

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT AND A SEARCH WARRANT**

I, Steven J. Mulcahy, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a detective with the Malden, Massachusetts Police Department and have worked for the Malden Police Department for 18 years. I have been a member of the Malden Police Department since 2006. I was appointed as a Police Officer in 2012. I have attended and graduated from the Massachusetts Criminal Justice Training Council Police Academy/18th ROC Reading Regional Police Academy. In addition, I hold an associate degree in criminal justice from Marian Court College and have attended annual in-service training. From August of 2012 to January of 2015, I was assigned to the Patrol Division as a patrol officer. I am currently assigned to the Criminal Investigation Division and have acted in the capacity of a detective for the past nine years. I am presently assigned to the Federal Bureau of Investigation (“FBI”) Violent Crimes Task Force (“Task Force”) as a Special Deputy US Marshal. As such, I am a “federal law enforcement officer” as defined by Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure and am empowered by law to conduct investigations and enforce the criminal law. The Task Force is comprised of personnel from the FBI, Massachusetts State Police, Boston, Somerville, Malden, Braintree, and Dedham Police Departments. The Task Force investigates bank robberies, as well as violent crimes, which are punishable under federal and state law.

2. During my tenure as a law enforcement officer, with both the Malden Police and the Task Force, I have interrogated numerous defendants, informants, and suspects who were users, sellers and/or distributors of controlled substances and who also had violent criminal records. I have additionally been involved in numerous investigations involving assaults, larcenies, homicide, extortion, arson, firearms violations, armed and unarmed robberies, and

crimes against persons, burglary, sexual assault, rape, assault and battery with a dangerous weapon, homicide, and fatal motor vehicle collisions. I have also investigated other crimes against persons and property such as larceny of motor vehicles, and theft from motor vehicles. I have investigated numerous identity fraud and financial crimes involving credit card fraud and banking fraud. I have investigated non-fatal and fatal shootings involving firearms. These investigations have resulted in the arrest of a number of offenders. These investigations have also resulted in convictions in the District and Superior Courts of Middlesex County. I have been the affiant in support of applications for approximately thirty-two search warrants, and I have participated in the execution of numerous search warrants in federal and state investigations for a variety of crimes. My investigations have included the use of surveillance techniques and the execution of arrest warrants and search and seizure warrants, including those involving data from telephone and other electronic service providers. Since joining the Task Force, I have investigated or assisted with multiple bank robbery investigations.

PURPOSE OF AFFIDAVIT

3. I submit this affidavit in support of a criminal complaint charging Wolf Fevrier (YOB 1977) with the robbery of a branch of Rockland Trust located at 1920 Centre Street in West Roxbury, Massachusetts on February 16, 2024.

4. I also make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant for the location specifically described in **Attachment A-1** of this Affidavit, including the entire property located at 21 Brahms Street, Roslindale, Massachusetts 02131 (hereinafter referred to as the “SUBJECT PREMISES”), and the person of Wolf Fevrier (YOB 1977) (**Attachment A-2**) for contraband and evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2113(a) (bank robbery; the “SUBJECT OFFENSE”), which items are more specifically described in **Attachment B** of this Affidavit.

5. The facts stated herein are based on my own personal involvement with this investigation, as well as from information provided to me by other law enforcement officers involved in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation; rather, I am only submitting enough evidence necessary to establish the requisite probable cause to secure a complaint and search warrant.

