

**AFFIDAVIT OF SPECIAL AGENT BRANDON AMERINE
IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Special Agent Brandon Amerine, being duly sworn, hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest warrants and search warrants. I am currently employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since May 2019. I am currently assigned to the FBI Boston Violent Crimes Task Force (“VCTF”), which is comprised of personnel from the FBI and Massachusetts State Police, as well as from the Boston, Braintree, Malden, Somerville, and Dedham Police Departments.

2. As a Special Agent with the VCTF, I have regularly responded to incidents involving violent encounters. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation. My responsibilities include the investigation of possible violations of federal law, including investigation of violent crimes like armed robberies, bank robberies, murders for hire, and threats/extortion. In the course of my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.

3. I am currently investigating Mohammed Chowdhury (“CHOWDHURY”), DOB xx/xx/1976, for violating 18 U.S.C. § 1958(a), use of interstate commerce or facilities in the commission of murder-for-hire (hereinafter, the “Target Offense”).

4. The facts stated herein are based on my own personal involvement in the below-described investigation, as well as from information provided by other law enforcement officers, witnesses, and from certain records. The quotations referenced below are taken from the original recordings and were documented to the best of my ability from those original sources. Those original source materials reflect the most accurate information. In submitting this affidavit, I

have not included each and every fact known to me about this investigation; rather, I am only submitting enough evidence necessary to establish the requisite probable cause.

STATEMENT OF PROBABLE CAUSE

The Murder for Hire Plot

5. In November of 2022, a Confidential Source (CS)¹ contacted FBI agents to provide information regarding CHOWDHURY's solicitation of assistance in having the mother of his children murdered. According to the CS, CHOWDHURY attempted to pay an individual to conduct the murder for hire, but that individual took the money and did not follow through with CHOWDHURY's request.

6. According to the CS, CHOWDHURY subsequently contacted the CS again and stated he needed the murder done as soon as possible and that he would get the money, indicating that he would even rob a store if necessary to do so. The CS subsequently provided CHOWDHURY's phone number to the FBI, who thereafter used an undercover employee (hereinafter, "UCE1") to communicate with CHOWDHURY about the murder for hire plot.

7. On November 22, 2022, UCE1 texted² CHOWDHURY about the job CHOWDHURY wanted taken care of. CHOWDHURY did not respond. On November 24,

¹ The CS is known to law enforcement and has previously provided information relevant to unrelated investigations that law enforcement has either corroborated or otherwise found to be reliable. The CS has worked several prior investigations with both the FBI and the Boston Police Department. The information provided was deemed corroborated and proved credible; it led to numerous arrests. Similarly, the information provided in this matter has proven equally reliable. Though CS has some criminal history, his most recent conviction (of which I am aware) dates back more than ten years and, regardless, does not cause me to question his credibility with respect to this investigation. That is primarily because, as outlined herein, law enforcement has been able to corroborate the substance of the information provided by CS.

² Unless noted otherwise, all communications between UCE1 and CHOWDHURY are recounted in sum and substance. They have been recorded or otherwise preserved.

2022, UCE1 again texted CHOWDHURY and provided him with details on how to contact UCE1 via Telegram, an encrypted messaging application.³

8. On December 7, 2022, CHOWDHURY texted UCE1 from telephone number xxx-xxx-0135, “Can you plz come to Charles Pizza⁴ at Dorchester o’clock knows”. UCE1 responded, “Can you download telegram? We can coordinate meeting up on telegram.” CHOWDHURY responded via text, “Ok.”

9. On December 7, 2022, UCE1 sent CHOWDHURY a text message asking CHOWDHURY to call on Telegram. CHOWDHURY then called UCE1 using Telegram, and, in a recorded conversation, they discussed dates, times, and locations of where they could meet in person. During the call, CHOWDHURY said, “The thing is, that, you know, I have been in trouble, you know, so I don’t wanna, uh, get in trouble again because there’s gonna be too much problem, you understand what I want to mean?”⁵ UCE1 informed CHOWDHURY that he is from New York City, then informed CHOWDHURY he would need to meet another associate. CHOWDHURY and UCE1 agree to meet in person at Charlie’s House of Pizza in Dorchester, MA. CHOWDHURY then asked, “Telegram is not gonna record, it’s not gonna, no phone number, right?” UCE1 then asked CHOWDHURY to “Send me the address of, uh, where the job is? So I can do a little looking online.” CHOWDHURY responded with, “Warren Street by Walgreens...there is a YMCA.”

