UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America v. Agustin Vinas, aka "AMIGO" YOB: 1969)) Case No. 1:21MJ53LDA))
Defe	ndant(s)	
	CRIMIN	NAL COMPLAINT
I, the complainan	t in this case, state that the fo	following is true to the best of my knowledge and belief.
On or about the date(s) of	04/19/2021 to 04/30/	0/2021 in the county of in the
Distric	et ofRhode Island	, the defendant(s) violated:
Code Section		Offense Description
18 U.S.C. § 1958	Use of interst	state commerce facilities in the commission of murder-for-hire
	nplaint is based on these fact t of Special Agent Caolan Ru	cts: Rudhan Scott, of the Federal Bureau of Investigation ("FBI").
♂ Continued on	the attached sheet.	Caolan R. Scott Special Agent Complainant's signature Special Agent Caolan R. Scott, FBI Printed name and title
Attested to by the applicant in accordance	ee with the requirements of Fed. R. Cri	Crim. P. 4.1 by means).
Date:April 30,	2021	Telephone Judge's signature
City and state:	Providence, Rhode Island	

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Caolan Ruadhan Scott, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter, "FBI"), and have been employed with the FBI since 2012.
- 2. As an FBI Agent, I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code, in that I am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.
- 3. During my work with the FBI, I have participated in numerous investigations relating to the distribution of controlled substances, including fentanyl, heroin, cocaine, marijuana, designer drugs, illegal prescription drugs and other substances in violation of the federal controlled substances laws. I have participated in numerous other investigations in different capacities, such as monitoring court authorized wiretap conversations, physical surveillance, execution of search warrants, execution of arrest warrants, and other investigative methods. Those investigations have resulted in arrests and convictions for violations of racketeering; murder; drug laws; seizures of drugs and firearms; and forfeiture of money and motor vehicles. I have received training in the field of narcotics enforcement, investigations and apprehension of narcotics offenders.
- 4. Through my training and experience I am familiar with the habits, methods, routines, practices and procedures commonly employed by persons engaged in various types of criminal activity. Specifically, I am aware that criminals commonly use cellular telephones in

furtherance of their illicit activities and frequently change cellular telephone numbers and cellular telephones in an effort to thwart law enforcement.

- 5. I have participated in the below-described investigation. I am familiar with the facts and circumstances of this investigation based on information I have received from a variety of sources, including other law enforcement officers and agents, confidential sources, public records and physical surveillance.
- 6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Purpose

7. Based on the facts set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 1958 (use of interstate commerce facilities in the commission of murder-for-hire) (the "Target Offense") has been committed by AGUSTIN VINAS, also known as (aka) "AMIGO", date of birth: 1969.

PROBABLE CAUSE

8. In April of 2021, the FBI's Rhode Island Safe Streets Task Force ("Task Force") received information from a Confidential Source (CS-1)¹ that a person known to CS-1 as First Name Unknown (FNU) Last Name Unknown (LNU), also known as (aka) "AMIGO" (later

¹ CS-1 has a criminal history which includes convictions for manufacturing/delivery/possession of controlled substances and for drug distribution. CS-1 is motivated by financial means, but has yet to be paid for his/her cooperation in this investigation. CS-1 has provided me with information which I and other Agents have been able to corroborate through physical surveillance, records checks, and through the use of consensual recording equipment. CS-1 has proven to be a credible and reliable informant. I have never found CS-1 to have knowingly provided false information.

identified as AGUSTIN VINAS, date of birth: _____/1969 and hereinafter referred to as such) was attempting to hire an individual to commit a murder on VINAS' behalf. CS-1 has known VINAS socially for several years, and knows VINAS to be involved in the construction trade. CS-1 also knows VINAS to utilize the cellular telephone number _______-4375 ("the 4375 number") as his cellular telephone number.

