

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Daniel Campbell, Bureau of Alcohol, Tobacco, Firearms & Explosives (“ATF”) being duly sworn, depose and state as follows:

1. I am a Special Agent with the ATF, and have been so employed since June 1990. I received training at the Federal Law Enforcement Training Center and at the ATF National Academy, both located in Glynn County, Georgia. I have also received DEA Basic Drug Investigator Training. I have participated in numerous investigations involving firearms trafficking and possession of firearms by persons, including felons, gang members and narcotics and firearms traffickers, and have become familiar with the crimes commonly committed by criminal street gang members and their associates. During my career as a Special Agent, I have participated in the execution of numerous arrest warrants and search warrants.

2. Based on my training and experience, I am familiar with federal narcotics laws. In this regard, I know it is a violation of 21 U.S.C. § 846 to conspire to distribute and to possess with intent to distribute controlled substances.

3. I am currently part of an investigative team consisting of the ATF, the Boston Police Department (“BPD”), the Federal Bureau of Investigation (“FBI”), the Massachusetts State Police (“MSP”), the Suffolk County Sheriff’s Office and several local Massachusetts Police Departments. This team is involved in the investigation of the criminal activities of a criminal organization identified as “NOB” and its members/associates. I submit this affidavit in support of an application for a criminal complaint charging THERESA ALVES and HAILEY STRINGFIELD, (hereinafter referred to as the “TARGETS”) with conspiracy to distribute and to possess with intent to distribute controlled substances in violation of 21 U.S.C. § 846. In this regard, the TARGETS were involved in a drug distribution network with various other individuals, including NOB members Samael “Hamma” Mathieu and Kelvin “Kal” Barros.

4. The facts in this affidavit come from my review of records and/or reports, my training and experience, and information obtained from other agents, officers and witnesses. This affidavit is submitted for the limited purpose of establishing probable cause to believe that these individuals have committed the above offense. Accordingly, I have not included each and every fact known to me and other law enforcement officers involved in this investigation, but only the facts that I believe are needed to establish the requisite probable cause.

BACKGROUND INFORMATION

5. The ATF, BPD and other federal and local law enforcement agencies are engaged in an ongoing investigation of criminal activities committed by two aligned criminal organizations – the NOB street gang and the Wendover street gang (hereinafter referred to as “Wendover”). Based on the investigation, NOB is involved in violence (including multiple murders/attempted murders) and other criminal activities, including drug trafficking. NOB members/associates often refer to themselves as being part of the “Head Shot Mafia” and use the acronyms “HSM” or “H\$M.” In rap videos, NOB members/associates, including Samael Mathieu, often brag about being in the “Head Shot Mafia” gang. On at least one occasion, Alves has referred to herself as “HSM First Lady.” On or about May 19, 2020, Alves posted a picture of herself on social media wearing a sweatshirt emblazoned with the “H\$M” logo.

6. As discussed in more detail below, ALVES and STRINGFIELD have worked with Mathieu to distribute drugs throughout various communities, including communities on Cape Cod. ALVES and STRINGFIELD have supported Mathieu’s drug dealing while Mathieu has been on the street and while Mathieu has been incarcerated. In this regard, throughout 2019 and continuing to the present, Mathieu has been in and out of custody. On September 27, 2018, Mathieu was arrested in Brockton on firearm and drug-related charges while driving in a vehicle

with ALVES. He was released from custody on December 28, 2018. Mathieu returned to custody on March 18, 2019, and remained in custody until approximately June 14, 2019. Upon release, based on the investigation, Mathieu resided at STRINGFIELD's apartment at 426 Washington Street, Taunton, MA. Mathieu resided with STRINGFIELD and her mother, who rented the apartment. The investigation has revealed that ALVES also spent time at the Taunton address, but that it was not her primary residence. On July 2, 2019, Mathieu was taken into custody after being arrested for operating a motor vehicle without a license. ALVES was a passenger in the vehicle. On August 30, 2019, Mathieu was released from jail. Finally, on October 1, 2019, Mathieu was arrested by MSP troopers on a probation violation warrant. Additional federal firearm and drug charges arose out of his arrest based on evidence seized from his person and inside 426 Washington Street in Taunton – STRINGFIELD's residence. Mathieu has remained in federal custody since that date.

7. Pursuant to a review of seized communications and other evidence (including evidence seized from the Taunton residence), I believe that, during time periods when Mathieu was not in custody, he actively worked with ALVES, STRINGFIELD and others to distribute drugs in various communities in Massachusetts. I further believe that, during time periods when Mathieu has been incarcerated, ALVES and STRINGFIELD have engaged in drug trafficking at Mathieu's direction and/or on his behalf, often utilizing Mathieu's phones and customer base to do so. Other NOB members/associates, including but not limited to, Kelvin Barros, have participated in the drug conspiracy. The types of controlled substances being distributed by the conspiracy include: heroin, crack and powder cocaine, opioid pills, Xanax pills and fentanyl (both

in powder form, but also in pill form: the fentanyl pills distributed have the appearance of oxycodone or Percocet pills).¹

8. I am aware, based on my training and experience, that individuals engaging in drug trafficking often refer to the controlled substances using slang terminology. For purposes of this affidavit, many of these slang terms are used by the TARGETS, and I have described them herein. Heroin is often referred to as “brown,” “dope,” “D,” or “boy,” and is typically packaged for street sale in grams. Good quality heroin is commonly referred to as “fire.” Larger amounts of heroin are referred to as “fingers” or “sticks,” with one finger or stick equaling 10 grams of heroin, a “half finger” or “half stick” equaling 5 grams and a “quarter finger” or “quarter stick” equaling 2.5 grams. Also, based on my training and experience, I know that the street value of heroin typically ranges from \$30 - \$50 per gram, with larger amounts warranting a discount. Drug transactions are often discussed in terms of pricing, so a buyer who asks for “100” is likely looking for two grams of heroin. Cocaine is often referred to as “white,” “girl,” or “white girl,” among other slang terms. Distinguishing between crack cocaine and powder cocaine is most typically done by referring to its consistency as either “hard” or “rock” for crack and “soft” for powder. An “8 ball” or “ball” refers to 1/8th of an ounce (3.5 grams) of cocaine or crack. The street value of cocaine typically ranges from \$20 - \$50 per gram. Fentanyl is often referred to as “fet” or “fetty.”

EVIDENCE IN SUPPORT OF PROBABLE CAUSE

STRINGFIELD’s Residence Used To Distribute Controlled Substances

9. Based on seized evidence, including physical evidence and electronic communications, the drug conspiracy involving the TARGETS used STRINGFIELD’s Taunton residence over a period of months to store, prepare and distribute drugs. As noted above, on

¹ Fentanyl is a far stronger drug than oxycodone.

October 1, 2019, MSP troopers arrested Mathieu, who was residing at STRINGFIELD's residence in Taunton. Prior to the arrest, troopers conducted surveillance of STRINGFIELD's residence. Troopers observed what they believed to be a narcotics transaction take place at STRINGFIELD's residence. Thereafter, troopers observed Mathieu and STRINGFIELD's mother exit the residence and drive away in a white Chevrolet Malibu; Mathieu was the front passenger. Troopers subsequently stopped the vehicle. Troopers recovered the following from Mathieu's person: (1) 2 large folds of currency consistent with drug trafficking proceeds (approximately \$2,000); (2) a plastic knotted bag with 5 oxycodone pills; and (3) two large plastic bags filled with marijuana. Troopers also recovered two cellular phones from the front passenger door, which was where Mathieu had been sitting. Troopers obtained a state search warrant for STRINGFIELD's apartment. STRINGFIELD's mother informed the troopers that she, STRINGFIELD and Mathieu lived in the Taunton apartment. Per STRINGFIELD's mother, her bedroom was used by Mathieu, while she (the actual renter) slept on the couch. From the bedroom used by Mathieu, troopers recovered:

- a. Multiple documents involving Mathieu;
- b. A black Nike box with: (1) 35 oxycodone pills (these pills were similar to the ones recovered from Mathieu's person during the arrest); (2) 26 Suboxone strips; (3) a gray digital scale (commonly used for street-level drug distribution) with white residue on it; (4) a large plastic twist containing fentanyl (which had a gross weight of approximately 32 grams); and (5) a box of plastic sandwich bags (which are commonly used to package drugs for street-level distribution);
- c. A black and red Jordan box with 3 bags of marijuana and \$155 in currency;

- d. A black suitcase which had two Nike boxes inside. The following evidence was seized from the two boxes: (1) a Smith & Wesson 9mm pistol loaded with 15 rounds of ammunition; (2) an additional magazine for the pistol containing 14 rounds of ammunition; (3) a Glock 9mm pistol loaded with 8 rounds of ammunition; (4) 2 sandwich bag boxes (these types of bags are commonly used to package drugs for street-level distribution); and (5) a plastic bag which contained multiple bottles of substances commonly used to cut drugs and a small blender that had a blending cup covered with a white powdery residue (these materials are consistent with diluting or cutting drugs in order to increase the volume for resale). The black suitcase had an airline label under the name “ALVES/THER.” STRINGFIELD’s mother confirmed that the suitcase belonged to Mathieu who had allowed ALVES to use it to travel. The troopers had previously observed ALVES and STRINGFIELD depart the residence together on two occasions.
- e. A bottle for a different type of substance used to cut drugs, which had numerous corner-cut plastic bags inside – the cut plastic bags are consistent with packaging used for street-level distribution of drugs.

10. As noted above, the troopers seized two phones - a Motorola TracPhone (hereinafter referred to as “Target Telephone 1”) and an Apple iPhone XR (hereinafter referred to as “Target Telephone 2”) from Mathieu. On November 11, 2019, law enforcement obtained a state warrant to search the contents of Target Telephones 1 and 2. On March 2, 2020, the Arlington Police Department and the FBI seized an Apple iPhone 6s (hereinafter referred to as “Target Telephone 3”) from ALVES. On March 24, 2020, law enforcement obtained a federal warrant to search the contents of Target Telephone 3. In reviewing the contents of the three

Target Telephones, law enforcement determined that drug trafficking between and amongst the TARGETS of this conspiracy was ongoing between June of 2019 and November of 2019.

Specific Instances of Drug Trafficking

11. In reviewing Target Telephone 1, beginning on June 16, 2019 (two days after Mathieu's release from custody), there are multiple outgoing text messages stating "it's hamma [Mathieu's street name]." Per these communications, Mathieu was using Target Telephone 1 to reestablish his drug trafficking network. The text messages from Target Telephone 1 during this time demonstrate that Mathieu, at times accompanied by ALVES, was regularly travelling to various communities (including communities on Cape Cod) to conduct drug transactions. The communications also establish that Mathieu was using STRINGFIELD's Taunton residence to meet with individuals to conduct drug deals. As noted above, on the date of Mathieu's arrest in October, MSP troopers observed what appeared to be a drug transaction take place at the Taunton residence.

12. The last outgoing message on Target Telephone 1 that appears to come from Mathieu himself during this initial time period was sent on July 2, 2019, at 10:44 am. As noted above, Mathieu was arrested on July 2, 2019. Investigators have obtained records that document Mathieu's arrest at 11:57 am for operating a motor vehicle without a license. According to the report, ALVES, who was also in the vehicle, was in possession of STRINGFIELD's driver's license and social security card.

13. A review of the electronic communications after Mathieu's arrest establishes that ALVES and STRINGFIELD obtained custody of Target Telephone 1, and began using the phone to continue drug trafficking with Mathieu's network of customers. In this regard, on July 8, 2019, there are multiple outgoing messages from Target Telephone 1 with the same message: "Yooo

hamma isn't out he's in jail this is his girlfriend he said for me to contact you and let you know I can come see you." These communications are consistent with ALVES and STRINGFIELD establishing contact with Mathieu's drug customer network to continue distributing drugs to them while Mathieu is incarcerated. Records obtained from the Plymouth County House of Corrections, where Mathieu was incarcerated at the time, indicate that a black cell phone (presumably Target Telephone 1), which was in Mathieu's possession, was released to ALVES on July 8, 2019. Based on this information, and the information set forth below, ALVES and STRINGFIELD had possession of Target Telephone 1 during Mathieu's incarceration in July 2019 and used the phone to continue Mathieu's drug trafficking operation.

14. In communications starting on July 8 and continuing through July 27, the TARGETS used the phone to distribute controlled substances, including from STRINGFIELD's residence in Taunton. In fact, in communications sent on July 10, the TARGETS sent a drug customer, who was seeking "brown" [heroin], a message asking: "You coming to Taunton"? The customer asked if it was the "same place he [Mathieu] sent me before?" The customer further clarified: "On Washington st or somewhere else?" They agreed to meet on Jackson Street, which intersects Washington Street in Taunton, and is close to STRINGFIELD's residence. Moreover, an electronic communication was sent to the customer asking where the customer was and identifying that the person facilitating the deal was in a "Chevy" – the type of car used by STRINGFIELD's mother at the time she was driving Mathieu on October 1st when he was arrested by MSP.

15. As an example of the ongoing drug trafficking during this period, on July 9, 2019, an outgoing message from Target Telephone 1 replied "Hailey" in response to an incoming text with the message "whose this," indicating that the phone was being used by STRINGFIELD. In

an outgoing message, STRINGFIELD told a buyer that she was on Cape Cod, and arranged to sell 3 grams of “brown” (heroin) for \$160 to a buyer on Cape Cod. Based on a review of subsequent messages, I believe this transaction was completed.

16. On July 12, 2019, there were multiple communications on Target Telephone 1 involving the arranging of a number of drug deals. The intercepted communications from July 12 also establish that both STRINGFIELD and ALVES were using the white Chevrolet (in which Mathieu was subsequently arrested in October 1st) to travel and do drug deals. In this regard, they used Target Telephone 1 to arrange to sell a “sample” of “fire” (good quality heroin) for \$20 at a buyer’s address in Hyannis, with the possibility of the buyer purchasing more after he/she tried it. The user of Target Telephone 1 sent a subsequent message stating that she was on her way to the Cape with her “sister.” At approximately the same time, ALVES, using Target Telephone 3, messaged that she was on Cape Cod to “get money.” Based on a review of subsequent messages, I believe this transaction was completed. That same day, STRINGFIELD used Target Telephone 1 to inform a buyer that she had just received 1000 “yurks” (oxycodone or Percocet pills). In response, the drug customer stated: “I got playssss all day hailey” – the customer was informing STRINGFIELD that he/she could move the drugs through multiple deals. Shortly after that exchange, the same buyer messaged: “I got a play [drug deal set-up] rn [right now] for 60 where u at about hes an impatient dick.” STRINGFIELD and ALVES then arranged to meet the buyer on Cape Cod. STRINGFIELD and ALVES subsequently sent the following message to the buyer: “If I’m not there in ten take him [the buyer’s customer] to someone else and I’ll get up with chu later cuz I got mad shit on me and I’m tryna get to this bag with chu.” In a later exchange with a customer seeking to get a sample of drugs, the TARGETS identified that they were in a

“white” car, and the customer confirmed it was a “Chevy” – the car associated with STRINGFIELD.

17. Based on a review of messages contained on Target Telephone 3, I believe that when Mathieu was not in custody, the TARGETS provided Mathieu with the proceeds of their drug sales. Following Mathieu’s October 1 arrest, ALVES continued to conspire with Mathieu and NOB member Kelvin Barros to engage in drug trafficking, with ALVES providing the proceeds of the drug sales to Barros.² Barros, in turn, used drug proceeds to assist Mathieu and other incarcerated NOB members/associates with attorneys’ fees, bail money or canteen funding.

18. The following are additional examples of electronic communications involving drug transactions engaged in by the TARGETS and other members of the drug trafficking conspiracy:

- a. On July 30, 2019, ALVES, using Target Telephone 3, instructed an associate to sell 15 fentanyl pills to a buyer for \$300;
- b. On July 31, 2019, an associate spoke to ALVES, using Target Telephone 3, about a buyer interested in oxycodone/Percocet pills. ALVES stated: “it’s fatty cut” – the pills she had were fentanyl. The associate replied: “Oh okay though it was perks ... ” and “Lmfao oh shit so it just fatty?” ALVES responded: “Yes with blue die 😊😊😊... ” and “Lol but it moves.” This exchange supports that ALVES was dealing fentanyl pills that appeared to be oxycodone/Percocet pills. This type of fentanyl pill has been seized from two different NOB members during the investigation;
- c. On August 1, 2019, ALVES, using Target Telephone 3, instructed an associate to sell 25 fentanyl pills to a buyer for \$500;
- d. On August 31, 2019, ALVES, using Target Telephone 3, instructed an associate to sell 40 fentanyl pills to a buyer for \$800;
- e. On September 2, 2019, Mathieu, using Target Telephone 1, advised a buyer looking for “2 balls” of “hard” (7 grams of crack cocaine) that only “d” (heroin) was

² For example, on December 26, 2019, ALVES tells an associate: “kal [Barros] is my backbone when hamma [Mathieu] ain’t home.”

available. The buyer agreed to purchase \$300 worth of heroin. In a subsequent outgoing message sent from Target Telephone 2 (Mathieu) to Target Telephone 3 (ALVES), Mathieu instructed ALVES to package “5 gs” (5 grams of heroin). Based on a review of subsequent messages, I believe this transaction was completed;

- f. On September 3, 2019, Mathieu, using Target Telephone 1, arranged to sell an unspecified amount of heroin to a buyer at an address in Marstons Mills. Based on a review of messages between Target Telephones 2 and 3, ALVES delivered the drugs to the buyer on Cape Cod;
- g. On September 8, 2019, ALVES instructed an associate to sell 40 fentanyl pills to a buyer;
- h. On September 13, 2019, Mathieu, using Target Telephone 1, arranged to sell a “half stick” (5 grams of heroin). Subsequently, ALVES, using Target Telephone 3, sent a message stating that she had to go retrieve drugs because she “got a play coming out here from cape.” ALVES then sent Mathieu a message on Target Telephone 2 telling him that she was about to go see his customers;
- i. Also on September 13, 2019, ALVES retrieved money from an associate for a previous sale of fentanyl pills. Approximately two hours later, ALVES sent a message to Mathieu stating: “bout to go see Kal” [Barros]. When Mathieu asked why, ALVES responded “to pay him why else;”
- j. A review of communications amongst the three Target Telephones indicate that, during the period of September 23 through September 28, 2019, Mathieu arranged drug deals with multiple buyers on Cape Cod (including for heroin and Xanax pills), which ALVES and/or STRINGFIELD completed by delivering the drugs and collecting the proceeds.³
- k. Also on September 26, 2019, ALVES and an associate discussed the proceeds from the sale of 40 fentanyl pills and ALVES stated that “anything after 520 is kal [Barros’] money;”
- l. On October 8, 2019, ALVES and an associate discussed the sale of 80 fentanyl pills to a buyer for \$1600; and
- m. On November 27, 2019, one of ALVES’ customers asked if ALVES had “the ercs?” [oxycodone/Percoct pills] because the customer had someone looking for that type of drug. Alves responded: “Tell her I got her lol,” and “She’s about to be fetty tf

³ Multiple outgoing messages on Target Telephone 3 beginning on September 23, 2019 indicate that ALVES and STRINGFIELD were together on Cape Cod during this time period, and that they rented a hotel room in Yarmouth through September 27, 2019.

out 😊😊.” Alves’ response again establishes that she was distributing fentanyl pills which appeared to be oxycodone/Percocet pills – the same type of fentanyl pill distributed by the NOB gang.

CONCLUSION

19. Based on the evidence set forth above, there is probable cause to believe that ALVES and STRINGFIELD conspired to distribute and possess with intent to distribute controlled substances in violation of 21 U.S.C. § 846.

Signed electronically and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on June 15, 2020.

/s/ Daniel Campbell

Special Agent Daniel Campbell
Bureau of Alcohol, Tobacco, Firearms & Explosives

Electronically subscribed and telephonically
Sworn to before me this 15th day of June 2020.

Page Kelley
HONORABLE M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

