

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: LENOX STREET)
HOUSING DEVELOPMENT GUN AND) VARIOUS CRIMINAL NOS.¹
DRUG TRAFFICKING OPERATIONS)

AFFIDAVIT OF SPECIAL AGENT PETER KELLEY

I, Peter Kelley, being duly sworn, depose and state as follows:

1. I am submitting this affidavit in support of the government's motion that the following individuals be detained pending trial: (1)BYRON ALEXANDER, A/K/A "BUNS"; (2)LAWRENCE BOGARTY, A/K/A "LB"; (3) DONTANE BRYANT, A/K/A "TANE"; (4)GEORGE DEEBLE, A/K/A "SMILES"; (5)TYLER DELOACH, A/K/A "TEK"; (6)JOHN

¹ This affidavit is being filed in the following 18 cases: (1) United States v. Byron Alexander, A/K/A "Buns," Crim. No. 16-10072; (2) United States v. Lawrence Bogarty, A/K/A "LB," Crim. No. 16-10079; (3) United States v. Dontane Bryant, A/K/A "Tane," Crim. No. 16-; (4) United States v. George Deeble, A/K/A "Smiles," Crim. No. 16-10064; (5) United States v. Tyler Deloach, A/K/A "Tek" and Daryl Tolbert, a/k/a "Blaze," Crim. No. 16-10069; (6) United States v. John Depina, A/K/A "Dough," Crim. No. 16-10067 (7) United States v. Stephen Freeman, A/K/A "Stizz," Criminal No. 16-10076; (8) United States v. Perry Hasberry, A/K/A "Percy," Mag. Judge No 16-2018-MBB; (9) United States v. Rasean Hills, A/K/A "Bleed," Criminal No. 16-10071; (10) United States v. Keron-Randall Lewis, A/K/A "Talent," Criminal No. 16-10074; (11) United States v. Frank Melo, A/K/A "Cuts," Criminal No. 16-10073; (12) United States v. Pablo Moreta, A/K/A "Migo," Criminal No. 16-10068; (13) United States v. Anthony Nunez, A/K/A "Dizzo," Criminal No. 16-; (14) United States v. Hassan Parham, A/K/A "Hizzy," Criminal No. 16-10065; (15) United States v. James Richardson, A/K/A "9-Ball" , Criminal No. 16-10070; (16) United States v. Derek Roberts, A/K/A "Keaz," Criminal No. 16-10077; (17) United States v. Ellis Santos, A/K/A "Slim," Criminal No. 16-10078; (18) United States v. Anthony Williams A/K/A "Batz," Criminal No. 16-10075

DEPINA, A/K/A "DOUGH"; (7)STEPHEN FREEMAN, A/K/A "STIZZ"; (8)PERRY HASBERRY, A.K.A "PERCY" (9)RASEAN HILLS, A/K/A "BLEED"; (10)KERON-RANDALL LEWIS, A/K/A "TALENT"; (11)FRANK MELO, A/K/A "CUTS"; (12)PABLO MORETA, A/K/A "MIGO"; (13)ANTHONY NUNEZ, A/K/A "DIZZO";(14) HASSAN PARHAM, A/K/A "HIZZY"; (15)JAMES RICHARDSON, A/K/A "9-BALL"; (16) DEREK ROBERTS, A/K/A "KEAZ"; (17) ELLIS SANTOS, A/K/A "SLIM BLACK"; (18)DARYL TOLBERT, A/K/A "BLAZE"; and (19) ANTHONY WILLIAMS A/K/A "BATZ." These individuals will hereinafter collectively be referred to as "the Targets".

2. Each of the Targets has been charged with drug and/or firearm violations in indictments or criminal complaints returned or issued since March 22, 2016. Eighteen of the Targets are alleged to have distributed or possessed with intent to distribute cocaine base, a/k/a "crack cocaine," heroin, or Ethylone (described by Target Pablo Moreta as a "pure form of ecstasy") in and around the Lenox Street Housing Development located in Boston's South End (hereinafter referred to as "Lenox" or "the Development"). Two of the defendants are charged with firearms offenses and are alleged to have sold guns during the course of these investigations, also inside the Development.