- 9. On April 19, 2021, CS-1 informed me that earlier in the day, CS-1 ran into VINAS in the Central Falls, Rhode Island area. This meeting between CS-1 and VINAS was a chance encounter and was not planned in advance. Furthermore, CS-1 specified that the last time CS-1 and VINAS communicated was approximately one month prior.
- 10. During the meeting, VINAS informed CS-1 that VINAS completed a construction job for another contractor one year ago, and that the contractor still owes VINAS \$8,500 for VINAS' work. At that time, VINAS did not provide any identifying information to CS-1 regarding the contractor. VINAS stated that he made several unsuccessful attempts to collect the debt. During VINAS' most recent attempt, the contractor informed VINAS that he was not going to pay VINAS the \$8,500, and that if VINAS continued collection attempts, the contractor would harm VINAS' family. Based on the contractor's threats, VINAS explained to CS-1 that he was looking to hire someone to kill the contractor. CS-1 informed VINAS that he/she may know someone interested in the job and would be in touch shortly. CS-1 provided me with VINAS' cellular telephone number as the 4375 number.
- 11. On April 20, 2021, an FBI intelligence analyst conducted open source checks on the 4375 number, and identified VINAS as being a person associated with the 4375 number. Based on this information, I obtained a color Rhode Island Department of Motor Vehicles driver's license photograph depicting an image of VINAS.

- 12. On April 20, 2021, CS-1 met with members of the Task Force to participate in the investigation into VINAS. I presented CS-1 with the Rhode Island driver's license photograph depicting the image of VINAS. This photo did not contain any identifying information. CS-1 identified the person depicted in the photograph as VINAS. CS-1 informed me that VINAS drives several vehicles to include a blue Honda Ridgeline, a white Honda Pilot, and a Sprinter van.
- 13. At approximately 4:10 pm, CS-1 placed a consensually recorded telephone call to VINAS on the 4375 number. This call was made in Spanish and was placed on speakerphone for a Spanish speaking officer to listen. Upon ending the call, CS-1 advised he/she spoke with VINAS. The Spanish speaking officer overheard VINAS agree to meet CS-1 later in the evening to discuss the "project." CS-1 understood "project" to mean the proposed murder-for-hire.
- 14. At approximately 4:30 pm, Agents initiated surveillance on Providence, RI. This address is listed on VINAS' drivers license as his residential address. Upon arriving at that location, Agents observed a blue Honda Ridgeline, bearing Rhode Island registration 083 parked in the driveway of the house. Records checks revealed the Ridgeline is registered to VINAS. Moments after arriving at VINAS' home, Agents identified VINAS as he exited the residence, entered the driver's seat of the Ridgeline, and departed the area.
- 15. At approximately 8:10 pm, CS-1 placed a consensually recorded telephone call to VINAS on the 4375 number. This call was made in Spanish and was placed on speakerphone for a Spanish speaking officer to listen. Upon ending the call, CS-1 advised he/she spoke with VINAS. The Spanish speaking officer overheard VINAS agree to meet CS-1 in Providence, RI, and instruct CS-1 to call VINAS while he/she was driving in order to obtain a specific meeting location.

- 16. While en-route to Providence, VINAS called CS-1 from the 4375 number and instructed CS-1 to meet VINAS at the Family Dollar, located at 1280 Broad Street, Providence, RI. I provided CS-1 with a recorder (equipped with audio/video surveillance equipment) and instructed CS-1 to meet VINAS at the Family Dollar to discuss the potential murder-for-hire. Specifically, I instructed CS-1 to inform VINAS that he/she knows a person who would be interested in the murder-for-hire job.
- 17. Agents initiated surveillance on 1280 Broad Street. I followed CS-1 to 1280 Broad Street, where he/she arrived at approximately 8:39 pm. At approximately 8:41 pm, I observed VINAS' blue Ridgeline as it arrived and parked next to CS-1's vehicle. Moments later, I identified VINAS as he exited the driver's seat of the Ridgeline and walked into a nearby liquor store.
- 18. At approximately 8:46 pm, I observed VINAS return to the driver's seat of the blue Ridgeline and observed CS-1 enter the front passenger seat of the blue Ridgeline, where I observed VINAS and CS-1 appear to engage in conversation.
- 19. At approximately 9:26 pm, I observed CS-1 exit VINAS' vehicle and observed VINAS depart the area. Other Agents and I followed CS-1 to a pre-determined meeting location where CS-1 provided me with the recording device. CS-1 was debriefed and informed me that as VINAS arrived at the Family Dollar, VINAS went into the liquor store to purchase alcohol. When VINAS returned to his vehicle, CS-1 entered the front passenger seat and exchanged conversation with VINAS regarding the proposed murder-for-hire. Specifically, VINAS provided the cellular telephone number for the intended victim as XXX-0294. CS-1 explained that VINAS initially provided an incorrect number for the victim as XXX-6294, but later corrected himself when he verified the phone number through his cellular telephone.

