

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) AIZAVIER ROACHE, a/k/a “Boston”

(2) TRAVON BRUNSON,”

Defendants

No. 24-cr-10001-LTS

**AFFIDAVIT OF ATF SPECIAL AGENT MICHAEL SORRENTINO
IN SUPPORT OF PRE-TRIAL DETENTION**

I, Special Agent Michael A. Sorrentino, being sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a special agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have been employed by ATF since July, 2015. Prior to joining the ATF, I was employed by Fidelity Investments as both an Assistant Security Manager and a Regional Background Investigator. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program, both of which are conducted at the Federal Law Enforcement Training Center in Glynn County, Georgia. I hold a Bachelor of Science Degree in Criminal Justice and a Minor in Psychology.

2. I have received specialized training in firearms identification and the investigation of firearms-related offenses. I have participated in investigations involving the unlawful possession of firearms by prohibited persons, including persons who are previously convicted felons; the possession of firearms in furtherance of the distribution of narcotics; and the use of firearms in the commission of violent acts. I have participated in investigations involving individuals who

unlawfully possess firearms. I have provided testimony in Grand Jury proceedings and spoken with informants and subjects, as well as local and federal law enforcement officers, regarding the manner in which individuals obtain, finance, store, manufacture, transport, and distribute their illegal firearms and drugs. I have received training, both formal and on-the-job, in the provisions of the federal firearms and narcotics laws administered under Titles 18, 21, and 26 of the United States Code.

3. During my tenure with ATF, I have written and/or participated in the execution of federal search warrants, and have debriefed defendants, informants, and witnesses with personal knowledge regarding firearms and narcotics trafficking and the operation of firearms and/or narcotics traffickers. I have also received training through my position as an ATF Special Agent involving firearms and trafficking. Among other things, this has familiarized me with: (1) the manner in which illegal guns are brought into this state and sold; (2) firearm and traffickers' methods of operation, including their acquisition, storage, and transportation of illegal guns; and (3) the widespread utilization of cellular telephones in the course of such activities.

4. In addition to this training, I have had extensive experience investigating firearm traffickers. Since joining the ATF, I have participated in numerous gun trafficking investigations as a case agent, and in a subsidiary role. I have also personally participated in many aspects of narcotics investigations, including surveillance, using confidential informants, and cooperating witnesses.

PURPOSE OF AFFIDAVIT

5. I make this affidavit in support of pre-trial detention of defendants (1) Aizavier ROACHE, a/k/a 'Boston', (hereinafter, "ROACHE") and (2) Travon BRUNSON (hereinafter,

“BRUNSON”). The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to present facts supporting pre-trial detention of ROACHE and BRUNSON and does not set forth all of my knowledge about this matter.

BACKGROUND OF THE INVESTIGATION

6. On August 5, 2021, ATF Special Agents assigned in Columbia, South Carolina, interviewed Travon BRUNSON regarding his suspected involvement in firearms trafficking from South Carolina to Massachusetts. During the consensual interview, BRUNSON admitted to purchasing twenty-four (24) firearms for an individual he knew as “Boston,” who he later identified through a photo as Aizavier ROACHE. BRUNSON explained that prior to purchasing firearms (for ROACHE), ROACHE would text him photos of the firearms he wanted. The two would then meet and ROACHE would provide BRUNSON with the cash to make the purchase(s). BRUNSON would purchase the firearms and meet ROACHE at different locations to transfer the firearms. BRUNSON stated that ROACHE was the only person he purchased firearms for. BRUNSON claimed to not know why ROACHE didn’t purchase firearms for himself, but assumed he was a felon. BRUNSON further stated that ROACHE lived in Blythewood, South Carolina.

7. On August 26, 2021, ATF Special Agent Wozniak conducted a telephonic follow-up interview with BRUNSON. During their conversation, BRUNSON stated that he deleted the previously referenced messages from ROACHE on his phone, and no longer had any of them. BRUNSON asserted that he didn’t make any money from purchasing the firearms for ROACHE, and stated he stopped buying for him once BRUNSON learned ROACHE was making extra money off them. BRUNSON did not know how frequently ROACHE traveled back to Boston but indicated ROACHE would occasionally say he was going home to see family and friends.