PROBABLE CAUSE TO BELIEVE FEVRIER COMMITTED THE SUBJECT OFFENSE

Robbery of Rockland Trust on February 16, 2024

6. I reviewed an incident report from the Boston Police Department (I#242012915) as well as surveillance footage captured from the West Roxbury Branch of Rockland Trust Bank. Based on my review of these, I know that on February 16, 2024, at approximately 1:10 p.m., a Black male subject wearing dark/black clothing, including a black winter jacket, a black winter hat, and a light blue surgical mask, entered Rockland Trust's 1920 Centre Street branch in West Roxbury. The subject approached the teller counter and passed a note under a deposit slip that the teller reported saying something to the effect of "I'm not playing any games, I have a gun" and that demanded large bills and stated that the teller was not to give him any "bait" bills.¹

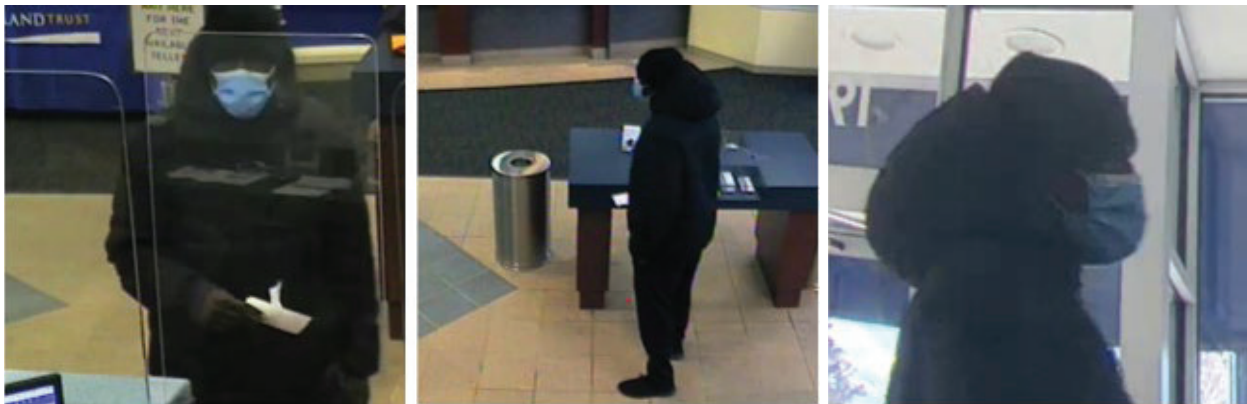
7. In response, the teller handed the subject 10- and 20-dollar bills in U.S. currency from the drawer (a bank audit revealed it totaled \$1,475). Once the subject received the money, he took the note and exited the bank at approximately 1:13 p.m. According to a subsequent review of nearby video surveillance by Task Force Officers, the subject then fled on foot from the area.

8. According to the Boston Police report about this incident, officers arrived at the Rockland Trust at 1:17 p.m. and took witness statements from the bank employees and customers of the bank. The teller who was targeted by the subject described the male suspect as a skinny,

¹ In my training and experience, I know that criminals carrying a weapon during a crime may brandish it or not. Also in my experience, criminals may say that they have a weapon when they do not.

Black male with dark complexion, standing about 5'11", appearing to be in his 30's, and wearing all black colored clothing, a black colored hat, and a surgical mask. The teller described the note and remembered it being a torn piece of paper and the handwriting was neat and cursive.

9. Bank surveillance cameras were operating and functioning on the date of the robbery, and they captured images of the subject as he initially entered the bank, interacted with the teller, passed the note, received money, and then departed the bank. Based on my review of the surveillance footage, I believe that the description provided by the teller was generally consistent with the images captured on the bank's video surveillance cameras. Below are some still images captured from the surveillance system upon the subject's arrival and during the robbery:



Prior Incidents Involving Similar Individual at Other Boston Banks

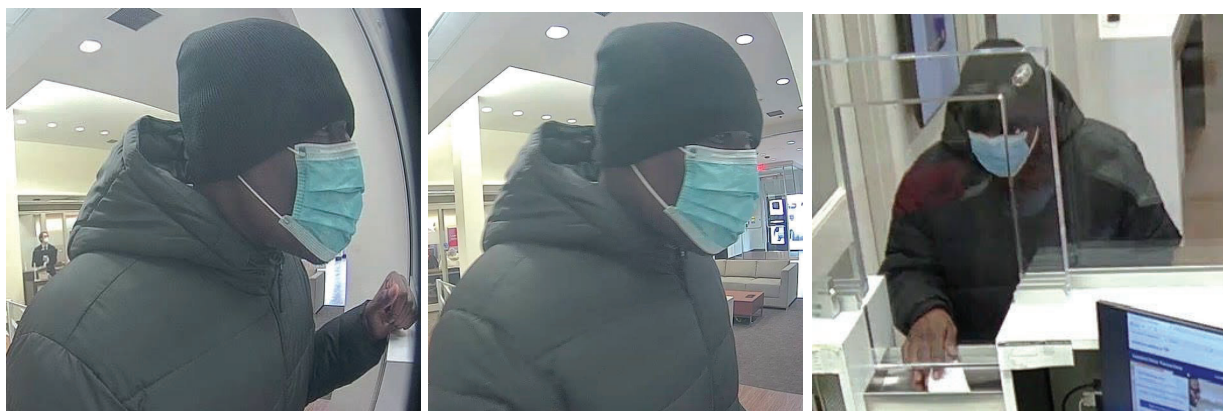
10. During the investigation of the robbery at the Centre Street Rockland Trust branch, I learned that an individual resembling the subject was involved in two additional incidents at other banks in Boston.

11. The first one was an attempted robbery on February 9, 2024 at a Bank of America branch located at 1237 Commonwealth Avenue, in Allston, Massachusetts. According to Task Force members who responded and who reviewed video surveillance and a Boston Police Report

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(I#242010891), a Black male wearing all black clothing and a blue surgical mask entered the Bank of America just after 11:20 a.m. The suspect was described as being about 6'3"-6'4" with a slim build, wearing all black, with a face covering that only revealed his eyes. The man approached the teller station and passed a demand note to the teller before taking it back. The note said something to the effect of, "Give me all of the money in the drawer." Upon seeing the note and the man's attire, the teller stated that the teller then asked the man to remove his face mask and show his face. While asking this, the teller pressed the panic alarm that is located under the desk. The man was aware of this and then fled from the building. Below are still images captured from the Bank of America surveillance system at that date and time:



12. The second incident occurred on February 16, 2024, approximately 45 minutes before the robbery at Rockland Trust, at The Cooperative Bank branch located at 40 Belgrade Avenue, in Roslindale, Massachusetts.

13. According to my review of a still image from video surveillance at The Cooperative Bank and the report of a Massachusetts State Police trooper who interviewed individuals at The Cooperative Bank and reviewed the surveillance footage (MSP Incident Report 2024-122-8/3), a Black male in a black winter jacket, a dark blue sweatshirt, a black winter hat, black pants, black sneakers, and a light blue surgical mask entered The Cooperative Bank branch at 12:29 p.m. on February 16, 2024.

14. The male subject approached the teller station, but because the teller was on the phone at the time, the man had to wait a few moments for assistance. The male subject is then seen on video appearing to speak with a teller and lowering his surgical mask. From a still of the video showing the mask lowered, I observed that the subject had a thin black mustache. Below is a picture obtained from The Cooperative Bank's surveillance system:



15. According to the teller, the subject asked to open an account. When asked for his name, the subject responded "Wolf" and said that he already had an account at Bank of America and lived in Roslindale. The teller stated that the subject lowered his mask after the teller had difficulty hearing his name. The teller encouraged the subject to open an account with The Cooperative Bank and handed the subject the teller's business card. Video surveillance showed the subject depart at 12:34 p.m.

16. Officers conducted a canvass of nearby video surveillance systems and to date have been able to observe this individual walking to/from The Cooperative Bank west on Belgrade Avenue (and towards the direction of Centre Street in West Roxbury) as far as Walworth Street.

According to Google Maps, the distance between The Cooperative Bank and Rockland Trust is 1.4 miles.

Identification of Wolf FEVRIER

17. After comparing the features and clothing of the male seen at The Cooperative Bank and the video of the male who robbed the nearby Rockland Trust less than an hour later, I believed that they were the same person. I then conducted a query of the name “Wolf” in a law enforcement database that aggregates images of individuals who have been incarcerated in the Massachusetts state prison system.