3. I am a Special Agent with the ATF and have been so employed for 10 years. I am currently assigned to ATF's Boston Group II, a team of Special Agents and Task Force Agents who regularly work with

state and local detectives to investigate firearms trafficking, firearms possession by prohibited persons, violent crimes committed with firearms and the use of firearms in furtherance of drug trafficking crimes in and around the City of Boston, Massachusetts with an emphasis on those individuals identified as members or associates of area gangs.

4. During my tenure at the ATF, I have been involved in investigations relating to a wide variety of suspected criminal activity, including drug and firearm trafficking. Since January, 2015, I have investigated drug trafficking, gangs, and gang-related activity in and around the Lenox Street Development with members of the Boston Police Department ("BPD") including officers assigned to District D-4 and BPD's Youth Violence Strike Force ("YVSF") and members of the Boston Housing Authority Police.

5. I have received training in enforcement and investigation of firearm and narcotics cases. I have also received training in the investigation of organized street gangs involved in firearms trafficking and narcotics distribution. I have conducted and participated in investigations involving the violation of both the federal drug and firearms laws, including 18 U.S.C. § 922(g)(1) --being a felon in possession of a firearm or ammunition, and 21 U.S.C. §§ 841 and 846 -- illegal distribution of narcotics and conspiracy to distribute narcotics. For much of the last 4 years,

my investigative efforts have focused on gun, drug and gang activity in Boston.

6. I have participated in the investigations described in detail below. During them, I have interviewed the cooperating witness about his/her knowledge of the matters described and reviewed consensual recordings made in the course of controlled buys of drugs and guns. I have reviewed reports prepared by other agents, discussed this case with law enforcement officers who have assisted the ATF, and inspected drugs and guns obtained from Targets. As a result of my personal participation in these investigations, my conversations with other law enforcement officers, and review of reports prepared by other officers, I am familiar with them.

7. This affidavit supports the government's request that the Targets be detained pending trial. The government is seeking detention in these cases even though some of the younger Targets do not have lengthy adult criminal histories. It does so because the activities described herein are adversely affecting the quality of life for hundreds of people who live in and around the Development and the Targets simply will not conform their conduct to the requirements of the law.

8. This affidavit is provided for the limited purpose of familiarizing the Court with the Lenox Street Housing Development and the persistent problems of drug trafficking, firearms, and

gang-related violence that plagues the Development and its residents. It also generally describes ongoing investigations at the Development that began in January, 2015 and provides some background information regarding the 19 individuals that have to date been charged with federal drug or firearm offenses. Still more individuals have also been charged with drug offenses in state court as a result of purchases made in the course of these operations. Other aspects of these investigations remain ongoing.²

I. BPD District D-4

9. BPD District D-4 covers the Boston's South End and some areas of downtown and Roxbury. District D-4 is an economically diverse section of our city that contains a number of public housing developments (both BHA owned and privately owned but federally subsidized) as well as a substantial amount of private housing stock that has been the subject of substantial repair and renovation as more and more people have returned to the South End of Boston to live.

² I believe that the information in this affidavit, including information set forth about the activities at the Lenox Street Housing Development and the Lenox Street Cardinals and the Villa Victoria Pirates, two allied gangs that frequent the Development, is reliable because, among other things, it has been provided by multiple sources or otherwise corroborated. The information set forth in this affidavit is not, however, everything that the ATF and the Boston Police Department have learned about Lenox Street and/or criminal activity in and around the Development. This affidavit merely includes information I believe to be relevant to detention issues.

II. The Lenox Street Housing Development

10. One of the larger of the public housing developments in District D-4 is the Lenox Street Housing Development ("Lenox" or "the Development"). Lenox is really two developments that sit next to each other between Shawmut Ave and Tremont Street and were built ten years apart. Lenox, a federally funded development, was built in 1939 and consists of 306 one, two, and three-bedroom housing units situated in three-story brick walk ups. Camden, funded by the state, was built in 1949 and includes 70 one, two, or three bedroom units also in three-story walk up buildings. Rents at both developments are based on a percentage of the tenant's income.

11. Lenox is located at 136 Lenox Street between Tremont Street and Shawmut Ave. The project sits across the street from Ramsay Park, which has historically been associated with open air drug markets and has been the site of many drug arrests (including one in these operations). In his State of the City address in December, the Mayor stated that improving Ramsay Park was one of his goals for 2016. It is ATF's hope that these investigations are a positive step in that direction.

