

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Special Agent Eric D. Poalino, having been sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since June 2021. I am currently assigned to the Boston Field Office, North Shore Gang Task Force (“FBI Task Force”). The primary mission of the FBI Task Force is to identify, investigate, disrupt, and dismantle violent criminal organizations operating in cities north of Boston. My responsibilities include the investigation of possible violations of federal law, including illegal possession/transfer of firearms, firearms trafficking, narcotics trafficking, and violent crimes involving firearms and narcotics trafficking. I have received training and experience in various aspects of criminal law and procedure, including electronic and physical surveillance, interrogations, stops, searches, seizures, and arrests for a variety of criminal offenses. Through my training, knowledge, and experience, I have become familiar with the habits, methods, routines, practices and procedures commonly employed by persons engaged in the use and trafficking of illegal firearms and narcotics, including persons involved in criminal organizations. My investigations have included the use of surveillance techniques and the execution of search, seizure, and arrest warrants.

2. I have written and/or participated in the execution of numerous search warrants resulting in the seizure of controlled substances and paraphernalia involved in the manufacture and distribution of controlled substances; United States currency, records of narcotics and monetary transactions, drug customer lists and other documents relating to the manufacturing, transportation, ordering, purchasing and distribution of controlled substances, as well as the collection, expenditure, accounting, transportation, and laundering of drug proceeds. I have participated in the debriefing of numerous defendants, informants and witnesses who had personal knowledge regarding large-scale narcotics trafficking organizations. I have participated in all aspects of drug investigations including conducting surveillance, executing searches pursuant to court-ordered search warrants, executing arrests, and participating in court-authorized Title III wiretaps of cellular phones. I have received extensive specialized training in the field of controlled substance identification, investigation and enforcement. Based on my training and experience, I am familiar

with narcotics traffickers' methods of operation, including methods used by them to distribute, store and transport narcotics and to collect, expend, account for, transport, and launder drug proceeds.

3. All dates, time and amounts set forth in this affidavit are approximate. Because this affidavit is being submitted for the limited purpose of securing the requested search warrants, I have not included each and every fact known to me concerning this investigation. I make this affidavit based upon personal knowledge derived from my participation in this investigation and upon information (whether received directly or indirectly) that I believe to be reliable from numerous sources including, but not limited to, the following:

- a. My training and experience investigating drug trafficking, violent crimes, and money laundering crimes;
- b. Oral reports, written reports, and documents that I have received from other federal, state, and local law enforcement agents;
- c. Physical and electronic surveillance conducted by me and other federal, state, and local law enforcement officers;
- d. Confidential sources of information (referred to as CI and their #) and cooperating witnesses (referred to by CW and their #);
- e. Public records;
- f. Business records;
- g. Telephone toll records, pen register and trap and trace information, and telephone subscriber information;
- h. Precise location information for cellular telephones;
- i. Queries of law enforcement records and intelligence databases;
- j. Execution of search warrants;
- k. Social media postings, videos and images;
- l. Review of data and information obtained by Search Warrants;
- m. Review of cellular phones searched and seized during this investigation; and
- i. Arrests of co-conspirators.

I. PURPOSE OF AFFIDAVIT AND BACKGROUND

2. I make this affidavit in support of an application for Criminal Complaint charging HARVEY RODRIGUEZ, A/K/A “BIG OPP” with the following: Count One, from a period of approximately January 2020 through December 2024, Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. § 846. Based on this information set forth in this affidavit, there is probable cause to believe that RODRIGUEZ and multiple other individuals conspired to distribute controlled substances and possess controlled substances with intent to distribute, in violation of 21 U.S.C. § 846.

3. I also make this affidavit in support of a second count charging RODRIGUEZ with Conspiracy to Interfere with Commerce by Robbery, relating to an armed home invasion robbery that took place on or about January 30, 2023, in Woburn, Massachusetts, that targeted a drug customer of RODRIGUEZ. During the home invasion robbery, RODRIGUEZ and multiple coconspirators robbed the victim of over \$20,000 of drug proceeds at gunpoint. Based on this information set forth in this affidavit, there is probable cause to believe that RODRIGUEZ, and multiple other individuals conspired to interfere with commerce by robbery (Conspiracy to Commit Hobbs Act Robbery), in violation of 18 U.S.C. § 1951(a).

4. I am familiar with Harvey RODRIGUEZ, a/k/a “Big Opp,” who has a date of birth of xx/xx/1996. RODRIGUEZ is the leader of the Big Opp Entertainment, or Brothers Over Everything, otherwise known as the BOE criminal enterprise. RODRIGUEZ is known to be a distributor of pressed fentanyl pills, fentanyl, pressed methamphetamine pills, cocaine, and is known to have conducted at least one armed robbery. RODRIGUEZ has a number of prior arrests but no convictions. A photograph of RODRIGUEZ follows:



5. With respect to the charged drug conspiracy in Count One, I note that at least four specific drug transactions have been conducted over the course of this investigation where RODRIGUEZ and his coconspirators, including known coconspirators whose identity I am omitting but who I will refer to as CC-1 and CC-2, sold drugs to confidential informants or cooperating witnesses on recording. One such transaction involved CC-2 who delivered drugs in accordance with a transaction that a cooperating witness had negotiated with RODRIGUEZ. These four controlled purchases are in addition to the numerous instances of manufacturing and transactions reflected in digital evidence such as text messages and photographs and videos or described by cooperating witnesses as having taken place historically. Those controlled purchases can be summarized as follows:

- a. RODRIGUEZ and CC-2: on or about December 11, 2023, where CC-2 provided a cooperating witness with over 275 grams of counterfeit Adderall pills containing methamphetamine, from a transaction arranged with RODRIGUEZ.
- b. RODRIGUEZ: on or about December 12, 2023, where RODRIGUEZ provided a cooperating witness with over 275 grams of counterfeit Adderall pills containing methamphetamine.
- c. RODRIGUEZ: on or about June 18, 2024, where RODRIGUEZ provided a cooperating witness with over 220 grams of cocaine.

- d. RODRIGUEZ: on or about June 26, 2024, where RODRIGUEZ provided a cooperating witness with over 80 grams of counterfeit Percocet pills containing fentanyl.

II. BASIS FOR PROBABLE CAUSE

A. HISTORICAL PILL MANUFACTURING IN ESSEX COUNTY

6. The FBI NSGTF continues to investigate various ongoing criminal enterprises in areas north of Boston. That investigation continues to focus on large-scale drug trafficking and pill manufacturers, including those related to traffickers who were identified and targeted during prior investigations, including Schuyler OPPENHEIMER, a/k/a “SK”, Vincent CARUSO, a/k/a “Fatz”, Lawrence Michael NAGLE, a/k/a “Mikey”, and Harvey RODRIGUEZ, a/k/a “Big Opp.” According to multiple cooperating witnesses, OPPENHEIMER, RODRIGUEZ, CARUSO, and NAGLE were historically linked and aligned in the manufacturing of counterfeit Percocet pills containing fentanyl during the period of approximately 2018 through early 2020 in the Saugus and Lynn areas of Massachusetts. At the time, the clandestine manufacture of counterfeit prescription pills containing fentanyl through the use of desktop pill presses was a relatively new phenomenon and drug users were willing to pay over \$10 per counterfeit pill, based on the novelty of counterfeit pills and common misperception that the pills were in fact authentic.

7. In January 2020, Massachusetts State Police (MSP) executed a series of search warrants at multiple townhouses on Founders Way in Saugus, Massachusetts that were used as manufacturing and distribution locations by RODRIGUEZ, CARUSO and other conspirators. Following these search warrants, the group largely discontinued working together in the same manner. CARUSO, in particular, believed that an individual named DAVID MARTINEZ, a/k/a “40” was the confidential informant referred to in a search warrant affidavit submitted by MSP and that MARTINEZ was therefore responsible for the January 2020, raids. I am aware from my investigation that this belief was the product of CARUSO’s lawyer reviewing discovery materials produced in the Saugus case. MARTINEZ is also believed to have been a familial relation of RODRIGUEZ.

8. I am aware from review of police reports and publicly reported information that DAVID MARTINEZ and a second individual were shot and killed in Charlestown, Massachusetts, in September 2020. Data from cellular phones recovered from the crime scene and phones seized during the CARUSO investigation have been reviewed by investigators. I know from the review of those devices that MARTINEZ and CARUSO exchanged threats over the phone in the days prior to MARTINEZ's murder. Additionally, in MARTINEZ's cellular phone there was a recording made by MARTINEZ that captured a phone call between MARTINEZ and CARUSO's lawyer on the pending Saugus case, where MARTINEZ accuses the lawyer of identifying him as the confidential informant. During the recording, the lawyer denies being responsible. Separately, CARUSO is also known to have claimed to have paid "40 for 40", meaning he had paid \$40,000 to procure the murder of "40", which was MARTINEZ's street name.

9. Apart from no longer working together, the group also threatened to commit and actually has committed violence against each other. For example, following the murder of MARTINEZ, it is believed that RODRIGUEZ placed a \$100,000 bounty on the head of CARUSO and CARUSO's associate ERNEST JOHNSON, a/k/a "Yo Pesci." JOHNSON in fact made a number of public social media posts regarding the bounty. This supposed bounty being placed was prompted by RODRIGUEZ's belief that CARUSO was responsible for procuring the death of MARTINEZ. Additionally, following a verbal dispute between CARUSO and NAGLE, CARUSO orchestrated the gunpoint robbery of NAGLE in May 2021, outside of his residence in Saugus, Massachusetts. Additionally, I am aware that OPPENHEIMER punched Lawrence Michael NAGLE's brother, Christopher NAGLE, a/k/a "CUDA", who was also charged in the NAGLE drug case.

10. Apart from RODRIGUEZ, each leader of this North Shore Pill Collective has been federally investigated, charged, and prosecuted. Though CARUSO and NAGLE are believed to have stopped directly working with the overall group at the time, as I will discuss RODRIGUEZ and OPPENHEIMER are known to have continued to work together with respect to the manufacturing and distribution of controlled substances in 2022, 2023, and 2024.

B. RODRIGUEZ AND BROTHERS OVER EVERYTHING

11. RODRIGUEZ is the leader and organizer of a street gang and criminal enterprise known as “BOE”, which means “Brothers Over Everything” and also “Big Opp Entertainment.” BOE is known to distribute fentanyl and cocaine and possess numerous firearms, including fully-automatic handguns with selector switch attachments. Through this investigation, I have confirmed that BOE members possess firearms, distribute controlled substances, and engage in violent criminal acts.

12. BOE is purported to be structured around the creation of rap music and promotes itself publicly through a secondary and more public-facing meaning of the acronym as a rap label known as “Big Opp Entertainment” (named for RODRIGUEZ). Though purportedly for legitimate commercial ends, the members of BOE are in fact engaged in the commission of the drug and firearm offenses. This BOE enterprise does in fact further the musical endeavors of associated BOE members and provide a putative lawful source of income and a means to invest drug proceeds. Of note, one individual who I will refer to as Coconspirator 1 (or “CC-1”) is a rap artist and is known to be affiliated with Big Opp Entertainment. Indeed, BOE is known to have invested substantial drug proceeds into a diamond-encrusted chain that depicts the acronym BOE. A public facing Instagram of CC-1 contains a photograph promoting BOE and CC-1’s rap album, in which the “BOE” chain can be observed and the neck tattoo of CC-1 can be seen. In fact, OPPENHEIMER can be seen commenting on this post. Investigators know that RODRIGUEZ would lend the BOE chain to CC-1 in order to promote the label and its music. It is my understanding that BOE has been in fact sold due to recent financial difficulties faced by RODRIGUEZ.



13. BOE has a symbol associated with it that is a bullseye with crosshairs. Multiple members and associates of BOE have this target logo tattooed on their body, and their neck in particular to signify their membership in the gang. The BOE diamond studded chain contains an arrow hitting the target of the “O” further demonstrating the use of this symbol.

14. There does not appear to be a formal leadership structure of BOE, apart from Harvey RODRIGUEZ, a/k/a “Big Opp,” who directs the manufacturing of controlled substances, and has a source of supply for fentanyl and cocaine. Based on his control over the distribution of controlled substances, and the gang being largely reflective of his street name (“Big Opp Entertainment”), RODRIGUEZ is believed to be the leader of BOE and other members fall under him. Due to his position, I believe that other lower-level members of BOE serve as his runners and drug distributors, thereby insulating him from threats and law enforcement interdiction. Multiple sources of information have described lower-level and juvenile associates of BOE holding drugs and firearms for RODRIGUEZ in order to commit violence and deal drugs on his behalf, and to take charges in the event of law enforcement locating the weapon.

15. I am familiar with one such incident involving a juvenile taking place in June 2023. In this incident, Harvey RODRIGUEZ was charged with causing a minor to distribute drugs. *See* Lynn District Court, Docket No. 2313CR001831. Investigators reviewed the related Lynn Police Reports for these charges, and they can be summarized as follows:

- a. On June 13, 2023, RODRIGUEZ and a juvenile male were in a vehicle outside of the recording studio in Lynn, and they were stopped for operating a motor vehicle with a suspended registration. The juvenile was observed with commercially packaged marijuana in his pocket. It was illegal for him to be in possession as a juvenile so an officer conducted a frisk search of the subject. The officer found a 2.5 inch folding knife and multiple packages of marijuana stored in sandwich bags hidden in the juvenile's underwear. When the officer explained to RODRIGUEZ that they were arresting the juvenile for being a minor in possession of a controlled substance, RODRIGUEZ claimed the drugs were his. Officers subsequently arrested RODRIGUEZ.

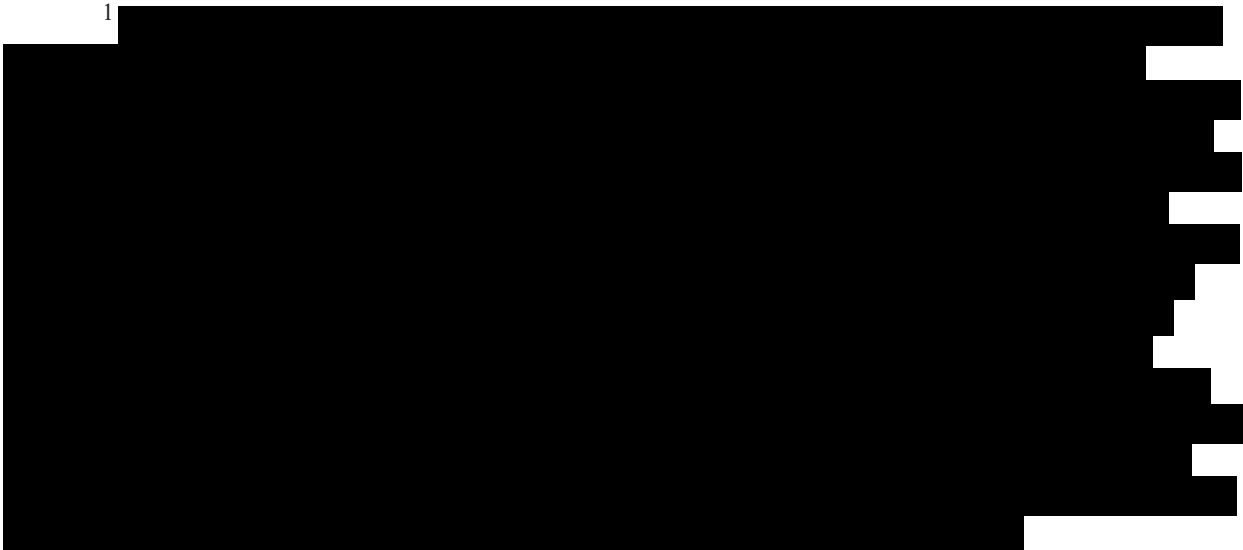
C. HISTORICAL DRUG DISTRIBUTION

1. CW-5

16. In April 2021, May 2021, and June 2022, CW-5¹ provided information regarding CARUSO, OPPENHEIMER and RODRIGUEZ.

- a. CW-5 described an individual, later identified as OPPENHEIMER, as being associated with Vincent CARUSO, a/k/a "Fatz", when CARUSO was residing in Saugus. CW-5 stated that OPPENHEIMER would put switches on firearms for Vincent CARUSO. CW-5 also stated that OPPENHEIMER put CARUSO's automated press together and would fix CARUSO's pill press when CARUSO's operation was located in Saugus.

¹



- b. CW-5 also provided information related to the historical association of Harvey RODRIGUEZ, Vincent CARUSO, Schuyler OPPENHEIMER, and NAGLE, when CARUSO's DTO was based in Saugus, Massachusetts. CW-5 stated that Harvey LNU (identified to be RODRIGUEZ), was a neighbor of CARUSO in Saugus. CW-5 stated that Harvey manufactured and distributed cocaine and Xanax.²

17. Investigators reviewed the extraction of a cellular phone seized from CW-5 and noted a conversation with OPPENHEIMER over Instagram using the Instagram account "sdot_k" on January 8, 2020, which was the day when Vincent CARUSO's operation in Saugus was subject to a search warrant executed by Massachusetts State Police. CW-5 communicated with OPPENHEIMER and told OPPENHEIMER to call him ASAP and identified himself as Vinny's friend and that "They", likely referring to the CARUSO Drug Trafficking Organization, instructed CW-5 to contact OPPENHEIMER.

2. CW-27

18. In August and September 2021, Agents from the Drug Enforcement Administration (DEA) interviewed an individual whose identity is known to me who I will refer to as CW-27.³ In sum and substance, CW-27 provided the following pertinent information:

- a. CW-27 described working for an individual known to investigators to be Harvey RODRIGUEZ, a/k/a "Big Opp", distributing pressed fentanyl pills. CW-27 went on to say that RODRIGUEZ produces a large amount of blue counterfeit Percocet pills, and that CW-27 can produce 250,000 pills in five days. CW-27 stated that the presses used

² This information was corroborated as MSP executed a search warrant at RODRIGUEZ's residence next door to CARUSO's shortly after searching CARUSO's residence. CW-15 was interviewed by investigators in August 2021, and CW-15 provided information that CW-15 was the listed tenant for the apartment that "Harvey" resided in at the complex. V. CARUSO lived at Founders' Way for approximately one year before moving out. CW-15 stated that "HARVEY" (in fact, HARVEY RODRIGUEZ) lived there for about six months and paid the rent while the apartment was in CW-15's name. Vincent CARUSO was the one who arranged for CW-15 to rent the apartment for "HARVEY". CW-15 stated that Vincent CARUSO filled out the application on CW-15's behalf. I know from review of reports that CW-15 rented unit 2001, which was actually occupied by RODRIGUEZ, and V. CARUSO rented unit 2002, which was nearby.

³

[REDACTED]

by RODRIGUEZ were kept in a house in a central Massachusetts, but CW-27 believed the house is currently vacant. CW-27 stated that CW-27 knows of at least two pill press machines utilized by RODRIGUEZ.

- b. CW-27 stated that one of the pill press machines is always with “SK” (known to investigators to be Schuyler OPPENHEIMER). CW-27 described the pill presses as portable, but they are extremely heavy and require at least two people to be moved. CW-27 did not know where RODRIGUEZ purchased the pill press machines, but they might have been purchased through Vinny CARUSO, aka “Fatz,” since they lived next to each other in Saugus. CW-27 explained that RODRIGUEZ and CARUSO sold Xanax pills together which resulted in a raid in Saugus in 2020. Investigators know from review of records from the State Police investigation that this information is accurate.
- c. CW-27 stated that RODRIGUEZ produces the pills with “SK” (OPPENHEIMER) and an individual known to CW-27 as “Drac” and that they stay up all night and day to make a batch of pills. CW-27 further stated that when RODRIGUEZ, “Drac”, and OPPENHEIMER are together at the same time then they are more than likely producing pills. CW-27 believed the pills were Oxycontin and did not realize they were fentanyl pills until CW-27 met “Drac”. CW-27 further stated that Drac was the source of supply for the fentanyl and that they were purchasing fentanyl for \$40,000.00 USD per kilogram, which yielded 250,000 pills. CW-27 stated that each pill was sold for a minimum of \$4.00 each. CW-27 further stated that Drac was RODRIGUEZ’s fentanyl source of supply and is connected to a Mexican Cartel.
- d. CW-27 stated that RODRIGUEZ has a boss above him who is ultimately in charge and is a millionaire. CW-27 stated that RODRIGUEZ has told him about this “boss” on several occasions but has never met this “boss”. CW-27 further explained that RODRIGUEZ has never met the unknown male in person either and that RODRIGUEZ was introduced to him through CARUSO.