18. In the database of previously-incarcerated individuals, there are five people with a first name of Wolf. Only one of those individuals was a Black male, Wolf Fevrier (YOB 1977). The below photo was associated with that individual:



19. I then reviewed records from the Registry of Motor Vehicles and obtained a driver’s license record for Fevrier that lists an address of 21 Brahms Street, in Roslindale, Massachusetts. The driver’s license had the attached photograph associated with it.



20. 21 Brahms Street in Roslindale is a single-family, two-story premises with white vinyl siding. According to records from the Suffolk County Registry of Deeds and the City of Boston Assessing Department, it is owned by Marlaine M. Fevrier. According to Massachusetts Board of Probation records and Department of Correction records, Fevrier's mother's name is Marleine (spelled alternatively as Marlene).

21. On February 22, 2024, officers conducted surveillance at 21 Brahms Street and observed a male resembling Wolf Fevrier exit the home at 11:45 a.m. and enter the passenger side of a waiting car.

22. According to Google Maps, 21 Brahms Street is approximately 1.3 miles from the Rockland Trust on Centre Street. It is 0.9 miles away from The Cooperative Bank.

23. Additionally, Bank of America security has confirmed that Fevrier holds an account with Bank of America. I have reviewed certain Bank of America records that show that on February 16, 2024 at 3:37 p.m., Fevrier deposited \$1,390 cash at an ATM located at 1857 Centre Street in West Roxbury, which is approximately 1.1 miles away from 21 Brahms Street and only 0.2 miles away from the Rockland Trust that was robbed approximately two and a half hours earlier that day. The amount was \$85 less than the amount stolen from Rockland Trust. A still image

from the Bank of America ATM associated with that deposit is below and shows Fevrier now wearing glasses and a winter hat with a logo:



24. Bank of America's records also showed that Fevrier's Bank of America card (ending -3418) was used a few minutes after the ATM deposit at 3:52 p.m. to make a \$949.81 purchase at a Walgreens at 1999 Centre Street in West Roxbury, which is 0.4 miles away from the Bank of America and 1.4 miles away from 21 Brahms Street. According to Massachusetts State Police Report 2024-122-8/5, troopers reviewed surveillance footage captured by the Walgreens store and saw at 3:49 p.m., a black male who looks like Fevrier, wearing a dark colored beanie style hat, dark colored jacket, light colored jeans, and white sneakers in the vicinity of the photo booth area. At approximately 3:52 p.m., the video shows the same individual conduct a transaction at the cash register with one of the employees.

25. Based on my training and experience and the facts outlined above, I believe, based upon the timing and relative proximity of The Cooperative Bank, Rockland Trust, Fevrier's residence, and the Bank of America and Walgreens (on Centre Street), that Fevrier went home after the robbery, changed his clothing and put on glasses, and then returned to the Centre Street

area to make the deposit and engage in the transaction at Walgreens.

26. I compared the images of the male with his mask down at The Cooperative Bank (top left) with known images of Fevrier (pasted below).



27. I also compared profile images of Fevrier (bottom left) with the individual who robbed the Rockland Trust (bottom right) and the individual who attempted a robbery at the Allston Bank of America (top images).



28. In comparing these and other images of Fevrier and paying attention to his nose, jawline, and complexion, I believe they are all of the same person.

29. I also note that Fevrier's height is reported in RMV and Department of Corrections records as being between 6'1" and 6'3". His weight is reported in State Police booking records as being 218 pounds in February 2023. This stature also matches that of the robber of Rockland Trust.²

30. Finally, during the investigation, I and other investigators have noted the similarity of the jackets worn by the man who robbed the Rockland Trust, the man at The Cooperative Bank

² I note here that the teller reported the robber's estimated height at 5'11".

shortly before, the man at the Allston Bank of America on February 9, 2024, and Fevrier when making the ATM deposit less than three hours after the robbery. All four of these individuals wore a dark colored³ winter jacket, with horizontal stitching, an integrated hood, and a zipper in front.