³ I am aware that Telegram is a cloud-based mobile and desktop messaging application that gives users the ability to access messages from multiple devices and set messages to self-destruct within a given time period. In my experience, Telegram does not maintain or otherwise have access to the unencrypted content of users’ communications.

⁴ “Charles Pizza” is a malapropism for Charlie’s House of Pizza, located in Dorchester, MA.

⁵ I have reviewed CHOWDHURY’s criminal history and am aware that on October 3, 2019, he admitted to sufficient facts in Boston Municipal Court, Roxbury Division Docket 1802CR003546, which charged a Violation of an Abuse Prevention Order. The restraining order was issued against him from the Boston Municipal Court, Roxbury Division, and prohibited him from abusing/contacting/coming within a certain distance of his wife/the intended victim of the murder for hire plot, which expired on 11/29/2019(. Include info specific to wife but also other info re: violent history.

10. On December 8, 2022, UCE1 and CHOWDHURY again spoke in a recorded conversation via Telegram. During this recorded conversation, CHOWDHURY and UCE1 agreed to meet in person at Charlie's House of Pizza on Dorchester Avenue in Dorchester, MA. CHOWDHURY asked UCE1 if he could make monthly payments because he does not make much money and worked in a convenience store. UCE1 told CHOWDHURY he could spread out the payments but would need to identify the target of the intended murder, where she is located, and provide some other information and then UCE1 could provide CHOWDHURY with a price. CHOWDHURY then informed UCE1 he wanted him to rob and beat his wife so that no one would think he was coordinating it. CHOWDHURY said his wife won't let him see his kids and if he goes there to see his kids, his wife just causes problems.⁶ CHOWDHURY told UCE1 the kids go to school and would not be home, just his wife. UCE1 then asked CHOWDHURY what the address was for his wife. CHOWDHURY gave a street address in Roxbury (hereinafter, "Target Address 1").⁷ UCE1 informed CHOWDHURY that someone would be taking a photo of the address and would send to CHOWDHURY to confirm the correct address over the weekend.

11. On December 10, 2022, UCE1 texted a photo of the front door of Target Address 1 to CHOWDHURY's cellphone. CHOWDHURY confirmed it was the correct home by responding, "Yes".

12. In subsequent communications, UCE1 and CHOWDHURY planned a meeting with UCE1's "associate," who was another undercover employee ("UCE2"). On December 13, 2022, CHOWDHURY met with UCE2 at Charlie's House of Pizza. CHOWDHURY was

⁶ I believe this to be a reference to an incident on December 5, 2018, in which the Boston Police were called to an address CHOWDHURY had formerly shared with his wife. The police were called in response to CHOWDHURY appearing at the residence despite a restraining order prohibiting his presence at that location during that time.

⁷ The address is known to law enforcement and has been confirmed to be the address formerly shared by CHOWDHURY and his wife. It is redacted here out of concern for the safety and privacy of the victims.

observed by members of law enforcement conducting surveillance, walking from his apartment in Dorchester, MA to meet with UCE2. The meeting was audio and video recorded. When CHOWDHURY met with UCE2, CHOWDHURY wrapped his face in a scarf and sat down. UCE2 asked CHOWDHURY, "So you know why we're meeting right?" and CHOWDHURY responded, "Yeah, yeah." CHOWDHURY then requested that the meet be moved outside to the car because there may be people and cameras inside the restaurant. CHOWDHURY and UCE2 then went outside to UCE2's vehicle and continued the recorded conversation. During the conversation, CHOWDHURY advised his wife does not drive or have a vehicle. CHOWDHURY provided details about his children, and also about his relationship with his wife. CHOWDHURY then asked UCE2, "So you guys are real?" CHOWDHURY informed UCE2 he was "scared to talk" and scared of the police.