19. I am aware that the time frame of the operation described by CW-27 was during 2020 through 2021.

D. JANUARY 30, 2023, HOBBS ACT ROBBERY

20. In January 2024, investigators interviewed an individual I will refer to as VICTIM-2. VICTIM-2 was initially interviewed with the promise that the information provided would not be used against VICTIM-2. Subsequently, VICTIM-2 has been accorded immunity in exchange for continued cooperation and truthful testimony. Later, investigators also interviewed CW-32 concerning this robbery.⁴

⁴ [REDACTED]

21. During the interview, VICTIM-2 described being robbed during a transaction where he intended to purchase a kilogram of cocaine from an individual, who was later identified by investigators as RODRIGUEZ. VICTIM-2 described being robbed of approximately \$25,000 in cash that was itself derived from VICTIM-2 drug distribution activities and the sales derived from a kilogram of cocaine. VICTIM-2 had purchased from an individual identified to be RODRIGUEZ in December 2024. One of the robbers, CW-32, was well known to VICTIM-2. CW-32 and VICTIM-2 had known each other for several years and VICTIM-2 would sometimes sell drugs to CW-32. In December 2022, CW-32 offered to sell VICTIM-2 a kilogram of cocaine in exchange for \$25,000.

22. During the evening hours on or about December 19, 2022, CW-32 and RODRIGUEZ delivered a kilogram of cocaine to VICTIM-2 at VICTIM-2's apartment. RODRIGUEZ remained in a mask and long jacket and his face was not visible to VICTIM-2. VICTIM-2 was not able to identify RODRIGUEZ as the source of the kilogram. However, the investigation identified RODRIGUEZ as the source through review of cellular phones and text messages concerning the transaction and information provided by CW-32. This transaction is captured in text messages between RODRIGUEZ and CW-32. The transaction was completed: RODRIGUEZ arrived at VICTIM-2's apartment and provided a kilogram of cocaine in exchange for an amount of cash in excess of \$20,000.

23. In January 2023, VICTIM-2 arranged with CW-32 to buy a second kilogram of cocaine for another \$25,000. During the evening hours on or about January 30, 2023, CW-2 arrived and accessed VICTIM-2's apartment with a pin code provided by VICTIM-2 to CW-32. VICTIM-2's girlfriend at the time was on the balcony grilling. The balcony door as well as the balcony's curtain were both closed.

[REDACTED]

VICTIM-2 had previously placed the approximately \$25,000 in an unmarked soft black lunch box which was on the living room coffee table.⁵ CW-32 counted the money in the lunch box and once the count was complete, CW-2 placed the money back in the lunch box. CW-2 then advised VICTIM-2 that CW-2's source was going to drop off the kilogram of cocaine.

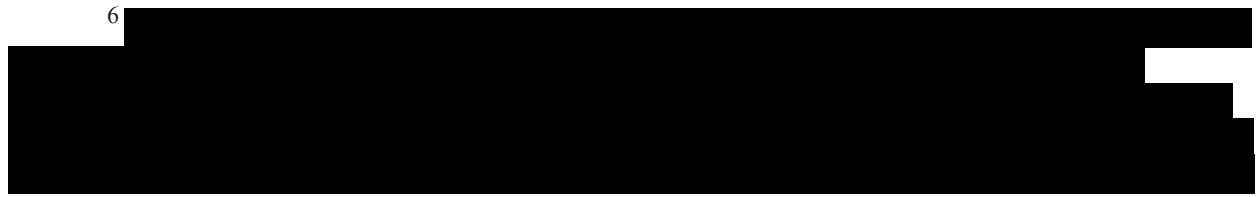
24. CW-32 subsequently departed the apartment in order to allegedly retrieve the cocaine from their associate. Shortly thereafter, two males "bum rushed" VICTIM-2's apartment, each pointing firearms at VICTIM-2. VICTIM-2 stated they are familiar with firearms and believed both guns were semiautomatic, Glock pistols. VICTIM-2 did not know the identity of RODRIGUEZ but recognized the individual to be the same person who accompanied CW-32 during the previous cocaine sale. VICTIM-2 did not know the identity of the second armed gunman, but I know this person to be CLAUDIO MELO based on multiple witnesses identifying MELO as a participant in this robbery.

25. In a forceful and threatening manner and while continuing to point their firearms at VICTIM-2, RODRIGUEZ and MELO demanded to know where VICTIM-2's money was. VICTIM-2 indicated the black lunch box and told the robbers to take it. CW-32 had reentered the apartment and was seemingly pretending to be surprised by the robbery. VICTIM-2 took the robbers to another room to open his empty safe and when they returned to the living area CW-32 had already left. Shortly thereafter both robbers departed.

26. In addition to CW-32 and MELO, another cooperating witness, CW-34,⁶ was the fourth member of the conspiracy to rob VICTIM-2. CW-34 was interviewed on multiple occasions and provided

⁵ VICTIM-2 admitted that this money was proceeds from the sale of drugs, including the previous obtained kilogram of cocaine.

⁶



information to investigators concerning the robbery of VICTIM-2. CW-34 provided the following information:

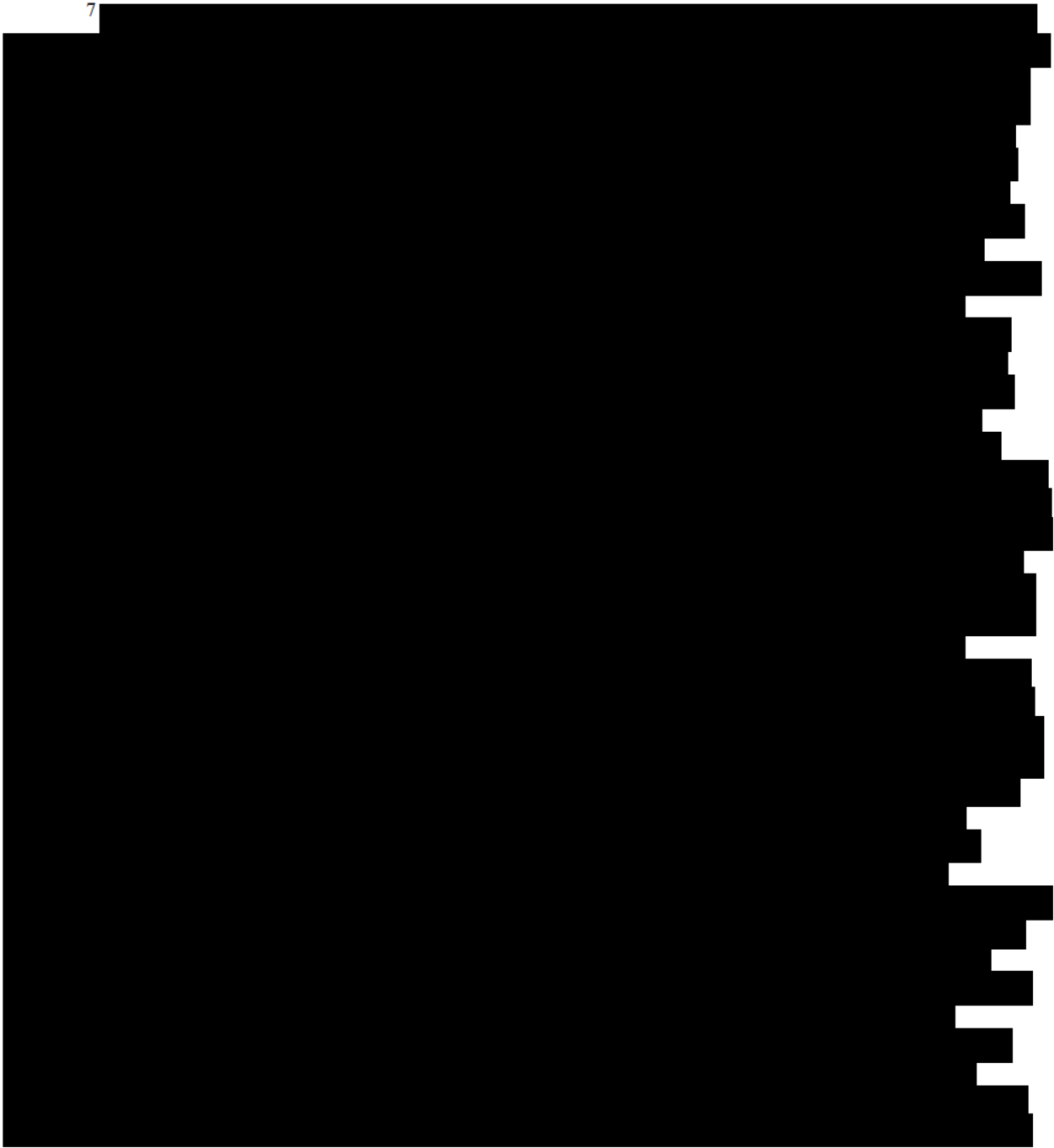
- a. On the day of the robbery CW-32, CW-34, MELO, and RODRIGUEZ, met at RODRIGUEZ's apartment in Stoneham, MA to stage for the criminal act. CW-34 had previously overheard CW-32 on the phone with others talking about the robbery and knew that it had been planned in advance. Prior to the robbery, all of the conspirators were aware that the plan was to rob VICTIM-2 of cash that VICTIM-2 had obtained from the sale of cocaine and other drugs and was intending to buy cocaine.
- b. Later the funds were split between RODRIGUEZ, MELO, and CW-32 at RODRIGUEZ's Stoneham apartment where they met before the robbery. I know from this investigation that around the time of the robbery RODRIGUEZ was living at Alta Clara Apartments located at 21 Executive Drive, Stoneham, MA under the fraudulent identity. The property manager at that address was familiar with RODRIGUEZ from numerous interactions. The property manager retrieved a photocopy of the tenant's driver's license and confirmed that the individual pictured was not the occupant he knew. I then showed him an RMV picture of RODRIGUEZ who he identified as the person who had rented the apartment. I believe that the Alta Clara address used by RODRIGUEZ was the same address he used to plan and facilitate the robbery. CW-34 believed that approximately \$24,000-\$26,000 was stolen. CW-34 knew that CW-32 received approximately \$3,000-\$4,000 and the rest was split between RODRIGUEZ and CW-34.

27. In summary, of the five individuals that were involved in the robbery (CW-32, MELO, RODRIGUEZ, CW-34, and VICTIM-2), investigators have interviewed at least three. Each individual was interviewed separately, and each individual was not aware that other interviews concerning this particular crime were conducted. I have found the information that they each individually provided corroborates and is corroborated by the information I received from the other cooperators. Furthermore, at least two of the coconspirators (CW-32 and CW-34) identified RODRIGUEZ as one of the armed men that stole approximately \$25,000 of drug buy money from VICTIM-2 at gun point with MELO.

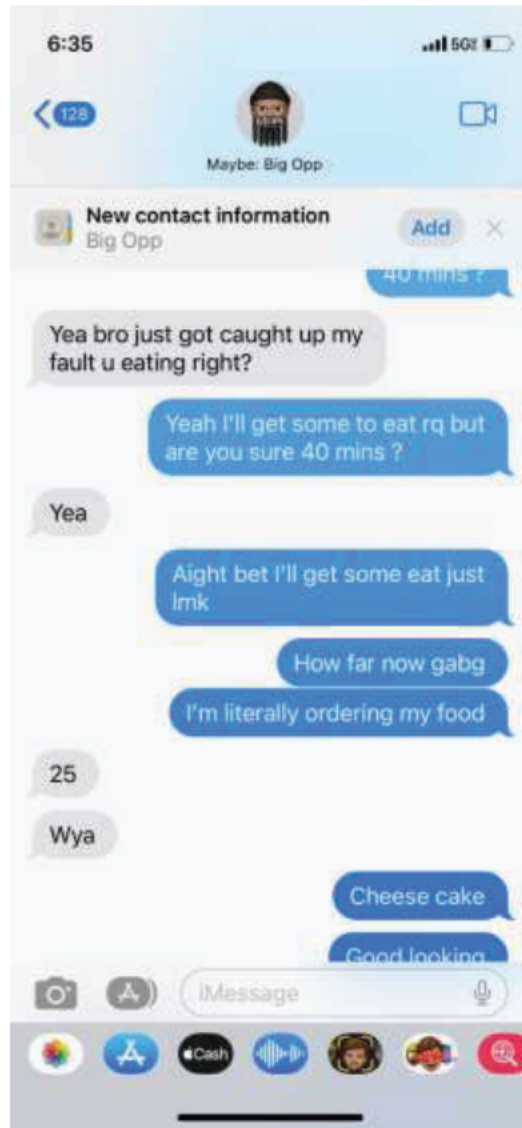
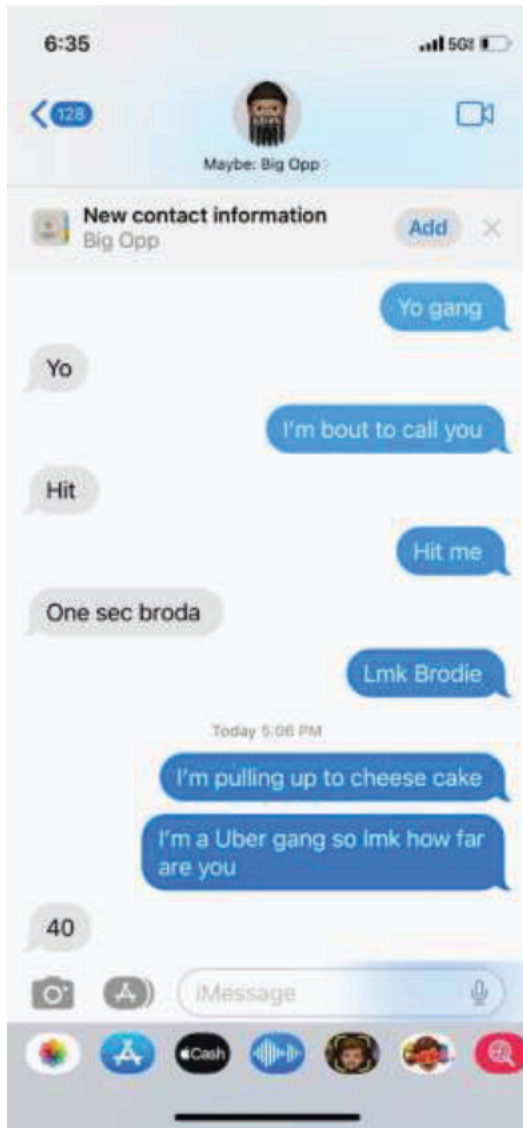
E. DECEMBER 11, 2023 CONTROLLED BUY OF METHAMPHETAMINE

28. On December 11, 2023, CW[REDACTED]⁷ conducted a controlled purchase of methamphetamine pills from RODRIGUEZ and the BOE Enterprise. This transaction was audio-video recorded and conducted

7



while under surveillance of investigators. Specifically, CW-█ arranged for the purchase of 1,000 counterfeit Adderall pills believed to contain methamphetamine from Harvey RODRIGUEZ. RODRIGUEZ used a phone number ending in 0631 (hereafter, the 0631 number) to coordinate the transaction with CW █. This sale was arranged over text message communications that were preserved. Screenshots of the coordination for the meeting follow:



■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

■ [REDACTED]

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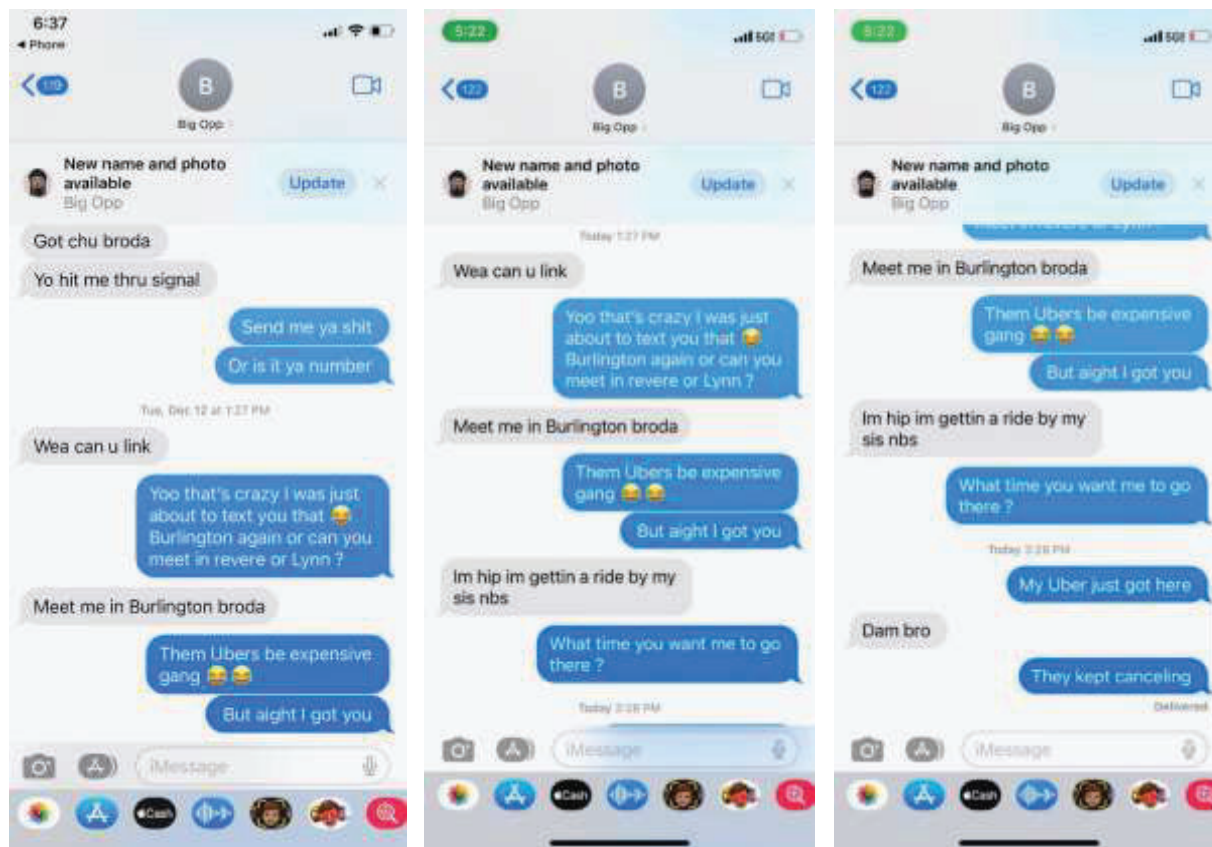
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[REDACTED]

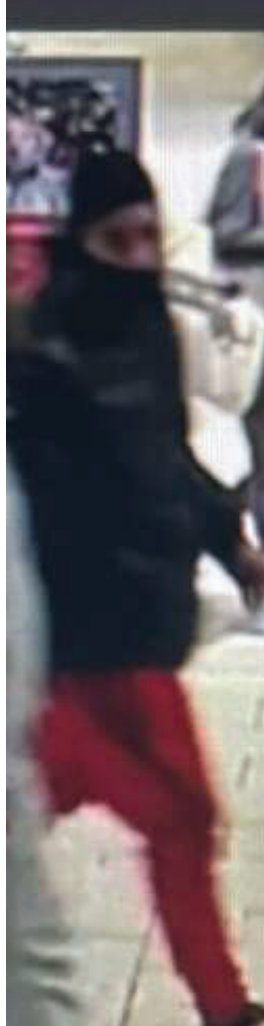


F. DECEMBER 12, 2023 CONTROLLED BUY OF METHAMPHETAMINE

31. On December 12, 2023, CW-█ scheduled a second purchase of 1,000 methamphetamine pills from RODRIGUEZ in exchange for \$700. The transaction was audio and video recorded and I have reviewed those recordings. CW-█ contacted RODRIGUEZ on the 0631 number and continued to communicate with RODRIGUEZ on the 0631 number throughout the transaction. CW-█ received instructions from RODRIGUEZ to meet again at the Burlington Mall. Screenshots of these text messages follow:



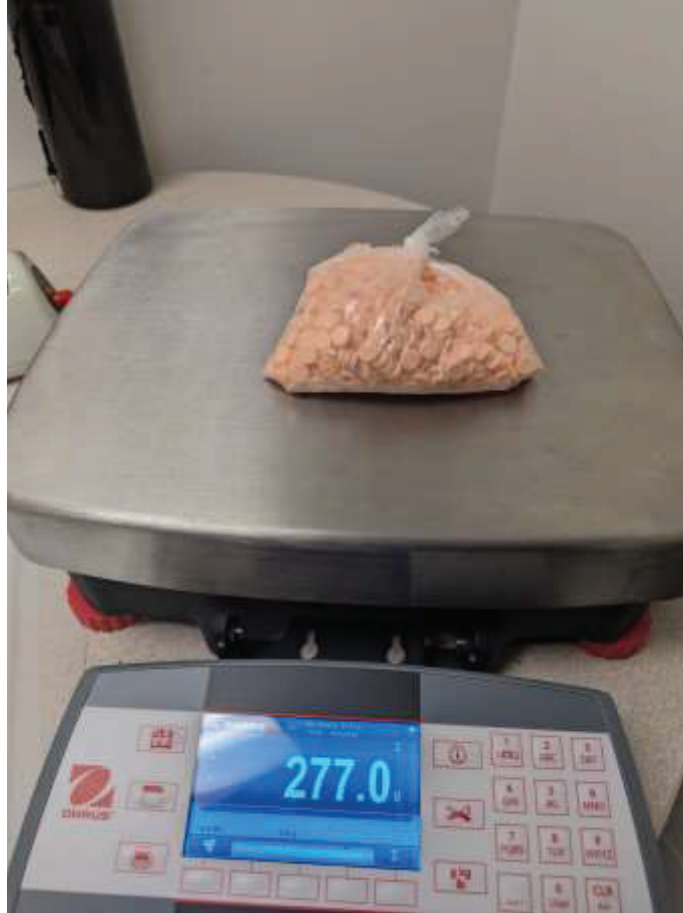
32. CW-█ met RODRIGUEZ inside of the mall which is equipped with CCTV cameras. Two investigators were also inside the mall on foot in order to continue surveillance. At approximately 4:25 PM, RODRIGUEZ instructed CW-█ to enter the mall and then directed them to the bathroom. After meeting in the bathroom to conduct the deal, CW-█ and RODRIGUEZ proceed to walk around the mall. The meeting of CW-█ and RODRIGUEZ was observed by physical surveillance, CCTV, and other audio/visual recording equipment. RODRIGUEZ was observed wearing a black mask, black puffer jacket, and red pants. A screenshot of RODRIGUEZ from CCTV footage follows (CW-█ was walking with RODRIGUEZ at the time and they have been edited out in order to protect their identity.):



33. After CW-█ departed and was met by investigators, RODRIGUEZ remained in the mall for some time while under surveillance by other investigators. At approximately 5:07 PM, RODRIGUEZ exited the mall and was observed walking down the sidewalk near the Cheesecake Factory. RODRIGUEZ then entered a silver Toyota Camry where he pulled his mask down revealing his face. Investigators took a photograph of RODRIGUEZ at the moment when he lowered his mask. I am familiar with the likeness of RODRIGUEZ and know that to be him. A photograph of RODRIGUEZ sitting in the vehicle after the transaction follows:



34. The counterfeit Adderall pills purchased on December 12, 2023, received initial examination at FBI Boston headquarters. The pills weighed 277 grams and field-tested positive for methamphetamine with a Thermoscientific TruNarc Analyzer. The drugs were then sent to the DEA Laboratory and determined to weigh 275.9 grams and contain methamphetamine. A photo of the seized drugs on a scale follows:



G. JUNE 18, 2024 CONTROLLED BUY OF COCAINE

35. On June 18, 2024, CI-[REDACTED]⁸ coordinated the purchase of 250 grams of cocaine from Harvey RODRIGUEZ. This transaction was surveilled by the FBI using both physical and electronic means, including live monitoring of an audio-video recording device carried by CI-[REDACTED] during the controlled buy. Investigators both live monitored the recording as it was generated and reviewed the recording after the

⁸

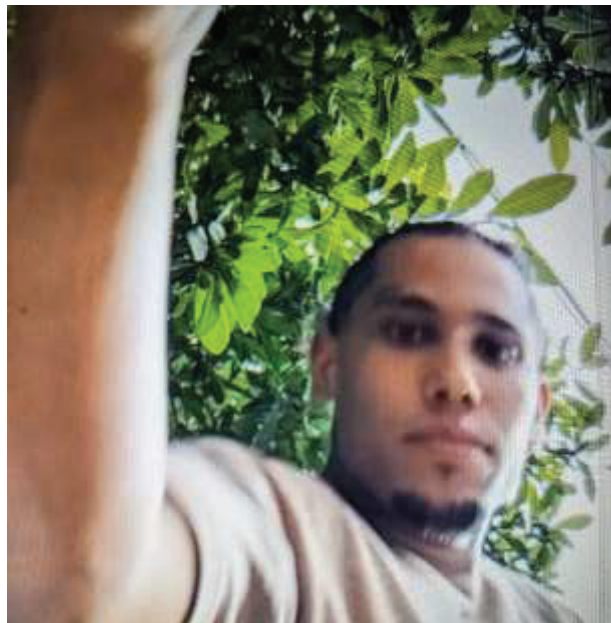
completion of the controlled buy. CI-█ was also debriefed and provided information about the controlled purchase that was consistent with what investigators saw and heard on the recording. Prior to the controlled purchase, CI-█ was searched for contraband and currency with negative results. CI-█ was then provided with an amount of U.S. currency in order to purchase the 250 grams of cocaine from RODRIGUEZ. The controlled purchase can be summarized as follows:

36. On June 18, 2024, CI-█ met with RODRIGUEZ and RODRIGUEZ's associate (the ASSOC.) in the vicinity of █ Washington St, Dorchester, MA. After waiting in the area for some time, investigators observed CI-█, ASSOC., and RODRIGUEZ enter a gray Honda CRV which investigators knew to be an Uber. Investigators maintained surveillance of the vehicle until it dropped all three passengers off in the vicinity of █ Street, Cambridge, MA. RODRIGUEZ told ASSOC. and CI-█ that RODRIGUEZ was going to meet with his drug supplier and instructed CI-42 and ASSOC. to wait on the street until RODRIGUEZ returned.

- a. At approximately 6:21 PM, RODRIGUEZ was observed speaking on his phone before leaving Buckingham Street via Healy Street. Healy Street is relatively short and connects Buckingham and Parker Streets.
- b. At approximately 6:25 PM RODRIGUEZ was observed standing in front of █ Parker Street and Schuyler OPPENHEIMER could be seen at the mouth of the alley between █ Parker and █ Parker. 32-38 Parker Street is a large single structure condominium with two front doors. When facing the building, the left door is marked █ and the right door is marked '█'. Investigators lost sight of both individuals but noted that they did not enter the front doors of █ Parker Street. Investigators believe that both OPPENHEIMER and RODRIGUEZ went down the alley between █ Parker and █ Parker before entering the rear of █ Parker Street
- c. About 30 minutes later, at approximately 6:57 PM RODRIGUEZ was seen emerging from the alley and walking back towards the direction of ASSOC. and CI-42. A photograph taken by investigators conducting surveillance of RODRIGUEZ follows – RODRIGUEZ can be observed with heavily laden pockets crossing Parker Street follows:



37. RODRIGUEZ returned to ASSOC. and CI-█ where RODRIGUEZ apologized for the long wait and mentioned that his drug supplier (referring to OPPENHEIMER) makes his associates turn off their phones as a security measure against law enforcement detection. In the recording, RODRIGUEZ can be seen pulling a package of white substances secured in clear plastic bags out of his right pocket before giving them into the possession of CI-█. Screenshots of the recording showing RODRIGUEZ's face and then the package of cocaine in his hand follow:



38. At approximately 7:34 PM, RODRIGUEZ, ASSOC. and CI- [REDACTED] separately departed the area. Investigators met with CI- [REDACTED] where investigators took possession of the purchased drugs. Investigators took the drug evidence purchased from RODRIGUEZ and OPPENHEIMER and determined the weight to be approximately 245.2 grams before adding additional evidence packaging. Investigators also field tested the white rock like substance which tested positive for Cocaine. The drugs were later tested by the DEA laboratory and determined the substance weighed 222 grams and contained cocaine.

H. JUNE 26, 2024, CONTROLLED BUY OF FENTANYL

39. On June 26, 2024, at the direction of investigators, CI- [REDACTED] facilitated a controlled drug purchase in which they obtained approximately 1,000 fentanyl pills in exchange for an amount of money. The transaction was arranged through RODRIGUEZ. The transaction was audio and video recorded.

40. At approximately 3:40 pm RODRIGUEZ was observed outside of [REDACTED] Road with green pants and a ponytail hair style. RODRIGUEZ entered a Nissan Altima with Florida license plate with two other unidentified individuals. The Altima and passengers then proceeded to [REDACTED] Avenue Woburn, MA where it arrived around 4:55 pm. CI-42 joined the RODRIGUEZ and the unidentified males who began walking around. Photos of RODRIGUEZ with a ponytail and green pants at the drug buy follow:



41. Eventually RODRIGUEZ, the unidentified males, and CI-█ returned to the Nissan Altima. At 5:15 PM, a Honda Accord parked near the subjects and RODRIGUEZ exited the Altima and entered the Accord. The Accord then traveled down the parking area where it stopped near a Chevrolet Malibu. The driver of the Accord got into the Malibu for approximately one minute then returned to the Accord. The Accord then drove back to the Altima where RODRIGUEZ exited and reentered the Altima. Based upon my experience I believe that the operator of the Accord was RODRIGUEZ's drug supplier, who was in turn supplied by the operator of the Malibu.

42. Approximately one minute after RODRIGUEZ returned, CI-█ exited the Altima and walked away. Once investigators were confident that CI-█ would not be seen with handling agents they were retrieved at approximately 5:43 pm. CI-█ surrendered the drugs and was searched with negative results.

43. The seized drugs were blue counterfeit 30mg Percocet pills. The weight before adding FBI packaging was 89.3 grams and the pills fielded tested positive for fentanyl. The drugs were later tested by the DEA Laboratory which determined the substance to be 87.968 grams of fentanyl.

I. REVIEW OF PHONE DERIVED DATA AND COMMUNICATIONS

1. OPPENHEIMER CELLULAR PHONE DATA

44. On May 23, 2024, Schuyler OPPENEHEIMER was arrested at Logan International Airport for state offenses related to violating a restraining order. OPPENHEIMER's phone, with a number ending in 6009 was detained by CBP which conducted an independent extraction of the device. Investigators obtained a search warrant in order to obtain the content of the device. The data from OPPENHEIMER's cellular phone contained chats, images, video, and other data indicative of his continued involvement in the manufacturing and distribution of controlled substances with RODRIGUEZ. OPPENHEIMER has since been charged with drug offenses, in part, related to the information described in this affidavit and is currently awaiting trial. *See United States v. Oppenheimer*, Docket No. 24-CR-10240-FDS.

45. In the data derived from OPPENHEIMER's cellular phone associated with the 6009 phone number, investigators located text messages between OPPENHEIMER and Harvey RODRIGUEZ, where drug distribution and manufacturing are discussed.

- a. For example, investigators located a conversation taking place on February 16, 2024, between OPPENHEIMER (utilizing the 6009) and RODRIGUEZ (utilizing a 5190 number and the alias "jackoswald"). In the conversation, RODRIGUEZ informs OPPENHEIMER that he had obtained four kilograms of controlled substances (believed to be fentanyl or cocaine), and has one kilogram remaining ("I just got 4 whole things tossed to me I got 1 left"). RODRIGUEZ invites OPPENHEIMER to come inspect the kilogram and determine if he can find some customers ("come peep it see if u can get sum jugs"). The next day, RODRIGUEZ sends OPPENHEIMER an image of a kilogram of controlled substances that is vacuum-sealed. OPPENHEIMER responds approvingly ("Shit look litt") and RODRIGUEZ replies that he has a few

more kilograms coming next week (“Got a few of drse coming next week”). The text message conversation follows below:

2/16/2024 3:23:07 PM(UTC-5)	OPPENHEIMER	Yerrr
2/16/2024 3:24:56 PM(UTC-5)	RODRIGUEZ	Bro I just got 4 whole things tossed to me I got 1 left come peep it see if u can get sum jugs I'm going to Cali tomorrow
2/16/2024 3:26:13 PM(UTC-5)	RODRIGUEZ	Il tell u bout Cali in person we gon eat
2/16/2024 3:26:51 PM(UTC-5)	OPPENHEIMER	I just got out here to Boston now
2/16/2024 3:26:53 PM(UTC-5)	OPPENHEIMER	Wya?
2/16/2024 4:23:38 PM(UTC-5)	RODRIGUEZ	Revere
2/16/2024 4:23:44 PM(UTC-5)	RODRIGUEZ	Wya bro
2/16/2024 5:42:12 PM(UTC-5)	RODRIGUEZ	You still out here?
2/17/2024 12:52:16 PM(UTC-5)	RODRIGUEZ	
2/17/2024 12:54:28 PM(UTC-5)	OPPENHEIMER	Shit look litt
2/17/2024 12:54:29 PM(UTC-5)	RODRIGUEZ	Got a few of drse coming next week
2/17/2024 12:54:36 PM(UTC-5)	System Message	Outgoing voice call
2/20/2024 10:58:56 PM(UTC-5)	RODRIGUEZ	U out here?
2/20/2024 10:59:55 PM(UTC-5)	System Message	Big Opp New Jack set disappearing message time to 28800 seconds.

- b. Investigators located another example conversation taking place in November and December 2023 between OPPENHEIMER (utilizing the 6009 phone number) and RODRIGUEZ (utilizing an unknown number, and alias Jared). In the conversation, RODRIGUEZ advises OPPENHEIMER that he has a drug customer purchasing 250 grams (“bout to have a 250 play”) and requests that OPPENHEIMER provide him with an ounce of controlled substances and that he will be able to sell it quickly (“Throw me like a zip ill get it off quick”). RODRIGUEZ indicates that he would

like to hand out samples of the drugs that OPPENHEIMER has available. Based upon the discussed drug weights and terminology used, investigators believe they are discussing cocaine or fentanyl. Shortly thereafter, RODRIGUEZ asks if OPPENHEIMER has any counterfeit Adderall pills (“U got Addie’s?”). OPPENHEIMER responds in the negative (“Nah”) and informs RODRIGUEZ that he has not had the opportunity to manufacture any counterfeit Adderall pills recently (“I ain’t even been able to do non of that shit smh”). A few hours later RODRIGUEZ asks if OPPENHEIMER has “swapped it out”, which I believe to refer controlled substances that OPPENHEIMER returned based on the drugs being low quality. OPPENHEIMER responds that the source of supply (“They”) said the replacement would available by Thanksgiving (“said Thanksgiving”), which means OPPENHEIMER would have the controlled substances in two or three days. Five days later RODRIGUEZ asks what is going on (“Broda wtw”). The next day RODRIGUEZ again asks what is going on, and notes that his customers will go elsewhere (“Broda Wtw dese niggas jus gon go elsewhere”) because they have been calling (“they been calling me”) and RODRIGUEZ continues to avoid their calls (“I just been dubbin em”). RODRIGUEZ then informs OPPENHEIMER he has a sale for 100 grams (“Got jug fa 100”) and the buyer is willing to pay \$1,900 (“He tryn pay 1900 tho”). RODRIGUEZ asks if OPPENHEIMER would like the sale (“U want it?”). On 12/7/23, RODRIGUEZ calls OPPENHEIMER, and OPPENHEIMER states he will call him back. RODRIGUEZ states he has a source of supply of kilograms for a low price (“Got things fa da low bro”). RODRIGUEZ states that he can get uncut controlled substances for \$15,000, and that he will be taking a trip to secure the supply (“I can get u raw fa 15 im bout to take trip”). RODRIGUEZ then states that if OPPENHEIMER comes with him on the trip, that the price will be \$13,000 (“If u come wit me 13”). OPPENHEIMER replies that he is driving and will call him back.

		Content
11/17/2023 3:03:44 PM(UTC-5)	System Message	Missed voice call
11/17/2023 3:03:50 PM(UTC-5)	RODRIGUEZ	Yo
11/17/2023 3:05:01 PM(UTC-5)	System Message	Jared changed their profile name from Bigopp to Jared
11/17/2023 3:05:04 PM(UTC-5)	System Message	Outgoing voice call
11/19/2023 8:29:43 AM(UTC-5)	RODRIGUEZ	Yo bro
11/19/2023 8:29:57 AM(UTC-5)	RODRIGUEZ	Bout to have a 250 play
11/19/2023 8:30:35 AM(UTC-5)	RODRIGUEZ	Throw me like a zip ill get it off quick
11/19/2023 8:30:47 AM(UTC-5)	RODRIGUEZ	Jus so I can hand out samples
11/19/2023 9:02:47 AM(UTC-5)	System Message	Missed voice call
11/19/2023 9:08:16 AM(UTC-5)	System Message	Missed voice call
11/19/2023 9:08:33 AM(UTC-5)	OPPENHEIMER	Yoooo
11/19/2023 9:08:49 AM(UTC-5)	System Message	Incoming voice call
11/19/2023 9:17:06 AM(UTC-5)	RODRIGUEZ	Lmk what times good
11/19/2023 9:24:16 AM(UTC-5)	OPPENHEIMER	I’m getting in the shower now my brudda
11/19/2023 9:24:26 AM(UTC-5)	RODRIGUEZ	U got Addie’s?
11/19/2023 9:24:33 AM(UTC-5)	OPPENHEIMER	Nah
11/19/2023 9:24:44 AM(UTC-5)	OPPENHEIMER	I ain’t even been able to do non of that shit smh
11/19/2023 9:25:02 AM(UTC-5)	System Message	Outgoing voice call
11/19/2023 11:17:05 AM(UTC-5)	System Message	Incoming voice call
11/19/2023 8:26:43 PM(UTC-5)	System Message	Missed voice call
11/19/2023 8:29:55 PM(UTC-5)	RODRIGUEZ	U swapped it out?
11/19/2023 8:42:15 PM(UTC-5)	OPPENHEIMER	They said thanksgiving

11/19/2023 8:42:22 PM(UTC-5)	System Message	So 2-3 days
11/24/2023 2:56:10 PM(UTC-5)	RODRIGUEZ	Outgoing voice call
11/24/2023 3:37:39 PM(UTC-5)	RODRIGUEZ	Broda Wtw
11/25/2023 9:20:50 AM(UTC-5)	System Message	??
11/25/2023 9:22:33 AM(UTC-5)	RODRIGUEZ	Missed voice call
11/28/2023 11:29:33 AM(UTC-5)	RODRIGUEZ	Broda Wtw dese niggas jus gon go elsewhere they been calling me nbs I jus been dubbin em
11/28/2023 11:30:05 AM(UTC-5)	RODRIGUEZ	Got jug fa 100
11/28/2023 11:30:09 AM(UTC-5)	RODRIGUEZ	He tryn pay 1900 tho
12/7/2023 4:48:57 PM(UTC-5)	System Message	U want it?
12/7/2023 4:49:49 PM(UTC-5)	OPPENHEIMER	Unanswered voice call
12/7/2023 4:49:54 PM(UTC-5)	RODRIGUEZ	Give me a second bro ima hit you right back
12/7/2023 4:50:18 PM(UTC-5)	RODRIGUEZ	Got things fa da low bro
12/7/2023 4:50:44 PM(UTC-5)	RODRIGUEZ	I can get u raw fa 15 im bout to take trip
12/7/2023 4:53:14 PM(UTC-5)	OPPENHEIMER	If u come wit me 13
12/7/2023 4:54:59 PM(UTC-5)	RODRIGUEZ	Yo we driving back from the studio ima hit you once I get out this car bro
		light Snm

2. OPPENHEIMER CELLULAR PHONE DATA

46. Investigators also obtained cellular phone data related to OPPENHEIMER. In the data, investigators located a conversation between OPPENHEIMER (using the 6009 phone number) and a phone number ending in 6799 that is believed to be historically used by Harvey RODRIGUEZ. The conversation begins on January 19, 2022, with a message from the 6799 phone number identifying himself as “opp” and that this is his new number and to delete the old phone number (“Yo is opp lock dis number in delete da other one”).

47. On March 4, 2022, the 6799 phone number sent the following messages to OPPENHEIMER on the 6009 phone number:

Yo can niggas slide I got mad shit I gotta pay fa bro we keep delaying it I got mad people on my back

+ I gotta get drac sum bread can I get sum of those u got done up my lil bro gon pay fa em ina couple days gotta keep things rollin w him he’a good bread

48. Investigators believe that in these messages RODRIGUEZ is asking OPPENHEIMER if he can come by OPPENHEIMER’s residence (“can niggas slide”). RODRIGUEZ informs OPPENHEIMER that he needs to provide “drac” (believed to be a street name for a source of supply) with money (“sum bread”) and asks for some of the pills that OPPENHEIMER has completed (“can I get sum of those u got done up”). RODRIGUEZ indicates that his associate (“lil bro”) is going to pay

OPPENHEIMER for the pills in a couple days (“gon pay fa em ina couple days”) and that the associate is trustworthy and requires pills in order to keep making money (“gotta keep things rollin w him he’[s] good bread.”).

