

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA

CRIMINAL NO. 3:15CR 44 ( JCH)

v.

RODRIGO RAMIREZ, a.k.a. "Rico"

VIOLATION:  
18 U.S.C. § 1962(c) (Engaging in a pattern of racketeering activity)

INFORMATION

The United States Attorney charges:

COUNT ONE

(Engaging in a pattern of racketeering activity)

The Enterprise

1. At various times relevant to this Information, the defendant RODRIGO RAMIREZ, a.k.a. "Rico," and others known and unknown, were members and associates of the Red Side Guerilla Brims, a criminal organization whose members and associates engaged in narcotics distribution, and acts of violence, including acts involving murder and robbery, and which operated principally in New Haven, Connecticut.

2. The Red Side Guerilla Brims, including its leadership, members and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4) (hereinafter "the enterprise"), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

3. The purposes of the enterprise included the following:

a. Enriching the members and associates of the enterprise through, among

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Richard M. ...  
By: *[Signature]*  
Clerk of Court

other things, murder, robbery, and the distribution of narcotics.

b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, threats of violence, assaults and murder.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its members and associates through threats of violence and violence.

#### Role of the Defendant

4. RAMIREZ was not a member of the enterprise, but participated as an associate of the enterprise, and he acted under the direction of the leaders of the enterprise.

5. Under the direction of the leaders of the enterprise, RAMIREZ participated in unlawful and other activities in furtherance of the conduct of the enterprise's affairs.

#### Means and Methods of the Enterprise

6. Among the means and methods by which RAMIREZ and his associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates committed, attempted and threatened to commit acts of violence, including murder and robbery, to protect and expand the enterprise's criminal operations.

b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence.

c. Members of the enterprise and their associates trafficked in cocaine and cocaine base, Schedule II controlled substances.

#### The Racketeering Violation

7. From approximately 2011 through in or about April 2014, in the District of Connecticut and elsewhere, RAMIREZ, together with others known and unknown, being persons employed by and associated with the Red Side Guerilla Brims, which was an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of Racketeering Acts One and Two, as set forth in paragraphs Eight through Eleven below.

The Pattern of Racketeering Activity

8. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

Racketeering Act One – Conspiracy to Distribute Cocaine Base

9. From in or about 2011 through in or about April 2014, in the District of Connecticut and the District of Maine and elsewhere, RAMIREZ, and others known and unknown, unlawfully, intentionally and knowingly combined, conspired, confederated and agreed together and with each other to distribute and possess with intent to distribute 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

Racketeering Act Two – Felony Murder of Kevin Lee

10. On or about April 20, 2011, in the District of Connecticut, RAMIREZ, and others known and unknown, unlawfully, intentionally and knowingly attempted to commit a robbery of Kevin Lee, a marijuana distributor, and, during the course of attempting to commit the robbery, which was intended to provide monies to the Red Side Guerilla Brims, caused the death of Kevin

Lee, in violation of Conn. Gen. Stat. § 53a-54c (Felony murder).

All in violation of Title 18, United States Code, Section 1962(c).



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