13. While in the vehicle, another undercover employee ("UCE3"), posed as an associate of UCE1 and UCE2. UCE3 advised CHOWDHURY, "This is something you have to think about. Is this something you really want to do?" to which CHOWDHURY responded, "Yeah, yeah, yeah. We have to, like you know, do something, like, you know, from too far, that they cannot, you know, understand that, you know, I am doing something, you know?" CHOWDHURY then said, "So I just want to first do the guy, who, is like, you know." CHOWDHURY then explained that he has been with his wife for twelve years, brought her to the United States from Bangladesh, paid money for her, had two children with her, and that she cheated on him with another guy and kicked CHOWDHURY out of the house.

14. CHOWDHURY then confirmed his wife lived at Target Address 1 and was having a relationship with another man. CHOWDHURY provided UCE2 with a photo of his wife and said he cannot sleep and is messed up because of what his wife was doing with the new man and that it was against his culture. CHOWDHURY then asked, "So how can you can handle the guy...I can show the store if you wanna go now, I can show where the guy work. He look like me, little bit beard...he work on [redacted] Street by Walgreens. I can show you if you go right now." UCE3, who was already located within the vehicle, asked CHOWDHURY, "You

want both, or just him?” CHOWDHURY responded, “I want first, him.” UCE2 asked, “So you want him killed first?” CHOWDHURY responded, “Not killed, just, you know, just do something like, like you know, beat him up very well so that he cannot, you know, survive or he cannot leave the city or he cannot leave this country you know, like that.” UCE3 then clarified, “So he cannot survive?” CHOWDHURY responded, “He cannot survive, or he cannot, like, you know...”. CHOWDHURY then explained he wanted it to look like a robbery because if not, it was going to come back on him and that he was worried about being the suspected perpetrator.

15. At the end of the recorded conversation, UCE2 informed CHOWDHURY, “We don’t leave witnesses, so for us, it’s either all or nothing, so you have to make a decision, what you want. So, you need to think about it.” CHOWDHURY then asked, “What do you do? Done? Done right?” UCE2 responded, “Which, I think you know that. I think you know that’s what we do. So the decision is yours, you know? You can think about it.” UCE2 subsequently said, “We don’t leave witnesses, it’s messy.” CHOWDHURY then asked, “OK just shoot, you know? Just shoot, right?” UCE2 responded, “However you want it.” CHOWDHURY then asked, “Just shoot on his back or something like that so he don’t die? Or his leg?” CHOWDHURY said he would like to paralyze both, but UCE2 advised Chowdhury that is not what they do. UCE2 finished the conversation by saying, “You think about it, you don’t have to tell us today, you can think about it, yeah. You have my boss’s number, so you can reach out to him.” Before exiting the vehicle, CHOWDHURY confirmed he now understood what UCE2 does and that he would think about it.

16. After the meet between CHOWDHURY, UCE2, and UCE3, members of the FBI surveilled CHOWDHURY back to his residence in Dorchester, MA. Upon approaching the door, CHOWDHURY appeared to take out a set of keys and let himself into the residence.

17. On December 17, 2022, CHOWDHURY messaged UCE1 via Telegram, “Hello. Brother I want to see you or your associate discuss about matter. Text me when you get message”. In subsequent communications, CHOWDHURY and UCE1 agreed to meet again in person on December 20, 2022, at El Barrio Mexican Grill in Dorchester, MA.

18. On December 20, 2022, CHOWDHURY and UCE2 met in the vicinity of El Barrio Mexican Grill. After meeting outside the restaurant, CHOWDHURY and UCE2 walked to UCE2's vehicle, entered the vehicle, and had a recorded conversation, discussing the details for CHOWDHURY's murder for hire plot. UCE2 asked CHOWDHURY, "So my understanding is that, um, you've been talking to him about this boyfriend that we talked about, is that correct?" CHOWDHURY responded, "Yeah and my wife, we have both two kids, you know? Two kids, yeah, so, I want to shoot the guy, you know? But other was trying to go, he's working this time, you know? So if we go now, right, then...no, right? Cuz how can you recognize? I don't have a picture of him. Cuz if you hit wrong person, there's nothing, you know?"