49. The conversation continued March 14, 2022, where OPPENHEIMER and RODRIGUEZ discuss payment to be made to OPPENHEIMER once a customer of RODRIGUEZ’s makes a drug sale. The conversation follows:

3/14/2022 1:24:22 PM(UTC+0)	OPPENHEIMER	Top of the morning my G
3/14/2022 1:24:41 PM(UTC+0)	OPPENHEIMER	Yo you think you can hit your man for me today and see if I can grab some of that before I slide tomorrow?
3/14/2022 1:24:53 PM(UTC+0)	OPPENHEIMER	Shit would come in clutch fr
3/14/2022 2:27:55 PM(UTC+0)	RODRIGUEZ	Mornin my brudda he not ready nbs bro he just hit me w 1k yesterday but he's bout to have ya half in full within next couple of days he's gonna need mo I just talked to him yesterday
3/14/2022 2:28:02 PM(UTC+0)	RODRIGUEZ	But I might have another play
3/14/2022 2:28:13 PM(UTC+0)	RODRIGUEZ	Lemme hit em
3/14/2022 2:28:33 PM(UTC+0)	RODRIGUEZ	Lmfao so funny bro
3/14/2022 2:28:36 PM(UTC+0)	RODRIGUEZ	He just hit me rn
3/14/2022 2:28:43 PM(UTC+0)	RODRIGUEZ	🤔🤔🤔
3/14/2022 2:29:09 PM(UTC+0)	RODRIGUEZ	Got a play fa 2k at 2 o'clock he said
3/14/2022 3:01:11 PM(UTC+0)	OPPENHEIMER	Aight bet let's put that together for 2 bro
3/14/2022 3:01:33 PM(UTC+0)	RODRIGUEZ	Bet
3/14/2022 3:01:39 PM(UTC+0)	RODRIGUEZ	Soon I'm up I'll slide bro
3/14/2022 5:14:44 PM(UTC+0)	RODRIGUEZ	Yo
3/14/2022 5:37:04 PM(UTC+0)	RODRIGUEZ	U at the crib?
3/14/2022 5:40:38 PM(UTC+0)	OPPENHEIMER	Yeah pulling up now bro
3/14/2022 10:00:21 PM(UTC+0)	RODRIGUEZ	I'm outside
3/14/2022 10:00:49 PM(UTC+0)	OPPENHEIMER	Liked "I'm outside "
3/14/2022 10:07:32 PM(UTC+0)	OPPENHEIMER	Doors open bro
3/14/2022 10:08:03 PM(UTC+0)	RODRIGUEZ	Bet
3/14/2022 10:17:57 PM(UTC+0)	RODRIGUEZ	Dis nigga talkin bout da nigga dat wanted da work not answering him now

50. Investigators believe that in this conversation, OPPENHEIMER asks RODRIGUEZ to contact RODRIGUEZ’s associate and inquire about an amount owed to OPPENHEIMER for pills that were fronted (“Yo you think you can hit your man for me today and see if I can grab some of that before I slide tomorrow?”). RODRIGUEZ replies that the associate is not ready to pay (“he not ready”) and had only recently paid RODRIGUEZ \$1,000 (“he just hit me with 1k yesterday”). RODRIGUEZ reiterates that the associate will have half of the amount owed in a few days and will need more pills (“he’s bout to have ya half in full within next couple of days he’s gonna need mo”). RODRIGUEZ then informs OPPENHEIMER

that there might be another anticipated sale (“I might have another play”). RODRIGUEZ then states that the associate has a sale for \$2,000 at 2 o’clock (“Got a play fa 2k at 2 o’clock he said”). RODRIGUEZ then arrives at OPPENHEIMER’s residence (“I’m outside”). Fifteen minutes later, RODRIGUEZ informs OPPENHEIMER that the associate did not make the sale because the customer who wanted the drugs (“da nigga dat wanted da work”) is not answering (“not answering him now”).

51. On March 16, 2022, RODRIGUEZ sent OPPENHEIMER a link to a Salem News article related to Vincent CARUSO’s guilty plea in federal court. As noted above, Vincent CARUSO, Harvey RODRIGUEZ, Michael NAGLE, and OPPENHEIMER were all known to associate with one another when CARUSO’s DTO was located in Saugus, Massachusetts.

52. Investigators located a conversation between OPPENHEIMER (utilizing the 6009 phone number) and RODRIGUEZ (utilizing a phone number ending in 8272) taking place on June 28, 2023 and June 29, 2023. In the conversation, it appears that RODRIGUEZ asks “How we looking broad” and informs OPPENHEIMER he has “1 so far”, which likely refers to \$1,000. RODRIGUEZ then asks if OPPENHEIMER has an unidentified item available for the following day (“Got me tomorrow?”). OPPENHEIMER agrees. The following day, RODRIGUEZ tells OPPENHEIMER that he needs the item that day, and that he has people who paid for a whole kilogram and they are pressuring him to pay him back (“get me dat today I got people dat threw down on da whole thing n dey on my back crazy”). Based upon later aspects of the conversation, and information provided by CW-█, investigators believe that RODRIGUEZ is requesting OPPENHEIMER provide him with is a part to a pill press so that he can commence pressing his own pills.

Date / Time	Author	Content
6/28/2023 11:11:15 PM(UTC+0)	RODRIGUEZ	How we looking broda
6/28/2023 11:12:18 PM(UTC+0)	RODRIGUEZ	I got 1 so far
6/29/2023 3:14:43 AM(UTC+0)	RODRIGUEZ	Got me tomorrow?
6/29/2023 4:32:32 AM(UTC+0)	OPPENHEIMER	Liked “Got me tomorrow?”
6/29/2023 4:32:39 AM(UTC+0)	OPPENHEIMER	Yeah I got you bro
6/29/2023 4:44:36 AM(UTC+0)	RODRIGUEZ	
6/29/2023 4:42:59 PM(UTC+0)	RODRIGUEZ	Morning broda
6/29/2023 5:46:06 PM(UTC+0)	RODRIGUEZ	Hit me gang
6/29/2023 6:05:14 PM(UTC+0)	RODRIGUEZ	Bro please get me dat today I got people dat threw down on da whole thing n dey on my

		back crazy
6/29/2023 9:13:12 PM(UTC+0)	RODRIGUEZ	Waiting on her bro

53. The conversation between OPPENHEIMER (utilizing the 6009 phone number) and RODRIGUEZ (utilizing the 8272 phone number) continued on. In this conversation, it appears that RODRIGUEZ continues to ask OPPENHEIMER for the “piece” to the pill press (or potentially an entire pill press) that he referred to in the prior conversation (“I really need dat piece”). OPPENHEIMER indicates that he does not have access to it without his associates (“it’s not about you going anywhere bro i can’t just go and get it bro I don’t got access wit out my ppl”) and that he will go and “take care of that” for RODRIGUEZ the next day (“I’m sliding up there tomorrow to link them and take care of that”). They continue to discuss arranging OPPENHEIMER’s retrieval of the part or press (“but I think today I can grab. It bro, I been. Hitting them to go pull up every day bro”). RODRIGUEZ replies that he understands and notes that he has a lot invested and would like the information about obtaining a press if OPPENHEIMER cannot provide a press itself (“I’m really tapped out at this point I got it all invested if not if u could help me figure out how to get one”). OPPENHEIMER then explains that he has been trying to contact his associates and they are not responding. RODRIGUEZ then asks if OPPENHEIMER can assist him in obtaining another pill press (“Bro I’m not trippin bout dat I jus asked u fa help to figure out another one I understand das dead”). OPPENHEIMER responds that he contacted the usual website he uses but it was not working, and has been checking reviews on websites (“other website I was using is dead to, we had sent a email to them and it bounced back bro, yesterday I was looking up other sites, reviews and all tk try and see what’s valid”).⁹ RODRIGUEZ then tells OPPENHEIMER that he only needs the information for the website and that he will have a female associate do the purchase (“I just need da info n I’ll have dis bitch do it I ain’t tryna bother u I kno u got a million things goin on daily but all I really need is information n I have dis bitch do it”). OPPENHEIMER then states he will send the sites he found for pill presses but cannot

⁹ From review of OPPENHEIMER’s email account, investigators know that OPPENHEIMER sent an email to [REDACTED] on June 1, 2023, with the following content: “Hello, I was trying to access your website but it is showing that the website TDPmolds is no longer active.” Of note, TDPMOLDS.com was subject to sanctions by the U.S. Treasury Department on May 30, 2023. <https://home.treasury.gov/news/press-releases/jy1507>

vouch for them (“Ima send you the sites I found bro, none of them are validated so I can’t vouch for any of them but I’m bout to send it”). OPPENHEIMER then sends two links to websites that sell pill presses and press molds (“https://www.toptdp.com/pill-press-machine/” “http://www.punchdies.com/help-center/payment-shipping/shipping-policy.html”). RODRIGUEZ tells OPPENHEIMER that he should have sent those links through the third-party encrypted application “Signal” (“Dam bro shoulda sent it thru signal lol”). The text message conversation follows:

7/1/2023 2:15:50 AM(UTC+0)	RODRIGUEZ	Wtw gang
7/1/2023 5:35:40 PM(UTC+0)	RODRIGUEZ	Grr
7/1/2023 6:52:59 PM(UTC+0)	RODRIGUEZ	Dam bro im real fucked up I really need dat piece I can go wheeeva n get it bro I been waiting 2 n half weeks
7/1/2023 6:53:36 PM(UTC+0)	RODRIGUEZ	I got dese niggas on my back
7/2/2023 3:43:51 AM(UTC+0)	OPPENHEIMER	Yo bro it's not about you going anywhere bro i can't just go and get it bro I don't got access wit out my ppl,
7/2/2023 3:46:14 AM(UTC+0)	OPPENHEIMER	I'm sliding up there tomorrow to link them and take care of that and bro you ain't been waiting on me for 2 n half weeks bro, you just hit me for that shit a few days ago fr.
7/2/2023 4:30:19 PM(UTC+0)	RODRIGUEZ	Gm bro I was knocked n I was jus saying bro if u not tryna take the ride I can meet anyone wea Eva so u wouldn't have to I ain't mean it no type ah way im jus tryna get things done on dis side I been on pause fa a lil bit now so my bread low n I kno I jus told u bout it cuz I knew u was away on tour bro n I wasn't tryna bother u but It was my mistake cuz I sat fa like a week fa I actually went to try n do it
7/2/2023 5:39:02 PM(UTC+0)	RODRIGUEZ	N yo bro if dat shi still not dead I got a few more people
7/5/2023 5:40:09 PM(UTC+0)	RODRIGUEZ	Yo
7/5/2023 5:40:14 PM(UTC+0)	RODRIGUEZ	N word yet bro?
7/5/2023 5:47:28 PM(UTC+0)	OPPENHEIMER	Give me a second bro I'm on the line, but I think today I can grab. It bro, I been. Hitting them to go pull up every day bro
7/5/2023 5:53:01 PM(UTC+0)	RODRIGUEZ	Ok bro please jus lmk cuz I'm really tapped out at this point I got it all invested if not if u could help me figure out how to get one
7/7/2023 5:08:31 PM(UTC+0)	RODRIGUEZ	Wtw bro
7/7/2023 5:45:04 PM(UTC+0)	RODRIGUEZ	So bro wha is it them niggas jus ignoring u is dat shit dead if so jus lemme kno wea to buy it like bro im really goin thru it cuz I got no motion rn
7/7/2023 5:45:19 PM(UTC+0)	RODRIGUEZ	I wouldn't jus be hittin u fa no reason I was depending on dis shit is all I got goin on rn
7/8/2023 6:33:19 PM(UTC+0)	RODRIGUEZ	Das crazy cuz Really treating me like sum sucka I won't bother u no mo cuz I kno wea we stand
7/8/2023 6:37:31 PM(UTC+0)	OPPENHEIMER	Smh yo bro I told you I been tryna grab that shit bro

		you hitting me like I ain't do you the solid to throw you the shit in the first place, i been told you the situation bro it ain't like I'm sitting here just saying fuck it im not gunna do it
7/8/2023 6:38:34 PM(UTC+0)	OPPENHEIMER	I been tryna get the shit situated bro it's frustrating on my end cuz I'm getting no fucking response from my ppl either bro, I ain't mean to not respond yesterday bro honestly shjt been mad stressful and I just took a break for the day bro
7/8/2023 6:38:46 PM(UTC+0)	RODRIGUEZ	Bro I'm not trippin bout dat I jus asked u fa help to figure out another one I understand das dead
7/8/2023 6:39:54 PM(UTC+0)	OPPENHEIMER	The other website I was using is dead to, we had sent a email to them and it bounced back bro, yesterday I was looking up other sites, reviews and all tk try and see what's valid
7/8/2023 6:40:04 PM(UTC+0)	RODRIGUEZ	I just need da info n I'll have dis bitch do it I ain't tryna bother u I kno u got a million things goin on daily but all I really need is information n I have dis bitch do it
7/8/2023 6:40:10 PM(UTC+0)	OPPENHEIMER	Ima send you what I was looking at, I wasn't tryna send you no scam shjt
7/8/2023 6:40:46 PM(UTC+0)	OPPENHEIMER	Ima send you the sites I found bro, none of them are validated so I can't vouch for any of them but I'm bout to send it
7/8/2023 6:41:20 PM(UTC+0)	OPPENHEIMER	https://www.toptdp.com/pill-press-machine/
7/8/2023 6:41:24 PM(UTC+0)	RODRIGUEZ	Ok bro thank u n is dat other shit dead cuz I had 2 people
7/8/2023 6:41:27 PM(UTC+0)	OPPENHEIMER	http://www.punchdies.com/help-center/payment-shipping/shipping-policy.html
7/8/2023 6:41:50 PM(UTC+0)	RODRIGUEZ	Dam bro shoulda sent it thru signal lol
7/8/2023 6:42:52 PM(UTC+0)	RODRIGUEZ	Ok ima figure it out das all I needed bro thank u I just been fucked up my bro took an L on some shit he not tryna send nun else dis way fa a while like shi been slow on my end
7/8/2023 6:44:11 PM(UTC+0)	OPPENHEIMER	Bro I'm fucked up in the game to bro, shit been OD stressful bro im bout to not have no crib to stay at in a few weeks so I needed to take a break and clear my head bro
7/8/2023 6:44:26 PM(UTC+0)	OPPENHEIMER	I apologize for not getting back to you bro I was just going through it fr
7/8/2023 6:50:40 PM(UTC+0)	RODRIGUEZ	Is ok bro love u bro

54. On July 18, 2023, RODRIGUEZ (utilizing the [REDACTED] phone number) asks OPPENHEIMER when he can meet up with OPPENHEIMER. Investigators know from other text messages sent around this time period and CSLI that OPPENHEIMER was located in Brockton, MA for hours on July 18, 2023. Investigators believe that OPPENHEIMER was likely in Brockton, MA, manufacturing pressed pills in a new location. Investigators believe RODRIGUEZ is asking OPPENHEIMER when they can meet up for a resupply of controlled substances.

7/18/2023 3:52:47 PM(UTC+0)	RODRIGUEZ	Morning broda
7/18/2023 3:52:59 PM(UTC+0)	RODRIGUEZ	Lmk when I can slide on u
7/18/2023 8:25:28 PM(UTC+0)	RODRIGUEZ	Yo

55. Investigators also identified another part of the text message conversation taking place on August 16, 2023, between RODRIGUEZ (utilizing the [REDACTED] phone number) and OPPENHEIMER (utilizing a 6009 phone number). In this part of the conversation, RODRIGUEZ asks if he can come retrieve an item believed to be drugs, because he is out of product (“but can I come grab dat I’m tapped out rn nbs”). RODRIGUEZ then states that he has had difficulty collecting outstanding drug debts (“Waiting to collect dese niggas slow”). RODRIGUEZ then asks OPPENHEIMER when he wants to do “that” because another individual is telling RODRIGUEZ that will need to complete that task during the day (“when do u wanna do that dude saying we gotta try n bang shi out during day”). OPPENHEIMER then asks if RODRIGUEZ had obtained the “piece” for “it”. In this second part of the conversation, investigators believe RODRIGUEZ is asking OPPENHEIMER to coordinate a time when they can make counterfeit pills at a location that is controlled by another individual. It would appear that the press is not readily accessible and is in the possession of another individual who will need to grant them access to the press. OPPENHEIMER then asks if RODRIGUEZ had obtained the part or “piece” needed for the press, which investigators believe is likely a reference to the molds used to form the pressed pills so that they resemble pharmaceutical pills.

		Content
8/16/2023 6:18:44 PM(UTC+0)	RODRIGUEZ	Bro ion even mean to bother u but can I come grab dat I’m tapped out rn nbs
8/16/2023 6:18:57 PM(UTC+0)	RODRIGUEZ	Waiting to collect dese niggas slow
8/16/2023 6:31:38 PM(UTC+0)	OPPENHEIMER	Yeah I can link you my bro, I’m bout to slide back towards Boston in a few minutes
8/16/2023 6:31:43 PM(UTC+0)	OPPENHEIMER	What time you tryna link?
8/16/2023 6:32:28 PM(UTC+0)	RODRIGUEZ	Wheneva bro n when do u wanna do that dude saying we gotta try n bang shi out during day
8/16/2023 6:35:12 PM(UTC+0)	OPPENHEIMER	Did you grab the piece for it ?

3. OPPENHEIMER INSTAGRAM

56. Investigators reviewed data associated with Instagram account utilized by Schuyler OPPENHEIMER, a/k/a “SK”. Investigators located a series of audio messages exchanged between Harvey

RODRIGUEZ's Instagram account username "bigoppzz" and OPPENHEIMER in January 2022. During the exchanges, RODRIGUEZ discusses a recent fight that took place with security at the Encore Casino in which he and another identified individual named "Mikey" were involved. RODRIGUEZ states that he was having difficulty getting through security in order to travel up the elevator to a hotel room. RODRIGUEZ tells OPPENHEIMER that "Mikey" smacked the shit out of a security guard and that RODRIGUEZ "had the pole with the switch in there" and states that he has been banned from the casino (filename: "unified_message_2837796473185398.m4a"). In one message, RODRIGUEZ tells OPPENHEIMER that he provided a fake name to the casino security and may in fact be able to return. I believe that RODRIGUEZ referring to his being in possession of a "pole with the switch" refers to the fact that during the struggle RODRIGUEZ was in possession of a firearm equipped with a machinegun conversion device.

57. I have obtained records and surveillance footage from the Encore Hotel and Casino in Everett, MA, and confirmed that this incident did in fact take place, on January 24, 2022. During the video, RODRIGUEZ can be observed in the company of Lawrence Michael NAGLE. I know from review of casino records related to the incident and review of the video footage that RODRIGUEZ was present during the incident and that the "Mikey" referred to in this incident is Lawrence Michael NAGLE.¹⁰

58. The surveillance video reflects multiple BOE associates entering the Encore casino with RODRIGUEZ and NAGLE, and other individuals believed to be associated with NAGLE. Still images from the incident follow with RODRIGUEZ identified with a red box.

- a. The first set of images depict RODRIGUEZ entering the Encore casino. RODRIGUEZ can be observed wearing the following: (1) in jeans with star embellishments, (2) winter hat with white writing, (3) black jacket and blue shirt, and (4) sneakers with predominantly white and red coloring. Notably, the "Big Opp" diamond-encrusted chain is also visible around RODRIGUEZ's neck. Multiple sources of information have informed investigators that this chain was stolen from RODRIGUEZ by rival gang members and he has never been able to recover it.

¹⁰ Investigators know from review of the footage from the Encore Casino and related records that "MIKEY" referred to in this message is Lawrence Michael NAGLE, who was federally indicted for drug conspiracy and related offenses. See *United States v. Nagle*, Docket No. 22-cr-10325-FDS.



- b. The fight in fact took place by the elevators in the Encore casino that allow access up to the hotel. The large group of RODRIGUEZ and NAGLE associates approach the elevator and appear to be denied entry. It appears that NAGLE confronts security and at one point pushes or slaps a male security guard by the elevator. In the images below, NAGLE can be seen confront a male security officer while a female security guard stands in between. NAGLE's arm then extends and slaps the male security guard.





- c. The fight then ensues between the groups and security. Still images follow depicting the initial slap and struggle in front of the elevators that then continues out into the area leading to the elevators.



59. As the fight flows out into the hall leading to the elevators, RODRIGUEZ stands over NAGLE who is being held by Encore security. It appears that RODRIGUEZ attempts to free NAGLE and is then physically engaged by one of the Encore security guards.



4. RODRIGUEZ PHONE DATA

60. Investigators reviewed data derived from RODRIGUEZ's cellular phone. The data related the period of approximately September 2022 through January 2023.

61. A "Note" in the RODRIGUEZ data stated the website of Lemelange.com, and dye colors that investigators know are used in the manufacturing of counterfeit pills. This particular website was a source of pill manufacturing ingredient also utilized by OPPENHEIMER and was described at length in the affidavit supporting the criminal complaint against OPPENHEIMER. The note read as follows:

<https://lemelange.com/>

Blue #1 blue # 2

Yellow # 10

62. Investigators located a number of photographs of depicting quantities of controlled substances, including what appear to be pressed pills and stamped and sealed quantities of white substances

believed to be cocaine or fentanyl. Some of the identified images and videos follow with pertinent notes regarding the image.

Date	Image / Still Image from Video	Note
10/17/2022		Filename: 9a84243e-0ec3-405e-9c69- 115da55d6db1.jpg Image depicts a number of pills in a plastic bag.