12. Historically, Lenox has been the subject of a number of law enforcement operations aimed at attacking drug dealing and the violence it produces. In 2011, the residents of Lenox contacted the

Boston Police Department to request help in attacking drug dealing from the hallways and other areas of the Project. That investigation resulted in 21 arrests. In 2012, ATF and BPD did another South End investigation that resulted in more Lenox Street, Villa Victoria, and Annunciation Road Gang members being charged with drug and firearm offenses.

13. Unfortunately, the problems at Lenox associated with gun and drug activity have persisted. Although crime in District D-4 went down in 2015, Lenox was still considered to be one of the city's 10 hotspots for violence for that year. The Boston Police Department's Boston Regional Intelligence Center ("the BRIC") identified 30 shootings and over 75 reports of shots fired in the area of the Development between March of 2012 and June of 2015. During the course of our operations, two of the Targets were shot and a third was murdered, all around the area of the Development. BPD's BRIC has also identified Lenox as being one of several areas of the city involved in an uptick in year-end violence between December 4, 2015 and January 7, 2016, when there were 28 people shot including 5 fatal shootings and has identified the Lenox Street Cardinals as being involved in two of the City's most active gang disputes in 2015.

14. There is no better way to demonstrate the concentration of drug and gun offenses at the Lenox Street Development than to examine

the maps attached to this Affidavit as Exhibit 1 that were prepared by the BRIC. Each of these maps has been prepared to show where within District D-4 certain categories of crime are most frequently being committed in 2014-15. With respect to every category analyzed (Shootings, Shots Fired with Ballistics recovered, Robberies, Firearm Arrests, and Drug Arrests), the occurrence of those crimes was centered in and around the Lenox Street Development. The investigations have also demonstrated the impact that drug trafficking and related crime and gang-violence has on the residents of the Lenox Street Development, the vast majority of whom have nothing to do with (and are in fact victimized by) the criminal activities described. Intelligence, consensual recordings, and surveillance developed during the investigations made it clear that innocent residents of the development are confronted with drug dealing, drug use, and other criminal activity being conducted by the Targets and their associates in the hallways or courtyards of the apartment buildings where the residents and their families live. As noted, 11 of the Targets have been ordered out of the Lenox Street Housing Development by the BHA, the BHA Police Department or the Courts but came into the Development to sell drugs or guns anyway)

15. Lenox Street residents have also reported being harassed and annoyed by groups of men using the hallways and courtyards (and sometimes the residential units) in the Development for smoking

marijuana or other illegal purposes. In a youtube video posted in 2014, for example, a number of the Targets to these investigations can be seen hanging out in the Development and appear to be openly smoking marijuana. See Photos attached as Exhibit 2. One of the individuals depicted in these photos (Anthony Nunez) is wearing a memorial button to an area gang member, Mohammed Hassan a/k/a "Hum Greazy," who was killed in 2012. Another (Rasean Hills) appears to be wearing a custom Boston Red Sox hat with a Cardinal stitched on the side. Although not included in the attached photos, this video also depicted the scarring on Ellis Santos' body from a 2010 incident in which he was shot 23 times. Hence, like all of the ongoing efforts in this area to curtail drug trafficking and the violence it breeds, a principal purpose of the underlying investigations and the government's request that the Targets be detained, is to improve the quality of life for the hundreds of law-abiding citizens who call the Development home and merely wish to provide a safe and positive environment for their families.

16. The Lenox Street Housing Development is also the base of activities for the Lenox Street Cardinals, more commonly known on the street as "Lenox Street." Lenox and its allies (such as the Villa Victoria Pirates) are believed to be at the root of much of the violence and drug activity depicted on the maps attached as Exhibit 1.

17. The Lenox Street Cardinals street gang is one of the larger and more established gangs in the city. According to the BRIC, Lenox Street has close to 100 active members, many of whom are 30 or older. The Targets in our investigations therefore included both younger members of the gang, a group of older members whose offending hasn't stopped, and individuals who are members of gangs allied to Lenox such as the Villa Victoria Pirates. Overall, the Boston Police Department has identified 16 of the 19 federal targets as members of Lenox Street or other area gangs.

18. Of course, crime in and around the Development is not limited to that specifically related to gang disputes involving Lenox Street. As is indicated below, the investigations described herein focused on drug and gun offenses conducted by members of Lenox Street, Villa Victoria, and other area gangs. Other serious incidents occurring in and around the Development in the last two years include reports of shots fired, robberies, and firearm and drug arrests, all as indicated in the maps attached as Exhibit 1.