VINAS [provided the address for the intended victim as "VINAS stated that he also wants a second person killed who works for the contractor. VINAS did not supply any additional information regarding the identity of the second proposed victim, but indicated that he was willing to pay \$3,000 total for both murders, with an additional \$500 bonus if the killer could make the bodies "disappear." VINAS informed CS-1 that one of the intended victims owns a construction company called "Amigo Construction," and that VINAS has been surveilling the intended victims around the Providence area. VINAS explained that he would like to have the victims tortured before they are killed. Lastly, VINAS informed CS-1 that he has another person interested in performing the murders.

- 20. A Spanish speaking Task Force Officer (TFO) reviewed the DVD containing the recorded conversation between VINAS and CS-1. Upon review of the recording, the TFO was able to verify that the summary provided by CS-1 after the meeting was accurate. During the conversation, the TFO overheard VINAS engage CS-1 in the following conversation:
 - CS-1: *Give me a price, that way I can divide with him, that way I know how much.*
 - VINAS: No you tell me. Negotiate with him and then you talk to me, send me a message saying something like that roof job is going to cost, or, sheet rock, or whatever for this price. You send me a text saying roof job.
 - CS-1: Ok, you don't want me saying anything about a dead person through text? VINAS: No.
- 21. Further review of the recording revealed the following remarks made by VINAS to CS-1:
 - A. I want you guys to make that person disappear, you understand me? If you get rid of the body it is better so there is no evidence.

- B. Oh no, I wouldn't kill a mosquito, but these assholes don't have hearts. Not only did they rob me but this guy threatened me.
- C. Yes I know, I want to torture them first and then kill them.
- 22. On April 22, 2021, I conducted an open source check on the phone number for the XXX-0294 ("the 0294 number"). This phone number is visible in a intended victim, Facebook photograph for Facebook account "LTG Construction." In the photograph, the phone number is printed on the side of a work van, underneath the name of the company "LTG Friends Construction." I know the Spanish word "amigo" is a direct translation to the English word "friend." Records checks revealed the 0294 number is associated with L . Further checks revealed T "), aka L , Cranston, RI. Lastly, I entered the 0294 number into the encrypted address of messaging app "WhatsApp", which revealed a profile picture depicting an image of the LTG Friends Construction van. Based on the foregoing, I believe T to be the intended victim of VINAS' murder-for-hire plot.
- 23. On April 22, 2021, at my direction, CS-1 placed a consensually recorded telephone call to VINAS at the 4375 number for the purpose of arranging a meeting to introduce an Undercover Law Enforcement Officer (UCE-1)² who would pose as a "hitman" to VINAS. This call was placed on speakerphone for agents to listen. During the call, VINAS instructed CS-1 to call VINAS at 7:30 pm that night to discuss further.

² UCE-1 is a certified law enforcement officer in the State of Rhode Island, and is deputized as a federal Task Force Officer assigned to the FBI. UCE-1 has been a law enforcement officer for over eight years, and has experience working undercover operations in the past.

- 24. At approximately 7:26 pm, CS-1 placed a consensually recorded telephone call to VINAS on the 4375 number. This call was placed on speakerphone for agents to listen. During the call, VINAS stated he would call CS-1 back when VINAS finished work for the day.
- 25. At approximately 8:49 pm, CS-1 received a telephone call from VINAS on the 4375 number. This call was recorded and placed on speakerphone for Agents to listen. During the call, VINAS instructed CS-1 to meet VINAS off exit 27 in Pawtucket, RI.
- 26. At approximately 9:00 pm, Agents initiated surveillance in the vicinity of Exit 27 in Pawtucket. I provided CS-1 with a recorder (equipped with audio/video surveillance equipment) and instructed CS-1 to drive with UCE-1 to the vicinity of Exit 27, meet VINAS, and discuss the proposed murder-for-hire.
- 27. I followed CS-1 and UCE-1 to the Burger King parking lot, located at 91 Cedar Street, Pawtucket, RI where they arrived at approximately 9:05 pm. At approximately 9:25 pm, I observed VINAS' blue Ridgeline as it pulled into the Burger King lot and parked next to CS-1. Moments later, I observed CS-1 and UCE-1 as they followed VINAS out of the Burger King lot and departed the area. UCE-1 called me and stated that they were likely driving to a restaurant in Pawtucket, RI. Agents followed CS-1 and UCE-1 as they arrived at Shark Lounge, located at 25 Pawtucket Avenue, Pawtucket, RI, where they arrived at approximately 9:30 pm. Moments later, Agents surveilled CS-1 and UCE-1 as they followed VINAS from Shark Lounge to the parking lot of Dunkin Donuts, located at 105 Cedar Street, Pawtucket, RI where they arrived at approximately 9:36 pm. UCE-1 called me as they drove to Dunkin Donuts, and stated that Shark Lounge was about to close, and that they were trying to find a new location to meet.