11/1/2022		Filename: 82c8426d-7799-467b-9162-50cbddb0ef4a.jpg Image depicts what appears to be a kilogram quantity of a white powder substance in a vacuum sealed package with the letters T680.
9/10/2022		Filename: IMG_0028.heic / IMG_0028.mov The image and video depict what appears to be a kilogram quantity of white powder substance that investigators believe to be fentanyl or cocaine in a vacuum sealed package with the stamp of a horse. It appears that a knife has been used to cut open the package.

5. RODRIGUEZ TEXT MESSAGES

63. Investigators also located a number of text message conversations in the RODRIGUEZ data utilizing the iMessage application. For each of the text message conversations, RODRIGUEZ utilized the 8272 phone number.

64. Investigators located a text message conversation between RODRIGUEZ (utilizing the 8272 phone number) and CC-1 (utilizing a 6704 phone number). In the conversation, there is extensive discussion concerning the production of CC-1's music, drug distribution, and other aspects of promoting the reputation and image of BOE. Pertinent examples follow:

- a. In one portion of the conversation on October 18, 2022, CC-1 tells RODRIGUEZ that they are going to "get Breezo," referring to an individual whose identity is known to me, "ASAP" ("Nbs we gonna get breezo) and RODRIGUEZ agrees, replying say no more ("Snm Les get it"). I am aware from other interviews conducting during this investigation that the individual whose true name I know and whom I will refer to as "BREEZO," consistent with RODRIGUEZ, was in fact a drug customer of RODRIGUEZ who was provided a kilogram of cocaine on consignment. BREEZO then claimed that the kilogram had been seized by police, but RODRIGUEZ and his associates in BOE did not believe this story to be true. According to multiple witnesses, RODRIGUEZ and others involved went to the Alta Clara apartment leased by RODRIGUEZ under a false name in order to force BREEZO to return a kilogram of cocaine that RODRIGUEZ had provided to BREEZO. Multiple criminal associates of RODRIGUEZ were present with at least one firearm when BREEZO was threatened and in fact beaten as part of RODRIGUEZ's efforts to secure return of the kilogram of cocaine. Ultimately, the kilogram was returned.

DATE	AUTHOR	<u>Content</u>
10/18/2022 10:04:43 PM(UTC+0)	RODRIGUEZ	Nigga
10/18/2022 11:46:05 PM(UTC+0)	CC-1	Nbs we gonna get breezo
10/18/2022 11:46:09 PM(UTC+0)	CC-1	ASAP
10/19/2022 3:14:13 AM(UTC+0)	RODRIGUEZ	Snm Les get it

- b. In another portion of the conversation on December 16, 2022, RODRIGUEZ invites CC-1 to drive and pickup "sum thing", which investigators believe refers to pills. RODRIGUEZ then tells CC-1 that they need to "sell" the things that they are going to pickup ("Bro we gotta sell dese double up"). RODRIGUEZ describes the things as the you know what ("is da u kno wha"), which investigator believe means fentanyl. RODRIGUEZ then tells CC-1 that he "can get all types" at a low price ("N fa da low").

DATE	AUTHOR	<u>CONTENT</u>
12/16/2022 3:23:22 PM(UTC+0)	RODRIGUEZ	Bout to go pick up sum things u wanna come take da ride
12/16/2022 3:23:35 PM(UTC+0)	CC-1	Come
12/16/2022 3:23:37 PM(UTC+0)	RODRIGUEZ	Wha we needed

12/16/2022 3:23:40 PM(UTC+0)	CC-1	I'm bored as shit
12/16/2022 3:23:44 PM(UTC+0)	CC-1	Been up for hours
12/16/2022 3:23:50 PM(UTC+0)	CC-1	Making scripts
12/16/2022 3:23:51 PM(UTC+0)	RODRIGUEZ	Bro we gotta sell dese double up
12/16/2022 3:24:19 PM(UTC+0)	CC-1	Lgi bro no cap
12/16/2022 3:24:24 PM(UTC+0)	CC-1	Come grab me
12/16/2022 3:24:26 PM(UTC+0)	RODRIGUEZ	Is da u kno wha
12/16/2022 3:24:30 PM(UTC+0)	CC-1	Yessirrr
12/16/2022 3:24:32 PM(UTC+0)	RODRIGUEZ	I can get all types
12/16/2022 3:24:34 PM(UTC+0)	RODRIGUEZ	Now
12/16/2022 3:24:37 PM(UTC+0)	RODRIGUEZ	N fa da low
12/16/2022 3:24:44 PM(UTC+0)	RODRIGUEZ	No mo than 500 he said
12/16/2022 3:24:58 PM(UTC+0)	RODRIGUEZ	Ima lyk when we dippin
12/16/2022 3:25:02 PM(UTC+0)	CC-1	Bet
12/16/2022 3:25:14 PM(UTC+0)	CC-1	Loved "N fa da low "
12/16/2022 3:25:20 PM(UTC+0)	CC-1	Loved "I can get all types "

- c. In another portion of the conversation on December 21, 2022, CC-1 tells RODRIGUEZ to bring him "28", which investigators believe refers to 28 grams of drugs, likely cocaine. CC-1 states that he is trying to line up some sales ("try n get some moves").

		<u>CONTENT</u>
12/21/2022 7:31:15 PM(UTC+0)	CC-1	Bring me 28 gotta try n get some moves
12/21/2022 8:17:52 PM(UTC+0)	CC-1	Grab me after you grab the whip
12/21/2022 8:21:42 PM(UTC+0)	RODRIGUEZ	Bet

- d. In another portion of the conversation on December 22, 2022, CC-1 tells RODRIGUEZ that he needs an ounce or two ("Need like zip or 2 brudda") in order to make some money. RODRIGUEZ agrees.

<u>DATE</u>	<u>AUTHOR</u>	<u>CONTENT</u>
12/22/2022 5:30:33 PM(UTC+0)	RODRIGUEZ	One sec bro in shower lol
12/23/2022 3:29:55 PM(UTC+0)	CC-1	Need like zip or 2 brudda
12/23/2022 3:29:59 PM(UTC+0)	CC-1	Gotta make some bread
12/23/2022 6:45:14 PM(UTC+0)	RODRIGUEZ	Got u bro

- e. In another exchange on November 17, 2022, RODRIGUEZ asks CC-1 where RODRIGUEZ's firearm is ("Bro wea tf is my blick").
- f. In another exchange on September 10, 2022, CC-1 asks RODRIGUEZ if anyone has a firearm ("No one got a pole or none"). RODRIGUEZ replies that he does ("I do").

65. Investigators located a text message conversation between RODRIGUEZ (utilizing the 8272 phone number) and a contact that I will refer to as "Customer 1" (utilizing a phone number ending in 5860). In the conversation, there is extensive discussion concerning the sale of drugs to Customer 1 by RODRIGUEZ. Pertinent examples follow:

- a. On September 17, 2022, Customer 1 asked RODRIGUEZ how much he was charging per gram (“How much a g”) and informed RODRIGUEZ that she pays \$32 a gram at the moment (“Rn i pay 32”). RODRIGUEZ then tells Customer 1 that he can sell her half of one ounce for \$850 (“I can do u 850”). Customer 1 then begins to inquire about prices for 4 ounces, or 62 grams for \$2,000 (“Or a 62 2k”), at approximately \$31 or \$32 per gram (“31-32 a g”). RODRIGUEZ replies that he will sell her 250 grams for \$7,500 (“I’ll jus throw u 250 fa 7500”), which equates to \$30 per gram. Customer 1 then asks for 125 grams for \$3,500 (“Or 125 3500”), which equates to \$28 per gram. Later in the conversation, RODRIGUEZ indicates that he will sell Customer 1 250 grams for \$7,000 (“give u 250 fa 7 flat”).

9/17/2022 12:08:36 AM(UTC+0)	Customer 1	How much a g
9/17/2022 12:08:47 AM(UTC+0)	Customer 1	Rn i pay 32
9/17/2022 12:10:19 AM(UTC+0)	Customer 1	Lol @the contact bitmoji 🧐
9/17/2022 12:17:53 AM(UTC+0)	Customer 1	7 min
9/17/2022 12:20:54 AM(UTC+0)	Customer 1	3
9/17/2022 12:22:53 AM(UTC+0)	RODRIGUEZ	Bet
9/17/2022 12:23:27 AM(UTC+0)	Customer 1	How muchh
9/17/2022 12:23:43 AM(UTC+0)	RODRIGUEZ	900
9/17/2022 12:23:51 AM(UTC+0)	Customer 1	For a half?
9/17/2022 12:29:25 AM(UTC+0)	Customer 1	I moved in thr corner
9/17/2022 12:29:41 AM(UTC+0)	Customer 1	If u walkin across then to the left
9/17/2022 12:31:01 AM(UTC+0)	Customer 1	&I need better prices if i grab more I already get it for this lol
9/17/2022 12:50:12 AM(UTC+0)	Customer 1	Yeah grease i got the same exact shit lol
9/17/2022 11:09:12 PM(UTC+0)	RODRIGUEZ	Loved “Yeah grease i got the same exact shit lol”
9/17/2022 11:10:13 PM(UTC+0)	RODRIGUEZ	My fault I thought I hit u back but I told u lol
9/17/2022 11:10:35 PM(UTC+0)	RODRIGUEZ	Got Betta shit on da way
9/17/2022 11:28:52 PM(UTC+0)	Customer 1	Its cool and ok bet
9/17/2022 11:29:03 PM(UTC+0)	Customer 1	I already get these numbers tho lol
9/17/2022 11:29:40 PM(UTC+0)	Customer 1	& greasee too
9/18/2022 12:07:09 AM(UTC+0)	RODRIGUEZ	I can do u 850
9/18/2022 12:11:40 AM(UTC+0)	Customer 1	No like i grab 4&a baby
9/18/2022 12:12:27 AM(UTC+0)	Customer 1	3900
9/18/2022 12:13:13 AM(UTC+0)	Customer 1	Or a 62 2k
9/18/2022 12:13:28 AM(UTC+0)	Customer 1	31-32 a g
9/18/2022 12:13:36 AM(UTC+0)	RODRIGUEZ	I’ll jus throw u 250 fa 7500
9/18/2022 12:14:46 AM(UTC+0)	Customer 1	Have those numbers thoo
9/18/2022 12:14:55 AM(UTC+0)	Customer 1	Need like 7flat
9/18/2022 12:14:59 AM(UTC+0)	Customer 1	Or 125 3500
9/18/2022 12:18:33 AM(UTC+0)	RODRIGUEZ	Lol I got u goof
9/18/2022 12:19:22 AM(UTC+0)	Customer 1	Ok bet lol 🤔
9/18/2022 12:20:31 AM(UTC+0)	RODRIGUEZ	Jus lmk when u ready
9/18/2022 12:25:17 AM(UTC+0)	Customer 1	Im goin to fl wed to sat so wen I get back sat
9/18/2022 6:35:29 PM(UTC+0)	RODRIGUEZ	Bet
9/18/2022 6:35:43 PM(UTC+0)	RODRIGUEZ	U gon b ready w dat fa u leave?
9/18/2022 6:36:18 PM(UTC+0)	Customer 1	Wymm
9/18/2022 6:36:44 PM(UTC+0)	Customer 1	I gave her the bread wen I grabbed it
9/18/2022 6:36:52 PM(UTC+0)	RODRIGUEZ	Oh fr?
9/18/2022 6:36:57 PM(UTC+0)	Customer 1	Yes

9/18/2022 6:37:54 PM(UTC+0)	RODRIGUEZ	
	Customer 1	I thought u wanted me to buy it to try b4 u threw me some lol
9/18/2022 6:37:58 PM(UTC+0)	Customer 1	I gave her 9
9/18/2022 6:39:13 PM(UTC+0)	RODRIGUEZ	Na I was gon let u try it before lol but ok snm
9/18/2022 6:39:27 PM(UTC+0)	RODRIGUEZ	When u get back I'll jus give u 250 fa 7 flat
9/18/2022 6:40:00 PM(UTC+0)	Customer 1	Oh lol wasnt hip & ok bet ill hit u wen i touch downn
9/18/2022 6:40:16 PM(UTC+0)	RODRIGUEZ	I don't mind throwin u work I kno u good fa it 🤔

- b. On October 2, 2022, RODRIGUEZ inquires about the repayment of the drug debt owed by Customer 1 ("Is iight how we lookin"). Customer 1 replies that she will pay \$2,500 or \$3,000 this weekend and her business was slow ("Ill giv u 2500/3k tm, this weekend was kinda slow thoo"). Customer 1 then asks when she obtained the drugs from RODRIGUEZ and he agrees that it was a week ago, but notes that he has some new drugs arriving soon that his associates are saying is much better quality ("Yea a week ago das smooth got sum fiyaa on da way niggas is saying is better").

10/2/2022 11:34:47 PM(UTC+0)	RODRIGUEZ	Is iight how we lookin
10/2/2022 11:37:33 PM(UTC+0)	Customer 1	Ill giv u 2500/3k tm, this weekend was kinda slow thoo
10/2/2022 11:40:24 PM(UTC+0)	Customer 1	Wen did i grab it last Sunday rightt
10/2/2022 11:44:58 PM(UTC+0)	RODRIGUEZ	Yea a week ago das smooth got sum fiyaa on da way niggas is saying is better
10/2/2022 11:47:42 PM(UTC+0)	Customer 1	Ok bet ill see u tmm

- c. On October 7, 2022, RODRIGUEZ again inquires about the outstanding drug debt with Customer 1 ("how long till u got da rest of dat"). Customer 1 replies it will take about a week, and RODRIGUEZ replies he needs the money sooner than that and indicates he cannot be waiting three weeks for \$7,000 ("I need dat bread sooner g I can't b waiting 3 weeks fa 7 bands"). RODRIGUEZ explains that he would have already sold the drugs and been paid by another customer and he provided the drugs to Customer 1 at a very low price so he is losing money ("I woulda already flipped dat n I'm throwing u a crazy number so I'm losing"). Customer 1 replies that her sales have been slow, and the individuals who buy large quantities already have drugs – Customer 1 then proposes returning 125 grams to RODRIGUEZ so he can sell it ("Its been slow everyone who buys bulk already got work, i can give u a 125 back and u can flip it"). Customer 1 then remarks that she usually clears \$12,500 per week, and the timing of when she obtained the drugs caused her to miss a weekend ("Usually i clear a 125 a week but wasnt boomin last weekend" "& i grabbed it on a sunday so i missed that whole weekend to clear it"). RODRIGUEZ agrees to the return of the drugs.

<u>DATE</u>	<u>AUTHOR</u>	<u>CONTENT</u>
10/7/2022 1:58:16 PM(UTC+0)	RODRIGUEZ	Yo how long till u got da rest of dat
10/7/2022 2:30:59 PM(UTC+0)	Customer 1	Probably week
10/7/2022 2:31:30 PM(UTC+0)	RODRIGUEZ	I need dat bread sooner g I can't b waiting 3 weeks fa 7 bands
10/7/2022 2:32:19 PM(UTC+0)	RODRIGUEZ	I woulda already flipped dat n I'm throwing u a crazy number so I'm losing

	Customer 1	Its been slow everyone who buys bulk already got work, i can give u a 125 back and u can flip it
10/7/2022 2:34:08 PM(UTC+0)	Customer 1	Usually i clear a 125 a week but wasnt boomin last weekend
10/7/2022 2:34:24 PM(UTC+0)	Customer 1	& i grabbed it on a sunday so i missed that whole weekend to clear it
10/7/2022 2:34:59 PM(UTC+0)	RODRIGUEZ	Yeah fuck it bring it 🙏
10/7/2022 2:35:30 PM(UTC+0)	RODRIGUEZ	I'll have mo on Monday anyways
10/7/2022 2:35:34 PM(UTC+0)	Customer 1	I cant rn i gotta go to Plymouth for showings but wen i get back around 2/3:00
10/7/2022 2:35:43 PM(UTC+0)	RODRIGUEZ	Das perfect

a. Conversations with FRANCIS FORSYTH, Jr.

66. Investigators are familiar with Francis FORSYTH, Jr., a/k/a “Kranko,” who has a date of birth xx/xx/1999. FORSYTH pleaded guilty to Indictment from Suffolk Superior Court charging him with trafficking in 36 grams or more of a class B substance. That case relates to an April 11, 2022, search warrant at FORSYTH’s residence in East Boston, where approximately 70 grams of fentanyl were recovered. FORSYTH was charged that day and posted bail. Based on the investigation thus far, investigators believe that the fentanyl pills recovered during the search warrant were in fact obtained from RODRIGUEZ. FORSYTH has since pleaded guilty to this case and was sentenced to 30 months in the house of correction. *See Commonwealth v. Forsyth*, Suffolk Superior Court, Docket No. 2284CR00718. The filed statement of the case in Suffolk Superior Court states as follows:

- a. On April 8, 2022, members of the Winthrop Police Department and Boston Police Departments executed a search warrant for the residence of [REDACTED] in East Boston. Once inside, Ms. Constantino (wife of Mr. Forsyth Sr. and mother of Mr. Forsyth Jr.) told officers where everyone's bedrooms were. From the bedroom that Mr. Forsyth Jr. shared with his girlfriend, officers recovered 8 plastic bags of blue pills marked A 215 that were tested and found to contain 73.71g fentanyl. Mr. Forsyth Jr. later admitted to possessing all of the pills found inside of his bedroom. Officers also executed a search warrant for Mr. Forsyth Jr.'s person, and they recovered an iPhone as well as \$770.

67. Investigators are also familiar with a separate Drug Enforcement Administration (DEA) investigation of FORSYTH taking place in 2022, while FORSYTH was on pretrial release for the April 11, 2022, state search warrant case. Specifically, investigators have reviewed audio and video recordings of FORSYTH selling CW- [REDACTED] two firearms and 1000 blue pressed fentanyl pills. FORSYTH was federally

charged with these offenses, pleaded guilty, and was sentenced to 47 months imprisonment. *See United States v. Francis Forsyth*, Docket No. 24-cr-10103-FDS.

- a. On March 23, 2022, CW-27 made a recording of a Facetime call with FORSYTH. During the conversation, CW-27 spoke with FORSYTH about the purchase of a firearm. Investigators have reviewed the recording, and an accurate transcript of the pertinent portion of the recording follows. During the recording, FORSYTH discusses having a source of supply for firearms, including ghost guns (“ghost”) and then indicates that the source of supply owes him a firearm already:

FF: Let me know.

CW-27: Fuck it, I’ll just get a ghost then. Is that – - Is that - Is that easier? Is that – Is that easier?

FF: (Speaking at the same time as CW-27): Yeah, that’s probably (inaudible) on everything else. I’ll be able to get you a good ticket on it.

CW-27: Yeah, I – I obviously can’t give you the things for them anymore.

FF: I know, yeah I know. Yeah, nah, I’ll you a good ticket though. That’s why it was – it was easier, you know what I’m saying?

CW-27: Yeah.

FF: Like that was easier. But now it goes (inaudible) enough to my pocket like a band or something.

CW-27: Yeah, well I got – I’ll give you whatever – whatever it costs, I’ll give it to you.

FF: Yeah.

CW-27: I got – I got cash.

FF: I’m supposed to meet – meet up with the kid tonight. ‘Cause he owes me – he owes me one, so he’s about to bring me money anyway, and I’m just gonna put in the order for yours, and he’ll let me know tonight when it’s gonna be in.

CW-27: Alright, alright. Just let me know.

FF: I’ll just let you know, you know what I mean? I can have enough –

CW-27: Just – Just make sure you FaceTime me. Don’t – Don’t send no text or

anything.

FF: Yeah, no I got you, I got you. Yeah, but I should call you – When I’m with him, I’ll call you tonight.

CW-27 Alright, let me know. And just send me –

FF: Alright.

CW-27: Just let me know the price, and I’ll – I’ll give it to you.

