

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

– v. –

ZAIRE QUELL,

also known as "Rico,"

Defendant.

Case No.: 23 Cr. [REDACTED] (S.D.N.Y.)

CRIMINAL COMPLAINT

Violations of:

18 U.S.C. § 1962(d)

18 U.S.C. § 1959(a)(1)

21 U.S.C. § 846

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2010. I am currently assigned to the Organized Crime Drug Enforcement Task Force operating within the Southern District of New York, with a primary focus on narcotics trafficking organizations, violent criminal enterprises, and related financial crimes.
 2. I have participated in numerous investigations involving court-authorized wire interceptions, physical surveillance, confidential source development, undercover operations, and the analysis of financial records and telecommunications data. I have previously testified as a witness in federal criminal proceedings in this District and others.
 3. This Complaint is based upon my personal participation in the investigation described herein; my review of reports prepared by other law enforcement officers; court-authorized wire interceptions conducted pursuant to Title III of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; physical surveillance; information provided by confidential sources whose reliability has been established through independent corroboration; and records obtained pursuant to lawfully issued search warrants and grand jury subpoenas.
 4. Because this Complaint is submitted for the limited purpose of establishing probable cause, it does not set forth every fact known to me or to law enforcement in connection with this investigation. Where I describe the statements of others, I do so in substance and in part.
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PROBABLE CAUSE

The QV Enterprise

5. Since at least in or about January 2021, ZAIRES QUELL, also known as "Rico," and others known and unknown to law enforcement, have operated as members and associates of a criminal organization functioning within the Bronx, New York, and surrounding areas, hereinafter referred to as the "QV Enterprise."

6. The QV Enterprise is an ongoing criminal organization whose members and associates function as a continuing unit for the common purpose of enriching themselves through criminal activity, including: the distribution of controlled substances including heroin, fentanyl, and cocaine; the commission of acts of violence, including murder, to protect and expand the Enterprise's territory and operations; and the laundering of criminal proceeds through coordinated financial channels, including fraudulent loan applications.
7. QUELL has served as a senior decision-maker within the QV Enterprise. Based on court-authorized wire interceptions, physical surveillance conducted over an eighteen-month period, and information provided by confidential sources whose reliability has been independently corroborated, QUELL exercised authority over territorial disputes, the distribution of narcotics proceeds, and the coordination of responses to perceived threats from rival criminal organizations. Individuals associated with the QV Enterprise routinely deferred to QUELL on matters involving organizational policy and enforcement.

Narcotics Trafficking

8. Since at least January 2021, members and associates of the QV Enterprise have distributed heroin, fentanyl, and cocaine within the Bronx, New York, and surrounding areas. Court-authorized wire interceptions have captured communications in which QUELL and associates discussed narcotics transactions, the management of territorial boundaries, and the collection and distribution of proceeds derived from narcotics sales.
9. Physical surveillance conducted between January 2022 and June 2023 documented repeated meetings between QUELL and known associates at multiple locations within the Bronx, New York, consistent with the coordination of narcotics distribution activity and the management of enterprise finances.
10. Financial analysis of accounts associated with QUELL and identified co-conspirators reflects proceeds of approximately \$412,000 derived from narcotics trafficking activity and laundered through coordinated financial channels, including fraudulent small business loan applications submitted during the period of approximately 2020 through 2021. These applications listed fictitious employees and non-operational business addresses.

The June 18, 2023 Shooting

11. On the evening of June 18, 2023, Malik Denton, a male known to law enforcement, was fatally shot in the vicinity of a parking structure located in the Soundview neighborhood of the Bronx, New York. Two additional individuals sustained non-fatal gunshot wounds in connection with the same incident. Mr. Denton was pronounced dead at the scene.
12. Court-authorized wire interceptions captured a communication occurring on or about April 14, 2023, in which QUELL, utilizing a cellular device registered to a third party, participated in a telephone call during which he issued directives concerning a perceived encroachment upon QV Enterprise territory. Law enforcement believes this communication constitutes authorization for the act of violence that resulted in the death of Malik Denton on June 18, 2023.
13. Cell tower data places QUELL's primary cellular device within the Southern District of New York at the time of the intercepted communication referenced in paragraph 12. Additionally, a prepaid cellular device activated from a telephone line associated with QUELL was utilized on the evening of June 18, 2023, within approximately 200 meters of the Soundview location. This device was not utilized again following that date and has not been recovered.

14. Based on the foregoing, and on information derived from confidential sources and physical evidence collected at the scene, law enforcement believes that one or more individuals acting at the direction of QUELL participated in the shooting death of Malik Denton on June 18, 2023, as an act of enforcement in furtherance of the QV Enterprise's territorial interests.

CONCLUSION

15. Based on the facts set forth herein, I respectfully submit that there is probable cause to believe that ZAIRE QUELL, also known as "Rico," committed the following offenses:

— Conspiracy to distribute and possess with intent to distribute controlled substances, including heroin, fentanyl, and cocaine, in violation of Title 21, United States Code, Section 846;

— Participation in a racketeering conspiracy, in violation of Title 18, United States Code, Section 1962(d); and

— Murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(1).

16. I therefore respectfully request that this Court issue an arrest warrant for ZAIRE QUELL.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

KANE MARR

Special Agent

Federal Bureau of Investigation

Sworn to before me this

██████ day of ██████, 2023

United States Magistrate Judge

Southern District of New York

Application for an arrest warrant is hereby GRANTED.

SO ORDERED, this ██████ day of ██████, 2023.

████████████████████, U.S.M.J.