

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

---

UNITED STATES OF AMERICA,

Plaintiff,

– against –

ZAIRE QUELL, *also known as "Rico,"*

SIN CARTER,

*and others,*

Defendants.

Case No.: S1 23 Cr. [REDACTED] (S.D.N.Y.)

**SUPERSEDING INDICTMENT**

Violations:

18 U.S.C. § 1962(d)

18 U.S.C. § 1959(a)(1)

18 U.S.C. § 1512(b)

21 U.S.C. § 846

18 U.S.C. § 924(c)

18 U.S.C. § 1343

---

**COUNT ONE**

*(Racketeering Conspiracy — 18 U.S.C. § 1962(d))*

---

*The Grand Jury charges:*

1. At all times relevant to this Indictment, in the Southern District of New York and elsewhere, the defendants **ZAIRE QUELL**, also known as "Rico," **SIN CARTER**, and others known and unknown to the Grand Jury, being persons employed by and associated with an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), in violation of Title 18, United States Code, Section 1962(d).

**The Enterprise**

2. The enterprise, hereinafter referred to as the "QV Enterprise," was an association-in-fact enterprise consisting of the defendants and others known and unknown to the Grand Jury. The members and associates of the QV Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of enrichment through criminal activity. The QV Enterprise operated principally in the Bronx, New York, and surrounding areas within the Southern District of New York.
3. The purposes of the enterprise included, among other things:
  - a. Preserving and protecting the power, territory, and profits of the enterprise through acts involving narcotics trafficking, acts of violence, and threats of violence directed at rivals and individuals perceived as cooperating with law enforcement;

- b. Promoting and enhancing the reputation of the enterprise and its members through public displays, social media communications, and music-related activities designed to project an image of violence and dominance, thereby intimidating rivals and discouraging cooperation with law enforcement;
- c. Generating revenue through narcotics distribution, wire fraud, and other unlawful means, and using such revenue to promote and sustain the enterprise's operations; and
- d. Concealing the nature, source, and extent of the enterprise's criminal activities from law enforcement through the use of coded communications, shell entities, and the corruption of individuals with access to sensitive information.

#### **The Defendants**

4. **ZAIRE QUELL**, also known as "Rico," was a senior member and leader of the QV Enterprise. QUELL exercised decision-making authority over territorial disputes, the distribution of narcotics proceeds, and the authorization of acts of violence committed in furtherance of the enterprise's interests. Members and associates of the QV Enterprise deferred to QUELL on matters of organizational policy and enforcement. QUELL's directions, including communications transmitted via telephone and electronic messaging platforms, were understood and acted upon by members and associates as binding directives.
5. **SIN CARTER** was an associate of the QV Enterprise who participated in the affairs of the enterprise by, among other things: promoting the enterprise's reputation for violence, cohesion, and dominance through digital media platforms and music-related activities; coordinating communications and events among members and associates of the enterprise; and facilitating financial transactions, including the movement of narcotics proceeds through accounts in her name and otherwise, intended to further the objectives of the enterprise. CARTER's financial accounts and professional activities were utilized, with her knowledge and participation, to conceal and promote the criminal proceeds of the enterprise.

#### **Racketeering Acts**

6. In furtherance of the enterprise and its purposes, the defendants and others known and unknown to the Grand Jury committed, conspired to commit, and aided and abetted the commission of, among other offenses, the following racketeering acts:

##### **Racketeering Act One**

*(Narcotics Trafficking — 21 U.S.C. § 846)*

- a. From in or about January 2021 through in or about June 2024, within the Southern District of New York and elsewhere, the defendants **ZAIRE QUELL** and **SIN CARTER**, and their associates, knowingly and intentionally conspired to distribute and possess with intent to distribute heroin, fentanyl, and cocaine, controlled substances within the meaning of Title 21, United States Code, Section 812. The proceeds generated through this conspiracy, exceeding \$400,000, were used to promote, finance, and protect the operations of the QV Enterprise.