- b. On April 11, 2022, CW-27 made a recording of Facetime calls with FORSYTH where FORSYTH spoke about law enforcement conducting a search of his residence (the East Boston Search warrant case) and police seizing 800 fentanyl pills.
- c. On June 6, 2022, FORSYTH sold CW-27 an AK-47 rifle with an obliterated serial number, and 223 rounds of 7.62x39mm ammunition, for \$2,200. This transaction was audio recorded. In a number of audio recordings before and afterward, FORSYTH discusses the sale of the AK-47, and the fact that it was stolen. Prior to the purchase, CW-27 made a number of recordings of Facetime calls with FORSYTH on May 13, 2022, June 2, 2022, and June 6, 2022, to arrange the purchase of the AK-47. During prior recordings regarding the sale of this AK-47, FORSYTH stated that RODRIGUEZ was the original buyer for the weapon after the death of “40” (who investigators know to be David MARTINEZ, a/k/a “40,” who was murdered in September 2020, along with a second individual in Charlestown, Massachusetts). I am also aware that RODRIGUEZ was a relation of MARTINEZ, and that following the murder of MARTINEZ, RODRIGUEZ was believed to have put a \$100,000 on the heads of CARUSO and ERNEST JOHNSON (charged and convicted in *U.S. v. Johnson*, Docket No. 22-CR-10103-LTS).¹¹ A transcript of that May 13, 2022, recording follows:

¹¹ According to information from CW-9 and CI-5, as a result of MARTINEZ’s murder, RODRIGUEZ and RODRIGUEZ’s associates, who were formerly aligned with CARUSO did not agree with the murder of MARTINEZ and purportedly placed a \$100,000 bounty on CARUSO’s head for killing MARTINEZ. CARUSO and JOHNSON repeatedly referenced this bounty in various interceptions made by a cooperating witness and JOHNSON has also repeatedly referenced it in videos that he posts online to social media accounts that he controls. During the investigation of Operation Street Sweeper, Vincent CARUSO, a/k/a “FATZ” was captured on recording during a call in May 2021, where he discussed the fact that a mutual acquaintance (who I will refer to as “M-A”) was known to have been spending time with RODRIGUEZ and Big Opp Entertainment, who was then responsible for the \$100,000 bounty on CARUSO’s head. CARUSO states “your man [M-A] is going to end up in a real fucked up situation” because he was spending time with the rival drug dealers. CARUSO states, “it’s about to get real 40ish. Not with [M-A]. I would never do that to [M-A]. But it’s about to get real 40ish, on dogs. You know who I’m talking about.” I believe in this statement CARUSO is stating that he is contemplating procuring the murder of RODRIGUEZ in the same manner that he procured the murder of MARTINEZ, and uses the

CW-27:	I still got the all black AK – the real black AK-47.
FF:	Yeah. They (inaudible), n****.
CW-27:	N****, I'll – I'll take that. You just sell me that shit.
FF:	That shit's expensive.
CW-27:	How much you want for it? I'll give it to you right now.
FF:	I paid – I paid like 27 hundred for that.
CW-27:	Nah I'll give you 27 hundred right now.
FF:	I got the – the K with like 4 clips, and there's like bags, like this big, filled – filled with food. Like filled – If there's a zombie apocalypse, I'll -
CW-27:	Yo, let me get it, n****. I'll buy that off you, bro.
FF:	Yeah we would have – The only thing that – Yeah, I would have to go get it. It's in Winthrop, you feel me? So
CW-27:	It's in Winthrop?
FF:	Yeah it's at my granny's.
CW-27:	Oh my god.
FF:	But I'll definitely be able to get it. I just got to be smooth, you feel me? I got mad shit at my granny's
CW-27:	Bro they didn't go to your grandma's house?
FF:	Yeah if they go to my grandma's I'm fucked. But they don't – They don't be going there.
CW-27:	You gotta be careful, n****.
FF:	Nobody stay there, you feel me? Like it's literally my grandma.
CW-27:	This n**** got everything at the granny's crib.
FF:	I got all (inaudible). I got the FN, I got – But I got it like, put up. Like it's not just in her crib, you feel me, like.
CW-27:	Yeah.

nickname of MARTINEZ (“40”) to synonymize the murder he is contemplating (“40ish”) against the rival drug dealers (“you know who I’m talking about”).

FF:	It's put up, you feel me? Like that shit gonna be hard to get at.
CW-27:	Yeah I'll buy that shit.
FF:	'Cause she got – She got a crazy ass basement. She got like walls that are like damaged from like flood 'cause she lives on the beach. So it's like in the walls, you feel me? That shit crazy though.
CW-27:	You gotta get me that, yeah I'll buy that.
FF:	Yeah no if you want – Bro I don't – I don't even need it. If you want you that, that was -
CW-27:	'Cause I'll sell that for like 4 bands to fucking little ass n**** in Salem.
FF:	Yeah no bullshit. 'Cause that shit, bro, it dog shit. Big, big dog shit.
CW-27:	Well I'll use it. Feds come, I'll use that shit. Shit I'll go to war with them n****s.
FF:	Big motherfucking K, it's all black too. Like it's not like them ugly wood (ink). It's all black, it got like the army grip. The army grip fucking clips. It got like 4 different magazines, all different sizes. 30, 50. Like all different banana clips, no drums or nothing.
CW-27:	Yeah it's crazy. I think you showed me a picture of that once.
FF:	I did.
CW-27:	Yeah.
FF:	I brought Ty – Bro, when all that shit happened with Harv's mans or whatever, that dude that got shot, Harv called me and was like, yeah bro, I'mma need some – some, you feel me, this and that. I'm like –
CW-27:	Yeah he called me too. It was at night, right? At nighttime, about that Spanish n****, what's his name? He got – He got into it at the club and said some n****s were after him or something.
FF:	Nah this is when his boys got killed back then.
CW-27:	Oh, yeah.
FF:	40 got shot at Charlestown or whatever. And he called me like, yeah shit's about to get crazy, this and that, like I need some big shit, some (whoop whoop). So I'm like, alright, like I hit him up like yo, them n****s got all black K. I'mma get that for you, come – I'mma get everything with it, you feel me? Like basically, fully loaded, like all type of shit with it, and he's like alright bet, say no more, get it, and n**** stopped answering. I talked to him the next few days, I'm like yo, like I got this shit, like what's up? He's like, oh I'mma let you know bro, like I'm not even (inaudible) right now and just, yeah, I got stuck with n****. But then at one point I

	was like fuck it, this shit's crazy anyway. I was like, (inaudible). It is what it is.
CW-27:	Yeah that shit's lit. N**** I'll take that, I'll definitely get that.
FF:	Yeah, a hundred percent. I got you.
CW-27:	I'm going – I'll go to Winthrop. I'll go rent a car and fucking go and pick it up.
FF:	Yeah. No I can go it, so I'll get it. Damn, it's not even like I could bring it here. Like even here is more hot.

- d. On July 11, 2022, FORSYTH sold CW-27 a Glock .40 caliber pistol for \$1,400. This firearm was comprised of a Glock upper and a Polymer80 lower. During the conversation for the sale of the Glock, CW-27 arranged for the purchase of 1,000 pressed fentanyl pills from FORSYTH for \$2,000. This transaction on July 11, 2022, was audio-video recorded and FORSYTH can be observed handling the firearm in the recording.
- e. On July 14, 2022, FORSYTH sold CW-27 1,000 blue pressed fentanyl pills bearing the M30 stamp for \$2,000. This transaction on July 14, 2022, was audio-video recorded and FORSYTH can be observed in the recording pulling the pills out of his pocket and handling the pills before passing them to CW-27. The pressed fentanyl pills were tested at the DEA laboratory and determined to contain fentanyl and weight 145 grams.

68. During the review of RODRIGUEZ's phone data, investigators identified a text message conversation between RODRIGUEZ (utilizing the 8272 Phone Number) and FORSYTH. In the text message conversation, they discuss the distribution of controlled substances, and the purchase of diamond chains. Pertinent examples follow:

- a. On December 9, 2022, FORSYTH and RODRIGUEZ discussed the price for buying a diamond-encrusted ("fully flooded") 700 gram gold chain ("700 gram Cuban"). During the discussion, FORSYTH states that he has a 200 gram chain that he purchased for \$20,000, but it is not diamond encrusted ("I got a 500 gram for 20 bands but is plain"). Investigators believe they are discussing the expenditure of drug proceeds to make these purchases.

		Content
12/9/2022 12:55:29 AM(UTC+0)	FORSYTH	What would a 700 gram Cuban fully flooded cost?
12/9/2022 12:55:40 AM(UTC+0)	FORSYTH	The 700 plain is around 28k so base if off that
12/9/2022 12:56:31 AM(UTC+0)	RODRIGUEZ	700 grams fully flooded depends on das diamonds but is up there bro
12/9/2022 12:56:41 AM(UTC+0)	RODRIGUEZ	60-70
12/9/2022 12:56:47 AM(UTC+0)	FORSYTH	60 70 huhhhh
12/9/2022 12:57:30 AM(UTC+0)	RODRIGUEZ	It depends on da diamond quality but ya bro like I got mine fa 45 n is 500 grams
12/9/2022 12:57:55 AM(UTC+0)	RODRIGUEZ	But gold goes up n down all da time

12/9/2022 12:58:33 AM(UTC+0)	FORSYTH	I got a 500 gram for 20 bands but is plain
12/9/2022 12:59:44 AM(UTC+0)	Outgoing	Ya sounds bout right bro
12/9/2022 1:00:21 AM(UTC+0)	FORSYTH	Damn I wasn't thinking the 700 bust down cost that much lol
12/9/2022 1:00:24 AM(UTC+0)	FORSYTH	I'll stick to plain fa now
12/9/2022 1:00:46 AM(UTC+0)	RODRIGUEZ	I can ask Nate idk bro gold goes up n down but I kno fa sho is up there
12/9/2022 1:01:41 AM(UTC+0)	FORSYTH	Is at 40 rn he doin me
12/9/2022 1:01:57 AM(UTC+0)	FORSYTH	So basically the 700 gram would b 28k
12/9/2022 1:02:07 AM(UTC+0)	FORSYTH	So if I want it flooded I gotta drop damn near another one on it 😏😏😏😏
12/9/2022 1:02:07 AM(UTC+0)	RODRIGUEZ	Ya I got mine a year ago
12/9/2022 1:02:30 AM(UTC+0)	RODRIGUEZ	Das not a bad deal

- b. On January 1, 2023, FORSYTH and RODRIGUEZ coordinated a meeting. FORSYTH tells RODRIGUEZ that he is on his way to meet RODRIGUEZ and the person he is with had to conduct a drug sale along the way ("Omw right now my cuz had a jugg on the way"). FORSYTH and RODRIGUEZ then appear to meet and FORSYTH arrives in a Range Rover.

1/1/2023 12:25:03 AM(UTC+0)	RODRIGUEZ	Wtw
1/1/2023 12:25:17 AM(UTC+0)	FORSYTH	Omw right now my cuz had a jugg on the way
1/1/2023 12:25:25 AM(UTC+0)	FORSYTH	I'm 16 min away
1/1/2023 12:32:17 AM(UTC+0)	RODRIGUEZ	Alta Clara
1/1/2023 12:45:43 AM(UTC+0)	RODRIGUEZ	15 executive drive stoneham
1/1/2023 12:46:35 AM(UTC+0)	RODRIGUEZ	I'm talkin to an admin broda nbs
1/1/2023 12:46:47 AM(UTC+0)	RODRIGUEZ	But is down da street
1/1/2023 12:47:16 AM(UTC+0)	RODRIGUEZ	I'll throw u sum gas niggas buggin
1/1/2023 12:47:45 AM(UTC+0)	FORSYTH	Bro I'm not da driver I can't jus point an niggas drive that way
1/1/2023 12:47:56 AM(UTC+0)	FORSYTH	I'm paying niggas to drive me can't drive around the world cuz
1/1/2023 12:48:03 AM(UTC+0)	FORSYTH	Why u even send me a Malden addy if that's not where u at
1/1/2023 12:48:06 AM(UTC+0)	RODRIGUEZ	I feel u Bro
1/1/2023 12:48:18 AM(UTC+0)	RODRIGUEZ	Nigga we jus spoke on da phone u said u was gone come to me
1/1/2023 12:48:22 AM(UTC+0)	RODRIGUEZ	I sent u da complex name
1/1/2023 12:48:47 AM(UTC+0)	FORSYTH	U sent me a Malden address bro I said where am I going the next text [REDACTED] Salem street
1/1/2023 12:49:30 AM(UTC+0)	RODRIGUEZ	Bro u want me to pull up there?
1/1/2023 12:49:34 AM(UTC+0)	FORSYTH	I'm bout to b on foot in revere bro if u want it lmk I got it on me
1/1/2023 12:51:16 AM(UTC+0)	FORSYTH	If I had my whip I woulda slid these niggas worried bout they own moves lil faggs
1/1/2023 1:13:22 AM(UTC+0)	FORSYTH	U comin ?
1/1/2023 1:13:28 AM(UTC+0)	RODRIGUEZ	Yea
1/1/2023 1:13:30 AM(UTC+0)	RODRIGUEZ	Sliding rn
1/1/2023 1:27:54 AM(UTC+0)	RODRIGUEZ	150 heard st
1/1/2023 1:29:35 AM(UTC+0)	RODRIGUEZ	Chelsea
1/1/2023 1:29:48 AM(UTC+0)	FORSYTH	Comin

1/1/2023 1:43:20 AM(UTC+0)	FORSYTH	I'm pulling up fool
1/1/2023 1:44:54 AM(UTC+0)	RODRIGUEZ	Dis u right hea?
1/1/2023 1:46:47 AM(UTC+0)	FORSYTH	I'm here
1/1/2023 1:46:49 AM(UTC+0)	FORSYTH	In a range
1/1/2023 1:46:50 AM(UTC+0)	FORSYTH	Rover

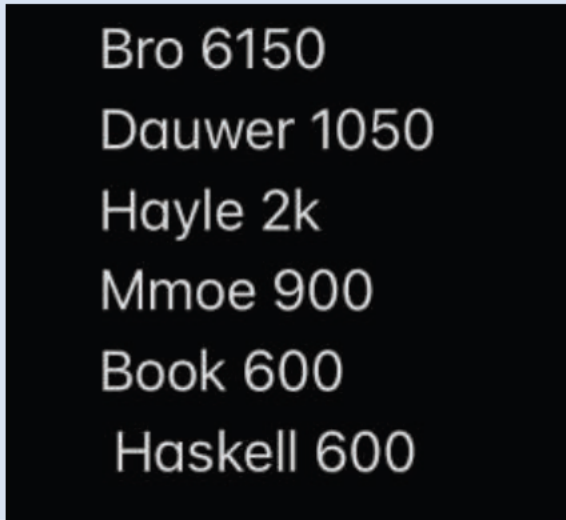
- c. On January 4, 2023, FORSYTH and RODRIGUEZ discussed the sale of “lines”, which investigators believe is a quantity of marijuana, likely 10 grams. During the exchange, RODRIGUEZ asks for three “lines” for (“fa”) \$650. FORSYTH replies that the source of supply for the “lines” paid \$220 per line and can get the lines for \$230 each. FORSYTH tells RODRIGUEZ to give him \$700 for 3 lines and that the source has 13 lines remaining. FORSYTH then tells RODRIGUEZ that he will buy 8 lines and store them (“I’m bout to grab a 8 n stash it”). FORSYTH then tells RODRIGUEZ that he will store the 8 lines so that RODRIGUEZ does not think that FORSYTH is joking about buying an entire kilogram, which is referred to as a “ticket” (“Jus so u don’t think I’m capping bout da ticket too”). Investigators believe that RODRIGUEZ obtains marijuana from FORSYTH but supplies FORSYTH with cocaine and fentanyl.

1/4/2023 12:46:27 AM(UTC+0)	FORSYTH	How many lines u want fr cuz
1/4/2023 12:46:31 AM(UTC+0)	FORSYTH	I'm tryna get u a deal
1/4/2023 12:48:09 AM(UTC+0)	RODRIGUEZ	Gimme 3 fa 650 fag
1/4/2023 12:48:29 AM(UTC+0)	FORSYTH	Wtf I didn't even get it for dat low cuz
1/4/2023 12:48:40 AM(UTC+0)	FORSYTH	This nigga paid 220 a line all da way up
1/4/2023 12:48:48 AM(UTC+0)	FORSYTH	Best I could get u is 230 he makin 30 bucks
1/4/2023 12:49:09 AM(UTC+0)	FORSYTH	Throw me 700 I'll get u a nice 3
1/4/2023 1:17:15 AM(UTC+0)	FORSYTH	This nigga got 13 lines left
1/4/2023 1:17:19 AM(UTC+0)	FORSYTH	I'm bout to grab a 8 n stash it
1/4/2023 1:37:14 AM(UTC+0)	FORSYTH	Jus so u don't think I'm capping bout da ticket too

69. During the review of RODRIGUEZ’s data, investigators identified a text message conversation between RODRIGUEZ (utilizing the 8272 Phone Number) FORSYTH (utilizing a 8366 phone number). In RODRIGUEZ’s data, the 8366 phone number was associated with a contact named “Kranko,” which investigators know is FORSYTH’s street name. In the conversations, they discuss the distribution of controlled substances. Pertinent examples follow:

- a. On September 7, 2022, RODRIGUEZ and FORSYTH discuss an outstanding debt owed to RODRIGUEZ by FORSYTH. RODRIGUEZ asks if FORSYTH can pay any of the debt (“Yo u got any bread u could throw me?”) and informs FORSYTH that three “things” of “da girl” will be arriving (“landing”) on Saturday. Investigators believe that the “things” are kilograms of cocaine, as “girl” is a common term for “cocaine”. FORSYTH replies that he has no money available, and that a number of customers owe him substantial amounts. These customers include “mike moe,” who owes FORSYTH \$1,000 (“a band”) and another individual from Revere who owes

FORSYTH \$1,600. FORSYTH then sends RODRIGUEZ a screen capture of his ledger of outstanding drug debts and indicates that he took a loss (“took a L”) from each of the customers. FORSYTH then indicates that he has two sealed amounts of controlled substances that can be sold for \$10,000 once broken down and adulterated. Among the customers listed are “Bro” who owes \$6,150, “Dauwer” who owes \$1,050, “Hayle” who owes \$2,000, “Mmoe” (believed to be Mikey Moe”) who owes \$900, “Book” who owes \$600, and “Haskell” who owes \$600.

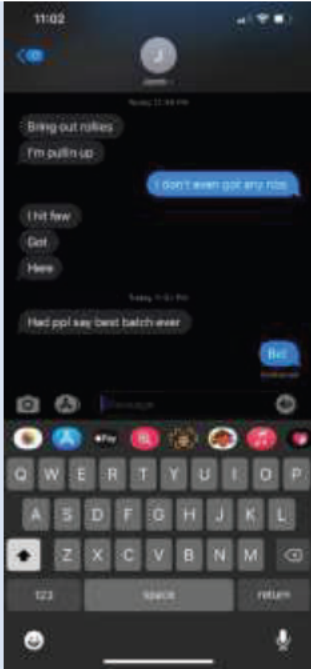
9/7/2022 6:09:48 PM(UTC+0)	RODRIGUEZ	Yo u got any bread u could throw me?
9/7/2022 6:10:02 PM(UTC+0)	RODRIGUEZ	N got 3 things landing Saturday
9/7/2022 6:10:11 PM(UTC+0)	RODRIGUEZ	Of da girl
9/7/2022 6:15:58 PM(UTC+0)	FORSYTH	I got no bread on me rn nbs I got a few zazas on me an I got mike moe owe me a band he pose to come today and this other nigga from revere owe me 1600 an they should b done today that's basically ur 2600 off the work so ima tell em come thru today we need it
9/7/2022 6:16:16 PM(UTC+0)	FORSYTH	Or if he bring a band rq u can come snag that then wen the 1600 too ima call em now
9/7/2022 6:17:59 PM(UTC+0)	FORSYTH	Or if jet or somebody want za I can give it to em an give u that bread shifts hittin crazy I got a move for 10 jus waiting on him to have all cash in hand I'm bout to tax him crazy n I got whatever nbs
9/7/2022 6:21:21 PM(UTC+0)	FORSYTH	I basically took a L on every single one these beside dauwer n mike moe but I still got 2 sealed things of da work so that's like 10k breakdown 
9/7/2022 6:28:25 PM(UTC+0)	FORSYTH	If these niggas don't fall thru today regardless I'll have it once this nigga grab the zaza or once we serve them the other shit
9/7/2022 10:30:04 PM(UTC+0)	FORSYTH	Yea it's lookin slow today but I'm bout to crack these last 2 things an start gettin those moving I got a move for pink too niggas still got ?
9/7/2022 11:10:55 PM(UTC+0)	RODRIGUEZ	I'm hea

- b. On September 9, 2022, RODRIGUEZ and FORSYTH discussed the distribution of kilogram of controlled substances that is about to be received by RODRIGUEZ (“Bout to touch down”). RODRIGUEZ asks FORSYTH to identify customers and tell him how he needs (“Lmk who needs what if Dey still need it”), and informs FORSYTH that one of the kilograms was seized by law enforcement (“First pack had gotten seized”). FORSYTH then states that he would like three ounces (“3 zips still a go”). RODRIGUEZ tells FORSYTH to setup the sales and they will quickly sell them and RODRIGUEZ can give FORSYTH 250 grams of raw cocaine for FORSYTH to adulterate himself that FORSYTH can make extra money (“Set those up well bang Those out n ima throw u like 250 fa ya self fa da breakdown”). RODRIGUEZ then tells FORSYTH that he will have additional blue pressed fentanyl pills in a few days (“Gon have more blue things in a couple days”).