BRUNSON also explained that he knew ROACHE from working together at different jobs, dating back to 2010¹.

8. SA Wozniak asked BRUNSON if he recalled the 4473 forms.² BRUNSON stated he did recall the forms and admitted he filled the form out himself on each purchase. SA Wozniak asked how BRUNSON answered the question asking if he was the actual purchaser of the firearm? BRUNSON said he just answered, 'yes,' and said he was the purchaser.

9. At the end of the interview, SA Wozniak reminded BRUNSON that buying a gun for someone else is a federal crime. SA Wozniak told BRUNSON that ROACHE was a felon, with some instances of violence in his history, and his possession of any firearms is unlawful.

I. BRUNSON'S 2023 FIREARM PURCHASES

10. In September 2023, I became aware that BRUNSON purchased four (4) firearms of the same make, model, and caliber in South Carolina on April 25, 2023. Since that time, three (3) of those firearms have been recovered in Boston, MA on individuals without pistol permits. One of the firearms purchased on that date was preliminarily linked through NIBIN to a non-fatal shooting in Boston just 15 days after its purchase. That same firearm was ultimately recovered by law enforcement just 56 days after the purchase, (*41 days after the shooting*) on an individual without a valid MA pistol permit, who was gang affiliated. Additionally, one of the four firearms from April 25th was recovered in a juvenile's vehicle on August 30, 2023 (127 days after purchase), as well as one on an individual without a valid MA pistol permit on August 26, 2023 (123 days after purchase), in addition to the firearm recovered on the shooting recovered on June 20, 2023.

¹ According to BRUNSON, he and ROACHE worked at Amazon and McDonalds together.

² An ATF Form 4473, also referred to as a Firearms Transaction Record, is an ATF form required to be completed by an individual when attempting to purchase a firearm from a Federal Firearms License (FFL) holder, such as a gun dealer.

As of the date of this affidavit, eleven (11) firearms purchased by BRUNSON in South Carolina since 2020 have been recovered in Massachusetts.

11. Suspecting that BRUNSON was again engaged in straw purchasing and trafficking firearms, I contacted Academy Sports and Outdoors, located in Columbia, SC, (the store where BRUNSON purchased the four (4) firearms on April 25, 2023) and requested the associated ATF Form 4473s, as well as records for any other purchases BRUNSON made since August 2021. After receiving the requested forms, I reviewed and confirmed BRUNSON as the purchaser and that question “21a.” was answered “yes,” certifying that BRUNSON was the actual transferee/purchaser of the firearms.³ I learned that in addition to the four (4) firearms purchased in April, BRUNSON purchased an additional firearm (that has not been recovered) in February 2023. On both ATF Form 4473s, BRUNSON’s phone number, XXX-XXX-9909, is listed as a contact number for BRUNSON. In addition, I was informed that BRUNSON purchased another firearm on January 19, 2023, from Sportsman’s Warehouse, in Columbia, SC. Based in part on ATF Form 4473s records received from various FFLs in the Columbia, SC, area, I’m aware that BRUNSON has purchased at least forty-six (46) firearms in South Carolina since May 2020.

12. During the course of this investigation, I requested and received records associated with both ROACHE⁴ and BRUNSON⁵ pursuant to Grand Jury subpoenas from Block Inc. aka

³ The language of the Form 4473 regarding the “actual purchaser” is detailed below.

⁴ Specifically, as to ROACHE, the Cash App account referenced herein is associated with ROACHE’s name, date of birth, and phone number, XXX-XXX-9909. The Varo Bank records referenced herein are associated with ROACHE’s name, date of birth, and social security number.

⁵ Specifically, as it pertains to BRUNSON, the Cash App account referenced herein is associated with BRUNSON’s name, date of birth, last four of his social security number, phone number XXX-XXX-9909 (the phone number attributed to BRUNSON), and the same address listed on his South Carolina driver’s license. The Sutton Bank records referenced herein are associated with BRUNSON’s name, date of birth, social security number, and the same address listed on his South Carolina driver’s license.

Cash⁶ App, Varo Bank, Sutton Bank, T-Mobile, and other companies. These records received included specific information linking both BRUNSON and ROACHE to their respective accounts.

13. As to the number assigned to BRUNSON's phone, XXX-XXX-9909, I received subscriber records from T-Mobile that showed that the account was activated in BRUNSON's name. From reviewing call detail records (from January 2023-October 2023), I learned that the only. In addition, the phone number was used by Special Agent Wozniak to contact BRUNSON during the aforementioned August 2021, follow-up interview. Finally, the number is listed on each of the referenced ATF Form 4473's completed by BRUNSON in 2023.

14. As for phone number, XXX-XXX-9909, which is believed to be utilized by ROACHE, I received subscriber records from T-Mobile, pursuant to a federal Grand Jury subpoena. From these records, I learned that the number is subscribed to an "Azal Norris" with an address in Quincy, MA. This same address is associated with Varo Bank records in ROACHE's name, date of birth, and social security number. In addition, the phone number is associated with ROACHE's Cash App account. According to one law enforcement database, the number has been associated with ROACHE since February 2020. On November 16, 2023, a phone with the number XXX-XXX-9909 (herein referred to as ROACHE's phone) was seized from ROACHE incident to his arrest by the BPD. That phone was later searched pursuant to a District of Massachusetts search warrant (23-mj-6547-MPK).

15. From these records, along with records received from various FFLs, I learned the following in respect to BRUNSON's firearm purchases on January 19, 2023, February 2, 2023, and April 25, 2023:

⁶ Cash App is digital financial platform that, among other services, allows individuals to quickly send and receive money via a mobile app. The platform also allows individuals to apply for and receive a debit card.

JANUARY 19, 2023, PURCHASE

16. According to the Form 4473 and sales receipt obtained from Sportsman's Warehouse, located in Columbia, SC, I learned that on January 19, 2023, at approximately 3:32 PM, BRUNSON purchased a single firearm from their store.

17. Earlier on the same date, at approximately 12:14 PM, phone number XXX-XXX-6369 (ROACHE's phone) contacted BRUNSON's phone number⁷ via a phone call that lasted approximately one minute. Within a few minutes of the call, BRUNSON's phone began making calls to various FFLs in the Columbia, SC area. Following the completion of a call to an FFL at approximately 12:52 PM, BRUNSON's phone sent a text to ROACHE's phone, and the two phones communicated via text and voice calls until approximately 12:55 PM. Minutes later, BRUNSON's phone again began to contact FFLs. Once finished, BRUNSON's phone contacted ROACHE's phone via text and the two exchanged messages for a period of time before BRUNSON's phone contacted Sportsman's Warehouse (the store BRUNSON ultimately purchased a firearm from later that day) at approximately 1:40 PM. After the call, the two phones continued to communicate via text and voice calls. At approximately 2:58 PM, ROACHE's Cash App account sent BRUNSON's Cash App account \$675.00. Approximately 34 minutes later, at 3:32 PM, BRUNSON purchased a Glock, 21 Gen 4, .45 caliber pistol for \$588.49, using a debit card. Following the purchase of the firearm, at approximately 3:45 PM, ROACHE's Cash App account sent BRUNSON's account an additional \$30.00.

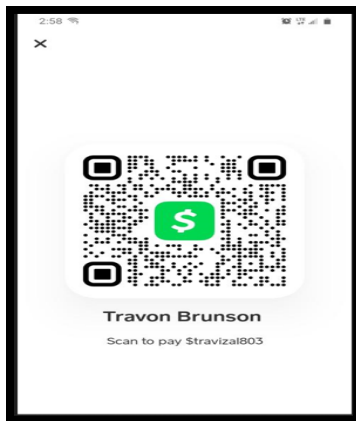
18. A review of the text message exchange found on ROACHE's phone between ROACHE and BRUNSON's phones during the aforementioned period of time on January 19,

⁷ XXX-XXX-9909 (BRUNSON's phone number) is saved in ROACHE's phone contacts as "Trayvon".

2023, revealed that the two discussed the price of different firearms at length before ultimately settling on purchasing a Glock model 21 firearm from Sportsman’s Warehouse for \$570 (plus tax).

Below is a portion of the exchange between ROACHE (XXX-XXX-6369) and BRUNSON (XXX-XXX-9909):

Roache (1:17 PM): I kno sportsman the only good store that’s responsible
Brunson (1:44 PM): Glock 21 for 570 with tax
Roache (1:51 PM): You went up there
Brunson (1:51 PM): Spoke with him
Roache (2:45 PM): I’ll get it fuck it just hold it for me
Brunson (2:45 PM): Otw 2 it
Roache (2:47 PM): You got video chat?
Brunson (2:47 PM): Yeah
Roache (2:47 PM): Ok cool
Brunson (2:58 PM):



Roache (3:00 PM): Sent it
Roache (3:00 PM): 675
Brunson (3:00 PM): Good
Roache (3:01 PM): Bet
Roache (3:31 PM): Is everything ok
Brunson (3:35 PM): Got it
Roache (3:36 PM): Thank you so much please just hold it

19. Based on my training and experience, I believe that during their exchange, BRUNSON advised ROACHE that the Glock model 21 was available for \$570, plus tax (“Glock 21 for 570 with tax”). After relaying that he (BRUNSON) spoke with an associate (“Spoke with him”) at Sportsman’s Warehouse (previously referred to as “sportsman”), ROACHE gave the go ahead to purchase the firearm for him (“I’ll get it...”) a little under an hour later. BRUNSON

then told ROACHE that he was on his way to purchase to get the firearm (“Otw 2 it”). Shortly thereafter, BRUNSON sent a photo containing a QR code for his Cash App account. A few minutes later, ROACHE advised that he sent the \$675 to purchase the firearm (“Sent it”) (“675”). After telling ROACHE that he purchased the firearm (“Got it”), ROACHE thanked him and asked that he hold on to it for him (“Thank you so much please just hold it”).

20. Based on call records received from T-Mobile, texts messages found on ROACHE’s cell phone, the Cash App exchanges detailed above, BRUNSON’s prior admissions, records received from Sportsman’s Warehouse, and my training and experience, I believe that BRUNSON purchased the aforementioned firearm on ROACHE’s behalf. I believe the two discussed (via text and voice calls) the purchase of a specific firearm and BRUNSON subsequently contacted various FFLs to check for availability and pricing. After speaking with Sportsman’s Warehouse, I believe BRUNSON relayed the price of the firearm to ROACHE and ROACHE sent the money via Cash App to complete the purchase⁸.

FEBRUARY 2, 2023, PURCHASE

21. On February 2, 2023, BRUNSON purchased a single firearm from Academy Sports & Outdoors, located in Columbia, SC. During the morning of February 2nd, ROACHE’s phone contacted BRUNSON’s phone and engaged in an (approximately) 24-minute phone call. Later that day, a series of text messages are exchanged between the two numbers. A short time later, BRUNSON’s phone began contacting various gun stores in the Columbia, SC area. The two

⁸ Although the purchase took place in South Carolina, there is probable cause to believe ROACHE was in Boston during this transaction. ROACHE has multiple Varo bank transactions in the Boston area that posted on January 18th and 19th. In addition, ROACHE took several Lyft rides on January 19th (and 20th) in Boston; the same day that the BRUNSON purchased the firearm. In addition, CashApp maintains IP address geolocation records for their transactions and based on open source records these IP addresses geolocate to the Boston area for ROACHE on January 19th.

phones remained in contact via text and voice calls during this period of time that lasted from approximately 1:32 PM – 2:20 PM. At approximately 2:10 PM, BRUNSON's phone called Academy Sports & Outdoors (for the final time). Following this call, a series of texts were sent between the two devices and at 2:21 PM, ROACHE's Cash App account sent \$570.00 to BRUNSON's Cash App account. Also of note is that from 1:32 PM – 2:34 PM, the only calls/texts made to or from BRUNSON's phone are with ROACHE's phone or an FFL.

22. A little over an hour after ROACHE's account sent BRUNSON's \$570.00, at approximately 3:28 PM, BRUNSON purchased a Glock, 22, .40 caliber pistol for \$515.15 from Academy Sports & Outdoors, located in Columbia, SC. According to the sales receipt associated with BRUNSON's purchase, the original purchase price was \$572.39 (\$529 plus tax), before a 10% discount was applied, resulting in a final sale price of \$515.15. The original purchase price was just a difference of \$2.39 from what BRUNSON's Cash App account received from ROACHE's account.

23. A review of the text message exchange found on ROACHE's cell phone between ROACHE and BRUNSON during the aforementioned period of time on February 2, 2023, revealed that they discussed the price of different firearms at length before ultimately settling on purchasing a Glock, model 22 firearm from Academy Sports and Outdoors. Below is a portion of the exchange between ROACHE (XXX-XXX-6369) and BRUNSON (XXX-XXX-9909):

Brunson (2:09 PM): Sports academy got a 22 for 569

Roache (2:09 PM): A Glock 22 40?

Brunson (2:09 PM): Yea and a 23 gen 3

Roache (2:10 PM): How much for that 23?

Brunson (2:16 PM): 569

Brunson (2:17 PM): 22 gen 3 529 the gen 5 is 569

Brunson (2:34 PM): U want the gen 3

Roache (2:34 PM): Yeah

Brunson (3:13 PM): I'll call you back.

Brunson (3:13 PM): Still at the store

Roache (3:13 PM): Oh ok

Brunson (3:13 PM): Wassup

Brunson (3:14 PM): Its 529

Brunson (3:14 PM): It's on sale

Roache (3:14 PM): O wow that's great

Based on my training and experience, I believe that during their exchange, BRUNSON relayed that there was a Glock model 22, "gen 3" available for \$529 and a "gen 5" firearm available for \$569 (22 gen 3 529 the gen 5 is 569) at Academy Sports and Outdoors (previously referred to as "Sports academy"). BRUNSON asked if he wanted the "gen 3" (U want the gen 3) and ROACHE confirmed (Yeah) at 2:34 PM. At approximately 3:13 PM, BRUNSON stated that he was still at the store and that he'd call ROACHE back. Approximately fifteen minutes later, BRUNSON purchased the aforementioned firearm from Academy Sports and Outdoors, which he advised was on sale for \$529 ("its 529" "It's on sale").

24. Based on the call records received from T-Mobile, texts messages found on ROACHE's phone, the Cash App exchanges detailed above, BRUNSON's prior admissions, records received from Academy Sports & Outdoors, and my training and experience, I believe that BRUNSON purchased the firearm for ROACHE. I also believe that BRUNSON and ROACHE discussed (via text and voice calls) the purchase of a specific firearm and BRUNSON subsequently contacted various FFLs to check for availability and pricing. I also believe that after speaking with Academy Sports & Outdoors, BRUNSON relayed the price of the firearm to ROACHE and ROACHE sent the money via Cash App to purchase the firearm.⁹

25. After this purchase in February, there is probable cause to believe that ROACHE traveled to South Carolina from Massachusetts to pick up the firearm or firearms. While the

⁹ Similar to the January transaction, there is probable cause to believe ROACHE was also present in Boston at the time of the February transaction. On February 2, 2023, the IP addresses for ROACHE's phone shows the CashApp geolocate to the Boston area on open-source records. In addition, on February 3rd, ROACHE texted "it's cold as hell up here" and included a screen capture showing it to be 13 degrees in "Boston."

investigation has not revealed evidence that ROACHE traveled between Massachusetts and South Carolina between the January 19th purchase and February 2nd, information found on ROACHE's phone indicate that he booked a ticket to fly to Charlotte, NC on February 10, 2023 (*with a connecting flight in Washington SC on Feb 11th*). Specifically, messages from United Airlines on ROACHE's phone, show "check in" reminders from United Airlines for his flight to Charlotte, NC (*approximately an hour and a half from Columbia, SC*), with a connecting flight in Washington DC. In addition, he sent his sister a text message on February 11th letting her know that he is in South Carolina. There are also text messages between ROACHE and "PandaNYBus" indicating that ROACHE scheduled a bus ticket for February 11th for 8:30 PM. Earlier on the same day, at approximately 6:36 PM, ROACHE texted a contact requesting \$70 for a bus ticket. In addition, ROACHE's Varo Bank records show transactions that posted the following day (Feb 12th) with "Panda NY Bus" and "Adirondack Transit Line".¹⁰

26. I believe that BRUNSON stored the firearms he purchased for ROACHE on January 19th and February 2nd until ROACHE was able to take subsequent possession of them on February 11th. ROACHE's text message from January 19th indicates as much when he texts BRUNSON to purchase the firearm and hold it for him.

APRIL 25, 2023, PURCHASE

5. On April 25, 2023, BRUNSON purchased four Taurus, PT111 G2A, 9mm pistols from Academy Sports & Outdoors, located in Columbia, SC. From reviewing the associated sales receipt, I learned that a credit or debit card in the name of "AIZAVIER ROACHE" was used to

¹⁰ I believe that ROACHE chose to travel back to Boston via bus and/or train, rather than airplane, to avoid security screening while travelling with the firearms. I also believe that these transactions occurred on the evening of the 11th, however, did not post to the bank account until the following day.

pay for a portion of the balance. Specifically, of the \$1,123.16 balance owed, \$240 was paid in cash and the remaining \$883.16 was paid for by the “AIZAVIER ROACHE” card. I was later able to corroborate this transaction through ROACHE’s Varo Bank account records, which is the issuing bank of the card used. Also of note is the fact that ROACHE’s phone placed a call to Academy Sports & Outdoors approximately 1 ½ hours before BRUNSON purchased the four (4) firearms. In addition, the call records show numerous text message exchanges between BRUNSON’s phone and ROACHE’s phone both on and around the April 25th purchase date.

6. A review of the text message exchange found on ROACHE’s cell phone between ROACHE and BRUNSON indicate that ROACHE was in South Carolina at the time BRUNSON purchased the four (4) firearms and that the two spent time together the day of and day before the purchase on April 25, 2023.¹¹

7. On the day of the purchase (April 25th), at approximately 1:51 PM, ROACHE’s phone texted BRUNSON’s phone, “My PIN number is 2580”. Based on the associated sales receipt, I know that BRUNSON purchased the firearms approximately forty (40) minutes later at 2:32 PM. Based on the fact that ROACHE’s card was used to complete the transaction, I believe that ROACHE texted BRUNSON the pin number to the same card.

8. A review of the video’s located on ROACHE’s phone revealed a video dated April 25, 2023, 8:42 PM, that shows what appears to be a black male’s hand reaching into a compartment

¹¹ A video was located on ROACHE’s phone, dated April 24th (at 1:41 PM), of BRUNSON driving a vehicle, which appears to have been taken from the front passenger seat. Earlier on the date, at approximately 11:58 PM, ROACHE sent BRUNSON a text asking where he was at, to which he replied, “crib”. There is probable cause to believe that BRUNSON is in his home during this exchange with ROACHE because he states he’s in his “crib” (slang for his residence). The two send additional texts through the April 25th, until ROACHE ultimately texts BRUNSON what I believe to be his pin number in order to complete the purchase of the firearms (later that same date).

located on the back of some sort of seat, moving around what appear to be multiple handguns, some of which are in plastic. The bottom of two of the suspected firearms are visible, which are black in color and consistent with that of a handgun's grip and magazine well. The pattern seen on the grip on the only one of the plastic wrapping is consistent with that of a Taurus G2C firearm (which is the type of firearm purchased by BRUNSON earlier that day). See screenshot taken from the referenced video:



27. Based on ROACHE's call to Academy Sports & Outdoors, ROACHE's card being used to complete the purchase, the text message containing ROACHE's pin number, BRUNSON's previous admissions, the video of suspected firearms on ROACHE's phone, the fact that three of the four firearms were later recovered in Massachusetts, and my training and experience, I believe that BRUNSON purchased the four firearms for ROACHE. I also believe that ROACHE travelled to South Carolina from Massachusetts and provided BRUNSON his bank card sometime beforehand to complete the purchase.

28. As previously noted, three of the four firearms purchased in April 2023 have been recovered in Boston, MA, in the possession of individuals who could not lawfully possess them. *See supra*, ¶13.

DISCUSSIONS OF OBLITERATING SERIAL NUMBERS AND PROFITS

29. From reviewing the text thread between BRUNSON’s phone and ROACHE (on ROACHE’s cell phone), I learned of BRUNSON and ROACHE’s intention to obliterate the serial number on the aforementioned firearms purchased in April. In addition, BRUNSON discusses the “cut” he will receive from ROACHE’s subsequent sale of the firearm. See below text exchange:

Brunson (7:48 PM): Wen u get paid just send me the same amount you did in Feb 300
Roache (7:50 PM): Ok cool tomorrow night like 9 imma scratch these shits off
Brunson (7:50 PM): Make sure dey unrecognisable
Roache (7:51 PM): Of course, we have a machine now
Brunson (7:51 PM): Aite bro be safe
Roache (7:51 PM): Good looks
Brunson (7:52 PM): Always fan you should be set after this flip
Roache (7:52 PM): Hell yeah
Brunson (7:53 PM): You can get like 3500
Roache (7:54 PM): I was just transporting and getting a cut from him
Brunson (7:59 PM): I kno bro long you get dat

30. Based on my training and experience, I believe the following: that BRUNSON reminded ROACHE to pay him his “cut” of \$300 like he had done before in February (the same amount you did in Feb 300) after he gets paid (i.e., sells the firearms). ROACHE then told BRUNSON that he’s going to “scratch these shit off” (referring to the firearm’s serial numbers), to which BRUNSON told him to “make sure dey unrecognizable”, which demonstrates BRUNSON’s awareness that the serial numbers would link the firearms back to him should they be recovered. The two continue to talk about potential earnings for flipping (“flip”) the firearms as BRUNSON advised that he could earn approximately \$3,500.00. ROACHE then indicated that he was getting his cut from another co-conspirator (“I was just transporting and getting a cut from him”).

MORE RECENT DISCUSSIONS OF POTENTIAL FIREARMS TRAFFICKING

31. From reviewing the text thread between BRUNSON's phone and ROACHE on ROACHE's cell phone, I learned that on October 26, 2023, ROACHE advised BRUNSON of a "gun show" that was coming in November. See below text exchange:

Brunson (1:23 PM): Wassup
Roache (3:56 PM): The gun show is coming
Roache (3:56 PM): See if they got a Mac
Brunson (4:52 PM): Wat Day
Roache (5:24 PM): In November
Roache (5:24 PM): I want a Mac so bad
Brunson (5:29 PM): Lol

32. Based on my training and experience, along with additional information recovered from ROACHE's phone and open-source information, I believe ROACHE was alerting BRUNSON of a gun show that was scheduled to take place at the Jamil Shrine Temple, located in Columbia, SC on November 11th & 12th, 2023. He also advises BRUNSON that he wants a "Mac", referring to a Military Armament Corporation (Mac) model firearm. There are no further text messages regarding the gun show and there is no indication that BRUNSON attended or purchased firearms.

33. At this time, the total amount of firearms purchased and/or illegally trafficked by BRUNSON is unknown. It is also unknown if BRUNSON illegally purchased or sold firearms to/for anyone in addition to ROACHE. As of now, I'm aware that BRUNSON purchased at least forty-six (46) firearms in South Carolina since May 2020, based upon records received from various FFLs¹². However, additional purchases from different FFLs and/or firearms acquired from unlicensed private sellers, may have occurred that are unknown to me.

¹² The records referenced were obtained from ATF by one of two ways; one being from contacting specific FFLs and requesting the records; and the other from multiple sale reports submitted to ATF by the affected FFLs. A "Multiple Sale Report" is a report that's required to

ADMISSION OF SELLING FIREARMS

34. I reviewed a text message thread on ROACHE's phone between ROACHE and who's believed to be his child's mother on October 25, 2023. During a back and forth on that date in what I believe to be some sort of family-related argument, ROACHE texted "I just have to Mia" then "Back to spellings guns and doing my thing". I believe based on my training and experience, that ROACHE intended to text "Back to selling guns and doing my thing".

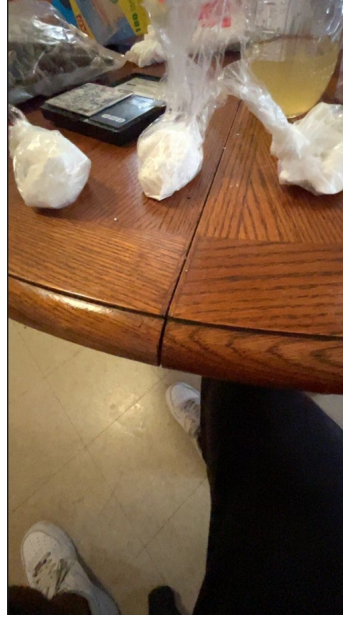
NARCOTICS DEALING

35. On October 12, 2023, ROACHE was issued a court summons by the Boston Police Department for 94C/32A/G-1 – Possession with intent to distribute a Class B narcotic, after a pat frisk of his person yielded a plastic bag containing a rock-like substance believed to be crack-cocaine in his pocket. During a subsequent search of his vehicle, a digital scale believed by officers to be used for weighing drugs for distribution, was located, and seized.

36. During my review of ROACHE's phone, I also observed conversations regarding his suspected distribution of narcotics in both Massachusetts and South Carolina.

37. For example, I reviewed a conversation between ROACHE and a female who I believe based on the totality of their conversation, to be living in SC where ROACHE discussed the sale of crack-cocaine. Specifically, while texting with this female on August 18, 2023, ROACHE texted, "I'm out here selling crack" to which the female replied, "ohh my". ROACHE then sent the following photo of three plastic bags containing what I believe based on my training and experience to be distribution amounts of crack-cocaine, near a digital scale (which based on my training and experience, is used to weigh narcotics for distribution):

be submitted to the ATF by an FFL when the same individual purchases two or more handguns within a five (5) days business period.



ROACHE also sent a video of what I believe based on my training and experience, to be of an individual (standing next to another individual) manufacturing crack-cocaine, also with a digital scale close-by. Below is a screenshot of the video:



ROACHE continued to discuss the narcotics with the female, sending texts such as, “Im out here bout to get us rich bro” and “I know how to cook it up now”. Based on my training and experience, I believe ROACHE is referring to “cooking” or manufacturing crack-cocaine from powder cocaine, as I believe is being depicted in the aforementioned video.

OUTSTANDING WARRANTS

38. Per a query in NCIC on January 11, 2023, ROACHE has two outstanding arrest warrants in South Carolina for the following: Probation Violation (underlining charge of Larceny) and Failure to Appear (underlining charge of Selling a Weapon). Relative to the warrants there is a notation in NCIC that reads “violent tendencies”.

CONCLUSION

39. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to present facts supporting the pre-trial detention of Aizavier ROACHE and Travon BRUNSON and does not set forth all of my knowledge about this matter.

Signed under pains and penalties of perjury this 11th day of January, 2024.



MICHAEL A. SORRENTINO
Special Agent
Bureau of Alcohol, Tobacco, Firearms &
Explosives