- 28. As VINAS parked in the Dunkin Donuts lot, CS-1 and UCE-1 parked next to VINAS' vehicle. I observed CS-1 enter the front passenger seat of VINAS' vehicle and observed UCE-1 enter the rear passenger seat.
- 29. At approximately 9:55 pm, I observed CS-1 and UCE-1 as they exited VINAS' vehicle, returned to CS-1's vehicle, and departed the area. Agents followed CS-1 and UCE-1 to a pre-determined meeting location, where they arrived at approximately 10:00 pm. CS-1 provided me with the recording device. I debriefed UCE-1, who informed me that after CS-1 introduced UCE-1 as a hitman, VINAS informed UCE-1 that he did not bring a photograph of the intended victim. VINAS explained that the intended victim of the murder plot was the person who utilizes the 0294 number, and that the intended victim resides at , Cranston, RI. VINAS identified the intended victim as "L" and stated that the victim drives a black Chevrolet pickup truck. UCE-1 presented VINAS with a color Facebook photograph depicting the image of the work van from "LTG Friends Construction" Facebook page, to which VINAS confirmed that it was the correct vehicle for the victim. VINAS informed UCE-1 that the owner of the LTG Friends Construction van was the primary target, and that VINAS wants this person killed first. VINAS specified that the second victim was not as important, and that he would be an easy person to kill. VINAS described the second victim as a "basement guy." UCE-1 understood "basement guy" to mean the victim is a basement contractor. VINAS agreed to pay UCE-1 \$3,000 to kill both individuals. VINAS asked UCE-1 if UCE-1 would dispose of the bodies, to which UCE-1 agreed. VINAS agreed to provide UCE-1 with a deposit for the killings, and stated, words to the effect of, "I'm not dying until this guy is dead." VINAS further explained that he has another person interested in killing the victims, and that this person would do the job for less than one thousand dollars. However, VINAS was unsure about using this person since

VINAS was skeptical about his ability to commit the murders. UCE-1 inquired as to the identity of this other hitman, to which VINAS provided his name as "TOCAYO" and cellular telephone number as XXX-6807. UCE-1 said he/she would need several days to make arrangements, and that UCE-1 would be in contact. VINAS instructed UCE-1 to contact VINAS on the 4375 number.

- 30. At the conclusion of the debrief, UCE-1 informed me that on April 21, 2021, during a physical surveillance on an unrelated narcotics investigation, UCE-1 was parked across the street from ________, Cranston, RI. At approximately 7:30 am, UCE-1 observed as he exited the front door of ________, entered the driver's seat of a black GMC pickup bearing Rhode Island registration _______137, and drove around the block slowly while staring at UCE-1. Moments later, T ________ pulled alongside UCE-1's vehicle and asked UCE-1 if everything was ok. UCE-1 responded in the affirmative, and T ________ departed the area.
- 31. I reviewed the audio/video recording of the April 22nd meeting between UCE-1, CS-1 and VINAS, and identified VINAS as the person who met with UCE-1 and CS-1 that evening. Furthermore, UCE-1 reviewed the DVD containing the recorded conversation between VINAS, UCE-1, and CS-1, which revealed the following conversation:

UCE-1: No, I'm just going off of the information from the business. And you said

VINAS: Yes.

CS-1: *Its*

VINAS: Yes exactly.

UCE-1: I am going to go over there this weekend.

VINAS: You will see his van there. You guys work good. We set the price at \$1,500 for each person, and its \$3,000 and that's how its done. Do the job how you do it, you guys are experts at what you do.

UCE-1: I will call you Monday because I have to leave.

CS-1: *Tell him how you want it done so you can be satisfied.*

VINAS: I don't want there to be any evidence. I want to disappear them.