19. UCE2 responded, "So, my understanding is that you want the boyfriend killed, correct?" CHOWDHURY further responded, "So what you can do? What you can do? You can like, you know, no evidence, disappear, like that?" UCE2 asked CHOWDHURY if he wanted it to look like a robbery and CHOWDHURY confirmed he wanted the murder to look like a robbery, so it does not come back to him. UCE2 again asked, "So, but you want, the boyfriend is what you want first, correct?" CHOWDHURY responded, "Yeah, one, one thing, and second thing is like, my wife, you know?" UCE2 asked, "You want your wife killed too? Remember we talked about this last time?" CHOWDHURY confirmed he remembered talking about his wife and then asked, "So how much the boss want? For both cases?" UCE2 advised CHOWDHURY that one murder is \$10,000 and he would need to pay a deposit up front. UCE2 further advised CHOWDHURY the job could be handled, but that CHOWDHURY would need to provide the name and a photo of the new boyfriend, as well as the address of where to find him.

20. CHOWDHURY and UCE2 further discussed taking a photo of the intended victim, his wife's new boyfriend, and the price, and CHOWDHURY said, "Yeah, I understand, but uh, its too expensive for me, you know, because honestly, I don't make that much money, you know? I work for \$12 dollars per hour, and that's not his problem, you know, that's just, like, my situation, you know? I thought it was going to be cheaper, you know?" CHOWDHURY then provided UCE2 with further details pertaining to his wife's, the kids', and the boyfriend's

schedules. CHOWDHURY again confirmed he gave UCE2 his wife's picture and again asked, "They could do, like, disappear, like, no evidence?" CHOWDHURY again reiterated that he was worried about the murders coming back to him and wanted to make sure the murder of his wife looked like a robbery, so "they don't suspect me, that I did something, you know?"

21. CHOWDHURY then informed UCE2 that the job was "too much money for me, you know?" UCE2 asked CHOWDHURY how much he could afford, and CHOWDHURY responded, "I could afford \$4,000, you know." CHOWDHURY then said, "I am going to pay you after the work is done, you know? Yeah, last time, you know, I pay somebody, and it's gone, you know, so?"

22. UCE2 then called UCE1 with CHOWDHURY in the car. CHOWDHURY told UCE1 that he could afford \$4,000. UCE1 then said to CHOWDHURY, "I gotta know you're serious, bro..." and CHOWDHURY responded, "Yeah, I'm serious, that's why I was keep asking, keep calling, you know." CHOWDHURY later asked, "Without deposit you not going to do it, right? And how much would be? How much would be deposit?" CHOWDHURY and UCE1 ultimately agreed on \$5,000 per murder (which CHOWDHURY referred to as a "case") with a deposit of \$1,000 and agreed that CHOWDHURY could pay in installments. At the end of the recorded conversation, UCE1 and UCE2 again informed CHOWDHURY he needed to provide information about the boyfriend, including his name, photograph, and work address. CHOWDHURY once again confirmed, "No evidence. No evidence. No evidence from like, you know, that, uh, I did something, you know?" Before ending the conversation, UCE2 asked, "So we understand each other?" CHOWDHURY responded, "Yeah, we understand each other." CHOWDHURY also confirmed he wanted the new boyfriend killed first, then they would talk to CHOWDHURY about handling his wife after some time goes by. CHOWDHURY again confirmed UCE2 had the photo of his wife before exiting the vehicle.

23. On December 26, 2022, CHOWDHURY sent a text to UCE1 which said, "I talk with my friend. I borrow money from him. after work done he gona paid you right way. i will introduce him before work done. but no deposit. Also I can pay 4grand for job done. if you agree

we gona meet tomorrow.”