19. Crime committed in and around the Development also includes incidents that might be considered by some to be less serious but that still have a dramatic impact on the quality of life. Area residents (who may often be afraid to file a formal police complaint, much less pursue it) nevertheless advise officers that groups literally take over hallways and courtyards inside the Development

in order to use drugs and hang out. These incidents can literally leave residents and their children feeling like prisoners in their own homes.

20. Such incidents take place despite intensive enforcement efforts by BPD and BHA officers and the issuance of formal "No Trespass" orders by the BHA or the Courts. Of the 19 Targets, 11 had been ordered to stay out of the Development by the BHA prior to the drug sales that are alleged. Of these 11 individuals, every one of them returned, many to sell drugs.

III. The Operations in the Lenox Street Area

21. Based on all of the foregoing, operations at Lenox were initiated in January, 2015. From its inception, our operations have been greatly assisted both by the Boston Police Department and members of the Boston Housing Police Department.

22. The principal goal of these investigations was to attack drug and gun trafficking in the Lenox Street Housing Development. Emphasis was placed on: (i) individuals who were believed to be particularly active in street and lower-level wholesale drug trafficking in the Development and the open air markets on Shawmut Avenue and Ramsay Park; and, (ii) Lenox Street associates believed to be trafficking drugs and who were independently involved in violence and gang disputes.

23. To accomplish these goals, a cooperating witness ("the CW")

was used to make street-level drug purchases of controlled substances such as crack cocaine, the drug of choice sold by most of the Targets. Drug purchases were captured on audio and video recording equipment and were surveilled by law enforcement to the extent possible. Many meetings and/telephone calls leading up to the buys were also consensually recorded.

IV. The Targets

24. To date, scores of controlled purchases of crack cocaine, heroin and Ethylone have been made as well as three gun purchases (one of which was a starter pistol). Federal indictments or criminal complaints have been returned charging 19 individuals with federal drug or firearm charges. Many of the Targets are believed to be members of area gangs or are long-term felons. As set forth above, other Targets have been charged in state court based on other drug purchases made during these investigations.

25. Nearly all of the 18 drug Targets have conducted at least one drug sale either in or within 1000 feet of the Lenox Street Housing Development in violation of 21 U.S.C. § 860. All three gun purchases also took place inside the Development. Perhaps the most revealing statistic about the 19 federal targets is that, according to Boston Police Department Reports, 11 have been shot or stabbed, many more than once.

26. Our operation confirmed many of the premises on which it

was initiated. The Development is plagued by drug trafficking which represents a major threat to the well-being of all area residents. During the active phase of our operations, the CW was able to purchase crack cocaine or other drugs with relative ease. On a number of days on which drugs were purchased, the CW was able to select from a number of available dealers. Virtually all of the buys either took place inside or were initiated in the area of the Lenox Street Development.

27. As set forth above, 19 Targets have been charged in Federal Court with drug or firearm offenses. Based on criminal histories obtained during the course of the investigations, these 19 individuals collectively have amassed scores of adult and juvenile arraignments. The criminal records of the Targets and other individualized information that may be relevant to detention decisions are described below and will be supplemented at individual detention hearings.

28. **BYRON ALEXANDER, A/K/A "BUNS."** Alexander is an identified member of the Lenox Street Cardinals. He is charged with selling crack cocaine to the CW in this case on December 1, 2012 inside the Development even though he had been on the BHA No Trespass list since 2014. Approximately one hour after that buy, he was arrested on a state warrant and 21 more bags of crack cocaine were recovered from him at booking. This seizure forms the basis of the second charge in Alexander's indictment.

29. Alexander has a lengthy criminal record that includes convictions for a 2015 Assault and Battery, a 2011 conviction for Possession to Distribute Class D, and a 1997 group of convictions that included *Involuntary Manslaughter, Armed Robbery, and Assault with a Dangerous Weapon*. Alexander was sentenced to 10-15 years on the latter group of convictions. BPD records also indicate that Alexander was shot in 2012 in the area of the Lenox Street Housing Development.

30. **DONTANE BRYANT, A/K/A "TANE,"** is a 20-year old identified member of the Villa Victoria Pirates. He has a 2014 drug trafficking conviction on which he was given probation that he violated and was then incarcerated. He has three drug charges, one of which took place inside Ramsay Park and the others inside the Development. As of December 31, 2015, Bryant had two sets of state charges pending against him that include charges of Assault and Battery, Assault and Battery with a Dangerous Weapon, Home Invasion, Assault with Intent to Murder, and Assault to Rob. Two of the three charges pending against Bryant here resulted from an arrest by the Boston Police Department based on drug activity they observed in Ramsay Park and the recovery of additional drugs after Bryant had been placed under arrest as he walked in the Development.

31. **LARRY BOGARTY, a/k/a "LB"** is charged with a single sale of heroin to the CW in this case that took place in a car ride that originated at 725 Tremont Street.

32. Bogarty is identified as a member of the Copeland Street Gang. At the time of the charged sale, Bogarty was on pretrial release on two Suffolk Superior Court drug trafficking cases and was wearing a GPS Monitor. He also had pending district court cases for Possession to Distribute Class A, Resisting Arrest, and Assault and Battery on a Police Officer. Bogarty's criminal record includes convictions for Possession of Cocaine With Intent to Distribute, Firearms Possession, Assault and Battery With a Dangerous Weapon, and Assault and Battery.

33. **GEORGE DEEBLE, a/k/a "SMILES."** Deeble is charged with one count of being a felon-in-possession of a firearm, which charge arose out of a gun sale he made to a CW at the beginning of the operations inside the Lenox Street Development. Deeble has two prior gun convictions along with convictions for Accessory to Murder, Assault with a Dangerous Weapon, and Armed Robbery. At the time he made the charged sale, he was on probation for two state charges.

34. **TYLER DELOACH, A/K/A "TEK."** Deloach is charged with three drug offenses, the last one of which took place inside the Development. Deloach was at one time trespassed out of all BHA properties. BPD lists him as a member of Lenox Street and the Mass. Ave. Hornets. Deloach has 2 prior convictions for crack cocaine distribution and Determinations of Delinquency for Unarmed Robbery and Assault and Battery. BPD Reports indicate that Deloach has been slashed with a knife and shot in the area of the Development.

35. **JOHN DEPINA, A/K/A "DOUGH."** Depina is an identified member of the Lenox Street Cardinals who was ordered out of BHA Properties in 2014.

36. Depina is charged with one count of distributing crack cocaine inside the Lenox Street Housing Development (despite the No Trespass Order issued against him). At the time of the charged sale, Depina was on probation in Roxbury District Court where he had been convicted of possessing ammunition. As a juvenile, he had been committed to DYS custody on four separate cases. He also discussed the sale of a gun on video with the CW during the course of the investigations.

37. **STEPHEN FREEMAN, a/k/a "STIZZ."** Freeman, an identified member of the Lenox Street Cardinals, stands charged with 1 count of distributing crack cocaine within 1000 feet of the Development. During the charged buy, Freeman bragged to the CW on video about the quality of his crack cocaine, which he referred to as "fire!" Freeman was shot in 2005 and has prior convictions for Assault and Battery with a Dangerous Weapon, Assault with a Dangerous Weapon, and Firearms Possession.

38. **RASEAN HILLS, A/K/A "BLEED."** Hills is charged with distributing crack cocaine within 1000 feet of the Development. BPD records identify him as a member of the Mass. Ave Hornets and 1850 Washington Street Gangs. Hills was shot in 2007 and has convictions

for firearms possession both as an adult and a juvenile.

39. **KERON-RANDALL LEWIS, a/k/a "TALENT."** Lewis is charged with two counts of distribution of crack cocaine, one of which took place inside the Lenox Street Development. BPD has identified Lewis as a member of the Mass. Ave. Hornets. Lewis has three prior drug distribution convictions in addition to convictions for Assault and Battery on a Police Officer, Resisting Arrest, Armed Assault to Murder, Aggravated Assault and Battery with Serious Bodily Injury and for Possessing a Firearm. Lewis had a BHA No Trespass Order entered against him in 2012.

40. **FRANK MELO, A/K/A "CUTS."** Melo is charged with conspiracy to distribute cocaine and with distributing cocaine within 1000 feet of the Lenox Street Housing Development, all based on a sale that took place inside the Development. Melo was ordered to stay off all BHA properties in 2012 but was nevertheless was one of the individuals who appeared in the 2014 youtube video shot inside the Development (available at <https://www.youtube.com/watch?v=MgXqE-36OH0>) in which he appeared to be in possession of marijuana. Melo is listed by BPD as a member of the Lenox Street gang. His criminal record is limited to 2 determinations of delinquency.

41. **PABLO MORETA, a/k/a "MIGO"** is an identified member of the Lenox Street, Mass Ave. Tremont Street, and Villa Victoria Gangs who sold Ethylone (which he described as the "pure form of ecstasy") and

two firearms (one of which was a starter pistol) to the CW inside the Lenox Street Housing Development. Moreta was shot in 2012 and ordered out of BHA Properties on January 2, 2015. His record includes 2 drug distribution convictions and he currently has multiple cases pending against him, two of which he has already admitted to committing.

42. **ANTHONY NUNUEZ, A/K/A "DIZZO."** Nunez is an identified member of the Villa Victoria Pirates who is charged with two sales of crack cocaine, one of which took place inside the Lenox Street Housing Development. He has two prior Superior Court drug distribution convictions and has been on the BHA No trespass list since 2014. His criminal history also includes multiple probation violations.

43. **HASSAN PARHAM, A/K/A "HIZZY."** Parham is charged with one count of distributing crack cocaine within 1000 feet of the Lenox Street Development. Like many of the charged sales in this case, that buy took place inside the Development and was captured on video. BPD has identified him as a member of the Lenox, Villa Victoria, and the Mass. Ave. gangs.

44. Parham was stabbed in 2012. He has prior convictions for Firearms Possession and Armed Assault with Intent to Kill as well as more recent convictions for Assault and Battery with a Dangerous Weapon and Threats.

45. **DEREK ROBERTS, A/K/A "KEAS."** Roberts is charged with 1

count of distributing crack cocaine within 1000 feet of the Lenox Street Development. In fact, the buy took place inside the Development and was captured on video.

46. During the buy, Roberts boasted about a social security disability matter he had pending in this Court and stated that the federal judge had said the Social Security Administration had made a mistake in an earlier hearing and he was expecting, "like 40 grand." The federal court docket confirms the pendency of such a proceeding in the name of "Derek Roberts."

47. Roberts has a lengthy criminal record. It includes convictions for Armed Robbery, Distribution of a Class B Substance, a Federal Firearms conviction (on which he served 10 years), and three additional drug distribution convictions. The basis for his alleged disability is not clear.

48. **JAMES RICHARDSON, A/K/A "9-BALL."** Richardson is charged with making a single sale of crack cocaine within 1000 feet of the Lenox Street Housing Development. Richardson had previously served 15 years on a federal firearms conviction and also has convictions for Assault and Battery on a Police Officer/Possession to Distribute Class B, Armed Robbery, and Assault and Battery with a Dangerous Weapon.

49. **ELLIS SANTOS, A/K/A "SLIM BLACK."** Santos is charged with making two sales of crack cocaine within 1000 feet of the Lenox Street Development. He is an identified member of the Lenox Street Gang who

discussed on video an incident in 2010 during which he was shot 23 times and also has affiliations with the Mass. Ave. Hornets and the Tremont Street Assassins. Santos also met with the CW on April 29, 2015 and showed the CW a firearm that the CW was then able to photograph. Santos has adult convictions for Assault and Battery with a Dangerous Weapon and Breaking and Entering and Determinations of Delinquency for Armed Robbery, Unarmed Robbery, Assault and Battery, and Malicious Destruction of Property.

50. **DARYL TOLBERT, A/K/A "BLAZE."** Tolbert is charged with adding and abetting Tyler Deloach's first sale of crack cocaine to the CW. He has been identified as a member of the Lenox Street Cardinals and was shot in 2006 and stabbed in 2012.

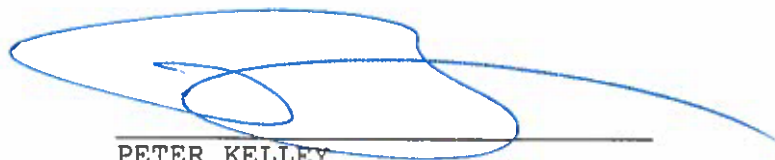
51. Tolbert went on the BHA's No Trespass List in 2012. His prior convictions include Possessing Cocaine with Intent to Distribute (2X), Distributing Cocaine, Assault and Battery, Resisting Arrest and Possession of a Firearm.

52. **ANTHONY WILLIAMS, A/K/A "BATZ."** Williams has also been identified by the Boston Police Department as a Lenox Street Cardinal. He is charged with distributing crack cocaine within 1000 feet of the Lenox Street Housing Development. His record includes a 2012 shooting case that resulted in convictions for Possessing a Firearm and Ammunition, Assault with a Dangerous Weapon, and Aggravated Assault and Battery. Prior to that, he had been convicted of Distribution of

Class B and Carrying a Dangerous Weapon and a number of less serious offenses.

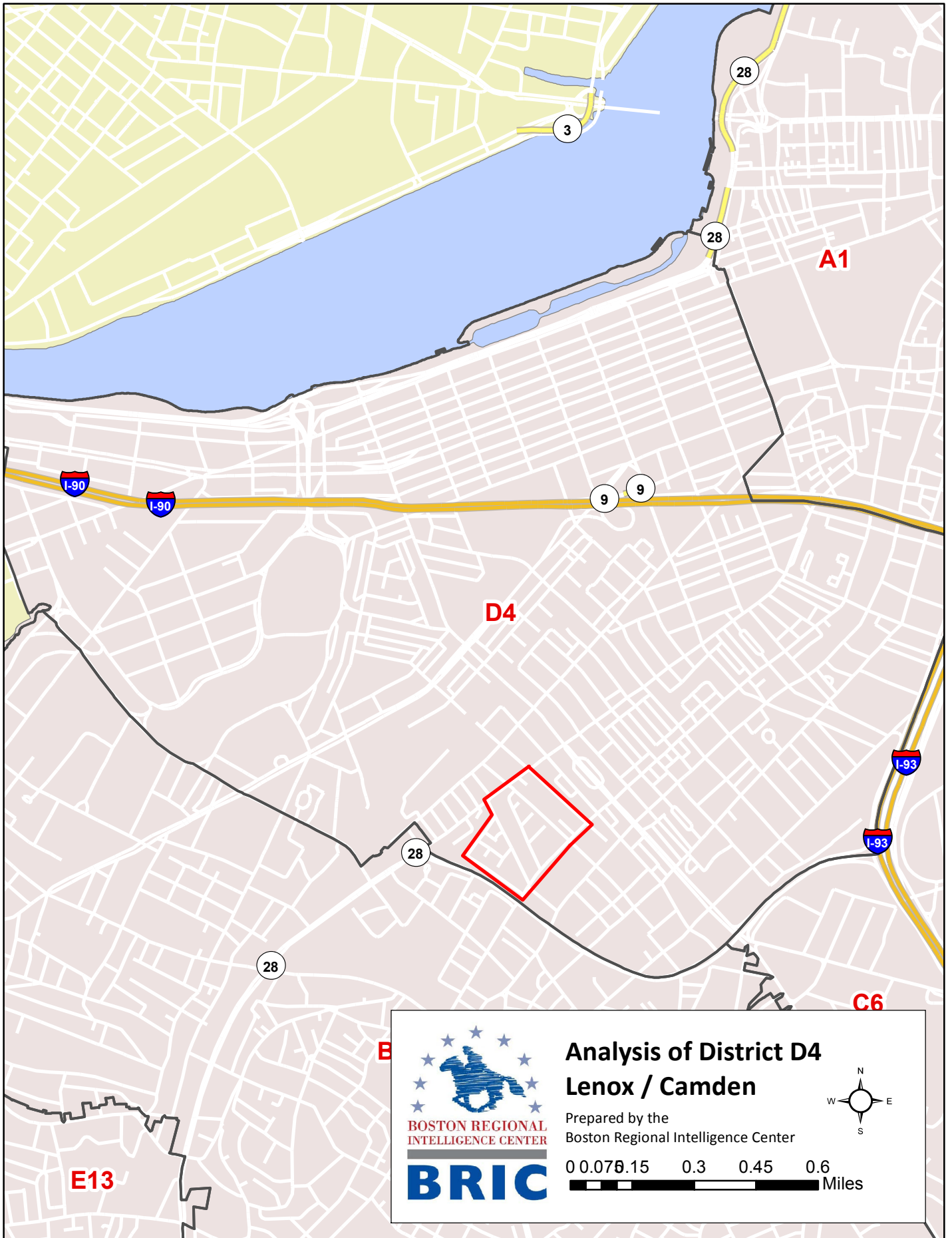
53. **PERRY HASBERRY, A/K/A "PERCY."** Hasberry is charged by criminal complaint with distributing crack cocaine within 1000 feet of the Lenox Street Housing Development. This is another buy that took place inside the Development even though Hasberry had been ordered out of BHA properties via a No Trespass Order. At the time of the charged sale, Hasberry was on pretrial release for Assault and Battery of a Person over 60.