- 32. On April 26, 2021, UCE-1 placed a consensually recorded telephone call to VINAS on the 4375 number, whereby VINAS agreed to meet UCE-1 later in the evening to discuss the "roofing job." UCE-1 knows "roofing job" to mean the proposed murder-for-hire plot. UCE-1 suggested to VINAS to meet at the Home Depot, located in Attleboro, Massachusetts.
- 33. At approximately 7:44 pm, CS-1 informed me that he/she just received a call from VINAS on the 4375 number, during which VINAS informed CS-1 that VINAS was going to meet UCE-1 shortly. VINAS stated that he did not feel comfortable meeting UCE-1 alone and requested that CS-1 accompany UCE-1 to the meet. Upon receiving this information, I instructed CS-1 to meet me at the pre-determined meeting location.
- 34. At approximately 8:16 pm, while in the presence of UCE-1, CS-1 received a call from VINAS on the 4375 number. This call was recorded and placed on speakerphone for Agents to listen. During the call, VINAS informed CS-1 that he was on his way to Home Depot.
- 35. I provided UCE-1 with a recorder and a transmitter and instructed UCE-1 and CS-1 to proceed to the Home Depot parking lot, meet with VINAS, and discuss the proposed-murder-for-hire.

- 36. Agents surveilled UCE-1 to that location where he/she arrived at approximately 8:26pm. Simultaneously, agents observed VINAS's blue Ridgeline as it arrived and parked in front of the Home Depot. Shortly thereafter, I observed UCE-1 and CS-1 as they entered VINAS's vehicle.
- 37. At approximately 8:52 pm, I observed UCE-1 and CS-1 as they exited VINAS' vehicle and returned to the pre-determined meeting location.
- 38. Agents followed VINAS from the Home Depot parking lot onto Interstate 95 southbound, where VINAS crossed back into the State of Rhode Island. Agents followed VINAS into the Providence, RI area where surveillance was terminated.
- 39. UCE-1 provided me with the recorder, the transmitter, and \$100 of United States currency. UCE-1 was debriefed and informed me that as he/she entered VINAS's vehicle, UCE-1 identified VINAS as the driver of the vehicle. VINAS informed UCE-1 that he did not bring a photograph of the intended victim, and that he could not access an online photograph because VINAS' access to "WhatsApp" is blocked. VINAS removed two personal checks from his wallet, one of which was made out to JOSE VINAS for \$1,500, and the other being made out to JOSE VINAS for \$2,000. JOSE VINAS is VINAS's son. VINAS informed UCE-1 that these checks would be cashed when UCE-1 kills the intended victim, and that VINAS would pay UCE-1 the proceeds. VINAS also explained that the checks were made out to his son because VINAS is receiving unemployment benefits. VINAS then removed one hundred dollars in United States currency from his wallet and paid UCE-1 these funds as a deposit for the killings. VINAS agreed to provide UCE-1 with an additional \$300 deposit at their next meeting. UCE-1 asked VINAS to send UCE-1 the license plates for the intended victim, which VINAS agreed to do. VINAS specified that he would send the plate numbers through text message, but that he

would send the numbers backwards in an effort to avoid detection. VINAS informed UCE-1 that the name of the intended victim is "Legel". "Upon conclusion of the meeting, VINAS agreed to meet UCE-1 later in the week to finalize details of the killing.

40. I reviewed the audio/video recording of the meeting between UCE-1, CS-1 and VINAS, however, the recording was too dark to make any observations. UCE-1 reviewed the DVD containing the recorded conversation between VINAS, UCE-1, and CS-1, which revealed the following conversation:

VINAS: I won't kill a fly, but this motherfucker made me convert into the devil.

UCE-1: *I know, its because of the money.*

VINAS: Listen brother, I am not dying until he pays for what he did.

Later in the conversation, UCE-1 overheard the following conversation:

VINAS: *Listen, we are on the correct side, it has to be the right one.*

CS-1: *Add him to your other phone. What is his name?*

VINAS: I already told you they call him L

- 41. On April 27, 2021, this Court granted a search warrant (21-SW-196-LDA) authorizing the collection of location data for thirty days on the 4375 number. This warrant was executed on April 27, and I began receiving GPS "pings" for the 4375 number at approximately 7:00 pm.
- 42. On April 29, 2021, UCE-1 placed a consensually recorded telephone call to VINAS on the 4375 number to arrange a meeting later in the evening. VINAS agreed to meet UCE-1 between seven and eight o'clock. VINAS informed UCE-1 that he would bring the "materials." UCE-1 understood "materials" to mean the requested documents which would identify the victim.

- 43. At approximately 6:38 pm, UCE-1 placed a consensually recorded telephone call to VINAS at the 4375 number. VINAS agreed to meet UCE-1 in 40 minutes, and stated that he had the "materials" in his vehicle.
- 44. At approximately 6:46 pm, I received a GPS ping for the 4375 number, which indicated the phone was located in the vicinity of the Shark Lounge, located at 25 Pawtucket Avenue, Pawtucket, RI. Agents initiated surveillance at this location, and observed VINAS' blue Honda Ridgeline parked in the parking lot.
- 45. Shortly thereafter, agents observed VINAS as he departed the Shark Lounge and an arrived at 43 Cooper Street, Central Falls, RI.
- 46. At approximately 7:36 pm, UCE-1 received a consensually recorded telephone call from VINAS on the 4375 number, whereby VINAS stated he was doing a quick handy-man job and that he would meet UCE-1 shortly.
- 47. I provided UCE-1 with a recorder and a transmitter. I instructed UCE-1 to proceed to the Home Depot parking lot, located at 1100 Newport Avenue, South Attleboro, MA and meet with VINAS, and exchange conversation about the proposed murder-for-hire.
- 48. At approximately 8:12 pm, agents observed VINAS as he returned to the Ridgeline parked near 43 Cooper Street, Central Falls, RI and departed the area. Agents followed VINAS from that location, under constant surveillance, to the South Attleboro Home Depot parking lot, where he arrived at approximately 8:24 pm. Upon arrival, I observed VINAS as he pulled alongside UCE-1's vehicle, and exchanged conversation with UCE-1 through the window.
- 49. A Spanish speaking agent, who was monitoring the meting in real time, informed me that she overheard VINAS provide UCE-1 with license plate numbers. The Agent also

overheard UCE-1 ask VINAS on several occasions if VINAS was certain he wanted to go through with the murder plot. On the final attempt to dissuade VINAS, VINAS replied to UCE-1, words to the effect of, "I am one hundred percent sure."

- 50. At approximately 8:37 pm, I observed VINAS as he departed the area. Agents surveilled VINAS from the Home Depot parking lot back across the Rhode Island border to the vicinity of exit 27 on Interstate 95, where surveillance was terminated.
- 51. I followed UCE-1 to the pre-determined meeting location. UCE-1 provided me with the recording device, the transmitter, and \$200 of United States Currency. UCE-1 was debriefed, and informed me that as VINAS arrived, UCE-1 identified VINAS as the driver of the Ridgeline. VINAS stated he drove by earlier in the day and observed the intended victim's vehicle at this location. VINAS believes the victim was working on a construction job. VINAS provided UCE-1 with a handwritten note with the address " " written on it. VINAS provided UCE-1 with the license plate numbers for the intended victim, which were also written on a note. The note bore the following markings: "Puto" "PA997," "Puto" " 137," "GMC". I know TAVERAS's black GMC pickup to bear license plate number 137. UCE-1 explained to me that "puto" is commonly translated to the English word "asshole." UCE-1 took photographs of these notes, and gave the notes back to VINAS. UCE-1 informed VINAS that at the conclusion of the meeting, the job could not be stopped, and asked VINAS if VINAS actually wanted to go though with the plot. VINAS replied, saying words to the effect of, "I want you to make that guy disappear." VINAS provided UCE-1 with \$200 of United State currency as a down payment, and stated he was going to sell his house shortly, and would have the remainder of the proceeds for UCE-1 shortly after the job is done. UCE-1 again asked if VINAS was serious, and stated that UCE-1 did not want to do the

job only to have VINAS change his mind after the fact. VINAS replied, saying he would sign a written contract with UCE-1 if UCE-1 wanted him to do so.

- 52. On April 30, 2021, at approximately 9:30 am, agents conducted physical surveillance at 212 Alabama Avenue, Providence, RI, and observed T work van, bearing the name, "LTG Friends Construction" parked in the driveway.
- 53. Based on the foregoing, I believe there is probable cause for the issuance of a complaint and arrest warrant to charge AGUSTIN VINAS, date of birth, with a violation of 18 U.S.C. § 1958.

Respectfully submitted,

CAOLAN RUADHAN SCOTT

Special Agent

Federal Bureau of Investigation