24. On December 27, 2022, CHOWDHURY sent multiple messages via Telegram to UCE1 which contained photos of the intended male victim as well as the name, “SUMON,”⁸ and an address in Roxbury that I know to be the workplace of CHOWDHURY’s wife’s boyfriend (hereinafter, “Target Address 2”).

25. CHOWDHURY and UCE1 planned to meet on January 4, 2023, in a parking lot in Dorchester, MA. CHOWDHURY was instructed to bring with him a deposit of between \$500 and \$1,000.

26. On January 4, 2023, CHOWDHURY met with UCE1 and UCE2 in the agreed-upon parking lot in Dorchester, MA. CHOWDHURY walked to the meet, entered the UCE’s vehicle, and had a recorded conversation with the UCEs. CHOWDHURY did not have the money with him; he told UCE1 that he left it in his apartment. During this conversation, UCE1 clarified with CHOWDHURY that the plan was to kill CHOWDHURY’s wife and her boyfriend one at a time. UCE1 informed CHOWDHURY that the boyfriend would be killed first, per CHOWDHURY’s request, and then, after some time had passed, they could discuss the plan to kill CHOWDHURY’s wife. UCE1 explained to CHOWDHURY that he needed to pay the \$500 deposit up front for the murder of the boyfriend before they will go near the wife. UCE1 also informed CHOWDHURY he could still pay in installments and CHOWDHURY agreed.

27. UCE1 then explained to CHOWDHURY how he’d done his homework and that he would kill the boyfriend and make it look like a robbery, as CHOWDHURY requested. UCE1 then said, “You gotta show us you’re serious, you gotta show us that you want this to be done.” CHOWDHURY responded, “So you promise me I’m not going to lose the money?” UCE1 responded, “No, you’re not gonna lose the money, listen, why, listen to me, why would we, we got another job coming. Why would I walk away?... We’ll kill the boyfriend and then we’ll come

⁸ CHOWDHURY’s wife’s boyfriend’s first name is not “Sumon,” but does contain the letters o and n in the same order.

back and kill the wife.” CHOWDHURY further explained he’s already lost money and has been cheated before. UCE1 then said, “Listen, \$500 bucks, you’re gonna know when it’s done and then all you gotta do from that point on, is give me a call when you’re ready to make another payment, and she’ll come up and collect it.”

28. After UCE1 informed CHOWDHURY of how payments would be made, UCE1 and UCE2 reminded CHOWDHURY that they don’t leave witnesses because it is a liability for everyone involved in the murder for hire. UCE1 then tells CHOWDHURY, “So it’s either you pay us \$500 and there’s no coming back from it, he’s, he’s gone for good, or you go find some other schmuck, man, we’re, we’re out.” UCE2 added, “We talked about it, remember?” and CHOWDHURY responded, “Yeah, yeah.”

29. CHOWDHURY subsequently asks, “So how we gonna disappear his, uh, body?” and UCE1 responded, “We’re not gonna have to, it’s gonna look like he was robbed.” And CHOWDHURY says, “I understand.” UCE1 continued, “The cops are gonna take care of it...Yeah it’s gonna look like he got robbed at his [expletive] store...We did our homework, there’s robberies that happen all over this [expletive] place...” CHOWDHURY then acknowledges, “Yeah, my friend is stolen two times in a month, you know, robbery, yeah rob around here, yeah.”

30. CHOWDHURY then said, “Ok, let me think, you know...I cannot make decision...I cannot make decision.” UCE1 reminded CHOWDHURY that this was it, the UCEs were not traveling to meet CHOWDHURY again unless it was to collect the money for the job. CHOWDHURY indicated that he understood. UCE1 again said, “I am not coming back again unless you decide we’re doing this thing, we’re not coming back...If you can’t decide today, you’ve got a week, a week from today...If you can’t decide by then, we’re walking.” CHOWDHURY responded, “Ok, alright, alright, a week, just uh, one or two days. Give me two days, I can’t make decision.” UCE1 responded, “That’s fine, yeah, listen, take as many, take one day, take four days, but if by, by next week, Wednesday, you haven’t made a decision, find

somebody [expletive] else...is that fair?" CHOWDHURY stated that he understood but it was a hard decision.

31. UCE1 then informed CHOWDHURY, "I wanna make it clear, if you call me and you tell me to come back and get the \$500, that means this thing is a go, and, and, there's no coming back from it, and she will show up, and we're not having a conversation. You are going to walk to the car, you're gonna pay the \$500, and she's gonna [expletive] leave. We're not gonna debate this shit anymore. Does that make sense?" CHOWDHURY responded, "Yeah, yeah, that makes sense."

32. Before leaving the vehicle, CHOWDHURY asked, "And another case, so you could do, like, my wife, like uh, uh, disappear, like, no, no, no evidence? If I said that like do first?...Or like, because, if anything happen, its comes to me, cuz she, I'm like, uh, you know, an enemy of her." UCE1 then asked, "What do you mean? Like, like, we kill her, but make it look like she's disappeared?" CHOWDHURY responded, "Disappeared, uh, look like, uh, no evidence, that uh, you know, no evidence, or like that, you know?" UCE1 responded, "Yeah, we can do that. It's not gonna be for \$4,000 though...and honestly, now that we're talking about it, if you want us to do that, we should forget about the [expletive] boyfriend and just, and just do that, because if, if the boyfriend, if we do the boyfriend, now it's gonna look funny, buddy." CHOWDHURY responded, "Its two cases make it more expensive." UCE1 finished the conversation by saying, "So you think about that. If we're back up here, bro, we're not having, we're not talking about it...Yes, she'll come, take the payment, and then we're doing it." CHOWDHURY then exited the UCE vehicle.

33. On January 10, 2023, CHOWDHURY attempted to contact UCE1 initially via call and then via a text message on Telegram. The text message on Telegram read, "call me plz when get chance". On January 11, 2023, UCE1 responded, "Ok I will call you this afternoon or tomorrow". Following UCE1's response, CHOWDHURY attempted to call UCE1 via Telegram but was unsuccessful. At approximately 5pm on January 11, 2023, CHOWDHURY again called and UCE1 answered and conducted a consensually recorded conversation with CHOWDHURY.

34. During the recorded call, CHOWDHURY expressed on several occasions that he still wanted to engage UCE1 to kill his wife's boyfriend and was willing to make a payment for the job. CHOWDHURY and UCE1 agreed to meet on Tuesday, January 17, 2023, to exchange the funds. CHOWDHURY again asked UCE1 to help with getting rid of his wife and to do so without leaving any evidence of the murder that would lead to CHOWDHURY's arrest. To complete both jobs, CHOWDHURY and UCE1 agreed to \$4,000 per murder and that payments could be made in installments.

35. On January 13, 2023, CHOWDHURY called UCE1 again and to reiterate to UCE1 that he's ready to go. CHOWDHURY again asked UCE1 about killing his wife but ultimately confirmed for UCE1 that he wants to stick with the original plan to kill his wife's boyfriend and reiterated to UCE1 that he did not want to leave any evidence of the murders. CHOWDHURY told UCE1 he was scared that evidence of the murders would come back to him because he had never done something like this before. CHOWDHURY and UCE1 confirmed their meeting on Tuesday, at approximately 11:00am or 11:30am, to make a down payment for the murders.

36. On January 17, 2023, CHOWDHURY met with UCE2 and UCE3 in the agreed-upon parking lot in Dorchester, MA. During the meeting with CHOWDHURY, he provided UCE2 with the \$500.00, the required down payment. CHOWDHURY confirmed to UCE2 that he wanted the job done. CHOWDHURY was then arrested and taken into custody by the FBI. CHOWDHURY was transported to the FBI offices in Chelsea for booking. During a subsequent recorded and *Mirandized* interview with CHOWDHURY at the FBI offices in Chelsea, he admitted to negotiating a \$4,000 price and to providing the money (\$500 down payment), the photographs, and the address information so that the UCEs could identify the targets. CHOWDHURY claimed that the payment and information was to "punish" his wife and her boyfriend but denied that the services solicited were for murder.