**PROBABLE CAUSE TO BELIEVE EVIDENCE, FRUITS, AND INSTRUMENTALITIES
WILL BE IN LOCATIONS TO BE SEARCHED**

31. Based on my training and experience, I have reason to believe that Fevrier's person and home will contain evidence, fruits, and instrumentalities of his crime. In my years of experience investigating crimes, I have found it to be true that individuals engaging in a crime retain evidence of that crime on their person, in their residences, and in places outside of public view. I have found that to be true for a number of crimes, including bank robbery.

32. In this case, Fevrier resides 0.9 miles away from The Cooperative Bank and 1.4 miles away from Rockland Trust. Based on the fact that he was seen in those locations between approximately 12:30 p.m. and 1:13 p.m. and then was seen at the Bank of America and Walgreens on Centre Street (close to the Rockland Trust) two and a half hours later depositing all but \$85 of the proceeds of the robbery into his Bank of America account and spending nearly \$1,000 of it at the Walgreens wearing different clothes, shoes, and wearing eyeglasses, it is reasonable to infer that Fevrier returned home after robbing the Rockland Trust, changed his clothes, and then returned to the Centre Street area to engage in the ATM deposit and Walgreens transaction.

33. Given these circumstances, there is probable cause to believe that his person and his home contain evidence, fruits, and/or instrumentalities of the bank robbery. More specifically, while Fevrier deposited a majority of the funds stolen from the Rockland Trust, there are several

³ In the video obtained from Rockland Trust and The Cooperative Bank, the jacket of the subject appears to be black. In the video of the transaction showing Fevrier making the ATM deposit at the Bank of America shortly after the robbery, the lighting makes the jacket seem slightly lighter (gray or brown).

categories of records and tangible items that would be probative of Fevrier's guilt (including his identity as the robber), including the clothing and accessories (including hats, mask, glasses) he was captured on video wearing, demand notes that he passed in the completed West Roxbury robbery and the attempted Allston robbery, firearm(s) that he claimed to possess in the West Roxbury robbery, the teller's card from the Cooperative Bank, receipts for his transactions at Walgreens, and other items described more fully in Attachment B.

SUMMARY AND CONCLUSION

34. Based on this investigation, I have probable cause to believe that Fevrier was the individual who robbed the Rockland Trust on Centre Street in West Roxbury in violation of 18 U.S.C. § 2113(a) on February 16, 2024 because:

- a. The male who robbed Rockland Trust physically matches in characteristics and clothing the male who was at the nearby branch of The Cooperative Bank less than an hour earlier and who suddenly left despite indicating he wanted to open an account;
- b. The male at The Cooperative Bank told the teller that his name was Wolf, lived in Roslindale, and that he had a Bank of America account;
- c. Wolf Fevrier lives nearby in Roslindale 0.9 miles from The Cooperative Bank and 1.9 miles from Rockland Trust and does, in fact, have an account at Bank of America;
- d. Fevrier's license and prior booking photos match the likeness of the male at The Cooperative Bank (whose face was visible when he pulled his mask down);
- e. On the date of the robbery, Fevrier made an ATM deposit of an amount slightly less than was taken from Rockland Trust less than three hours earlier; and


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f. Fevrier used his Bank of America card to make a \$949.81 purchase at a nearby Walgreens shortly after the deposit.

35. Furthermore, for all the reasons outlined above, I have probable cause to believe that Fevrier's nearby home and Fevrier's person will contain evidence, fruits, and/or instrumentalities of the robbery.

Respectfully submitted,


DETECTIVE STEVEN MULCAHY JR.
Task Force Officer, FBI

Sworn to before me telephonically in accordance with Fed. Rule Crim. P. 4.1 on this Feb 26, 2024 day of FEBUARY, 2024.


HONORABLE JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE