

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Cr. No. 21-10354-WGY(sss)
	)	Cr. No. 19-10330-WGY
1. KENNY ROMERO,	)	
a/k/a “KG,”	)	
Defendant	)	

GOVERNMENT’S SENTENCING MEMORANDUM

On November 20, 2023, KENNY ROMERO, also known as “KG,” pleaded guilty without a plea agreement to Counts One, Two, Fifteen, Twenty, Twenty-One, Twenty-Three, and Twenty-Eight 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), multiple counts of distribution or possession with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1), and multiple counts of being a felon in possession of a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1).

In the final version of the Pre-Sentence Report, dated May 10, 2024 (“PSR”), the United States Probation Office determined ROMERO’s total offense level (“TOL”) after acceptance of responsibility was 23. PSR, ¶ 52. With a criminal history category (“CHC”) of III, Probation concluded that ROMERO’s guideline sentencing range (“GSR”) was 57-71 months. PSR, ¶¶ 62, 108. At the time he committed these offenses, ROMERO was on supervised release, the result of his 2019 conviction in U.S. District Court in Boston for interstate transportation of a firearm, in violation of 18 U.S.C. § 922(a)(3).

For the reasons set out below, the government respectfully requests that this Court sentence ROMERO to a total of **95** months in prison. This sentence consists of a 24 month sentence (the statutory maximum) for his many violations of supervised release and a 71 month sentence for the

instant offense (the high end of the Guidelines as calculated by Probation). In the course of his participation in a deadly criminal enterprise, ROMERO distributed cocaine while armed with a firearm; sold multiple firearms, including an assault rifle, to another member of Cameron Street who was in fact a cooperating witness; and engaged in human trafficking, all while under the supervision of this Court.

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 ROMERO 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, ¶¶ 13-17.

ROMERO. The third superseding indictment alleged that ROMERO was a member of Cameron Street. Members of Cameron Street refer to themselves as such or use abbreviations such 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”) (see “3113” tattoo from ROMERO):



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 – including ROMERO – 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 and promise to target any NOB/Wendover member for death.

For instance, a July 2019 video entitled “Fuck the Opps,” featured co-defendant Eric Correia but included appearances from ROMERO and other Cameron Street members. In the video, Cameron Street members flashed large sums of cash and three-fingered “C” hand signs. Members made firearm trigger pull gestures and described being armed with Glock (“Glicks,” “Glizzies”), Berettas, and more generally “sticks” (firearms). The lyrics discussed the death of a deceased Cameron Street member and make reference to “NOBK,” or “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 Natalio Gomes, who was killed in Peguero’s Market at 218 Bowdoin Street in Dorchester. 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 learned that it was a common sign of disrespect to name a murdered gang rival as a type or grade of marijuana, so “Smokin’ mad Nat” was a way for Cameron Street members to claim responsibility for Gomes’s murder.

On supervised release for a serious federal firearms charge, ROMERO sold a total of seven firearms – including a high-powered assault rifle – containing dozens of rounds of ammunition as well as cocaine base, cocaine, and marijuana to someone he believed was a fellow gang member but was in fact a cooperating witness (CW-1). ROMERO displayed an eighth firearm to CW-1 while ROMERO sold CW-1 cocaine.

The best way to understand the seriousness of ROMERO’s criminal conduct is to view it chronologically:

- Marijuana Sale. June 29, 2021, Boston: ROMERO sold CW-1 109 grams of marijuana for \$550;
- Cocaine Sale. July 8, 2021, Quincy: ROMERO sold CW-1 43 grams of cocaine base and 11 grams of marijuana for \$2250 (Count Fifteen);
- Cocaine Seizure and Arrest. August 21, 2021, Boston: During a car stop, Boston Police officers seized 19.4 grams of cocaine packaged for sale and cell phones from ROMERO (this seizure eventually became Count One of the indictment). ROMERO was arraigned in state court and released on conditions, including the standard condition that ROMORO not commit a new offense while on release;
- Phone Search Warrant / Narcotics: Pursuant to a warrant, agents searched ROMERO's cell phones seized during the Boston arrest. A review of the data showed that ROMERO was regularly involved in distributing cocaine, crack cocaine, heroin, marijuana, Adderall, and Percocet with multiple customers while on supervised release. The conversations were hardly coded – on one occasion, a customer texted ROMERO, “the coke is great it just has a little too much cut,” and ROMERO replied, “I actually do have some better stuff a lot less cut.” Two hours before he was stopped with cocaine by the Boston Police, ROMERO texted a customer, “Got some new fire” and told him, “Hit me up.”
- Phone Search Warrant / Human Trafficking. In addition to drug trafficking, data from ROMERO's phones showed that he was also engaged in prostitution. ROMERO's phone included lengthy text threads with a woman who engaged in sex with men for a fee and shared the proceeds 50-50 with ROMERO (the split was set out in the texts). ROMERO and the woman solicited business, set meeting locations, and discussed prices for various sex acts. The texts showed that ROMERO simultaneously supplied the woman with Percocet pills.
- Cocaine Sale Armed With Firearm. September 14, 2021, Boston: ROMERO sold CW-1 29 grams of cocaine for \$1,350 (Count Twenty). During the meeting between ROMERO and CW-1, ROMERO removed a black 9 millimeter pistol from his waistband and handed it to CW-1. CW-1 asked ROMERO whether he would sell CW-1 the firearm and for how much. ROMERO told CW-1, “13,” or \$1,300. When CW-1 offered to purchase the firearm for \$1300, ROMERO told CW-1 he would “call his man in Springfield” to see if he had more firearms.
- Firearms Sale. September 21, 2021, Boston: ROMERO sold CW-1 a Bersa .380 caliber semi-automatic pistol and ammunition and a Girsan 9 millimeter semi-automatic pistol and ammunition for \$3,100 (Count Twenty-One);
- Firearms Sale. October 13, 2021, Chelsea: ROMERO sold CW-1 a Smith and Wesson .44 caliber revolver and a F.N. Herstal 9 millimeter semi-automatic pistol in exchange for \$2,700 (Count Twenty-Three); and

- Firearms Sale. October 27, 2021, Somerville: ROMERO sold CW-1 a SCCY model CPX-2 9 millimeter pistol, a Ruger model ECS9s 9 millimeter pistol, and a Windham Weaponry model WW-15 .233 rifle, with ammunition, in exchange for \$4,100 (Count Twenty-Eight):



Argument. The evidence set out above amply demonstrates that the government’s 95 month recommendation is fair, just, and appropriate. Cameron Street members possessed firearms to murder their rivals, to project their power and influence, to protect themselves, and to make money for themselves and the enterprise. The possession, distribution, and use of illegal firearms fuels the “epidemic of handgun violence in communities within this district,” including neighborhoods in Boston and Brockton impacted by the cycle of violence attributable to the Cameron Street / NOB feud. See United States v. Politano, 522 F.3d 69, 71-72 (1st Cir. 2008). ROMERO’s possession and sale of firearms “directly facilitate[d] crimes of violence” and “indirectly facilitate[d] other crimes, including drug offenses.” Id. at 72. ROMERO day-in, day-out drug trafficking activity of multiple controlled substances, as well as the money he made from human trafficking, produced substantial income and helped fund Cameron Street, a fact that ROMERO celebrated:



Conclusion. The government's 95 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. By combining a high-end guideline sentence with a statutory maximum sentence for his many violations of supervised release, the sentence will specifically deter ROMERO and promote respect for the law. Finally, and most importantly, the sentence will serve to protect the public from ROMERO.

For the reasons set out above, the government respectfully requests that this Court sentence KENNY ROMERO to a total of 95 months in prison and three years of supervised release.

Respectfully submitted,

JOSHUA S. LEVY  
Acting 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 May 12, 2024.

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