

**AFFIDAVIT OF SPECIAL AGENT CRAIG R. HARVEY IN SUPPORT OF AN APPLICATION FOR A COMPLAINT AND ARREST WARRANT**

I, Special Agent Craig R. Harvey, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2018. I am currently assigned to the Boston Field Office, North Shore Gang Task Force (“FBI Task Force”). The primary mission of the FBI Task Force is to identify, investigate, disrupt, and dismantle violent criminal organizations operating in cities north of Boston. I have received training and experience in various aspects of criminal law and procedure, including electronic and physical surveillance, interrogations, stops, searches, seizures, and arrests for a variety of criminal offenses. Through my training, knowledge, and experience, I have become familiar with the habits, methods, routines, practices and procedures commonly employed by persons engaged in the use and trafficking of illegal firearms and narcotics, including persons involved in criminal organizations. My investigations have included the use of surveillance techniques and the execution of search, seizure, and arrest warrants.

**PROLOGUE: BACKGROUND OF INVESTIGATION**

2. The FBI, Bureau of Alcohol, Tobacco, Firearms and Explosive (“ATF”), Massachusetts State Police (“MSP”) and local police departments are currently investigating a large number of shootings taking place in Chelsea, Cambridge, Everett, Lynn, Malden, Somerville, and surrounding communities north of Boston over the past eighteen months. In total, there have been over 650 separate shootings and over 1,900 rounds fired in these densely populated urban communities north of Boston. For example, during 2019 through the early months of 2021, Somerville experienced dozens of shootings that involved nearly 200 rounds-fired. During the same period, Everett experienced over 100 shootings that involved over 100 rounds-fired. A large proportion of these shootings are believed to be gang-related and to have resulted from ongoing

gang rivalries dangerously playing out in the community. This investigation, dubbed **Operation Street Sweepah: Kings of Belaire**, commenced in order to directly respond to the increasing violence being experienced in these communities.

3. Using Somerville as an example to illustrate the gang-related nature of this violence, the shootings in Somerville have frequently taken place in the area of the Mystic Housing Projects, due to the targeting of the MP-45 gang (named for the Mystic Housing Projects) by rival gangs. In other communities, the violence has also been focused in public housing as well, such as the housing projects in the Port section of Cambridge, Massachusetts, which is home to the Port 44 gang. This violence significantly endangers the residents of these densely-populated neighborhoods and dramatically reduces the quality of life for those who live there. Numerous victims, innocent bystanders, and uninvolved parties have suffered injuries as a result of these shootings or have had their homes, businesses, or vehicles riddled with gunfire merely because they happen to live in an area claimed by a local gang.

4. Rivalries between these gang originate from the competing drug enterprises that these gangs operate in their respective communities. Conflicts between individuals arise over drug customers, proceeds, territory, and personal disrespect taking place over social media. Once a conflict arises, the gangs to which the individuals are affiliated become involved and the conflict expands to encompass the respective gang as well. Time and again, such conflicts that start on social media platforms, such as Facebook, SnapChat and Instagram, have escalated into gunfire on the streets.

5. Emblematic of the danger posed by these incidents, shootings under investigation in Somerville, Cambridge, Everett, and Lynn in the last 18 months are believed to involve automatic weapons, or machine guns. Machine guns are illegal to own in Massachusetts, and are heavily

regulated federally. These machine guns are believed to have been illegally obtained by gang members, and have been used over the last 18 months to dominate the streets, instill fear among rival gang members, and exact silence from the community. Other shootings under investigation are believed to have been essentially open gun battles on the street between rival groups firing dozens of rounds at each other.

6. While many of the gangs involved in these shootings are locally centered in the neighborhood in which their members reside, these local neighborhood gangs are at times aligned with members of national criminal enterprises, such as the Bloods, Crips, or the Tiny Rascals Gang, also known as “TRG.” As such, some of these shootings are believed to be linked to larger racketeering enterprises with which the local gangs align and become associated, and subsequently act in furtherance of a shared interests of controlling the streets.

7. Nationally, TRG is one of the largest and most violent Southeast Asian criminal street gangs in the United States, centered on the west coast. While traditionally comprised of Southeast Asians, local groups of TRG members or “sets” in Massachusetts have expanded their membership to include other ethnicities. TRG operates on a decentralized structure, without an identifiable national hierarchy. Recent gang intelligence has identified least 60 structured and unstructured local groups or “sets” of TRG through the country, with an estimated 5,000 to 10,000 members and associate members who have adopted a common street gang culture. TRG is involved in the street-level distribution of powdered cocaine, marijuana, ecstasy, and methamphetamine. TRG members are also known specifically for their involvement in gun violence on the street, including drive-by shootings of residences of rival gang members. TRG members use and wear the color gray and the gang frequently associates with both Blood and Crip sets, who are themselves rivals. As such, the gray color employed by TRG is both specifically indicative of TRG membership by

an individual, and also symbolic of TRG's relationship to other gangs.

8. Based upon the increased number of shootings attributable to these violent street gangs, FBI, ATF, MSP, and local police departments experiencing the surge in shootings have focused their collective attention upon the individuals responsible and the particular drug trafficking organizations directly linked to the violence.

**SPECIFIC CHARGES BEING SOUGHT**

9. This affidavit supports an application for criminal complaint charging a historical and ongoing conspiracy between JAIIR COLEMAN, CHRISTINA BERNBAUM, and others known and unknown to law enforcement, to: distribute, manufacture, and possess with intent to distribute and manufacture multiple-kilogram quantities of fentanyl, cocaine and cocaine base; and possess, use, carry and discharge firearms, including machine guns during and in relation to the drug trafficking conspiracy. In the course of these drug trafficking crimes, COLEMAN has discharged firearms on multiple occasions, including in November 2019, June 2020 and July 2020. Most recently in January 2021, a machine gun possessed by COLEMAN in furtherance of his drug trafficking crimes was recovered by investigators.

10. Specifically, I make this affidavit in support of a criminal complaint charging JAIIR COLEMAN ("COLEMAN") and CHRISTINA BERNBAUM ("BERNBAUM") with violating the following criminal statutes:

- a. For COLEMAN and BERNBAUM, Conspiracy to Distribute, Manufacture, and Possess with Intent to Distribute Controlled Substances, including Cocaine, Cocaine Base, and Fentanyl, in violation of 21 U.S.C. §§ 841 and 846;
- b. For COLEMAN and BERNBAUM, Conspiracy to Possess Firearms in Furtherance of, and to Use and Carry, Brandish and Discharge, Firearms During and in Relation to, a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(o);
- c. For COLEMAN, on or about January 6, 2021, Possession of a Machine Gun, in violation of 18 U.S.C. § 922(o);

- d. For COLEMAN, on or about January 6, 2021, Possession of a Machine Gun in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c)(1)(A), & (B)(ii).

11. This affidavit describes a series of four shootings taking place the night of November 11, 2019 – one in Chelsea (the “Chelsea Shooting”) and three in Somerville (the “Somerville Shootings”) – that were committed by COLEMAN, and others, during and in relation to the ongoing drug trafficking conspiracy of which COLEMAN is a participant. This affidavit also describes a fifth shooting taking place on July 2, 2020, in Cambridge, Massachusetts, committed by COLEMAN, where COLEMAN is believed to have used a machine gun.

12. Additionally, this complaint charges COLEMAN with possession of one such machine gun in furtherance of his drug trafficking crimes. In January 2021, COLEMAN was arrested and a machine gun was recovered from within the motor vehicle COLEMAN was driving. Further investigation revealed that COLEMAN was transporting controlled substances in the motor vehicle at the time, and that the machine gun was being possessed in furtherance of the drug trafficking crime.

13. BERNBAUM is COLEMAN’s current girlfriend and coconspirator in the drug trafficking and firearm crimes. Since COLEMAN’s arrest in January 2021 and during his incarceration, BERNBAUM has overseen a drug trafficking operation on COLEMAN behalf. This drug conspiracy in which COLEMAN and BERNBAUM are participants, involved multiple other persons and is believed to have entailed the manufacture, transportation and distribution of hundreds of grams of fentanyl, cocaine and cocaine base in the District of Massachusetts and the District of Maine.

14. The information contained in this affidavit is based on my personal observations and review of records and reports, my training and experience, and information obtained from other federal agents including FBI and ATF agents, MSP Troopers, Maine law enforcement, local police

officers, witnesses, victims, forensic analyses of cellular phones, call detail records, recordings, review of cellular phones seized in this case, the execution of search warrants, and information received from confidential informants and cooperating witnesses. The dates and times in this affidavit are approximate, and photographs have been cropped or formatted to fit the dimensions of the page. This affidavit is submitted for the limited purpose of establishing probable cause for the issuance of the requested criminal complaint and arrest warrants and does not set forth all of my knowledge about this investigation.

**APPLICABLE FEDERAL FIREARMS LAWS**

15. Machine guns are a certain type of firearm that are regulated by the National Firearms Act, 26 U.S.C. §§ 5841, et. seq. Pursuant to 26 U.S.C. § 5845(b), the term “machinegun” (sic) is defined as “any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.”

16. I am familiar with a certain type of firearm part known as a “selector switch”, which converts certain firearms from semi-automatic to fully-automatic, thus rendering the firearms capable of firing multiple shots by a single function of the trigger. As these are parts intended to convert a firearm into a machine gun, a selector switch itself qualifies as a “machinegun” under the statute.<sup>1</sup>

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<sup>1</sup> See United States v. Cash, 149 F.3d 706, 707 (7th Cir. 1998); United States v. Bradley, 892 F.2d 634, 635-36 (7th Cir. 1990).

17. Under the National Firearms Act, machine guns must be registered with the Bureau of Alcohol Tobacco and Firearms. See 26 U.S.C. § 5841(a). Under 18 U.S.C. § 922(o), it is unlawful for any person to transfer or to possess a machine gun that is not lawfully owned and registered. It is illegal to possess an unregistered machinegun, whether or not the individual is a prohibited person under 18 U.S.C. § 922, for another reason such as a felony conviction.

18. Under 18 USC § 924(c)(1)(A)(iii), the discharge of a firearm during and in relation to a drug trafficking crime, or while possessing a firearm in furtherance of a drug trafficking crime, carries a ten-year mandatory minimum sentence to be served consecutive to the sentence imposed for the underlying drug trafficking crime. “Section 924(c)(1)(A)(iii) requires no separate proof of intent. The 10-year mandatory minimum applies if a gun is discharged in the course of a violent or drug trafficking crime, whether on purpose or by accident.” See Dean v. United States, 556 U.S. 568 (2009).

19. Under 18 U.S.C. § 924(c)(1)(B)(i), the use and carrying of a machine gun during and in relation to a drug trafficking crime, or the possession of a machine gun in furtherance of a drug trafficking crime, carries a thirty-year mandatory minimum sentence to be served consecutive to the sentence imposed for the underlying drug trafficking crime.

20. Under 18 U.S.C. § 924(c)(2), “the term ‘drug trafficking crime’ means any felony punishable under the Controlled Substances Act (21 U.S.C. 801 et seq.), the Controlled Substances Import and Export Act (21 U.S.C. 951 et seq.), or chapter 705 of title 46.” Violations of 21 U.S.C. §§ 841(a)(1), 843 and 846, as charged in this complaint and described below, qualify as “drug trafficking crimes” under 18 U.S.C. § 924(c)(2).

**BACKGROUND OF JAIIR COLEMAN**

21. I am familiar with JAIIR COLEMAN, who has a date of birth of XX/XX/1999. JAIIR

COLEMAN goes by the street name “JC”. COLEMAN has not been convicted of a crime as an adult, but has a number of open felony criminal cases, and has been thereby prohibited from possessing firearms since at least June of 2019. A photograph of COLEMAN from the Massachusetts Registry of Motor Vehicles (“RMV”) follows:



22. According to his criminal record, COLEMAN’s open felony cases include:
  - a. Docket No. 1950CR001217, charging COLEMAN with possession with intent to distribute (PWID) a class B substance (cocaine), PWID a class C substance, PWID a class D substance, and conspiracy to violate controlled substance laws; and
  - b. Docket No. 1950CR000197, charging breaking and entering in the day for a felony.
23. COLEMAN is believed to be a member of TRG. COLEMAN self-identified as a member of TRG when booked in the Essex House of Correction in January 2021. Additionally, COLEMAN has the letters “TR” tattooed on his stomach, signifying his membership.

#### **BACKGROUND OF CHRISTINA BERNBAUM**

24. I am familiar with CHRISTINA BERNBAUM, who has a date of birth of XX/XX/1998. BERNBAUM goes by the name “Tina”. BERNBAUM has no criminal history, and is known to reside in Malden, Massachusetts. BERNBAUM is the current girlfriend of COLEMAN and, based on the investigation, is believed to have taken over COLEMAN’s drug distribution operation since COLEMAN was incarcerated on January 6, 2021. BERNBAUM has frequently rented vehicles and AirBnB residences for COLEMAN and CC-8 to utilize in furtherance of their drug distribution

operations.

25. BERNBAUM has a daughter who is 4 years old. In various videos obtained from cellular phones seized and searched in this investigation, I know that this 4-year-old daughter has accompanied COLEMAN and others on various trips to distribute narcotics or collect payment. Furthermore, as will be discussed, BERNBAUM has employed the belongings of her 4-year-old daughter to store and conceal narcotics and drug distribution paraphernalia. A photograph of BERNBAUM from the RMV follows:



26. BERNBAUM is also featured prominently in a music video publicly posted online by an individual I will refer to as CC-4. COLEMAN and BERNBAUM appear in this video. BERNBAUM can be observed dancing and standing at a stove engaged in what appears to be the “cooking” of a white powder, believed to be or represent, cocaine powder, the end goal of which I understand to be the creation of cocaine base. As will be discussed in this affidavit, BERNBAUM in fact is currently operating a large drug distribution enterprise on COLEMAN’s behalf while COLEMAN is incarcerated. COLEMAN can be observed in the video, at points holding a firearm. Still images from this music video of BERNBAUM “cooking” and COLEMAN holding a firearm follow:



**PROBABLE CAUSE**

**A. MAY 31, 2019 ARREST**

27. On May 31, 2019, COLEMAN was arrested for operating a red Nissan Rogue motor vehicle with a suspended license. The Nissan Rogue was registered to the former girlfriend of COLEMAN, an individual I will refer to as “MM” (the “red Nissan Rogue”). In the vehicle was an amount of marijuana. The vehicle was pulled over because another passenger of the vehicle was identified as being involved in a road range incident threatening another motorist with a knife. Additionally, CC-10 was present in the vehicle. In the trunk of the vehicle, at least a pound of marijuana was located in a vacuum sealed bag.

28. During the booking search of COLEMAN, Malden Police located a plastic bag in COLEMAN’s underwear, inside of which were three smaller bags. Within two of the bags, there were approximately 90 pills, and in the third bag there was an amount of suspected cocaine base, a/k/a “crack” cocaine. The suspected cocaine base was analyzed at the MSP Crime Lab and determined to be a cocaine base mixture and to weigh approximately 4.86 grams.

**B. OCTOBER 20, 2019 SEIZURE OF OVER 200 GRAMS OF COCAINE FROM A PASSENGER IN A RED NISSAN ROGUE DRIVEN BY COLEMAN**

29. On October 20, 2019, an officer of the Malden Police Department observed COLEMAN operating the above-described red Nissan Rogue registered to MM. The officer was familiar with COLEMAN’s criminal history, which included drug and firearms charges, and a recent May 2019 assault dangerous weapon and drug case that was pending in Malden District Court. Malden Police had also recently received information that COLEMAN was in possession of an Uzi firearm, and the officer knew that COLEMAN and CC-1 were depicted in various music videos in which firearms and narcotics are depicted. The officer in fact had recovered controlled substances from CC-1 in March 2019, when CC-1 was with COLEMAN.

30. The officer observed the red Nissan Rogue to be travelling well over the speed limit and

then take a right turn at high speed without using a directional signal. The officer stopped the red Nissan Rogue and approached the driver's side. COLEMAN's head was "popping up and down" in a movement consistent with concealing something. Once he moved closer, the Officer observed CC-1 in the passenger seat.

31. During the interaction, COLEMAN and CC-1 were asked to exit the vehicle. Both COLEMAN and CC-1 were pat-frisked and the Officer felt two large and hard bulges in CC-1's waistband/groin area. CC-1 would not identify what these items were, and the officer removed them from his pants. Upon inspection, the officer immediately knew them to be packages of suspected cocaine or cocaine base from their appearance. The officer also located three 30mg suspected oxycodone pills similar to the ones recovered from CC-1 in March 2019, described above. CC-1 was arrested and charged with trafficking over 200 grams of a class B substance, and COLEMAN was released.

32. The suspected crack cocaine seized from CC-1 was tested at the MSP Crime Lab. One of the chunks was determined to contain cocaine and to weigh approximately 86 grams. The other chunk was determined to contain cocaine base and to weigh approximately 171 grams. I know from my training and experience that this amount of drugs is consistent with bulk-trafficking and distribution.

### **C. NOVEMBER 11, 2019 CHELSEA SHOOTING**

33. On November 11, 2019, at 20:39, Chelsea Police responded to a ShotSpotter notification for numerous rounds fired at Tudor Street, Chelsea, Massachusetts. Officers arrived on scene and spoke with witnesses and collected evidence, including a holographic sight attachment for a handgun. Witnesses described a red, four-door mid-size sport utility vehicle ("SUV") seen driving away from Tudor Street. From interviews it was determined that two victims had been shot at,

and that two vehicles had been damaged by gunfire. Officers collected the spent shell casings, which totaled 29 rounds and were determined to be 9mm, and submitted them to MSP Crime Lab.

34. The red four-door SUV was observed on city camera footage from that date and approximate time period and was later determined to be a red Nissan Rogue SUV, which is the same color, make, and model as the red Nissan Rogue driven by COLEMAN on May 31, 2019 and October 20, 2019, described above. Chelsea Police alerted other law enforcement members in the area of this information.

**D. NOVEMBER 11, 2019 SOMERVILLE SHOOTINGS**

35. Later that same night, November 11, 2019, shortly after the Chelsea Shooting, three shootings took place in Somerville. At 21:54, a short time after the Chelsea Shooting, Somerville Police received a ShotSpotter notification for shots fired on Alston Street, Somerville, Massachusetts. Responding officers found 24 shell casings consisting of approximately 20 9mm casings and four .380 caliber casings.

36. Detectives discovered that most of the bullets fired were directed at the first and second floors of 15 Alston Street. Three rounds struck the first floor, one of which was recovered in the front living room. Both rooms in which ballistic evidence was found had persons present at the time of the shooting, though no persons sustained any injuries. Additionally, two bullets penetrated the siding and window at 19 ½ Alston Street, where a male victim was struck by glass from the projectile and sustained minor injuries. The MSP Crime Lab's ballistics examination of the casings recovered at the Alston Street scene later revealed that three separate firearms were used: two 9mm firearms and one .380 caliber firearm. Surveillance footage showed a small red SUV, consistent with the red Nissan Rogue, traveling on Alston Street at the time of the shots.

37. That same night, at 22:24, a second shooting, which was not captured by ShotSpotter, was

reported at the Mystic Laundromat located at 374 Mystic Avenue, Somerville, Massachusetts, three blocks away from the Mystic Projects. Based upon what Somerville Police observed at the scene, it appeared that one round was fired through the laundromat's front window, nearly striking a customer; at the time, multiple persons were inside. This was later confirmed by video footage that captured the round shattering the glass of the laundromat's window.

38. That same night, at 23:07, Somerville Police received another ShotSpotter notification for five shots fired in the area of 7 Memorial Road, Somerville, Massachusetts, which is at the corner of Memorial Road and Temple Street and is the approximate location of the Mystic Housing Projects. Responding officers observed several bullet holes on an apartment building known as Saint Polycarp Village (7 Memorial Road, Unit #101) and on a gray Honda Accord. Responding officers collected two 9mm shell casings and three spent projectiles and also recovered one round that had penetrated the apartment building and was found next to a couch on which an individual was sleeping at the time. Video footage from the area near 7 Memorial Road showed a small red SUV, consistent with the red Nissan Rogue, traveling into the area of the Mystic Housing Projects at the Memorial Road entrance at approximately the same time as the ShotSpotter notification. The vehicle's registration was determined to be associated with the red Nissan Rogue, which, as described above, is registered by COLEMAN's former girlfriend, MM.

39. The red Nissan Rogue was seized by police on November 12, 2019 and searched after a warrant was obtained. Among the evidence collected was a 9mm shell casing from the floor beneath the front passenger seat. On January 22, 2020, the MSP Crime Lab reported that particles characteristic of gunshot primer residue were recovered from the interior of the red Nissan Rogue. Further analysis and comparison of the 9mm casing recovered from the floor beneath the front passenger seat is ongoing.

**E. JULY 2, 2020 CAMBRIDGE SHOOTING**

40. On July 2, 2020, at 21:41, Cambridge Police received a ShotSpotter notification for 24 rounds fired at 110 Harvard Street, Cambridge, Massachusetts. Review of the audio captured by ShotSpotter revealed that the gunfire was consistent with having been fired by an automatic weapon. Responding officers found multiple shell casings scattered in the parking lot, courtyard, and surrounding areas. A witness reported hearing a loud popping noise, seeing an individual wearing a black shirt in the courtyard approach a group of people holding a firearm and pointing it towards a crowd of people opposite him, and observing the individual fire approximately eight to ten rounds into the crowd.

41. Law enforcement returned to the 110 Harvard Street area the morning of July 3, 2020 to continue their investigation of this shooting. Investigators discovered a shattered glass window on a residential ground floor unit of 125 Harvard Street, with damage consistent with a bullethole. A witness reported having seen a male individual standing in the parking lot at 110 Harvard Street and observing a verbal altercation take place, after which the individual brandished a black firearm from his right waistband, pointed the gun, and began firing continuous rounds in the direction of Harvard Street. This witness estimated hearing approximately five to eight rounds fired and observed the individual run through the parking lot towards the direction of Main Street.

42. Video surveillance of this area from around the time of the ShotSpotter activation depicts a man dressed in all black running down Washington Street, a street parallel to Harvard Street, towards the direction of Windsor Street.

**F. AUGUST 25, 2020 GUN RECOVERY BY BOSTON POLICE**

43. On August 25, 2020, Boston Police responded to a report of shots-fired in Roxbury, Massachusetts. While officers were patrolling the area of Washington Street, they heard what they

believed to be multiple gunshots coming from the area of Martin Luther King Boulevard.

44. The dark-colored SUV came to a complete stop at approximately the intersection of Marcella and Washington Streets, and officers safely removed its two occupants. Responding officers canvassed the area and a firearm was located on a grass area next to 95 Thornton Street, a location within the vehicle's direct path. The firearm was a 9mm loaded with five rounds in the magazine and one round in the chamber, with a 31 -round extended magazine. Of note, the firearm had a gray frame, a black slide with angled grooves, two vents, and a picatinny rail system on the frame underneath the barrel. A photograph of the recovered firearm follows:



45. As further detailed below, tool markings from one casing recovered at the Alston Street Somerville shooting and one casing recovered at the Chelsea Shooting were later determined to match this 9mm firearm, confirming that this 9mm firearm fired at least one of the bullets recovered at each of the Alston Street Somerville shooting and the Chelsea Shooting.

**G. BALLISTICS MATCHES**

46. The ATF's NIBIN (National Integrated Ballistic Information Network) system is used to analyze ballistics of shell casings from a shooting and also to compare such ballistics to ballistics entries from past shootings. To do so, a ballisticsian enters a digital photograph of a shell casing into the system, after which the computer system digitally compares it to previous entries. Following a computer match – i.e., an indication that the digital photograph matches digital photographs of ballistics/shell casings from previous shootings, also referred to as a “NIBIN match” – a visual comparison is conducted to determine whether the match is substantiated. Following the substantiation of a digital image comparison, the physical shell casings can be microscopically compared to confirm the matching tool markings.

47. The NIBIN system matched one of the casings recovered at the November 11, 2019 Chelsea shooting with one of the casings recovered at the November 11, 2019 Alston Street Somerville shooting, thus indicating that the same firearm was used to shoot bullets at both locations. The NIBIN system further matched those two casings with a casing determined to have been fired by the above-described 9mm firearm recovered by Boston Police on August 25, 2020. Physical comparison of the tool markings from the casings and the firearm was conducted by the Boston Police crime laboratory and confirmed the matches: it was determined that the firearm recovered by Boston Police on August 25, 2020 fired at least one of the casings recovered at the Chelsea Shooting and at least one of the casings recovered at the Alston Street Somerville shooting.

**H. MUSIC VIDEO DEPICTING COLEMAN HOLDING THE 9MM FIREARM USED IN THE CHELSEA AND SOMERVILLE SHOOTINGS**

48. Investigators are familiar with a music video for a song entitled “Demon Time” posted on YouTube on December 11, 2019, at which point it became publicly viewable. The music video depicts COLEMAN and BERNBAUM, and numerous other persons. COLEMAN and others can be seen holding firearms, including some with extended magazines, fanning dollar bills, and

drinking Belaire brand champagne.<sup>2</sup>

49. In the following still image from the video, COLEMAN can be observed on the left-hand side of the screen holding a firearm (I have superimposed a red outline on the image to identify COLEMAN):



50. Moments later in the music video, the details of the firearm held by COLEMAN can be observed. The firearm has angled grooves on the rear of the slide and is equipped with an extended magazine and holographic sight. Additionally, the slide is distinct: it has two vented ports along the slide and a holographic sight above the slide and a picatinny rail on the frame, in front of the trigger guard. The holographic sight attached to the firearm depicted in this music video appears identical to the holographic sight attachment recovered by Chelsea Police on November 11, 2019 after the Chelsea Shooting. A still image from the music video depicting the distinct firearm follows:

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<sup>2</sup> The video features a disclaimer that states “Anything Illegal that Symbolize Violence Isn’t Real and Used as Props.” Based on my training and experience in this and other investigations, and specific information developed in this investigation, I believe that this disclaimer is simply false and that real guns are being held and used.



**I. MUSIC VIDEO DEPICTING COLEMAN HOLDING A GLOCK FIREARM WITH SWITCH AND CC-1 HOLDING A FIREARM**

51. On August 18, 2020, a music video was uploaded to YouTube for a song called “Active”, at which point it became publicly viewable. This music video captures COLEMAN and CC-1 (the individual who was arrested on October 20, 2019, as described above)<sup>3</sup> holding firearms.

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<sup>3</sup> It is believed that this video was filmed while CC-1 was on pretrial release for the drug charges resulting from his October 20, 2019 arrest.

52. During the music video, COLEMAN can be observed holding a black Glock firearm (discernible from the logo on the slide) with a fully-automatic selector switch attached to the rear of the slide of the firearm. CC-1 can also be observed in this video holding a firearm and pointing it at the camera, and fanning large amount of cash at the camera. Other individuals can be observed drinking Belaire brand champagne, brandishing firearms, and displaying large amount of cash.

53. A still image from the music video depicting COLEMAN holding the firearm with a selector switch follows, with a red box superimposed over the selector switch:



54. Of note, COLEMAN appears to be wearing the same outfit as depicted in a photograph and video of COLEMAN recovered during this investigation that were taken on June 5, 2020. Consequently, I believe that this music video was filmed on or about June 4 or June 5, 2020.

**J. MUSIC VIDEO DEPICTING COLEMAN HOLDING A FIREARM RECOVERED ON JANUARY 6, 2021**

55. On January 1, 2021, a music video was uploaded to YouTube for a song called “Dog Time” by an individual who I will refer to as CC-6, at which point it became publicly viewable. During the video multiple individuals can be observed brandishing firearms, making gang signs, and drinking Belaire brand champagne. This music video also specifically depicts a firearm with a tan frame and black slide, equipped with a laser sight attached underneath the barrel in front of the trigger guard with the letters “P3XL”, and a selector switch protruding behind the slide that would render it capable of automatic firing. The firearm has a clear large-capacity 30-round magazine that appears loaded with ammunition. As such, it is clear that the firearm depicted in the music video is not a prop or replica; I believe it is in fact the same firearm later recovered on January 6, 2021 from COLEMAN’s vehicle, discussed below.

56. A rotated screen capture of the firearm depicted in the music video follows:



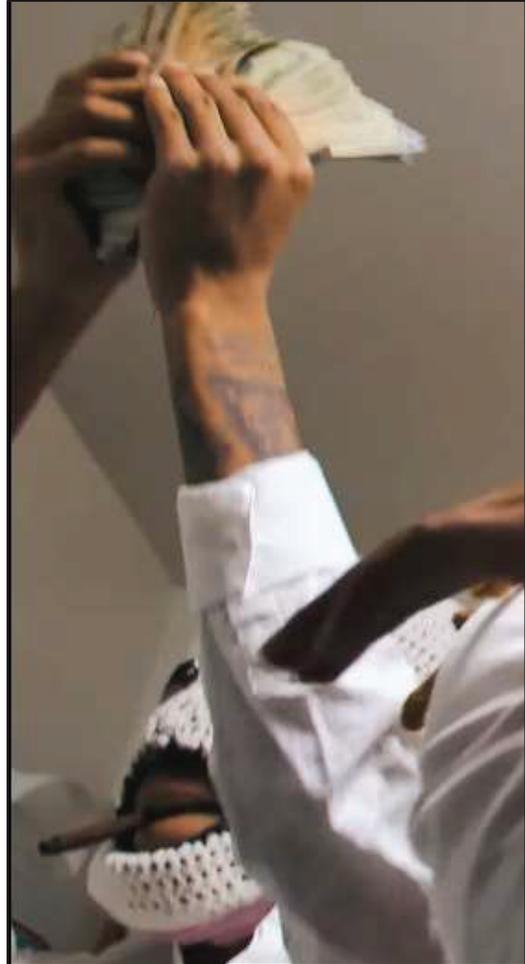
57. In the music video, various individuals can be observed holding this particular tan and black firearm, including an individual wearing a white knit mask, white button-down shirt, a black “Gucci” brand belt, and at various points, a New York Yankees hat. For reasons described below, I believe this individual wearing the white knit mask is in fact COLEMAN. The build and height of the individual in the white mask are consistent with that of COLEMAN. Additionally, at various points during the music video, tattoos are visible on the right forearm and left forearm of the white-masked individual that are consistent with tattoos that I know COLEMAN to have on his forearms. Still images of the individual wearing a white mask who I believe to be COLEMAN follow:







58. During the music video, tattoos on the right forearm and left forearm of the individual wearing the white mask are briefly visible. Still images from the music video of the tattoos follow:



59. I am familiar with a tattoo of the word “AYESHA” and a star on COLEMAN’s right forearm that is consistent with the design of the tattoo on the right forearm of the white-masked individual in the music video. I am familiar with another tattoo roughly in the shape of a triangle with writing beneath it on his left forearm and wrist. These same tattoos were observed on COLEMAN on January 6, 2021 following his arrest and photographed. The last letter “A” in AYESHA and the star that follows appear visible on the right forearm of the individual in the white mask in the music video. Part of the tattoo roughly in the shape of a triangle appears visible on the left forearm of the individual in the white mask in the music video. Photographs of COLEMAN’s forearm tattoos taken on January 6, 2021, follow:



**K. ARREST OF JAIIR COLEMAN ON JANUARY 6, 2021**

60. On January 6, 2021, at approximately 11:00 a.m., investigators saw COLEMAN leaving BERNBAUM's residence in Malden, Massachusetts in a Chevy Equinox bearing Maryland license plate number 5DM9212 (the "Equinox"). Approximately 4 minutes later, agents observed the Equinox at CC-8's residence in Salem, Massachusetts. Shortly thereafter, at approximately 11:50 a.m., agents observed COLEMAN operating the Equinox leaving the area of CC-8's residence. Investigators were familiar with COLEMAN and were aware that COLEMAN's driver's license status was suspended.

61. Investigators observed the Equinox park on a road directly in front of a white Nissan (the "white Nissan"). Investigators observed COLEMAN enter the passenger side front door of the

white Nissan, which remained running and contained a single unidentified operator. COLEMAN remained in the white Nissan for approximately thirty seconds and then exited through the same passenger side front door. COLEMAN reentered the driver's seat of the Equinox and left.

62. Investigators followed the Equinox and caused a marked unit of Lynn Police to conduct a motor vehicle stop of COLEMAN's vehicle because he was operating the motor vehicle on a public way with a suspended license. COLEMAN was then placed under arrest for operating with a suspended license. As COLEMAN exited the Equinox, the officer removed a switchblade-style knife that had been clipped to COLEMAN's front pants pocket.

63. Following COLEMAN's arrest, the Equinox was searched. During the search, a firearm with a tan frame and black slide was recovered that was determined to meet the definition of a machine gun. The firearm was hidden underneath the center console in a hide or stash location, accessible from the driver's seat. The firearm was equipped with a "selector switch" attachment, also known as a "chip," attached to the rear of the slide. As described above, selector switch devices turn semi-automatic firearms in fully-automatic machine guns by providing an option for fully-automatic fire with a single pull of the trigger. This firearm was also equipped with a laser sight attached underneath the barrel in front of the trigger guard that had the letters "P3XL". Near the firearm in the hide, a clear large-capacity 30-round magazine containing 28 rounds of ammunition was recovered. The firearm had no serial numbers or identifying markings. Of note, the GLOCK logo on the selector switch had a section missing near the "O" and "C" in the word "GLOCK". Photographs of the seized tan-framed machine gun, the selector switch at the end of the slide, and the clear extended magazine loaded with ammunition follow:





64. The firearm was examined by ATF Special Agent Jack Kelter and was determined to be equipped with a fully-automatic selector switch attachment. Special Agent Kelter conducted a dry test fire of the recovered firearm and preliminarily determined that it was a functional machine gun under federal law. Further testing and ballistics examination at the MSP Crime Lab confirmed that it is an operable machine gun.

65. Under federal law, this firearm qualifies as a machine gun because it is equipped with a selector switch that allows the firearm to shoot more than one shot by a single function (i.e., pull) of the trigger. See 26 U.S.C. § 5845(b). In fact, the selector switch itself qualifies as a machine gun because it is a “part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun.” 26 U.S.C. § 5845(b).

66. As the firearm lacks a serial number, it is incapable of being registered with the ATF’s National Firearms Act registration database. Special Agent Kelter conducted a query of the ATF’s National Firearms Act registration database and determined that COLEMAN is not the registered owner of any machine gun or any other firearms.

67. The Equinox that COLEMAN was operating was determined to be a rental from Hertz, rented in BERNBAUM’s name. Shortly after the firearm was recovered, BERNBAUM arrived on the scene and took possession of the Equinox as the authorized renter. According to the

documents related to the rental agreement, COLEMAN was not listed as an authorized driver.

68. BERNBAUM's cellular phone was later seized and searched during the course of this investigation. The search of BERNBAUM's phone revealed text messages from January 6, 2021 indicating that COLEMAN was in contact with BERNBAUM immediately prior to his arrest, while Lynn Police were interacting with him.

69. In the text messages, COLEMAN provides BERNBAUM his location and gives BERNBAUM instructions regarding whereabouts of his controlled substances and a firearm. A text message from COLEMAN to BERNBAUM stated "They broke the stash", which I believe to mean that the police had found the stash location in the Equinox and its contents. BERNBAUM replied, "No fucking way" and "Jaiir wtf bro", which I understand to be expressing displeasure at the current state of affairs.

70. COLEMAN then texted BERNBAUM about the whereabouts of specific "work," which I know to be a slang term often used to refer to drugs: "The work in Maine is in lazo room" "In the dresser under the last draw" "You gotta take it all out." In this exchange, I believe COLEMAN is telling BERNBAUM that there are narcotics ("work") in a location in Maine, in a room, and that she needs to go retrieve it. COLEMAN then instructed BERNBAUM to "Give my sitchy and stuff to let" "Ely", to which BERNBAUM replied "Okay". I believe "sitchy" is short for situation, which I know to be a slang term for firearm.

71. COLEMAN also texted BERNBAUM, "There perks in the top stash." I believe in this statement COLEMAN is telling BERNBAUM that there are Percocet pills ("perks") in a hidden compartment ("top stash") of the Equinox and that BERNBAUM should retrieve them.<sup>4</sup> During

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<sup>4</sup> As will be discussed below, COLEMAN later asks BERNBAUM about these controlled substances during a jail call. These drugs were not located by law enforcement on January 6, 2021.

this exchange, COLEMAN also provided BERNBAUM with a phone number for CC-8.

72. As further detailed below, I believe that the conspiracy to manufacture and distribute controlled substances continued after COLEMAN's arrest and that COLEMAN remained a participant even while incarcerated.

**L. SEARCH OF JAIIR COLEMAN'S PHONE**

73. Following his January 6, 2021 arrest, investigators searched two cellular phones found on COLEMAN's person at the time of arrest. The content of one appeared to be consistent with a longer period of use dating back to 2019 and seemed to be the primary phone used by COLEMAN (hereinafter the "COLEMAN PHONE").

74. In the COLEMAN PHONE, numerous pictures and videos were located that depict COLEMAN holding and brandishing numerous firearms, handling large stacks of currency, and drinking Belaire brand champagne inside of various motor vehicles. Additionally, the COLEMAN PHONE contained hundreds, if not thousands, of text messages, pictures, and videos pertaining to firearms and the distribution of controlled substances, including cocaine, cocaine base, fentanyl, and marijuana, dating back multiple years and corresponding to multiple kilograms of drug weight.

75. For example, a video located on the COLEMAN PHONE depicts bags of what appears to a large amount of cocaine base or fentanyl. During the video, COLEMAN states, "a quick little 500 grams." The metadata from this video file indicates it was taken on September 6, 2020. A still image from the video follows:



76. Another video located on the COLEMAN PHONE named “IMG\_2579.mov” depicts COLEMAN in the bathroom of what appears to be a hotel weighing and bagging white substances while dancing. A scale and white substances in plastic bags can be seen on the counter. According to the metadata, this video was taken on August 14, 2020. This video appears to have been posted by BERNBAUM to her TikTok account, and based on this investigation, I believe the video was filmed in Maine. A still image from that video follows:



77. Investigators also located a video file titled “IMG\_1719.mp4” in the COLEMAN PHONE, which, according to the metadata, was created on May 19, 2020, while CC-1 was on pretrial release for the above-described state arrest. In the video, COLEMAN and CC-1 can be seen holding

thousands of dollars in cash as they drive around in a vehicle listening to music.<sup>5</sup> COLEMAN is in the front seat, while CC-1 is in the rear of the vehicle. During the video, COLEMAN and CC-1 display the cash for the camera and generally celebrate and show how much money is in their possession. Based upon my investigation and review of other text messages between COLEMAN and CCI-1 I believe they are driving around selling controlled substances and this video depicts the profits of their drug conspiracy. Later in the video, a firearm with an extended magazine can be seen underneath the leg of COLEMAN. Still images from this video follow:



### 1. Selected Content Related to the November 11, 2019 Shootings

78. In the COLEMAN PHONE, a video was located that depicts COLEMAN holding a gray

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<sup>5</sup> The lyrics of song playing in the background are “she want a young n\*\*\*a, she want a drug dealer, she want a scammer.”

framed firearm with a holographic sight, consistent in appearance with the firearm recovered by Boston Police on August 25, 2020, confirmed to have been used in the November 11, 2019 Chelsea Shooting and Somerville Shootings. The metadata of the video indicates that it was created on November 2, 2019, nine days before the Chelsea and Somerville shootings. A still image from the video follows:



79. Investigators also located a series of text messages in the COLEMAN PHONE from the night of November 11, 2019, shortly after the Chelsea Shooting and Somerville Shootings. For example, COLEMAN received a text at 23:27 on November 11, 2019, stating “Kar on kamera” and then “Report stolen ASAP”. I am aware that footage from one of the cameras that captured

the red Nissan Rogue was posted on Twitter by the Chelsea Police Chief at 23:01 on November 11, 2019, and that this video footage was picked up and broadcast by various news outlets.<sup>6</sup>

80. In another conversation taking place at 23:38 on November 11, 2019, shortly after the Somerville shootings, CC-4 states that he is coming to get his wallet from the “v”, which is short for vehicle. COLEMAN inquires where in the vehicle the wallet is located, and tells CC-4 that he is currently in the vehicle. CC-4 states it is behind “ur seat”, which CC-4 indicates is the driver’s seat. COLEMAN states that he located the wallet, and CC-4 asks COLEMAN to get together (get with me “gwm”) in the morning.

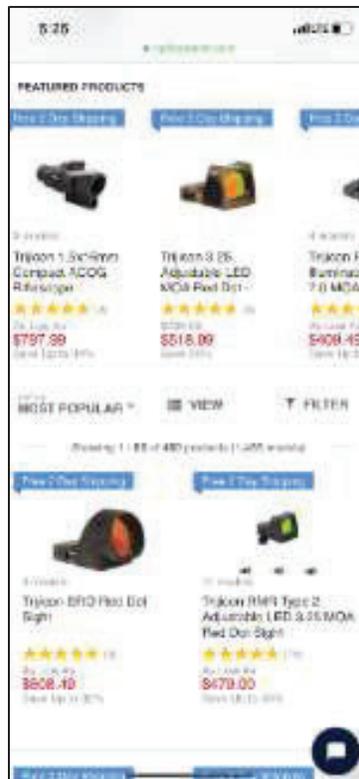
Time	Author	Text	Note
11/11/2019 11:38:00 PM	CC-4	Yo	
11/11/2019 11:38:15 PM	CC-4	I’m coming back to get my wallet from the v	“V” meaning vehicle
11/11/2019 11:39:32 PM	COLEMAN	I already left	
11/11/2019 11:39:39 PM	COLEMAN	Where is it	
11/11/2019 11:39:45 PM	COLEMAN	I’m in it	
11/11/2019 11:39:54 PM	CC-4	Behind ur seat	
11/11/2019 11:39:56 PM	CC-4	Driver	
11/11/2019 11:40:00 PM	CC-4	In the slot	
11/11/2019 11:40:20 PM	CC-4	Wya	
11/11/2019 11:41:07 PM	COLEMAN	I got it	
11/12/2019 12:21:03 AM	CC-4	Gwm in the am	“get with me”

81. The next day, November 12, 2019, CC-4 sent COLEMAN a text message about a “pole” which I know to be a slang term referring to a firearm. CC-4 asks if COLEMAN gave his gun (“pole”) to an individual named “ju” and COLEMAN states that he did not. CC-4 then indicates he is going to “come grab it”, which I believe to mean the firearm, and COLEMAN replies that it is “unacceptable” right now (“Rn”). I believe the statement that the firearm is “unacceptable” is a reference to the fact that the holographic sight attached to the gray frame firearm fell off during the Chelsea Shooting.

<sup>6</sup> See <https://twitter.com/ChiefKyes/status/1194102930879725570>.

Time	Author	Text	Note
11/12/2019 5:39:26 PM	CC-4	U gave ju my pole	Pole means firearm
11/12/2019 5:39:37 PM	COLEMAN	No	
11/12/2019 5:39:46 PM	CC-4	Ohhhhg	
11/12/2019 5:40:19 PM	CC-4	I'm bouta come grab it	
11/12/2019 5:40:29 PM	COLEMAN	Don't got it	
11/12/2019 5:40:40 PM	CC-4	Who has it	
11/12/2019 5:40:56 PM	COLEMAN	Me but it's unacceptable Rn	"Rn" meaning right now
11/12/2019 5:41:36 PM	CC-4	☹️	Sad face emoji
11/12/2019 5:41:59 PM	COLEMAN	Tomo	Tomorrow

82. Additionally, on November 12, 2019, at 17:25, a screen capture photograph of price listings for holographic sights was taken on the COLEMAN PHONE. As detailed above, a video on the COLEMAN PHONE created on November 2, 2019 depicts COLEMAN holding a gray framed firearm with a holographic sight, and Chelsea Police recovered a holographic sight from the November 11, 2019 Chelsea Shooting. I believe this was likely taken after COLEMAN realized that the holographic sight from the firearm had fallen off (and was recovered by Chelsea Police) during the November 11, 2019 shootings. The screen capture follows:



83. On November 12, 2019, at 13:49, text messages from the COLEMAN PHONE to BERNBAUM appear to set up his alibi if questioned by police. COLEMAN stated to BERNBAUM, “And if the boys ask you say I was with you cheating on [MM].” In this statement, I understand that COLEMAN is telling BERNBAUM that if the police ask, she should say that COLEMAN was with BERNBAUM the night of November 11, 2019, and not with the owner of the red Nissan Rogue used in the shootings, his other girlfriend, MM.

84. On November 12, 2019, around 14:00, text messages from the COLEMAN PHONE appear to indicate that COLEMAN became concerned about police officers being in the area: a large number of texts were sent to various persons seeking to have them assist COLEMAN in removing controlled substances from his residence. Ultimately, COLEMAN texted BERNBAUM specific instructions to move the controlled substances from the residence, including details about where the controlled substances were located and how to avoid being seen by police so that she would not get arrested.

85. Another conversation with BERNBAUM regarding drug distribution took place on November 14, 2019. COLEMAN asked BERNBAUM whether certain crack cocaine was “wet” and for her to weigh it. At 11:30, BERNBAUM reported that the weight was 18.05 grams and 22.7 grams. Three hours later, BERNBAUM reported that she had scaled additional crack cocaine that weighed 19.82 grams and 14.77 grams. The follow table sets forth pertinent portions of that text message conversation:

Timestamp	Author	Text	Note
11/14/2019 11:23:11 AM	COLEMAN	And under the heater can you see if that’s still kinda wet ?	Referring to recently cooked crack, and whether it is still wet from the cooking process
11/14/2019 11:23:27 AM	COLEMAN	Why you leaving so early	

11/14/2019 11:23:49 AM	BERNBAUM	Well you did have my wallet but you always wanna give it back to me when I'm fucked up and u know I lose everything	
11/14/2019 11:24:08 AM	BERNBAUM	Yes it's very wet	
11/14/2019 11:24:40 AM	COLEMAN	Ok so just leave it	
11/14/2019 11:24:53 AM	COLEMAN	Wash your hands	
11/14/2019 11:25:04 AM	COLEMAN	And can you scale the big nugs	Referring to weighing the "nugs" of crack cocaine
11/14/2019 11:28:53 AM	BERNBAUM	Ok	
11/14/2019 11:30:04 AM	BERNBAUM	18.05 and 22.7	Reporting the scaled weight in grams of the crack
11/14/2019 11:31:34 AM	COLEMAN	Ok	
11/14/2019 11:31:51 AM	COLEMAN	I wish you watched me no cap I forced it	
11/14/2019 11:32:00 AM	COLEMAN	It was 14 and then I made it that	Describing how he adulterated the crack
11/14/2019 2:06:26 PM	COLEMAN	Can you go for me if you not busy to move it from the heater	
11/14/2019 2:06:52 PM	BERNBAUM	Sure	
11/14/2019 2:19:45 PM	COLEMAN	Ok is it wet still	
11/14/2019 2:20:04 PM	BERNBAUM	Ya kinda	
11/14/2019 2:20:20 PM	COLEMAN	Ok scale it and put Under my tv	
11/14/2019 2:20:36 PM	BERNBAUM	Like leave it on the tray or put it in a bag	
11/14/2019 2:20:45 PM	COLEMAN	Yea on the tray	
11/14/2019 2:20:50 PM	BERNBAUM	Ok	
11/14/2019 2:20:53 PM	BERNBAUM	I already scaled it tho	
11/14/2019 2:21:25 PM	BERNBAUM	19.82	Reporting the scaled weight in grams of the crack
11/14/2019 2:21:40 PM	BERNBAUM	14.77	Reporting the scaled weight in grams of the crack
11/14/2019 2:22:01 PM	COLEMAN	Ok under the thing	
11/14/2019 2:22:22 PM	COLEMAN	Bc it's wet when it dry it goes for less	
11/14/2019 2:22:34 PM	COLEMAN	But it still gucci	
11/14/2019 2:22:37 PM	BERNBAUM	Oooh okay makes sense	
11/14/2019 2:22:59 PM	COLEMAN	Under the tv and LOCC yo	
11/14/2019 2:23:01 PM	COLEMAN	Up	
11/14/2019 2:23:04 PM	BERNBAUM	There's still more tho that was just the nugs	
11/14/2019 2:42:14 PM	COLEMAN	Nbs I might get book	Stating he may be arrested ("book") soon
11/14/2019 2:42:26 PM	BERNBAUM	Why you saying that	
11/14/2019 2:42:27 PM	COLEMAN	Thank you for everything you can always stay at my crib	
11/14/2019 2:43:00 PM	COLEMAN	Delete our messages remember what i said	
11/14/2019 2:43:08 PM	COLEMAN	I'll hyu later if anything	

86. Investigators also located a screen capture on the COLEMAN PHONE of a posting by

Boston Police on the BPDNEWS.COM blog concerning the August 25, 2020 recovery of the gray frame firearm linked to the Chelsea Shooting and Somerville Shootings. The metadata of this screen capture indicates it was made on August 28, 2020, three days after the recovery of the firearm. The screen capture follows:



**2. Selected Content Related to the July 2, 2020 Cambridge Shooting**

87. In the COLEMAN PHONE, investigators identified a text message conversation taking place on July 2, 2020 between COLEMAN and CC-4, who is known to reside in Cambridge in the area of the shooting, indicating that COLEMAN committed the above-described July 2, 2020 Cambridge Shooting.

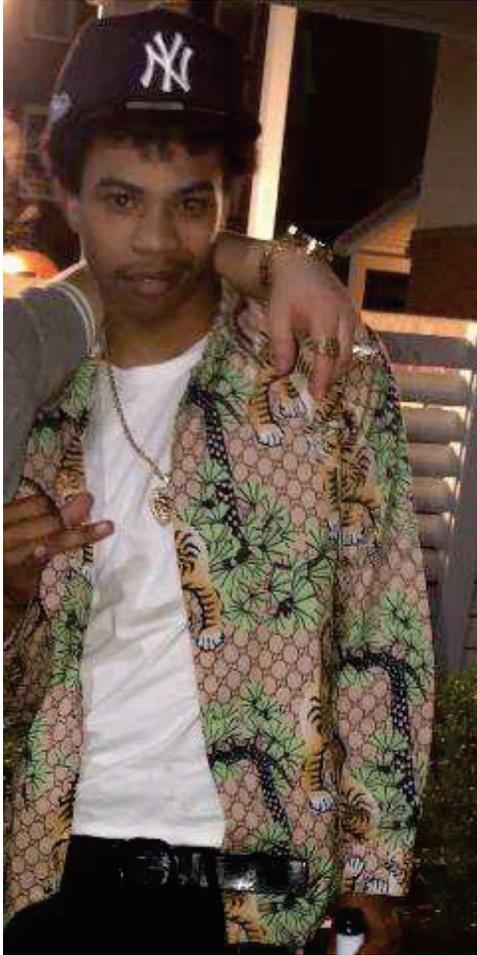
88. In this conversation, at 8:41 p.m. on July 2, 2020 COLEMAN writes to CC-4 “If your out there ledge” “Leave” “My wings coming out.” CC-4 responds “Kk leaving now.” I believe this to be a warning from COLEMAN to CC-4 to leave the area before COLEMAN arrives and shoots.

89. As noted above, the ShotSpotter notification for 24 rounds fired at 110 Harvard Street, Cambridge, Massachusetts. was approximately one hour later, at 21:41. Based on this and other information learned from this investigation, I believe COLEMAN was the shooter in the July 2, 2020 Cambridge Shooting, and that a fully-automatic weapon was used.

**3. Pictures of COLEMAN Indicating That he is the Individual in the “Dog Time” Music Video Holding the Firearm Recovered on January 6, 2021**

90. In the COLEMAN PHONE, investigators identified a conversation between COLEMAN and an individual believed to be CC-6, whose “Dog Time” music video was uploaded to YouTube on January 1, 2021. In the conversation, CC-6 and COLEMAN discuss the “Dog Time” music video, and COLEMAN attending its filming. From the context of the conversation, it appears that this video was filmed on or about December 14, 2020. At one point in the conversation, days after the filming, CC-6 shares the music video file with COLEMAN and then later sends a link to the posted video on YouTube.

91. Investigators also located a picture in the COLEMAN PHONE from 2020, in which COLEMAN is wearing a blue New York Yankees hat and a large black “Gucci” belt, which appears to be the same belt worn by white-masked individual in the “Dog Time” music video described above. That still image and a closer image of the “Gucci” belt follow, with a comparison snippet from the music video:



### 3. Video Relating to Firearm and Selector Switch

92. Investigators observed a video on the COLEMAN PHONE of a hand holding a firearm with a fully-automatic selector switch that, according to metadata, was created on July 21, 2020. This selector switch appeared to be consistent with the selector switch on the firearm recovered on January 6, 2021 from the Equinox that COLEMAN was driving. Of note, the GLOCK logo on the selector switch depicted in the video appears to be missing a section, consistent with section missing from the selector switch on the firearm recovered on January 6, 2021.

93. During the video, the hand manipulates the switch back and forth, rendering the firearm capable of firing as an automatic or semi-automatic. A still image from the video and an enlarged and rotated view of the missing section of the GLOCK logo from that still image follow:



94. A zoomed-in photograph of the selector switch attached to the firearm recovered from COLEMAN's vehicle on January 6, 2021 follows:



95. Also in the COLEMAN PHONE, investigators located a file named "jc x valee rough mix 2.mp3" which is a rap song in which COLEMAN's voice can be heard rapping. During the song COLEMAN states "got a Glock with a switch", indicating his familiarity with this particular type

of after-market accessory and its purpose. Additionally, investigators located a “notes” file in the COLEMAN PHONE that appears to contain song lyrics, stating the following: “Bitches can’t pop can’t move with” “Glock wit the switch yea packed up wit tool baby”. I believe these lyrics were written by COLEMAN on the COLEMAN PHONE, and demonstrate his knowledge of firearms (“tool”) and Glock switches, including their fully-automatic functionality.

96. Another video found on the COLEMAN PHONE depicts COLEMAN wearing the same clothing that he wore in the “Active” music video described above, uploaded to YouTube on August 18, 2020, in which COLEMAN is depicted in possession of a firearm with a selector switch. According to the metadata, that video file was taken at 00:37 on June 5, 2020.

#### **4. Text Message Conversations**

97. The COLEMAN PHONE also contained numerous other conversations, including many with various coconspirators, discussing the sale of controlled substances from at least September 2019 through January 6, 2021, indicating that COLEMAN was engaged in, or responsible for, a large drug trafficking organization (“DTO”) that sold large quantities of cocaine base, cocaine, fentanyl, and other controlled substances. In these text messages with various coconspirators, COLEMAN specifically discusses purchasing, “cooking,” and cutting hundreds of grams of cocaine, cocaine base, and fentanyl, and turning those into thousands of grams for retail distribution.

##### **a. Conversation with CC-8**

98. Text messages found on the COLEMAN PHONE between COLEMAN and a phone believed to be used by CC-8<sup>7</sup> (the “CC-8 PHONE”) from December 2020 through the date of

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<sup>7</sup> These text messages between the COLEMAN PHONE and CC-8 involve a phone number used by CC-8 ending in 4216. A cellular phone associated with the number ending in 4216 was recovered during the search of CC-8’s residence on March 4, 2021, and the same conversation

COLEMAN's arrest on January 6, 2021 pertained to their drug trafficking conspiracy.

99. In a series of text messages between December 12, 2020 and December 13, 2020, CC-8 instructs COLEMAN to cut fentanyl using specific proportions to adulterate the raw fentanyl and prepare it for street-level distribution. Portions of that text message sequence follow:

<u>Timestamp</u>	<u>AUTHOR</u>	<u>Text</u>	<u>Note</u>
12/12/2020 5:32:45 PM	COLEMAN	Yo	
12/12/2020 5:33:04 PM	CC-8	Yo	
12/12/2020 5:34:04 PM	COLEMAN	She gave me 42 hunnit	
12/12/2020 5:34:45 PM	COLEMAN	4250 all together and then the 80 she was short from last night so 4330	
12/12/2020 5:43:18 PM	CC-8	Give lazy 2 bands	2 bands means \$2,000
12/12/2020 5:43:30 PM	CC-8	U gave her the 50? From lazo shit or yours?	
12/12/2020 5:43:44 PM	CC-8	Take the other 2 sum change for u for a zip of that soft from yesterday	Zip of soft, means an ounce of cocaine powder
12/12/2020 5:43:51 PM	CC-8	U brought her a new one right?	
12/12/2020 5:43:57 PM	CC-8	And took the hard back?	Asking if Coleman took back the crack
12/12/2020 5:45:12 PM	COLEMAN	The 50 I took from wgst was made I gave her the soft	A customer was provided 50 grams of cocaine powder
12/12/2020 5:46:16 PM	COLEMAN	As yes she gave me the 11 grams of the hard back	Agreeing that he took the 11 grams of crack back
12/12/2020 8:45:50 PM	COLEMAN	Katrina calling me but you already know with her so I didn't answer	
12/13/2020 12:07:53 AM	CC-8	Yo	
12/13/2020 12:17:12 AM	COLEMAN	Yo	
12/13/2020 1:42:51 PM	CC-8	Zip soft	A zip is an ounce, or approximately 28 grams
12/13/2020 1:43:23 PM	COLEMAN	Yea it's on it way	
12/13/2020 1:43:43 PM	CC-8	What is	
12/13/2020 1:44:15 PM	COLEMAN	The soft	
12/13/2020 1:44:46 PM	COLEMAN	I gave them niggas they shit back to get new shit	
12/13/2020 7:01:34 PM	COLEMAN	I got 2 zips of soft and 3 zips of hard the hard is fire it's all totally different promise I won't have niggas looking stupid	Coleman is reporting having 2 ounces, or 56 grams of cocaine powder,

found in the COLEMAN PHONE was located in this phone as well. Some of the information recovered during the search of this phone, referred to as the CC-8 PHONE, is listed below.

			and 84 grams of crack
12/13/2020 9:22:15 PM	CC-8	Yea that shit fucked shit up	
12/13/2020 9:22:33 PM	CC-8	Go over there with 2 zips soft	2 zips, meaning 2 ounces
12/13/2020 9:25:33 PM	COLEMAN	Ok I'm going and down ?	Down being fentanyl
12/13/2020 9:25:44 PM	CC-8	None	
12/13/2020 9:25:50 PM	COLEMAN	Igh	
12/13/2020 9:26:18 PM	CC-8	My fault missed mad plays too she right	
12/13/2020 9:26:23 PM	CC-8	Tight and right lmaoo	
12/13/2020 9:29:06 PM	COLEMAN	I'm going to bring her the hard to see too and I'll call when I get there I'm leaving now it's fire tho I promise we not gonna look dumb	Coleman assures CC-8 that the new crack is "fire" meaning of sufficient quality
12/13/2020 9:30:41 PM	COLEMAN	And if she takes the hard I'll charge her like 16-17 this one time so she will be happy I kno she gonna love it str8 dropped it	
12/13/2020 9:31:14 PM	CC-8	So that 28 of hard that was trash u took it back?	28 grams of cocaine base
12/13/2020 9:31:21 PM	CC-8	Or she still got it	
12/13/2020 9:35:11 PM	CC-8	Bring 56 soft	56 grams of cocaine powder
12/13/2020 9:35:26 PM	CC-8	Then hard charge her 16 if she takes it	Instructing COLEMAN to collect money from the customer
12/13/2020 9:35:57 PM	CC-8	Take the other one back if not agree on a right price with her figure it out so we don't loose her cuz she was Odeeeing nbs in sum feen shit	Instructing COLEMAN to take back the drugs so the customer does not die from an overdose
12/13/2020 9:36:21 PM	COLEMAN	Ok	
12/13/2020 9:36:36 PM	COLEMAN	I'm here now I'll make her happy	
12/13/2020 9:38:31 PM	CC-8	Ok	
12/13/2020 9:41:19 PM	COLEMAN	She likes it	
12/13/2020 9:41:40 PM	CC-8	Hey	
12/13/2020 9:41:46 PM	CC-8	Bet*	
12/13/2020 9:43:22 PM	COLEMAN	So she took the 2 of soft and the hard	2 ounces of powder and 2 ounces of cocaine base
12/13/2020 9:43:32 PM	CC-8	Ight bet	
12/13/2020 9:53:28 PM	COLEMAN	77-37 =4 4-3 = 1 1 + 4 ( soft ) = 5 5 + 13hunnit ( hard ) = 13 I gave her 3 grams short that's why I charged 13 instead of 16 but all the math is right there just to save it	COLEMAN reports what he provided to the customer and gives amount ("math") so that CC-8 is aware and is preserved in writing
12/14/2020 2:31:42 PM	CC-8	Yo	
12/14/2020 11:22:29 PM	COLEMAN	She owed 63 and she returned the zip so it's 43 and she gave me a band so it	The customer returned an ounce reducing the amount

		Larry bird 33 just putting it here so it's listed	
12/15/2020 9:26:31 AM	CC-8	You	
12/15/2020 9:26:32 AM	CC-8	Yo	
12/15/2020 9:26:34 AM	CC-8	U up	
12/15/2020 9:26:36 AM	CC-8	He on his way	
12/15/2020 9:26:40 AM	COLEMAN	Yup	
12/15/2020 9:26:44 AM	COLEMAN	Lmk	
12/15/2020 11:27:57 AM	COLEMAN	Complete	
12/15/2020 11:28:28 AM	COLEMAN	10 ball	
12/15/2020 12:38:14 PM	CC-8	Ight did u get the 3 from Sara too?	
12/15/2020 12:38:25 PM	COLEMAN	Yea	
12/15/2020 12:38:39 PM	CC-8	Ight I'm bouts to come	
12/15/2020 12:38:48 PM	COLEMAN	Say less	
12/15/2020 1:31:23 PM	CC-8	Yo	
12/15/2020 1:54:00 PM	CC-8	Yo	
12/15/2020 3:35:20 PM	COLEMAN	So 33-15=18 plus a zip and 50 down	COLEMAN reports another sale and the amounts he has remaining
12/16/2020 9:39:59 AM	COLEMAN	K got snatched up shorty booked	COLEMAN reports that a customer was arrested
12/16/2020 9:42:08 AM	COLEMAN	Also my Stephan and Miranda I think	

100. Another such sequence takes place on December 21, 2020, in which COLEMAN and CC-8 discuss the various amounts of uncut and cut crack cocaine and fentanyl they have available.

Portions of that text message sequence follow:

Timestamp	Author	Text	Note
12/21/2020 4:11:33 PM	CC-8	How much down u got left	CC-8 inquires how much fentanyl COLEMAN has available
12/21/2020 4:12:03 PM	COLEMAN	Like 6 of raw 2 sticks already made	COLEMAN indicates he has 6 of raw fentanyl, and 2 sticks (20 grams), of cut product
12/21/2020 4:12:20 PM	COLEMAN	But we don't got no more cut unless I use the white shit	COLEMAN indicates he is out of the normal cutting agent but does have a white cutting agent
12/21/2020 4:13:20 PM	CC-8	Dam	
12/21/2020 4:13:52 PM	CC-8	We need 130	Telling COLEMAN they need 130 grams
12/21/2020 4:14:29 PM	COLEMAN	That's 13? Stick	COLEMAN replies asking whether this means 13 "sticks".
12/21/2020 4:14:49 PM	CC-8	Yea	

12/21/2020 4:17:05 PM	COLEMAN	I there only like 6	COLEMAN responds there are only 60 grams available (6 sticks)
12/21/2020 4:18:44 PM	CC-8	There's only enough for 60 until Tomorrow	
12/21/2020 4:18:59 PM	CC-8	I could double u on the new shit u wanted	
12/21/2020 4:19:27 PM	COLEMAN	That's for them	
12/21/2020 4:19:52 PM	CC-8	Yea wrong person	
12/21/2020 4:20:03 PM	COLEMAN	Start making it	COLEMAN states that CC-8 should start cooking and cutting the controlled substances
12/21/2020 4:20:17 PM	CC-8	Na lemme see what she say first	
12/21/2020 4:20:24 PM	COLEMAN	Igh	
12/21/2020 4:26:03 PM	CC-8	Yo	
12/21/2020 4:26:40 PM	COLEMAN	Yo	
12/21/2020 4:34:21 PM	CC-8	Bring the 6 and the 20	Telling COLEMAN to bring the 6 sticks (60 grams of uncut controlled substances), and 20 grams of cutting agent
12/21/2020 4:34:27 PM	CC-8	There brown cut over there	
12/21/2020 4:34:42 PM	COLEMAN	Over where ?	
12/21/2020 4:34:57 PM	CC-8	Mix it with 36	
12/21/2020 4:35:16 PM	CC-8	Center	
12/21/2020 4:35:27 PM	COLEMAN	Igh	
12/21/2020 4:35:42 PM	CC-8	And bring her what I got	

101. Another such text message exchange took place the night of January 5, 2021 and into the morning of January 6, 2021, a short time before COLEMAN was arrested in Lynn and the machine gun was discovered in the Equinox he was driving. Therein, CC-8 and COLEMAN discuss the amount of uncut fentanyl they have available. Portions of that text message sequence follow:

Timestamp	Author	Text	Note
1/5/2021 10:08:35 PM	CC-8	Yo	
1/5/2021 10:08:46 PM	CC-8	How much u got left of down	CC-8 inquires how much fentanyl COLEMAN has left
1/5/2021 10:12:01 PM	COLEMAN	.5	
1/5/2021 10:12:10 PM	COLEMAN	5 grams	
1/5/2021 10:12:46 PM	CC-8	No Gustavo	CC-8 indicates that is not good, "Gustavo" being a euphemism for good.
1/5/2021 10:13:19 PM	COLEMAN	I kno I was waiting for the new year to get right	COLEMAN was waiting until this new year to buy more
1/5/2021 10:13:35 PM	COLEMAN	So re on the soft too	COLEMAN says he also does not have any cocaine powder and need to "re" or re-up meaning resupply on the powder
1/5/2021 10:13:56 PM	CC-8	Yea	

1/5/2021 10:13:59 PM	CC-8	Asap	
1/5/2021 10:16:29 PM	COLEMAN	Off rip I need the 60 and I'm figuring out the soft now	COLEMAN tells CC-8 he needs 60 grams of fentanyl and he is figuring out how much cocaine powder he needs
1/5/2021 10:16:45 PM	CC-8	lght	
1/6/2021 10:00:31 AM	COLEMAN	U awake	
1/6/2021 10:18:53 AM	CC-8	Yea	
1/6/2021 10:22:46 AM	COLEMAN	Shower an I'm on my way	
1/6/2021 10:26:10 AM	COLEMAN	Question tho will they cook it	COLEMAN asks if the people from whom they are buying the drugs will cook it into crack for them
1/6/2021 10:53:14 AM	CC-8	Na	
1/6/2021 10:53:26 AM	CC-8	Wait how much up u need	
1/6/2021 10:53:34 AM	CC-8	Cuz I didn't even ask bout that	
1/6/2021 11:02:51 AM	COLEMAN	Lemme grab 2	COLEMAN says he needs two, which I believe to be ounces, or approximately 56 grams.
1/6/2021 11:03:15 AM	COLEMAN	And I'm on my way	
1/6/2021 11:04:17 AM	CC-8	It's by 31 tho	
1/6/2021 11:05:14 AM	COLEMAN	Ok yea grab the 2 I'm on my way with the money	COLEMAN confirms the purchase and says he is on the way.
1/6/2021 11:05:24 AM	COLEMAN	And F	A reference to Fentanyl ("F")
1/6/2021 11:31:16 AM	COLEMAN	Yo	
1/6/2021 11:32:05 AM	CC-8	Yo	
1/6/2021 11:32:41 AM	COLEMAN	Buzz I'm here	COLEMAN indicates he arrived at the purchase location

#### b. Conversations with CC-4

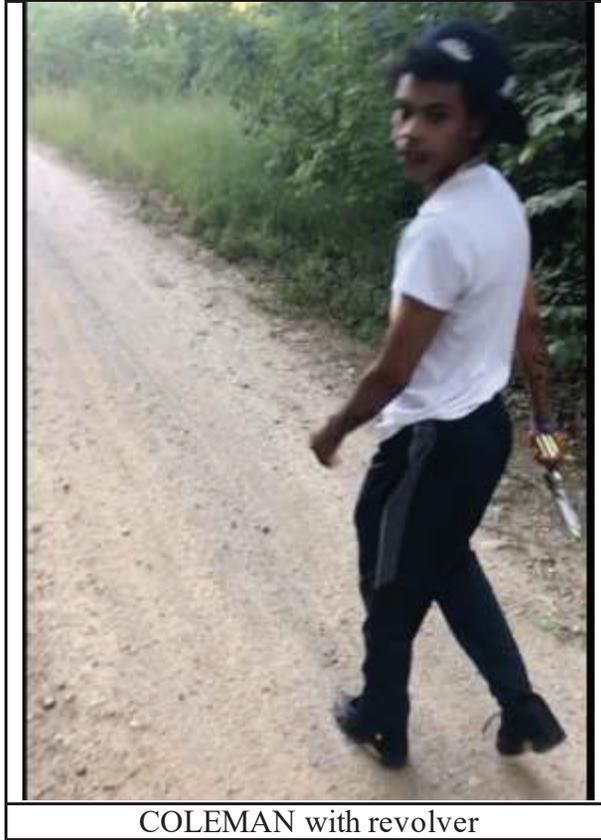
102. In the COLEMAN PHONE, as discussed above, investigators observed a lengthy text message conversation between COLEMAN and CC-4, stretching from October 2019 through January 2021, in which they discussed purchasing firearms, getting the “drop” on rival gang members and purchasing, manufacturing (“cooking”), and distributing controlled substances. This conversation also included a series of text messages taking place shortly after the November 11, 2019 shootings indicating that COLEMAN was driving a vehicle that night and that CC-4 was present in the vehicle as well.

**N. SEARCH OF A COCONSPIRATOR'S PHONE**

103. Investigators also searched the phone of an individual I will refer to as CC-2. On July 1, 2020, in Maine, law enforcement pulled over a vehicle being driven by COLEMAN. CC-2 and CC-8 were passengers in the vehicle. This vehicle was stopped to effectuate the arrest of CC-2 on an outstanding Massachusetts warrant. In a hidden compartment in the vehicle, Maine State Police recovered six firearms and the lower receiver of a seventh firearm.

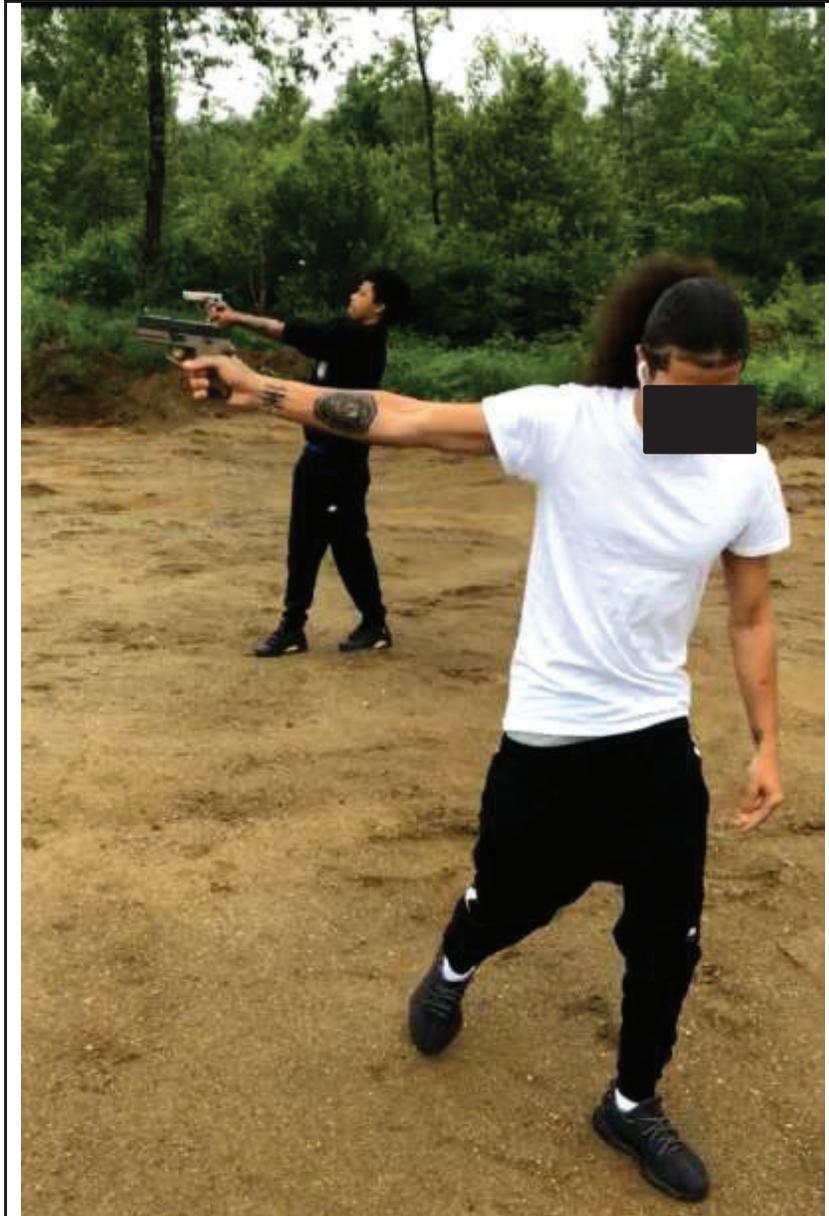
104. One of the phones used by CC-2 (hereinafter the CC-2 PHONE) was seized and searched. In the CC-2 PHONE, investigators located numerous conversations indicating that CC-8, COLEMAN, and CC-2 travelled to Maine to distribute controlled substances and obtain firearms. I am also aware of numerous firearms that were procured in Maine and were provided to CC-8 and COLEMAN in exchange for drugs.

105. In the CC-2 PHONE, investigator located a series of videos taken of COLEMAN, CC-8, and CC-2 holding firearms in various settings. Some of these videos depict CC-2, CC-8, and COLEMAN firing and attempting to fire firearms in rural settings. In the videos, the firearms can be heard discharging, and bullets can be seen striking the road. According to the metadata on the video files, these videos were taken on June 19, 2020. Still images from those videos follow:



COLEMAN with revolver

106. Another video depicts CC-8 firing a tan semi-automatic firearm with a black slide, and COLEMAN firing a silver firearm, with audible gunshots. According to the metadata on this video file, this video was taken on June 30, 2020, the day before CC-2 was arrested. Of note, the two firearms being fired by CC-8 and COLEMAN in the video appear to be same two of firearms that, among others, were recovered by Maine State Police from the vehicle being operated by COLEMAN on July 1, 2020, when CC-2 was arrested. A still image from this video follows:



COLEMAN and CC-8 firing pistols

107. Also in the CC-2 PHONE investigators identified a video depicting COLEMAN using a cellular phone to conduct a video call with another individual, while holding two firearms, with an additional two firearms visible on a couch seat. During the video, COLEMAN handles the firearms to display them to the person he is video-calling. COLEMAN's face can be seen captured on the screen of the phone into which COLEMAN is looking. Of particular note, a firearm that has a tan frame and black side can be observed on the couch. According to the metadata on this

video file, this video was taken on June 30, 2020. The four firearms depicted in this video appear to be firearms that were recovered on July 1, 2020, by Maine State Police from the vehicle being operated by COLEMAN, during CC-2's arrest. A still image from this video follows:



108. Following the arrest of CC-2, investigators searched another cellular phone belonging to CC-2. In that phone, investigators located a video file named “IMG\_5110.mp4” that was taken on November 11, 2019, at 8:32 PM, according to the metadata. In that video, CC-2 and COLEMAN can be observed in a vehicle; COLEMAN is driving with an open bottle of Belaire champagne on his hip. During the video, COLEMAN can be observed holding a gray firearm with a holographic sight attachment that appears identical to the holographic sight attachment recovered by Chelsea Police on November 11, 2019 after the Chelsea Shooting; as discussed above and herein, this

firearm is believed to be the same firearm used in the Chelsea and Somerville Shootings. Of note, the Chelsea Shooting would take place 7 minutes after this video was taken. In fact, COLEMAN holds up the firearm so that it is visible to the camera. Still images from the video follow:



**M. JAIL CALLS SINCE COLEMAN'S ARREST**

109. Following COLEMAN's arrest on January 6, 2021, he has been detained at the Essex County House of Correction. COLEMAN has made a number of calls on a recorded line that establish his knowledge of the firearm recovered from the Equinox subsequent to his arrest and the scope and substance of his drug distribution conspiracy. Prior to each of these calls, inmates

are informed that the calls are being recorded and that they may be furnished to law enforcement.

110. During one such call taking place on January 11, 2021, COLEMAN spoke with BERNBAUM. Therein, he instructs BERNBAUM on the manner by which she is to obtain and cut controlled substances while COLEMAN is incarcerated. The conversation begins with BERNBAUM discussing the sale of the remaining controlled substances to an individual named Sara. BERNBAUM is worried that she was played by a drug contact named “Sara” because BERNBAUM did not know what she was selling or the proper price. Portions of a draft transcript of continuing parts of this conversation follow:

JC: Yeah, you should know that. Up, gets you up. Down is slumped over scratchin g your face.

CB: Yeah, I know the difference of the effects of what it does. I don’t know the difference of what the fuck it looks or tastes like. I, I thought I did.

JC: Shh, shh. Hey man, I don’t have enough time, listen. Up is soft or hard. Straight up, I don’t got time for this. Up is soft or hard. That’s it.

CB: Okay.

JC: I know you give it to her hard because I make, yeah. I know you give it to her hard because I make more bread. There is no such thing as soft right now. With [CC], he gets the hard. With the hard. When you buy it off [CC]. Tell him to turn two zips into three and you’ll be Gucci. Just keep doing that. Don’t do nothing more, don’t do nothing less.

CB: Right, but, but, but what I’m saying why I think she played me is I thought it was up, she said it was down. That’s what she purchased.

JC: And down is F-E.

CB: Yes, I know that and I thought that that was a completely different color than what it was. That’s why, like.

JC: Because the F-E turns a color once I cut it.

111. I believe that in this conversation, BERNBAUM is telling COLEMAN that she was not aware of whether she was in possession of cocaine (“up”) or fentanyl (“down”). COLEMAN instructs BERNBAUM to ask the source of supply, CC-10, to cut two ounces of fentanyl for her

and make it in three ounces so that it can be sold for greater profit. COLEMAN informs BERNBAUM that she erroneously sold the uncut (“fire”) fentanyl (“F-E”), and that fentanyl turns a distinctive color when it is cut. The conversation then continues to discuss how BERNBAUM sold uncut fentanyl:

CB: Yeah, I know. So, was there something that wasn’t touched yet?

JC: Yeah, it was fire. You have to cut it bro. And every, and what. Listen. Whatever you. You can’t (UI) all at once. You have to do it in increments because it will turn dirty. You gave it to her like that?

112. COLEMAN instructs BERNBAUM how to cut fentanyl and “to do it in increments because it will turn dirty.” COLEMAN then instructs BERNBAUM on the method in which to add a cutting agent to the uncut fentanyl (“fire”) without turning it a different color (“dirty”).

JC: Alright, bet. Back to the business. So listen, so whatever you do. Like, say you get a point five of fire or point four of. I know you do a point fours. I mean four grams. You get a four grams of fire, you hit. You times that by six and that’s how much cut you put in it to make it what it is. So, four times six will get you twenty-four. Right? Twenty-four grams.

CB: Okay, okay. Like, that’s not helping me cause that’s already, that’s already gone.

113. After COLEMAN provides the precise amounts of cutting agent to add per gram of fentanyl, BERNBAUM responds that the manner by which to cut the fentanyl is meaningless because it is “already gone,” meaning that she already sold the uncut fentanyl without having added cutting agent to it. COLEMAN is outraged that BERNBAUM sold the uncut fentanyl:

JC: How much did you give her?

CB: Everything that was there.

JC: Oh my god. How much was it? How much did it fucking weigh?

CB: Fifty-five.

JC: Sixty-five?

CB: Fifty-five.

JC: Fifty-five?

CB: Yeah.

JC: And how much did she give you? How much money?

CB: Seventeen.

JC: Seventeen what? Hundred?

CB: Yeah.

JC: Yeah, she owes you way more than that.

114. BERNBAUM explains that she sold the entire amount of the remaining 55 grams of uncut fentanyl for \$1,700. Of note, the text message conversation between COLEMAN and CC-8, described above, indicated that COLEMAN obtained 2 ounces, or approximately 55 grams at 11:30 AM on January 6, 2021, about one hour before COLEMAN was arrested, at a time consistent with the Equinox he was operating being in the area of CC-8's residence in Salem, Massachusetts. As a result, I believe that BERNBAUM in fact subsequently sold the uncut fentanyl that COLEMAN had purchased an hour before he was arrested, which was located in the Equinox and not recovered by police. COLEMAN responds that BERNBAUM should have received far more money for the uncut fentanyl. As COLEMAN explains, the price BERNBAUM received was for "when it's cut already", not when it is uncut ("fire"):

CB: Every ten was three-hundred. That's what she said.

JC: That's when it's cut already, baby. Not when it's fire.

CB: Okay.

JC: Listen, write this in your notes.<sup>8</sup>

CB: Yes.

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<sup>8</sup> Investigators did in fact find a "Note" file in BERNBAUM's PHONE reflecting the information relayed to her by COLEMAN in this recording.

JC: And when I call you tomorrow, (UI). Listen. You listening?

CB: Yup.

JC: You gave her fifty-five untouched?

CB: Yeah, I think it was in like a hard. Like a rock.

JC: Babe, what are you saying?

CB: It was, it was in a form. It wasn't, it wasn't powder.

JC: Okay, so listen. You, how much did you, how much did you buy that for?

CB: I didn't buy that.

JC: Where was it?

CB: I had it. That's just, that's what was from what was there.

JC: What? At the, at the crib?

CB: Yes. If that's what. That's what I'm saying. I didn't touch nothing. I didn't do nothing. I just tried to get rid of what, what I had.

JC: (UI) at the crib. (UI) I was just thinking cause I was like, what the fuck is she talking about. Alright, so boom. Fifty-five. Times that by six right now on your phone. No, times it by four. No, yeah six. Fifty-five times six.

CB: Three-thirty.

JC: Three-thirty, right?

CB: Uh huh.

JC: And for every ten grams of that three-thirty, that's thirteen grand. Right? Nope, that's thirty-three grand. Right?

115. As COLEMAN explains, for every gram of the 55 grams of fentanyl, BERNBAUM should add 5 additional grams of cutting agent in order to turn the original 55 grams of uncut fentanyl into 330 grams of cut fentanyl. COLEMAN then explains that BERNBAUM can sell 10 grams of cut fentanyl for \$1,300, which means that BERNBAUM should have been able to sell the total amount of 330 grams of cut fentanyl for \$33,000.

116. Another jail call took place on January 17, 2021 between COLEMAN and BERNBAUM.

During the call, they discuss BERNBAUM learning from a contact that the Equinox had been investigated by “the boys”, which I believe to mean the police. They discuss the fact that Hertz had inspected the vehicle and noticed some damage, which prompted a call to BERNBAUM about a pending charge for the damage. COLEMAN is immediately distressed by the police interest in the vehicle and asks BERNBAUM if she “got the ones up top?” BERNBAUM responds, “Yeah” and after a brief exchange confirming that they are speaking about the same thing, which they will not identify openly, BERNBAUM states “Yeah, They’re already-already... they are already been gone.” COLEMAN then responds, “Yeah. I didn’t know if you left them or not. Cause that’d be my only worry.” I believe in this conversation COLEMAN is inquiring if BERNBAUM had retrieved controlled substances that were stashed in the Equinox in a concealed location “up top”. BERNBAUM responds that yes, she had retrieved them and already sold them (“they are already been gone”).

117. On January 19, 2021, in a call with COLEMAN, BERNBAUM discusses doing drug deals in a rental car and states that she has another one to do the following day. Further, in sum and substance, BERNBAUM tells COLEMAN that the business is hers now and that she is going to keep the profits; COLEMAN claims that he is the boss of the business. Portions of a draft transcript of this call follow:

CB: Yeah, I’m, I’m sittin’ here trying to get rich, nigga. There’s not all this money can go to you. I’m going to fucking get my eyebrows, my eyelashes, and my nails done tomorrow. Fuck you.

JC: Yeah. All on JC. You’re welcome, big daddy.

CB: No, no, no, no, no. All on Tina. This is...this is Tina’s operation now.

JC: Yeah, right. I’ll slap the shit out you.

CB: Like, the fuck? You don’t...you don’t know the numbers. I’ll leave...I’ll leave you what you started with. Don’t worry. Everything will be paid for.

JC: I'll beat your ass.

CB: [UI] I can't use some of the money? Like, what?

JC: Of course you can, but not how you're thinking. You're not gonna be spending money like how I was spending money, cause you're not the boss. I'm the boss.

CB: Uh, yeah. Right now? I am.

JC: Alright, come on. Keep getting too comfortable. See what happens. You'll still get left when I come home.

CB: Okay.

JC: Mhmm. Watch.

CB: Okay.

118. On January 28, 2021, in a call with COLEMAN, BERNBAUM discusses her continuing efforts to distribute narcotics in Maine, and her coordination of the drug distribution on behalf of COLEMAN. In particular, COLEMAN mentions his contact in Maine ("Sara") and an issue regarding collecting money from her, and then BERNBAUM describes getting a hotel room in Maine so that she can break up the long drive:

JC: But, you already know where it's comin from. Fucken, he just you know wants to fucken. I, I feel like fucken. Cus, alright. So what it is, Sara and her boyfriend be beefin and shit, like, cus he's a fucken clown. Anyway, he does. He'll take, he'll take this nigga's, Gustavo's bread, and like break up with Sara for like three, four days and spend all the bread. And, then, try to come back and be with Sara to get, you know, more bread.

(Investigators know "Gustavo" to be TRG member CC-8 and "bread" to be money)

CB: Yea, naw. I already, but that, but that's why I was sayen to you like cus even he.

JC: I feel like he, the nigga Craig, try to like oh. Try to say to this nigga Gustavo, oh think that Sara's doin shit behind your back, da da da da da da. Cus, I know for a fact Shotz didn't take her phone and go through it, you feel me?

(Investigators know "Shotz" to be an alias of CC-8.)

CB: No. He woulda seen a lot more if he did.

JC: Prolly just the boyfriend bein a fucken maggot. And then this nigga like, I don't want nobody, I don't want nobody talken to her and shit, but I know you don't. Huh?

CB: Naw, that, that was my thing though. Like, as far as he's concerned, I hit her up that one time and he told me to dead it and its be deaded. I haven't even brought that shit up. The only time it gets brought up is when this nigga fucken Ju calls me.

CB: It's just annoying like. And I, and I just have a feeling that this nigga Sparks is gonna hit me up again asking for it. No bullshit."

JC: I'mma tell Ju. I'mma tell Ju to, feel me, relay the message but, aint really no reason to. Naw, I already know what's goin on so. You feel me?

CB: No. I, which I get that but that's not. That's not happening right at this moment anyway, so it's like why does it matter who has them?

JC: Because, like I said, the nigga feels like you, you, you're still seein her. You feel me? You're not understanding what I'm sayin.

CB: No I don't understand.

JC: So if this nigga Sparks has the card. Then, he a feel more comfortable in his head that you don't talk to her. Period. You know what I'm sayin?

CB: Uh huh.

JC: Because he wants all, he wants all his backends. He don't want. He don't even want a dollar bein spent your way. You get what I'm sayen?

...

CB: Tomorrow, I just have to take [DAUGHTER] to the dentist. After school, bring her back to Jules and then, me and Brins gonna go stay in a hotel for the night, so we can come back on Saturday. Like early.

JC: Oh, my fault. Oh, yea. You're goin up. I was like what the fuck you goin to a hotel for?

(Investigators believe "goin up" is code for traveling to Maine.)

CB: Right. Like, I was waiting for you to say something. Like, did I say something wrong, like?

JC: I had to think real quick, before I snapped.

CB: No, cus it just, it just makes more sense cut the, cut it in half instead of all at once.

(Investigators believe “cut it in half” is in reference to the travel time to Maine.)

JC: Yea. You guys gon drink fucken. And fireball all night.

CB: Yea, so we could just at least like, you know, be there, relax, and then do what we gotta do and come home and not have it be like all day type shit because, like, [DAUGHTER] not gone for the weekend. I have to get her back at a reasonable time on Saturday. So, it was only \$70.

JC: Naw, I know its cheap out there. Excuse me.

CB: Not the fucking casino wants like 150. That’s what I was lookin at. That one was kinda cheap, but no. The other one I got like it think it was like Four Points or something, it was like \$69, so I’m like yep. I already booked it. Its already all set.

JC: Yea, I think that’s near like the Denny’s and shit that we go to.

CB: Uh, near the airport?<sup>9</sup>

JC: Yea.

CB: Is that near the air?

JC: Yea.

CB: Uh huh. So, that’s where we’ll be tomorrow. Um, like proolly not til later though cus I do have to take [DAUGHTER] to the dentist, but....

119. On March 4, 2021, at 12:10, shortly after the execution of a search warrant at BERNBAUM’s residence, described further below, COLEMAN called a contact who initiated a three-way call with BERNBAUM. During the call, COLEMAN asked if “there were any sitchys”, meaning firearms, at the location, and BERNBAUM replied that there were not. COLEMAN also asks if “there was up and down over there”, meaning fentanyl and cocaine at the residence, and

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<sup>9</sup> Investigators know there is a Four Points by Sheraton hotel located at 308 Godfrey Blvd, Bangor, ME 04401, which is near the airport.

BERNBAUM confirms that there was.

**N. SEARCH OF BERNBAUM'S RESIDENCE**

120. On March 4, 2021, investigators searched BERNBAUM's residence located in Malden, Massachusetts. During this search, investigators located BERNBAUM in bed in her bedroom with her four-year-old daughter lying next to her.

121. On the nightstand next to BERNBAUM's bed, a few feet away from where her four-year-old daughter was located, investigators located a box of plastic bags, and within the box there were two plastic bags. One of the bags contained an amount of white rock-like substance that appeared consistent with cocaine base (item 31). The other bag contained a white powdery substance that appeared consistent with cocaine (item 33) and tested positive for cocaine on a field test.

Photographs of the items recovered from the nightstand follow:





122. In BERNBAUM's bedroom, investigators located a vacuum sealer and a notebook that appeared to be a drug ledger of amounts paid and owed. In the closet of BERNBAUM's bedroom,

investigators located a children's Minnie Mouse bag (believed to be a lunchbox) with BERNBAUM's four-year old daughter's name on the back. Inside of the lunchbox, investigators located five drug scales (item 22), and a white powdery substance in a clear bag (item 21), which tested inconclusive on a field test. Inside another bag within the lunchbox, investigators located approximately 50 pills that tested positive for fentanyl on a field test (believed to be fentanyl pressed into pill form) (item 27). Also in the closet of BERNBAUM's bedroom, investigators also located a ballistic plate-carrier vest, and a round of 9mm ammunition. Photographs of the Minnie Mouse lunchbox and its contents follow:







123. In a dresser in BERNBAUM’s bedroom, investigators located a New York Yankees hat and approximately \$16,000 in cash. A photograph of the seized cash follows:



**O. SEARCH OF BERNBAUM’S PHONE**

124. As noted above, BERNBAUM’s cellular phone (the “BERNBAUM PHONE”) was seized and searched during the course of this investigation. In the BERNBAUM PHONE, investigators located a number of photographs in which she is depicted holding firearms and large amounts of

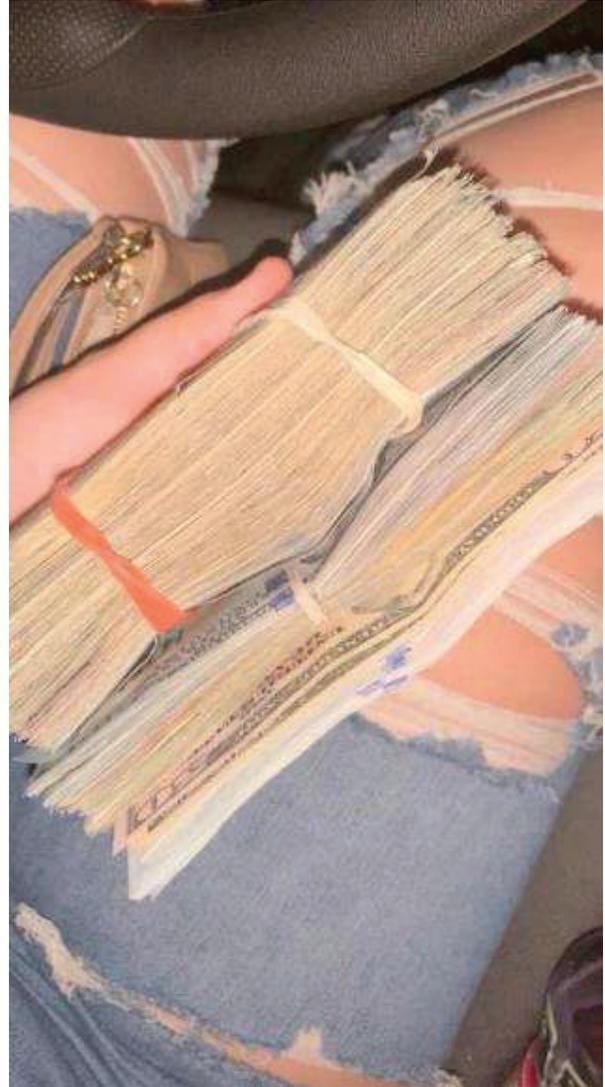
cash, which are believed to be drug proceeds.<sup>10</sup> Some of those photographs<sup>11</sup> follow:



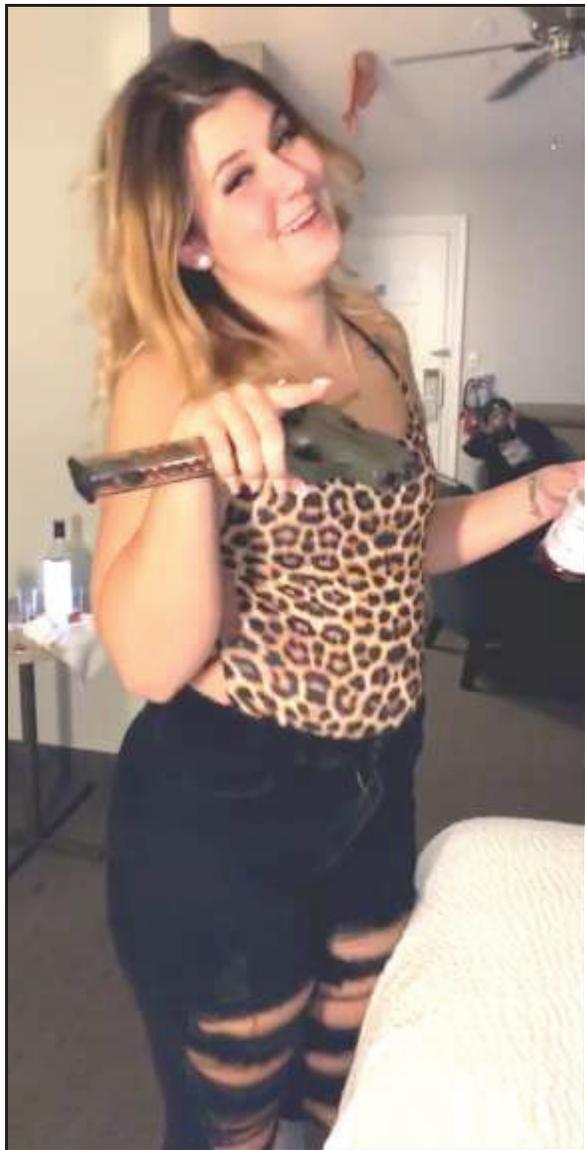
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<sup>10</sup> Holding the stack of cash to the ear in a manner consistent with holding a phone is a frequent theme in many of the images and videos in this investigation. This refers to the notion of the “money calling” and is a common reference among drug traffickers in their constant efforts to promote their success in distributing controlled substances for financial gain.

<sup>11</sup> Of note, the photograph of BERNBAUM holding a firearm was taken on March 5, 2019. This particular firearm is believed to be an IntraTec-22 firearm, and is believed to be the same firearm separately recovered by Everett Police on April 8, 2019.



125. Investigators also located a number of recent videos where BERNBAUM can be seen holding firearms. One video, which according to the metadata was taken on or about September 22, 2020, depicts BERNBAUM holding a firearm with a large capacity clear magazine in which ammunition can be observed. The video appears to have been taken in a hotel setting and COLEMAN and CC-8 are visible in the background. Based upon location information found in the BERNBAUM PHONE, the phone was located in the area of Bangor, Maine at the time this video was taken. Still images from that video follow:

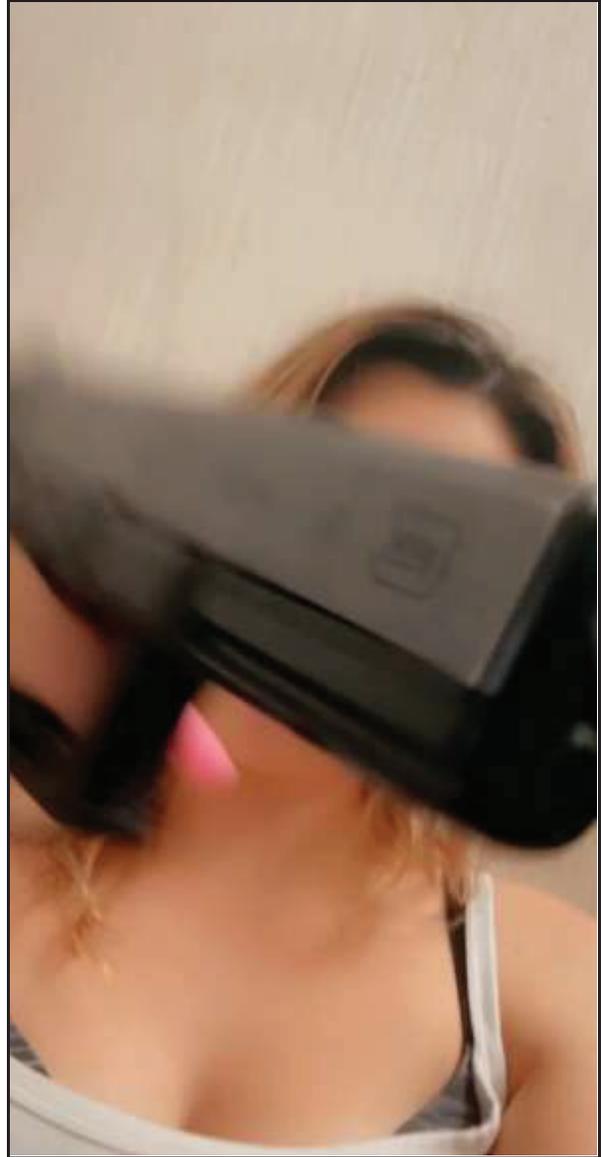


126. Another video, which according to the metadata was taken on or about September 22, 2020, depicts BERNBAUM holding two firearms with large capacity magazines that appear to contain ammunition. The firearm in BERNBAUM's right hand with the clear magazine appears to be equipped with a selector switch, which is visible protruding behind the slide. A still image from that video follows:



127. Another video, which according to the metadata appears to have been taken on or about May 11, 2020, depicts BERNBAUM holding a firearm and pointing it at the camera. The “Glock”

logo on this firearm can be observed on the slide signifying that it is in fact a real firearm. Still images from that video follow:



128. Investigators also located a number of images that according to the metadata were created on or about the late evening of June 4, 2020, into the early morning of June 5, 2020. The embedded location data on one of these photographs indicates that the photograph was taken in the Liberty Hotel in Boston, Massachusetts. In these images, BERNBAUM can be seen sitting on COLEMAN's lap while COLEMAN can be seen holding a firearm with an extended magazine.

Both BERNBAUM and COLEMAN can be observed holding bottles of Belaire champagne. Other images include BERNBAUM and COLEMAN standing together in a bathroom. The photographs appear to have been taken during the filming of the music video for the song “Active” described above, publicly uploaded to YouTube on August 18, 2020. COLEMAN can be seen holding a firearm similar to the firearm with a selector switch depicted in “Active” music video. COLEMAN is also depicted wearing the same clothing as he is in the music video, and the location appears similar. Additionally, this photograph and others from around this time frame found on the BERNBAUM PHONE depict aspects of the “Active” music video filming location, including the furniture, and wall coverings. One of the photographs follows:



129. Investigators also located a video in the BERNBAUM PHONE, which according to the metadata appears to have been taken on or about July 19, 2020, depicting BERNBAUM, COLEMAN, CC-1 and another individual in a vehicle, with BERNBAUM's young child in the back seat. During the video, COLEMAN, and CC-1 and another individual display large amounts of currency, while BERNBAUM is driving and BERNBAUM's daughter can be seen sleeping in the car seat.<sup>12</sup> Still images from this video follows:



130. Also in the BERNBAUM PHONE, investigators located a text message conversation with

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<sup>12</sup> The lyrics of song playing in the background are “she want a young n\*\*\*a, she want a drug dealer, she want a scammer.”

COLEMAN in March 2019. In the conversation, they discuss the fact that BERNBAUM's family had gone through COLEMAN's belongings and found a "pound of weed" and "found a loaded gun somewhere that [SC] could reach it". BERNBAUM's daughter was about three years old at the time. BERNBAUM tells COLEMAN that she had lied to her family about knowing it was there ("It's loaded and everything" and "And I can't say I knew it was the[r]e" and "And I'm not gonna say it's yours"). They then agreed to blame the firearm on someone else.

**CONCLUSION**

131. Based on the foregoing, there is probable cause to believe that JAIIR COLEMAN has violated 21 U.S.C. §§ 841 and 846; 18 U.S.C. § 924(o); 18 U.S.C. § 922(o), and 18 U.S.C. § 924(c)(1)(B)(ii).

132. Based on the foregoing, there is probable cause to believe that CHRISTINA BERNBAUM has violated 21 U.S.C. §§ 841 and 846, and 18 U.S.C. § 924(o).

Signed electronically and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on April 5, 2021.

  
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Craig Ryan Harvey  
Special Agent  
Federal Bureau of Investigation

Electronically subscribed and telephonically sworn to before me this 5<sup>th</sup> day of April, 2021.

  
\_\_\_\_\_  
HON. DONALD L. CABELL  
UNITED STATES MAGISTRATE JUDGE

