)(2) and 2D1.1(b)(12), and that he used a minor to assist in avoiding detection of or apprehension for his offense. USSG § 3B1.4. The plea agreement called for the parties to recommend a sentence within the guideline sentencing range (“GSR”) as calculated by the parties.

With a three-level reduction for acceptance of responsibility, LOPES’s total offense level (“TOL”), as calculated in the plea agreement, was 25. In the final version of the Pre-Sentence Report, dated November 26, 2024 (“PSR”), the United States Probation Office determined that LOPES was in criminal history category (“CHC”) II. Together, these produce a guideline

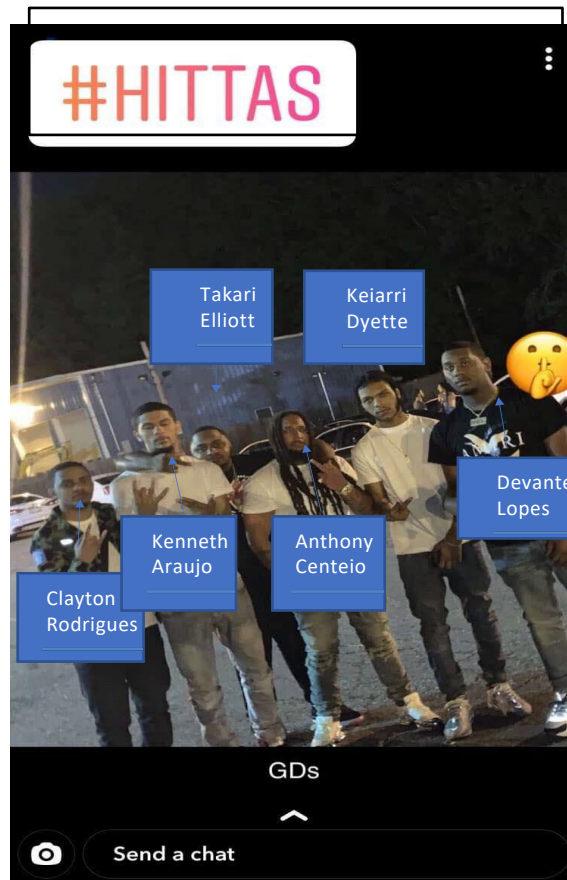
sentencing range of 63-78 months in prison. For the reasons set out below, the government respectfully requests that this Court sentence LOPES to 78 months in prison and three years of supervised release.

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 DYETTE 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 themselves 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, carried, 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. PSR, ¶¶ 11-19.

LOPES As A Member of Cameron Street. Several cooperating witnesses who are themselves associated with Cameron Street identified LOPES as a member of the gang. Agents corroborated these identification in several ways. Cameron Street members posted images on social media flashing gang signs, including this Snapchat image featuring Cameron Street leader ANTHONY CENTEIO, a/k/a “Wheezy,” TAKARI ELLIOT (charged with murder-for-hire in the RICO conspiracy count), KEIARRI DYETTE (convicted of RICO conspiracy), CLAYTON RODRIGUES (a fugitive charged in this indictment and with first degree murder in state court), and LOPES. The “3” hand sign signified the letter “C” for Cameron Street:



Agents also viewed a Cameron Street rap video from July 2019 entitled “Fuck the Opps,” a reference to all of Cameron Street’s “opposition.” The featured performer in the song is ERIC CORREIA (recently sentenced to 180 months for RICO conspiracy involving an attempted murder) but the video also included appearances from DEVANTE LOPES as well as sentenced RICO co-defendant KENNY ROMERO, a/k/a “KG,” among others. Cameron members flashed large sums of cash and three-fingered “C” gang hand signs toward the camera. Members made firearm trigger pull gestures and described being armed with Glocks (“Glicks,” “Glizzies”), Berettas, and more generally “sticks” (firearms). The lyrics discussed a deceased Cameron Street member and make reference to “NOBK,” which agents believe means “NOB Killas.” Among the murders suspected of being connected to the Cameron Street – NOB/Wendover feud is the December 1, 2017 murder of NOB/Wendover member Natalino Gomes, who was shot and killed in front of Peguero’s Market at 218 Bowdoin Street in Dorchester. At one point, 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*

Based on information received from cooperating witnesses, 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.

The Offense. The investigation revealed that LOPES has deep connections to Cameron Street and is a significant drug trafficker. As was detailed in the PSR, in 2019-2020, the U.S. Postal Investigative Service (USPIS) and the Quincy Police Department investigated LOPES’s use of the mail to unlawfully import marijuana from California to Massachusetts. Labels on the packages tracked back to fictitious addresses or senders in California. The packages were shipped to addresses in Boston and neighboring cities. Numerous packages were addressed to “Dyllan Lopes”

or “Dillon Lopes” as the intended recipient. At the time of the investigation, LOPES had a younger brother named Dyllan who was born in 2002 and was a juvenile until February 2020. Other packages used LOPES’s juvenile brother’s first name and their mother’s last name (“Ingram”). From physical surveillance and data from court-ordered GPS devices, agents determined that LOPES arrived in cars rented in his name and picked up the packages.

On February 6, 2020, agents obtained a search warrant and opened a package addressed to “Dyllan Lopes” from a fictitious San Francisco address to 497 Columbia Road, an address LOPES had picked packages up from on other occasions, and seized 2,637 grams of marijuana. After the seizure, no other packages were shipped to the Columbia Road address. All told, agents observed or tracked 24 packages of similar size shipped from various suspicious addresses in California to addresses used by LOPES. Given the number of packages tracked and the weight of the marijuana seized, the government estimates that LOPES received 56.6 kilograms of marijuana.

In addition to the packages going to LOPES, agents determined that LOPES was sending packages from local post offices in fictitious names but often using his mother’s address in Quincy to send to an address in San Francisco. On March 25, 2020, USPIS determined that LOPES mailed a package from the Quincy Post Office to the San Francisco address and obtained a federal “sneak and peek” warrant to inspect the package. Inside the package, USPIS observed four bundles of U.S. currency, with each bundle containing 10 separate elasticized stacks (for 40 stacks in total). It was not possible to determine the precise amount of money based on the packaging by USPIS estimated that the parcel contained approximately \$40,000.



On July 11, 2020, after LOPES again mailed a similar-sized package a California address using his brother's and mother's names, agents opened the package pursuant to a search warrant and seized \$58,200 in U.S. currency.

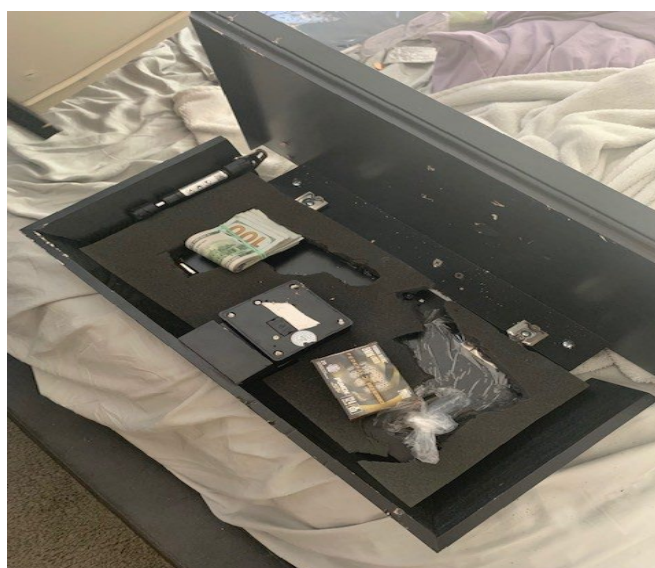
On April 15, 2022, agents executed arrest warrants for the defendants charged in the initial Cameron Street indictment. Agents proceeded to LOPES's residence at 550 Victory Road, Apartment 239, in Quincy.¹ When agents knocked on the front door, an individual came to the front door. Agents believed that the person at the front door was LOPES (and eventually confirmed that he was in fact LOPES). Agents asked if there was anyone else in the apartment and LOPES replied, "My brother." Agents conducted a brief protective sweep of the apartment for their safety and also to ensure that the person at the threshold of the apartment was in fact LOPES. On a kitchen counter, agents observed in plain view a money counter and suspected marijuana. Agents also observed an empty gun box in a drawer in the master bedroom. Agents located LOPES's brother Dyllan Lopes in a second bedroom. Agents obtained a federal search warrant for LOPES's apartment. From LOPES's bedroom, agents seized 800 grams of cocaine from a bag in a

¹ Even a cursory Google search showed that LOPES's residence was located in a luxury apartment complex on Marina Bay in Quincy, with many one and two bedroom apartments going for \$3,000 - \$4,000 per month.

compartment or bedroom bench by the foot of his bed.



Agents discovered two hidden compartments in LOPES's apartment. When an electronic key card was passed over a shelf, a secret compartment opened. The compartment contained approximately \$5,000 in U.S. currency, a box of ammunition, and foam cut-outs for a firearm.



Agents located a mirror with an orange dot in the bottom center. Agents determined that when they

waived an electronic key card over the mirror, it swung up to display a hidden compartment with a foam insert (Count Forty-two). See PSR, ¶¶ 11-20.



In addition to the items set out above, agents seized marijuana, a mixing bowl, a heat sealer, identification cards and mail for LOPES (including a summons for jury service), a GPS device suitable to place on the bottom of an automobile, cellular telephones, digital scales, plastic bags commonly used for street-level sales, a bag of pink pills, a money counter, the Glock gun box (empty), and a round of ammunition next to LOPES's bed. Agents also located remote cameras inside each room in the apartment. Agents recovered a handwritten letter addressed, "Dear Devante," which warned LOPES to be careful keeping drugs in his apartment, to store his money at his mother's residence, and to be on the lookout for robbers. An examination of LOPES's cellular phone included messages, images, and videos connecting LOPES to members of Cameron Street and to possession of firearms (left) and cash derived from drug trafficking (right):



The PSR. In the final version of the PSR, Probation assessed the two-level enhancement for LOPES running a drug stash house, but did not assess the enhancement for his use of a minor. See PSR Addendum, Government’s Objection 1 and Probation Officer’s Response. There are two responses to this. First, LOPES admitted in his plea agreement that he used his minor brother in the offense – that should be the end of the matter. Second, for the reasons set out in the government’s objection, Probation’s view of this enhancement is cramped and inconsistent with the spirit of the guidelines. LOPES place this brother’s name on drug-laden packages to avoid detection and in so doing concealed his involvement in the crime. That is all the enhancement requires. See United States v. Torres-Colon, 156 F. App’x 332, 334 (1st Cir. 2005); United States v. Castro-Hernandez, 258 F.3d 1057, 1060-61 (9th Cir. 2001).

Argument. As noted in the PSR, Cameron Street members supported themselves and the enterprise in part through drug trafficking. These sales took many forms. Several Cameron Street members participated in hand-to-hand sales of small quantities of cocaine and crack cocaine near Fernandez’s Liquor Store at 81 Hancock Street in Dorchester, a location that served as an open air drug market for the gang in the heart of Cameron Street territory. Others moved larger quantities of drugs from locations outside the gang’s neighborhood. JAMES RODRIGUES, WILTER

RODRIGUES, and JOSE AFONSECA, for instance, sold large quantities of cocaine and cocaine base from an apartment in Somerville. Cameron Street leader ANTHONY CENTEIO, a/k/a “Wheezy,” was arrested in a stash house in Rhode Island where agents seized hundreds of grams of cocaine, cocaine base, and methamphetamine.

With the possible exception of CENTEIO, one would be hard pressed not to conclude that DEVANTE LOPES was the most successful drug dealer in the Cameron Street indictment. LOPES made hundreds of thousands of dollars through a multi-state marijuana trafficking scheme, and the quantity of cocaine seized from his apartment showed that by the time he was arrested he had moved into selling substantial quantities of cocaine. The PSR reported that LOPES worked for years in a series of low-to-modest paying jobs in cleaning companies and retail, see PSR, ¶¶ 68-72, yet LOPES lived in a luxury condominium in Quincy. Moreover, the search of LOPES’s residence uncovered sophisticated hidden compartments and surveillance gear, the kind of tools that only the most successful drug traffickers would access and be brazen enough to utilize.

The government’s 78 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. A high-end guideline sentence will specifically deter LOPES, promote respect for the law, and most importantly, serve to protect the public from LOPES.

Conclusion. For the reasons set out above, the government respectfully requests that this Court sentence DEVANTE LOPES to 78 months in prison and three years of supervised release.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ Christopher Pohl
Christopher Pohl
Charles Dell'Anno
Assistant U.S. Attorneys

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 January 27, 2025.

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