9/9/2022 3:26:40 PM(UTC+0)	RODRIGUEZ	Yo
9/9/2022 3:27:50 PM(UTC+0)	RODRIGUEZ	Bout to touch down
9/9/2022 3:48:16 PM(UTC+0)	FORSYTH	Let's get it
9/9/2022 3:48:42 PM(UTC+0)	RODRIGUEZ	Lmk who needs what if Dey still need it
9/9/2022 3:48:49 PM(UTC+0)	RODRIGUEZ	First pack had gotten seized
9/9/2022 3:48:53 PM(UTC+0)	FORSYTH	I'm hitting em right now
9/9/2022 3:49:00 PM(UTC+0)	RODRIGUEZ	Das why it took a bit
9/9/2022 3:49:03 PM(UTC+0)	FORSYTH	I kno brosk got right but he said it was flying
9/9/2022 3:49:13 PM(UTC+0)	FORSYTH	N 3 zips still a go
9/9/2022 3:49:14 PM(UTC+0)	RODRIGUEZ	Jus lmk
9/9/2022 3:49:20 PM(UTC+0)	RODRIGUEZ	Bet
9/9/2022 7:18:40 PM(UTC+0)	RODRIGUEZ	Herman I
9/9/2022 7:18:43 PM(UTC+0)	RODRIGUEZ	Hermano
9/9/2022 7:19:26 PM(UTC+0)	RODRIGUEZ	Set those up well bang Those out n ima throw u like 250 fa ya self fa da breakdown
9/9/2022 7:19:41 PM(UTC+0)	RODRIGUEZ	Gon have more blue things in a couple days
9/9/2022 7:39:16 PM(UTC+0)	FORSYTH	Bet say no mas gang

- c. On September 13, 2022, RODRIGUEZ and FORSYTH discuss the quality of a recent quantity of drugs that FORSYTH obtained from RODRIGUEZ. FORSYTH sends a screen capture of a text message from a contact named “Jacob”, where Jacob informs FORSYTH that he had customers tell him it was the best batch of drugs that have received (“had ppl say best batch ever”). RODRIGUEZ acknowledges the quality of the drugs (“I told u it was fire”). Investigators reasonably believe that this refers to a batch of blue pressed fentanyl pills, which can widely vary in quality based on the skill of the manufacturer and quality of the drugs, and precision of the manufacturing equipment and process.

9/13/2022 7:42:19 PM(UTC+0)	FORSYTH	Where they at
9/13/2022 7:43:27 PM(UTC+0)	RODRIGUEZ	Zilla there
9/13/2022 7:43:31 PM(UTC+0)	FORSYTH	Ok
9/13/2022 7:45:15 PM(UTC+0)	FORSYTH	Gave him da \$\$ 1800
9/13/2022 7:45:47 PM(UTC+0)	FORSYTH	It's 2 right

	FORSYTH	
9/14/2022 4:19:47 AM(UTC+0)	RODRIGUEZ	Yea broda my fault been dealing w mad shii
9/14/2022 4:19:57 AM(UTC+0)	RODRIGUEZ	But I told u it was fire

- d. On September 27, and 28, 2022, RODRIGUEZ and FORSYTH discuss a sale of 250 grams for \$7,000 (“7 fa 250”) to one of FORSYTH’s customers. FORSYTH tells RODRIGUEZ he will check with the customer if he is willing to pay that price. FORSYTH tells RODRIGUEZ that the customer for the 250 grams informed him that he is getting for a lower price (“The 250 jugg said he gettin fa lowr”). FORSYTH tells RODRIGUEZ that in light of this sale not going through, FORSYTH will obtain two “ropes,” referring to 10 gram quantities, the following day. FORSYTH tells RODRIGUEZ that he informed the customer that the quality of the drugs is not comparable to what else is available (“I told him shit the work can’t be compared”) and that the customer is trying to save \$500. RODRIGUEZ replies that he sells at the low price as a favor and that he can conduct individual sales of 250 gram quantities for \$9,000 to \$10,000 each. RODRIGUEZ then tells FORSYTH that his “bitch can sell 250 grams through multiple smaller sales for a total of \$13,000. RODRIGUEZ and FORSYTH then confirm that FORSYTH will purchase the 2 ropes the following day, and FORSYTH indicates that he may obtain 3 ropes.

9/27/2022 6:49:54 PM(UTC+0)	FORSYTH	U said 27 right
9/27/2022 9:10:32 PM(UTC+0)	RODRIGUEZ	I told u 7 fa 250 broda
9/27/2022 9:10:56 PM(UTC+0)	FORSYTH	Ok bet
9/27/2022 9:11:02 PM(UTC+0)	FORSYTH	Lemme jus make sure he ready to pay dat
9/27/2022 9:11:43 PM(UTC+0)	RODRIGUEZ	Jus lmk
9/28/2022 3:22:31 AM(UTC+0)	RODRIGUEZ	Yo
9/28/2022 3:22:35 AM(UTC+0)	RODRIGUEZ	I jus touched down
9/28/2022 3:22:36 AM(UTC+0)	FORSYTH	Yo
9/28/2022 3:22:53 AM(UTC+0)	FORSYTH	The 250 jugg said he gettin fa lowr so ima jus grab the 2 ropes Tmr

9/28/2022 3:23:04 AM(UTC+0)	RODRIGUEZ	Bet snm
9/28/2022 3:23:20 AM(UTC+0)	FORSYTH	I told him shit the work can't b compared
9/28/2022 3:23:27 AM(UTC+0)	FORSYTH	But u kno how niggas b
9/28/2022 3:23:30 AM(UTC+0)	FORSYTH	He tryna save 500\$
9/28/2022 3:24:08 AM(UTC+0)	RODRIGUEZ	Na ya I get it lol I don't mind broda don't worry I do it dat low as a favor I got jugs im gettin it off fa 9-10k
9/28/2022 3:24:14 AM(UTC+0)	RODRIGUEZ	My bitch busting 250 down fa 13k
9/28/2022 3:24:16 AM(UTC+0)	RODRIGUEZ	Lol
9/28/2022 3:24:34 AM(UTC+0)	FORSYTH	Yea fr I knew u wouldn't trip anyway I told him go get it Wea he gettin it from then u feel me ain't no difference to us
9/28/2022 3:24:45 AM(UTC+0)	RODRIGUEZ	Loved "Yea fr I knew u wouldn't trip anyway I told him go get it Wea he gettin it from then u feel me ain't no difference to us"
9/28/2022 3:24:55 AM(UTC+0)	RODRIGUEZ	U want those tomorrow?
9/28/2022 3:25:01 AM(UTC+0)	FORSYTH	We still good for the 2 tho ima see if he can even get 3 or some
9/28/2022 3:25:04 AM(UTC+0)	FORSYTH	Ima call u in da morning
9/28/2022 3:25:08 AM(UTC+0)	RODRIGUEZ	Bet

- e. On October 10, 2022, RODRIGUEZ sends a message to FORSYTH that "Boe ain't dead dem niggas dead." FORSYTH replies that BOE is just getting started.

<u>Date</u>	<u>Author</u>	<u>Content</u>
10/10/2022 8:43:53 AM(UTC+0)	RODRIGUEZ	Boe ain't dead dem niggas dead
10/10/2022 8:44:01 AM(UTC+0)	RODRIGUEZ	No motion
10/10/2022 8:44:03 AM(UTC+0)	FORSYTH	Boe jus gettin started
10/10/2022 8:11:32 PM(UTC+0)	RODRIGUEZ	Loved "Boe jus gettin started "

- f. On October 21, 2022, FORSYTH asks RODRIGUEZ if the "Pinks," referring to pink pills that investigators believe are pressed methamphetamine pills. RODRIGUEZ replies that he does not have pink pills at the moment ("Na I don't got nun rn broda").

<u>Date</u>	<u>Author</u>	<u>Content</u>
10/21/2022 11:43:02 PM(UTC+0)	FORSYTH	Call me
10/21/2022 11:43:37 PM(UTC+0)	FORSYTH	Pinks round still?
10/21/2022 11:48:41 PM(UTC+0)	RODRIGUEZ	Na I don't got nun rn broda nbs
10/21/2022 11:48:55 PM(UTC+0)	FORSYTH	Lmk if u hear anything I got a move
10/23/2022 9:42:14 PM(UTC+0)	RODRIGUEZ	Jus 1 line
10/23/2022 9:42:24 PM(UTC+0)	FORSYTH	Ok

- g. On November 12, 2022, FORSYTH tells RODRIGUEZ that a customer he is with right now wants a whole kilogram ("whole thang") of cocaine ("White girl") and that the customer currently has a price of \$25,500 from another source ("He want whole thang I'm w him rn" "White girl he screaming somebody said 25,5 idk if u can beat that ??"). RODRIGUEZ replies that he will charge \$24,500 ("245") and that RODRIGUEZ will pay FORSYTH \$1,000 ("I'll swing u a band") for arranging the deal. FORSYTH tells RODRIGUEZ to not mention the \$1,000 that he will receive for arranging the deal when they meet with the customer).

<u>Date</u>	<u>Author</u>	<u>Content</u>
11/12/2022 12:14:25 AM(UTC+0)	RODRIGUEZ	Wya
11/12/2022 12:14:44 AM(UTC+0)	FORSYTH	He want whole thang I'm w him rn
11/12/2022 12:15:27 AM(UTC+0)	RODRIGUEZ	Ight bet
11/12/2022 12:15:55 AM(UTC+0)	FORSYTH	White girl he screaming somebody said 25,5 idk if u can beat that ??
11/12/2022 12:16:01 AM(UTC+0)	FORSYTH	I'm jus tryna swing it u kno
11/12/2022 12:35:04 AM(UTC+0)	RODRIGUEZ	245 I'll swing u a band
11/12/2022 12:41:28 AM(UTC+0)	FORSYTH	Jus say 245 wen we link don't mention da band
11/12/2022 12:41:32 AM(UTC+0)	FORSYTH	I'm pulling up
11/12/2022 12:41:42 AM(UTC+0)	RODRIGUEZ	Bet

b. Conversation with “JACOB”

70. Investigators are familiar with an individual whose identity is known to me that I will refer to as “Jacob.” During the review of RODRIGUEZ’s data, investigators identified a text message conversation between RODRIGUEZ (utilizing the 8272 Phone Number) and Jacob (utilizing a phone number ending in 2354). In the conversation, RODRIGUEZ and Jacob discuss the distribution of controlled substances and the payment of outstanding drug debts. Pertinent examples follow:

- a. On September 13, 2022, RODRIGUEZ directed “Jacob” to meet him at [REDACTED] Street, Chelsea, Massachusetts. Jacob stated that he dropped RODRIGUEZ’s keys to “Gurk” (who investigators know to be Gustavo DEOLIVEIRA-SOUZA, who was charged in Cr. No. 24-cr-10396-FDS) in order to walk the dog. Jacob then apologizes to RODRIGUEZ and states that he would not have dropped off RODRIGUEZ’s “shit” to anyone and that he only did so because he had spoken to “John” (referring to CC-1), “zef” (referring to CC-5)¹² and “gurk” (meaning DEOLIVEIRA-SOUZA).

<u>Date</u>	<u>Author</u>	<u>Content</u>
9/13/2022 4:37:41 PM(UTC+0)	RODRIGUEZ	150 heard st chelsea
9/13/2022 4:39:27 PM(UTC+0)	Jacob	On way gang
9/13/2022 4:49:47 PM(UTC+0)	RODRIGUEZ	Wya
9/13/2022 4:49:48 PM(UTC+0)	Jacob	Ten min
9/13/2022 4:49:50 PM(UTC+0)	Jacob	Not even
9/13/2022 4:49:56 PM(UTC+0)	RODRIGUEZ	Bet
9/13/2022 4:57:38 PM(UTC+0)	Jacob	5 min
9/13/2022 5:01:38 PM(UTC+0)	RODRIGUEZ	Wya
9/13/2022 5:39:24 PM(UTC+0)	RODRIGUEZ	Yo
9/13/2022 5:39:29 PM(UTC+0)	Jacob	I'm here
9/22/2022 3:21:10 AM(UTC+0)	Jacob	I jus dropped ur keys off to gurk n he finna go ur crib ina few walk ur dog I can ask him to do it rq ? If he can't I'll figure it out
9/22/2022 3:42:22 AM(UTC+0)	Jacob	My bad cuz I would never knew dropped ur shit no where niggas made it seem like that's was wat todo I talked to

¹² I know the identities of CC-1 and CC-5 but am omitting their full names to preserve their anonymity.

	John John n zef n gurr all them had same idea wat todo w
--	--

- b. On October 8, 2022, Jacob tells RODRIGUEZ that he will pay \$700 the following day because he has just obtained drugs from an associate (“I jus grabbed from bro on blocc n came”). RODRIGUEZ tells Jacob to not bring anyone to RODRIGUEZ’s residence, and that only Jacob’s girlfriend is allowed. Jacob replies that the individual he brought to RODRIGUEZ’s residence was his “stash”, meaning an individual who stores drugs on Jacob’s behalf, and that Jacob was obtaining drugs at the moment (“I got u he jus my stash I’m grabbin work now”). Jacob states that his residence has been drawing too much attention and that the individual serving as his “stash” does not even know what town Jacob resides in.

10/8/2022 4:19:43 AM(UTC+0)	Jacob	Got u 7 Tommorw I jus grabbed from bro on blocc n came
10/8/2022 4:19:54 AM(UTC+0)	RODRIGUEZ	N next time I tell u come to my crib don’t bring no random lil niggas jus u n ya girl allowed
10/8/2022 4:20:17 AM(UTC+0)	Jacob	I got u he jus my stash I’m grabbin work rn
10/8/2022 4:20:23 AM(UTC+0)	Jacob	I got u tho
10/8/2022 4:20:25 AM(UTC+0)	RODRIGUEZ	🙄
10/8/2022 4:20:57 AM(UTC+0)	Jacob	Crib been to hot lol feel me he ain’t even kno wat town I’m in
10/8/2022 4:21:05 AM(UTC+0)	Jacob	But I def got u gang my fault

- c. On October 10, 2022, RODRIGUEZ tells Jacob that he needs “gas,” likely referring to marijuana. They arrange the sale and RODRIGUEZ directs Jacob to [REDACTED] Street, Chelsea. Investigators believe that RODRIGUEZ is the supplier for fentanyl and cocaine, but obtains marijuana from FORSYTH and Jacob.

		<u>Content</u>
10/10/2022 10:34:37 PM(UTC+0)	RODRIGUEZ	Yo
10/10/2022 10:34:51 PM(UTC+0)	Jacob	Wats good gang
10/10/2022 10:52:47 PM(UTC+0)	RODRIGUEZ	I need gas
10/10/2022 10:52:48 PM(UTC+0)	RODRIGUEZ	Wya
10/10/2022 10:53:08 PM(UTC+0)	Jacob	Link me neee days days I’m finna go grab bro
10/10/2022 11:03:11 PM(UTC+0)	RODRIGUEZ	Rn?
10/10/2022 11:04:12 PM(UTC+0)	Jacob	Yeah
10/10/2022 11:04:19 PM(UTC+0)	Jacob	Unless u need me come
10/10/2022 11:04:23 PM(UTC+0)	Jacob	But that outta our way
10/10/2022 11:10:16 PM(UTC+0)	RODRIGUEZ	150 heard st chelsea
10/10/2022 11:10:20 PM(UTC+0)	Jacob	Okay

- d. On October 15, 2022, RODRIGUEZ and Jacob discussed the distribution of controlled substances. Jacob states that he has an ounce of drugs for RODRIGUEZ, likely marijuana, on his person and asks where RODRIGUEZ wants to meet (“W ur zip”, “Wea u wanna link”). Jacob then asks RODRIGUEZ if he can pay for the last ounce he sold him (“U can’t toss any fa last one ?”), and that Jacob will need money when he goes to get drugs from CC-1 (“I’m finna have no bresd one me wen I grab this from Johnny”). RODRIGUEZ states that he will pay Jacob the following day and that the \$600 he owes Jacob is a very small amount (“Bro ima get u ya bread tomorrow stop buggin ima owe u lil 600 das lunch money”). RODRIGUEZ then

boasts that he needs to collect money because he recently spent \$70,000 in the last two weeks (“I gotta go get mo bread dropped like 70k dese last 2 weeks I gotta wait to collect lol”) and that an apartment complex that he utilizes just charged him \$3,000 (“complex jus jacked me fa 3k lol”).

10/15/2022 8:12:54 PM(UTC+0)	RODRIGUEZ	Wtw ugly
10/15/2022 8:12:55 PM(UTC+0)	Jacob	W ur zip
10/15/2022 8:13:07 PM(UTC+0)	RODRIGUEZ	Wea u wanna link
10/15/2022 8:14:45 PM(UTC+0)	Jacob	U can't toss any fa last one ? I'm finna have no bresd one me wen I grab this from Johnny
10/15/2022 8:16:05 PM(UTC+0)	RODRIGUEZ	Bro ima get u ya bread tomorrow stop buggin ima owe u lil 600 das lunch money
10/15/2022 8:16:39 PM(UTC+0)	Jacob	I'm always hip
10/15/2022 8:16:43 PM(UTC+0)	RODRIGUEZ	I gotta go get mo bread dropped like 70k dese last 2 weeks I gotta wait to collect lol
10/15/2022 8:16:47 PM(UTC+0)	Jacob	I'm jus sayin cusse I'm have legit nun lol
10/15/2022 8:17:28 PM(UTC+0)	RODRIGUEZ	I ain't tryna drive an hour to get mo bread my complex jus jacked me fa 3k lol
10/15/2022 8:17:28 PM(UTC+0)	Jacob	Jus spent 3575 on the palate n gonna toss Johnny 600 feel me was seeing to have cash in pocket but I'll buss sun else
10/15/2022 8:18:24 PM(UTC+0)	RODRIGUEZ	I don't got bread out dis way rn less I can collect I'm bout to hit niggas
10/15/2022 8:18:41 PM(UTC+0)	Jacob	U good gang I'm finna link u anyway
10/17/2022 2:54:09 PM(UTC+0)	Jacob	Wtw get up w me
10/17/2022 3:03:51 PM(UTC+0)	RODRIGUEZ	Na your beat
10/17/2022 3:03:59 PM(UTC+0)	RODRIGUEZ	N ima rob ya crib fa da rest of them ounces
10/17/2022 3:08:23 PM(UTC+0)	Jacob	👉👉
10/17/2022 3:08:26 PM(UTC+0)	Jacob	Nigga said ounces
10/17/2022 3:28:11 PM(UTC+0)	Jacob	Send addy wen u want me to come
10/17/2022 3:43:42 PM(UTC+0)	RODRIGUEZ	Alta Clara at the fells

- e. On November 2, 2022, Jacob tells RODRIGUEZ that he only has 20 grams left and needs to resupply. RODRIGUEZ tells Jacob to bring a half, likely referring to a half-ounce of marijuana for \$150. Investigators believe that Jacob is obtaining a resupply of cocaine or fentanyl.

<u>Date</u>	<u>Author</u>	<u>Content</u>
11/2/2022 12:54:21 AM(UTC+0)	RODRIGUEZ	Nigga bring him a half fa 150
11/2/2022 12:54:40 AM(UTC+0)	Jacob	I only got like 20 gs left I gotta re up
11/2/2022 12:54:56 AM(UTC+0)	RODRIGUEZ	So bring him a half fa 150
11/2/2022 12:55:30 AM(UTC+0)	Jacob	Okay telll him give me 50 now
11/2/2022 12:55:43 AM(UTC+0)	Jacob	So we at even numbers

- f. On November 28, 2022, Jacob arrives at RODRIGUEZ's location and a short time later asks if the drugs he recently obtained are the same as the last resupply. Jacob explains that the controlled substances, likely pills, are a “lil powdery” and is worried about customers complaining (“don't want no one being annyoin Niggas be aggy asf lol”). RODRIGUEZ replies that the drugs came a little powdery and did not know why that was, but assures Jacob that the drugs were not cut with anything (“jus came

a lil powdery idk why but is not cut at all"). RODRIGUEZ then advises Jacob to have his customers test the drugs to check the quality ("Have niggas test it" "U gon see"). RODRIGUEZ then tells Jacob that he will return from Puerto Rico in 3 days and will swap the drugs ("I'm back from pr 3 days worse comes to worse I swap u fa a hard one"). Jacob agrees, and RODRIGUEZ replies with the "100" emoji and the TARGET emoji, which is a BOE symbol. Jacob then reiterates that he owes RODRIGUEZ "72", referring to \$7,200.

<u>Date</u>	<u>Author</u>	<u>Content</u>
11/28/2022 11:24:58 PM(UTC+0)	Jacob	Here
11/28/2022 11:28:19 PM(UTC+0)	Jacob	U heard
11/29/2022 12:27:22 AM(UTC+0)	Jacob	This the same as last?
11/29/2022 12:33:48 AM(UTC+0)	Jacob	Jus lil powdery feel me don't want no one being annyoing Niggas be aggy asf lol
11/29/2022 12:34:12 AM(UTC+0)	RODRIGUEZ	Ya jus came a lil powdery idk why but is not cut at all
11/29/2022 12:34:22 AM(UTC+0)	RODRIGUEZ	Have niggas test it
11/29/2022 12:34:24 AM(UTC+0)	RODRIGUEZ	U gon see
11/29/2022 12:34:44 AM(UTC+0)	Jacob	Bet gang
11/29/2022 12:34:46 AM(UTC+0)	Jacob	U believe u
11/29/2022 12:34:48 AM(UTC+0)	Jacob	I
11/29/2022 12:34:56 AM(UTC+0)	RODRIGUEZ	I'm back from pr 3 days worse comes to worse I swap u fa a hard one
11/29/2022 12:34:57 AM(UTC+0)	Jacob	I jus ask bc I would keep that aside feel me give other ppl
11/29/2022 12:35:09 AM(UTC+0)	Jacob	Bet shouldn't need to gang
11/29/2022 12:41:20 AM(UTC+0)	RODRIGUEZ	💯🎯
11/29/2022 12:49:13 AM(UTC+0)	Jacob	So owe u 72 take da 200 off n that zip off cool?

- g. On December 6, 2022, RODRIGUEZ requests that Jacob send him a band meaning \$1,000. Jacob replies that he will send \$600.

<u>Date</u>	<u>Author</u>	<u>Content</u>
12/6/2022 8:18:50 PM(UTC+0)	RODRIGUEZ	Can u send me a band
12/6/2022 8:19:18 PM(UTC+0)	RODRIGUEZ	Well is fa my people
12/8/2022 2:22:49 AM(UTC+0)	Jacob	Yoyooo
12/8/2022 2:22:55 AM(UTC+0)	RODRIGUEZ	Call me
12/8/2022 2:24:19 AM(UTC+0)	Jacob	I'm send u like 6 rq

- h. On December 8, 2022, Jacob and RODRIGUEZ discuss payment arrangements and RODRIGUEZ requests that Jacob pay whatever he can on the outstanding amount that Jacob owes. It appears that they arrange the transaction over a banking application. RODRIGUEZ then asks Jacob to confirm that the money transferred because the prices for flights are changing.

<u>Date</u>	<u>Author</u>	<u>Content</u>
12/8/2022 2:24:39 AM(UTC+0)	Jacob	I uaslly be good w 4 feel me but I can do watever I'm grab sun bread fa u upfront for now on
12/8/2022 2:24:41 AM(UTC+0)	Jacob	Snm
12/8/2022 2:25:08 AM(UTC+0)	RODRIGUEZ	Try n send whateva u can sooner da better so I can be home early tomorrow

12/8/2022 2:26:12 AM(UTC+0)	RODRIGUEZ	My man's jus sent me a band I thought it was gon b enough flights costin me 1400 lol
12/8/2022 2:26:24 AM(UTC+0)	RODRIGUEZ	U kno rates change
12/8/2022 2:26:31 AM(UTC+0)	Jacob	I'm send rn
12/8/2022 2:28:32 AM(UTC+0)	RODRIGUEZ	Loved "I'm send rn "
12/8/2022 2:28:35 AM(UTC+0)	RODRIGUEZ	Dis number
12/8/2022 2:29:18 AM(UTC+0)	Jacob	Just sen 500
12/8/2022 2:29:33 AM(UTC+0)	Jacob	We'll be at 55 I'll try get u most
12/8/2022 2:33:19 AM(UTC+0)	RODRIGUEZ	Check it out make sure it go thru broda
12/8/2022 2:34:15 AM(UTC+0)	Jacob	I did it says it's processing could take up to a few hrs it says
12/8/2022 2:34:20 AM(UTC+0)	Jacob	I'll show u screen shot
12/8/2022 2:43:04 AM(UTC+0)	RODRIGUEZ	Ok broda
12/8/2022 2:44:59 AM(UTC+0)	RODRIGUEZ	Check it send screenshot of wha is saying cuz it should be instant bro
12/8/2022 3:29:41 AM(UTC+0)	Jacob	Yo
12/8/2022 3:29:46 AM(UTC+0)	Jacob	I jus got message n had say yes
12/8/2022 3:29:48 AM(UTC+0)	Jacob	Should be good now
12/8/2022 5:45:49 PM(UTC+0)	Jacob	Did u get it

- i. On December 25, 2022, RODRIGUEZ asks Jacob if he has money for the ounce of drugs that he previously supplied ("u got da bread fa da o"). Jacob replies that he will pay RODRIGUEZ that day ("I got u today gang") because he just sold a large quantity of fentanyl the night before ("I jus busted mad down last nite").

<u>Date</u>	<u>Author</u>	<u>Content</u>
12/25/2022 4:39:11 PM(UTC+0)	RODRIGUEZ	Yo u got da bread fa da o?
12/25/2022 5:06:16 PM(UTC+0)	RODRIGUEZ	U kno dat nigga deez?
12/25/2022 5:16:12 PM(UTC+0)	Jacob	I'm not sure
12/25/2022 5:16:21 PM(UTC+0)	Jacob	N yeah I got u today gang I jus busted mad down last nite

- j. On December 29, 2022, Jacob asks RODRIGUEZ to bring him an ounce of drugs and that he will pay for the drugs the following day or day after. In the following days, Jacob tells RODRIGUEZ that no one has complained about the drugs, but people have commented about the color. RODRIGUEZ asks if the drugs being described as potent ("Fiya thou right"). Jacob replies that he will see RODRIGUEZ the following night with all of the outstanding money owed ("I'll see you Tommorw nite with it all"). Jacob then tells RODRIGUEZ on January 5, 2023, that two customers have complained and want the regular type of drugs. Jacob indicates he will come by and pay RODRIGUEZ what he owes.

<u>Date</u>	<u>Author</u>	<u>Content</u>
12/29/2022 5:49:17 PM(UTC+0)	Jacob	Can u bring me a zip to n I'll pay you fa both Tommorw or next day latest
12/31/2022 8:33:05 PM(UTC+0)	Jacob	Only thing ppl say is sun about da color but ain't complied
12/31/2022 9:12:04 PM(UTC+0)	RODRIGUEZ	Fiya thou right
1/1/2023 12:27:09 AM(UTC+0)	Jacob	I'll see you Tommorw nite with it all
1/5/2023 8:25:16 PM(UTC+0)	Jacob	I had 2 ppl complain n want other regular one I'm finna come by ina few w wat I owe u

c. Conversation with “Breezo”

71. Investigators are familiar with an individual, whose identity is known to me, who I will refer to as “Breezo”. Breezo was identified as having been kidnapped by RODRIGUEZ, Claudio MELO (who was charged in Cr. No. 25-cr-10071-FDS), and other associates on or about December 2022, based on RODRIGUEZ’s belief that Breezo had stolen a kilogram of cocaine. This kidnapping was undertaken in furtherance of RODRIGUEZ’s ongoing drug manufacturing and distribution conspiracy and multiple drug conspirators and BOE associates were involved in the incident.

72. CW-█ generated a recording of Breezo describing the incident that investigators have reviewed. During the recording, Breezo describes the incident, specifically that:

- a. Breezo told RODRIGUEZ that the police were chasing him and they seized the kilogram after Breezo fled on foot. Breezo indicates that they believed him at first. However, CC-1 did not believe Breezo and caused the members of BOE to come to Breezo’s residence and kidnap him.
- b. Breezo stated that they brought him to RODRIGUEZ’s “crib” that was an apartment rented in a fraudulent name. Breezo clarifies that it was not the Ironwood that CW-█ originally believed it was. Investigators believe it was in fact RODRIGUEZ’s apartment at Alta Clara Apartments in Stoneham where RODRIGUEZ was living under a fraudulent identity. Breezo stated that CC-1 made contact with a number of individuals while Breezo was in their custody and relayed information that numerous individuals believed Breezo had in fact stolen the kilogram.
- c. Breezo stated that RODRIGUEZ showed Breezo messages from his phone from the source of supply indicating that the source of supply was going to hold RODRIGUEZ accountable for the loss. RODRIGUEZ indicated that he had to hold Breezo accountable since he himself was going to face consequences as well.

73. Investigators identified a text message conversation between RODRIGUEZ (utilizing the 8272 Phone Number) and Breezo (utilizing phone number ending in 1123). The 1123 phone number was saved in RODRIGUEZ’s data as “Breezo.”

74. In the conversation, RODRIGUEZ and Breezo discuss the distribution of controlled substances and the payment of outstanding drug debts. Additionally, RODRIGUEZ threatens Breezo in text messages for apparently stealing an amount of drugs, consistent with the information from CW-█ and the recording of Breezo concerning the kidnapping. Pertinent examples follow:

- a. On December 6, 2022, Breezo asks RODRIGUEZ if the user of the phone number ending in 8272 is “Opp”, meaning Big Opp. RODRIGUEZ replies in the affirmative.

	<u>Author</u>	<u>Content</u>
12/6/2022 2:18:50 AM(UTC+0)	RODRIGUEZ	Ima call u ina sec
12/6/2022 2:18:59 AM(UTC+0)	RODRIGUEZ	Keep ya phone on u broda
12/6/2022 2:19:13 AM(UTC+0)	Breezo	This opp
12/6/2022 2:44:43 AM(UTC+0)	RODRIGUEZ	Ya
12/6/2022 4:51:18 AM(UTC+0)	Breezo	👍👍

- b. On December 13, 2022, Breezo discusses a transaction with RODRIGUEZ for the following day. Breezo states that his associate needs something as soon as possible. Breezo indicates that he told the associate to plan for Friday, but the associate needs an amount immediate. RODRIGUEZ states that he will need to wait one more day because he does not want to sell the items at the moment. RODRIGUEZ then directs Breezo to [REDACTED] Street, Chelsea, MA.

<u>Date</u>	<u>Author</u>	<u>Content</u>
12/13/2022 2:36:05 AM(UTC+0)	Breezo	Wat about tmrw for sure
12/13/2022 2:36:40 AM(UTC+0)	Breezo	Just gotta let my bro know
12/13/2022 9:45:53 PM(UTC+0)	Breezo	?
12/13/2022 9:49:49 PM(UTC+0)	RODRIGUEZ	On da road bro hol up
12/13/2022 10:04:33 PM(UTC+0)	Breezo	I'll just see him wit one
12/13/2022 10:04:38 PM(UTC+0)	Breezo	For rn
12/13/2022 10:04:43 PM(UTC+0)	Breezo	He just need sum asap
12/13/2022 10:04:53 PM(UTC+0)	Breezo	I told em Friday but he just need sum now
12/13/2022 10:52:44 PM(UTC+0)	Breezo	Wya
12/14/2022 12:09:17 AM(UTC+0)	Breezo	Wtw
12/14/2022 12:16:47 AM(UTC+0)	Breezo	Can I head there
12/14/2022 12:47:20 AM(UTC+0)	Breezo	?
12/14/2022 1:07:33 AM(UTC+0)	RODRIGUEZ	Ima give it one more day bro cuz I don't wanna give dese up rn nbs
12/14/2022 1:07:58 AM(UTC+0)	Breezo	150 heard st lynn ma
12/14/2022 1:08:05 AM(UTC+0)	Breezo	Chelsea righr
12/14/2022 1:08:11 AM(UTC+0)	Breezo	And oh damn fr
12/14/2022 5:23:30 AM(UTC+0)	Breezo	Hit me back

- c. On January 3, 2023, RODRIGUEZ and Breezo discussed the stolen kilogram. CW- [REDACTED] reported that the kilogram was returned by another individual on Breezo's behalf. RODRIGUEZ appears to accuse Breezo of taking an amount of the cocaine out of the kilogram before returning it. RODRIGUEZ tells Breezo he will “pay” for what he “took out there.” Breezo indicates that he did not take anything out that pack of drugs (“On my mother I didn't take nothing out that shit”, “On dead dogs I didn't touch that shit” “Cuz opp , I didn't touch that pack Nigga”). RODRIGUEZ does not believe Breezo and states that he will have money and is done talking (“I ain't gon talk no mo I want my bread niggas talked enough”). Breezo indicates that all he did was open the kilogram and that why would he return it if he took some out of it (“Nigga why tf would I give it back and take sun out of it”). RODRIGUEZ tells

Breezo that he will be attacked (“u really food now”). RODRIGUEZ tells Breezo that he wants \$2,000 (“I want my 2 bands”), and advises Breezo that if he does not pay the money to RODRIGUEZ that Breezo should purchase a firearm (“blick”) because he is not one to trifle with (“cuz jus go spend it on a blick cuz niggas gave u enough chances u must think niggas bitch or sum”).

<u>Date</u>	<u>Author</u>	<u>Content</u>
1/3/2023 1:48:55 AM(UTC+0)	RODRIGUEZ	N shi ain’t ova lol Nigga u gon pay fa wha u took out there
1/3/2023 1:49:09 AM(UTC+0)	RODRIGUEZ	Word 2 my dead
1/3/2023 1:49:59 AM(UTC+0)	RODRIGUEZ	Lil*
1/3/2023 1:55:53 AM(UTC+0)	Breezo	Wat are u talkin bout
1/3/2023 1:56:01 AM(UTC+0)	Breezo	Took out wat
1/3/2023 1:56:24 AM(UTC+0)	RODRIGUEZ	Nigga whateva u took out dat pack tf u mean wha am I talkin bout is u dumb
1/3/2023 1:56:39 AM(UTC+0)	Breezo	On my mother I didn’t take nothing out that shit
1/3/2023 1:56:44 AM(UTC+0)	RODRIGUEZ	Wh u think u jus gon come up a few os
1/3/2023 1:56:50 AM(UTC+0)	Breezo	Wat are u talking bout
1/3/2023 1:56:56 AM(UTC+0)	RODRIGUEZ	Ya u out lotta shi on ya mother
1/3/2023 1:57:02 AM(UTC+0)	Breezo	On dead dogs I didn’t touch that shit
1/3/2023 1:57:10 AM(UTC+0)	Breezo	Cuz opp , I didn’t touch that pack Nigga
1/3/2023 1:57:11 AM(UTC+0)	RODRIGUEZ	I ain’t gon talk no mo I want my bread niggas talked enough
1/3/2023 1:57:27 AM(UTC+0)	Breezo	All I did was open that
1/3/2023 1:57:51 AM(UTC+0)	RODRIGUEZ	U out lotta shi on ya moms niggas like u got no word or respect u really food now n I gave u da benifit of da day
1/3/2023 1:57:54 AM(UTC+0)	Breezo	Nigga why tf would I give it back and take sun out of it
1/3/2023 1:57:56 AM(UTC+0)	RODRIGUEZ	Put*
1/3/2023 1:58:33 AM(UTC+0)	RODRIGUEZ	I want my 2 bands or on my moms cuz jus go spend it on a blick cuz niggas gave u enough chances u must think niggas bitch or sum
1/3/2023 1:58:48 AM(UTC+0)	Breezo	Bro u know I didn’t take nun out thag pack

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1.1.1.1 1.1.1.2 1.1.1.3 1.1.1.4 1.1.1.5 1.1.1.6 1.1.1.7 1.1.1.8 1.1.1.9 1.1.1.10 1.1.1.11 1.1.1.12 1.1.1.13 1.1.1.14 1.1.1.15 1.1.1.16 1.1.1.17 1.1.1.18 1.1.1.19 1.1.1.20 1.1.1.21 1.1.1.22 1.1.1.23 1.1.1.24 1.1.1.25 1.1.1.26 1.1.1.27 1.1.1.28 1.1.1.29 1.1.1.30 1.1.1.31 1.1.1.32 1.1.1.33 1.1.1.34 1.1.1.35 1.1.1.36 1.1.1.37 1.1.1.38 1.1.1.39 1.1.1.40 1.1.1.41 1.1.1.42 1.1.1.43 1.1.1.44 1.1.1.45 1.1.1.46 1.1.1.47 1.1.1.48 1.1.1.49 1.1.1.50 1.1.1.51 1.1.1.52 1.1.1.53 1.1.1.54 1.1.1.55 1.1.1.56 1.1.1.57 1.1.1.58 1.1.1.59 1.1.1.60 1.1.1.61 1.1.1.62 1.1.1.63 1.1.1.64 1.1.1.65 1.1.1.66 1.1.1.67 1.1.1.68 1.1.1.69 1.1.1.70 1.1.1.71 1.1.1.72 1.1.1.73 1.1.1.74 1.1.1.75 1.1.1.76 1.1.1.77 1.1.1.78 1.1.1.79 1.1.1.80 1.1.1.81 1.1.1.82 1.1.1.83 1.1.1.84 1.1.1.85 1.1.1.86 1.1.1.87 1.1.1.88 1.1.1.89 1.1.1.90 1.1.1.91 1.1.1.92 1.1.1.93 1.1.1.94 1.1.1.95 1.1.1.96 1.1.1.97 1.1.1.98 1.1.1.99 1.1.1.100 1.1.1.101 1.1.1.102 1.1.1.103 1.1.1.104 1.1.1.105 1.1.1.106 1.1.1.107 1.1.1.108 1.1.1.109 1.1.1.110 1.1.1.111 1.1.1.112 1.1.1.113 1.1.1.114 1.1.1.115 1.1.1.116 1.1.1.117 1.1.1.118 1.1.1.119 1.1.1.120 1.1.1.121 1.1.1.122 1.1.1.123 1.1.1.124 1.1.1.125 1.1.1.126 1.1.1.127 1.1.1.128 1.1.1.129 1.1.1.130 1.1.1.131 1.1.1.132 1.1.1.133 1.1.1.134 1.1.1.135 1.1.1.136 1.1.1.137 1.1.1.138 1.1.1.139 1.1.1.140 1.1.1.141 1.1.1.142 1.1.1.143 1.1.1.144 1.1.1.145 1.1.1.146 1.1.1.147 1.1.1.148 1.1.1.149 1.1.1.150 1.1.1.151 1.1.1.152 1.1.1.153 1.1.1.154 1.1.1.155 1.1.1.156 1.1.1.157 1.1.1.158 1.1.1.159 1.1.1.160 1.1.1.161 1.1.1.162 1.1.1.163 1.1.1.164 1.1.1.165 1.1.1.166 1.1.1.167 1.1.1.168 1.1.1.169 1.1.1.170 1.1.1.171 1.1.1.172 1.1.1.173 1.1.1.174 1.1.1.175 1.1.1.176 1.1.1.177 1.1.1.178 1.1.1.179 1.1.1.180 1.1.1.181 1.1.1.182 1.1.1.183 1.1.1.184 1.1.1.185 1.1.1.186 1.1.1.187 1.1.1.188 1.1.1.189 1.1.1.190 1.1.1.191 1.1.1.192 1.1.1.193 1.1.1.194 1.1.1.195 1.1.1.196 1.1.1.197 1.1.1.198 1.1.1.199 1.1.1.200 1.1.1.201 1.1.1.202 1.1.1.203 1.1.1.204 1.1.1.205 1.1.1.206 1.1.1.207 1.1.1.208 1.1.1.209 1.1.1.210 1.1.1.211 1.1.1.212 1.1.1.213 1.1.1.214 1.1.1.215 1.1.1.216 1.1.1.217 1.1.1.218 1.1.1.219 1.1.1.220 1.1.1.221 1.1.1.222 1.1.1.223 1.1.1.224 1.1.1.225 1.1.1.226 1.1.1.227 1.1.1.228 1.1.1.229 1.1.1.230 1.1.1.231 1.1.1.232 1.1.1.233 1.1.1.234 1.1.1.235 1.1.1.236 1.1.1.237 1.1.1.238 1.1.1.239 1.1.1.240 1.1.1.241 1.1.1.242 1.1.1.243 1.1.1.244 1.1.1.245 1.1.1.246 1.1.1
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10/13/2022

[REDACTED]

Case No.	Case Name	Case Description
1	Case 1	Case 1 Description
2	Case 2	Case 2 Description
3	Case 3	Case 3 Description
4	Case 4	Case 4 Description
5	Case 5	Case 5 Description

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1	2	3
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[REDACTED]

[illegible]

Category	Value
Category 1	100
Category 2	200
Category 3	300
Category 4	400
Category 5	500
Category 6	600
Category 7	700
Category 8	800
Category 9	900
Category 10	1000

CONCLUSION

77. Based on the foregoing, there is probable cause that HARVEY RODRIGUEZ Conspired to Manufacture, Distribute, and Possess with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. § 846, commencing at an unknown time, but from at least approximately 2019 through December 2023. Further, based on the foregoing, there is probable cause that HARVEY RODRIGUEZ, and others, Conspired to Interfere with Commerce by Robbery, on or about January 30, 2023, in violation of 18 U.S.C. § 1951(a).

Attested to be telephone in accordance with Federal Rule of Criminal Procedure 4.1 on July 23, 2025.

Eric Poalino ^{DL}
Special Agent Eric D. Poalino
Federal Bureau of Investigation

Attested and subscribed by telephone in accordance with Federal Rule of Criminal Procedure 4.1 on July 23, 2025.

Hon. Donald L. Cabell
Chief United States Magistrate Judge