37. Agents turned off the recording device. CHOWDHURY was placed just outside the interview room, in the booking area, with one of the agents and a task force officer, and

continued making statements, unprompted by questioning. At one point, in response to CHOWDHURY's statement about being a good person, being mentally stressed, and that his wife had caused him pain and ruined his life, an agent told him, he should just tell the truth. At this point, CHOWDHURY admitted that he knew the \$500 was a down payment on the \$4,000 he was paying the UCEs to kill Person 1. Agents re-issued Miranda warnings to CHOWDHURY and re-engaged the recording equipment before asking him to repeat what he had said off-tape. CHOWDHURY repeated his admission.

Identification of CHOWDHURY and Intended Victims

38. In the course of law enforcement's investigation of Mohammed CHOWDHURY (YOB: 1976), CHOWDHURY's was determined to reside at a location in Dorchester, MA, based on records held by the Registry of Motor Vehicles and on surveillance of CHOWDHURY during this investigation.

39. In the course of the investigation, CHOWDHURY's wife ("PERSON 2") was identified as residing at Target Address 1. Records from the Boston Municipal Court, Roxbury Division, including a Civil Restraining Order, list PERSON 2 as the plaintiff and CHOWDHURY as the defendant in the order issued on November 30, 2018. The Civil Restraining Order lists Target Address 1 as PERSON 2's residence. This same residence was listed as CHOWDHURY's residence on his Massachusetts Criminal Offender Record, at least during the time period prior to the issuance Civil Restraining Order and subsequent criminal charges for violating the order, as referenced above. Furthermore, Incident Reports from the Boston Police Department from May 19, 2017, November 18, 2018, and December 5, 2018, list Target Address 1 as PERSON 2's residence and CHOWDHURY's former residence.⁹ The

⁹ Incident Reports from May of 2017 and November of 2018 detail allegations against CHOWDHURY for physically abusing PERSON 2 and one of their minor children at Target Address 1. The December 2018 Incident Report contained allegations that CHOWDHURY violated the aforementioned Civil Restraining Order at Target Residence 1. The May 2017 incident was dismissed in August of 2017. CHOWDHURY was arrested again in the course of a November 2018 incident, but according to his Criminal History information, the associated

Incident Report from May of 2017 and November of 2018 detail allegations against CHOWDHURY for physically abusing PERSON2 and one of their minor children in the residence at XX XXXXXXXX Street. The December 2018 Incident Report concerned CHOWDHURY violating the aforementioned Civil Restraining Order. CHOWDHURY is alleged to have arrived at the residence at XX XXXXXXXX Street, loudly knocking on the door, and requesting entry into the residence; despite the order prohibiting his presence at that residence and from being in the vicinity of PERSON2 and their children.

40. In the course of the investigation, CHOWDHURY's wife's boyfriend (hereinafter, "PERSON 1") was determined, through review of records held by the Registry of Motor Vehicles and through conversation with Person 1, to reside in Roxbury, MA and work at a market at Target Address 2.

CONCLUSION

41. Based on the foregoing, I have probable cause to believe that, on or about January 17, 2023, Mohammed CHOWDHURY traveled in interstate commerce, caused another to travel in interstate commerce, used any facility of interstate commerce, and caused another to use any facility of interstate commerce, all with the intent that a murder be committed in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, in violation of 18 U.S.C. § 1958(a).

Sworn to under the pains and penalties of perjury.

Brandon T. Amerine /by Paul G. Levenson
BRANDON T. AMERINE
Special Agent, Federal Bureau of Investigation

charges from November 2018 were dismissed on the same date he admitted to violating the restraining order.

Subscribed and sworn to via telephone in accordance with
Fed. R. Crim. P. 4.1 on January 17, 2023.



HON. PAUL G. LEVENSON
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MASSACHUSETTS