##### **Racketeering Act Two**

*(Use of Firearms in Furtherance — 18 U.S.C. § 924(c))*

- b. During the same period described in Racketeering Act One, the defendants and their associates knowingly possessed, used, brandished, and carried firearms, including firearms transported in interstate commerce, in furtherance of the narcotics trafficking conspiracy described above, and to protect enterprise territory, enforce organizational discipline, and retaliate against individuals perceived as rivals or threats to the enterprise.

**Racketeering Act Three**

*(Murder in Aid of Racketeering — 18 U.S.C. § 1959(a)(1))*

- c. On or about June 18, 2023, in the Soundview neighborhood of the Bronx, New York, members and associates of the QV Enterprise, acting pursuant to authorization issued by **ZAIRE QUELL**, committed and aided and abetted the commission of murder and attempted murder. The victim, Malik Denton, sustained fatal gunshot wounds. Two additional individuals sustained non-fatal injuries in connection with the same incident. The acts described herein were committed for the purpose of maintaining and increasing the position of the defendants in the QV Enterprise and to preserve the enterprise's territorial interests.

**Racketeering Act Four**

*(Witness Tampering — 18 U.S.C. § 1512(b))*

- d. On or about June 19, 2023, and continuing thereafter, the defendants and their associates, using intimidation, threats, and corrupt persuasion, knowingly and intentionally attempted to influence, delay, and prevent the testimony and communication of one or more witnesses in connection with the shooting described in Racketeering Act Three, with intent to impede an official federal investigation.

**Racketeering Act Five**

*(Wire Fraud — 18 U.S.C. § 1343)*

- e. From in or about 2020 through in or about 2023, the defendants and their associates devised and executed a scheme to defraud financial institutions and government relief programs by submitting materially false and fraudulent representations in applications for pandemic-related small business relief funds. Fraudulent proceeds obtained through this scheme were routed through shell entities and accounts controlled by enterprise members, and were used to conceal narcotics revenue and promote the continued operation of the QV Enterprise. The scheme involved the use of interstate wire communications in furtherance of the fraud.

---

(Title 18, United States Code, Sections 1962(d) and 2.)

**COUNT TWO**

*(Murder in Aid of Racketeering — 18 U.S.C. § 1959(a)(1))*

---

*The Grand Jury further charges:*

7. The allegations contained in Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.
8. On or about June 18, 2023, in the Southern District of New York, the defendant **ZAIRE QUELL**, also known as "Rico," and others known and unknown to the Grand Jury, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the QV Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the QV Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Malik Denton, in violation of New York Penal Law Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

**COUNT THREE**

*(Narcotics Conspiracy — 21 U.S.C. § 846)*

---

*The Grand Jury further charges:*

9. The allegations contained in Paragraphs 1 through 6 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.
10. From in or about January 2021 through in or about June 2024, in the Southern District of New York and elsewhere, the defendants **ZAIRE QUELL**, also known as "Rico," and **SIN CARTER**, and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute and possess with intent to distribute mixtures and substances containing a detectable amount of heroin, fentanyl, and cocaine, Schedule I and Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 846.)

**COUNT FOUR**

*(Wire Fraud — 18 U.S.C. § 1343)*

---

*The Grand Jury further charges:*

11. The allegations contained in Paragraphs 1 through 6 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

- 12.** From in or about 2020 through in or about 2023, in the Southern District of New York and elsewhere, the defendants **ZAIRE QUELL**, also known as "Rico," and **SIN CARTER**, and others known and unknown to the Grand Jury, having devised and intending to devise a scheme and artifice to defraud financial institutions and government programs, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1343 and 2.)

**FORFEITURE ALLEGATION**

13. As a result of committing the offenses charged in this Indictment, the defendants shall forfeit to the United States all property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, and all property used, or intended to be used, to commit or facilitate the commission of such offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses, and any and all accounts, funds, and assets derived therefrom.

(Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1); Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461.)

---

**A TRUE BILL**

---

**FOREPERSON OF THE GRAND JURY**

---

[REDACTED]  
United States Attorney  
Southern District of New York

Filed in open court this [REDACTED] day of [REDACTED], 2023.

Bail fixed at: [REDACTED]

---

[REDACTED], U.S.D.J.