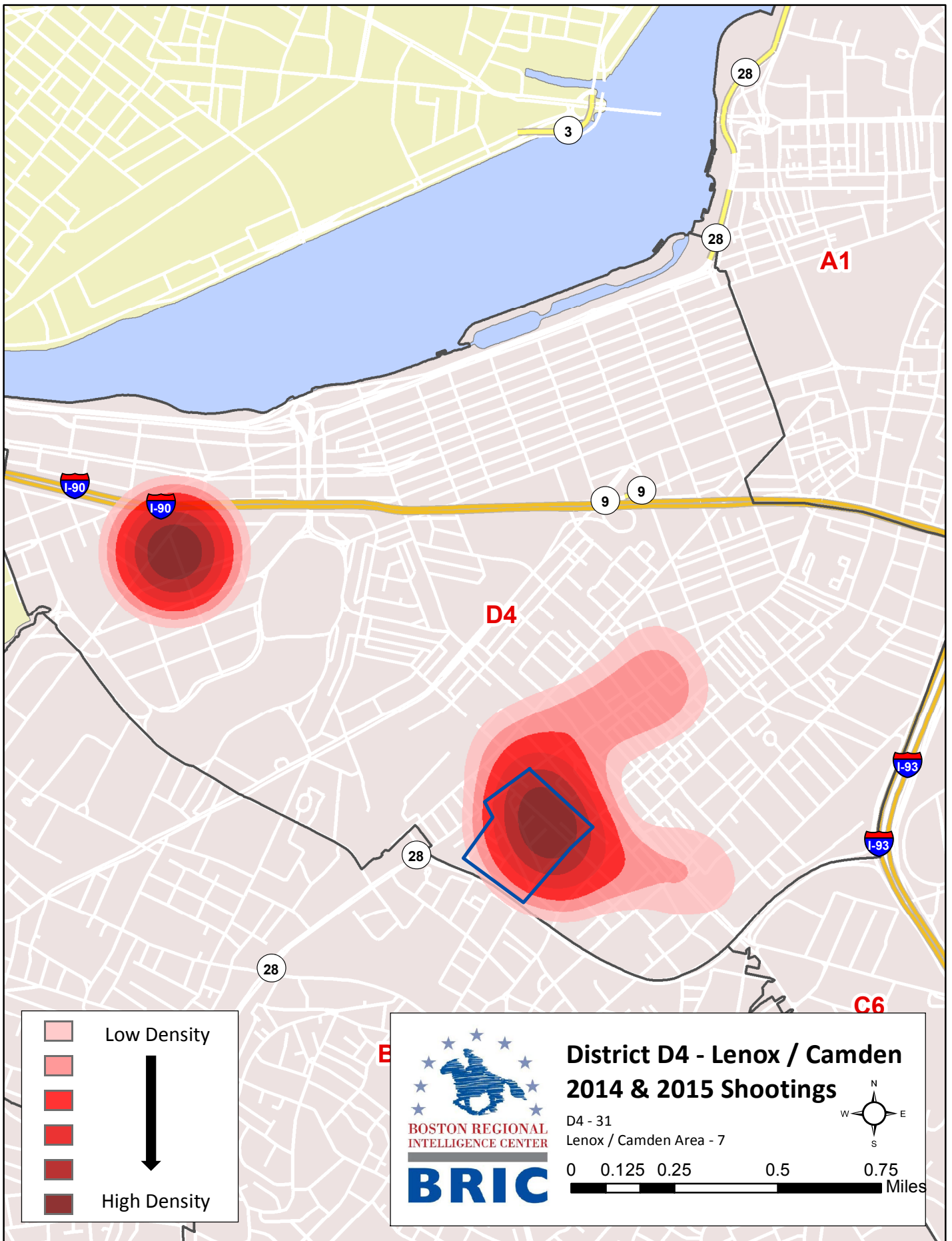
Signed under the pains and penalties of perjury this 23rd day of March, 2016.

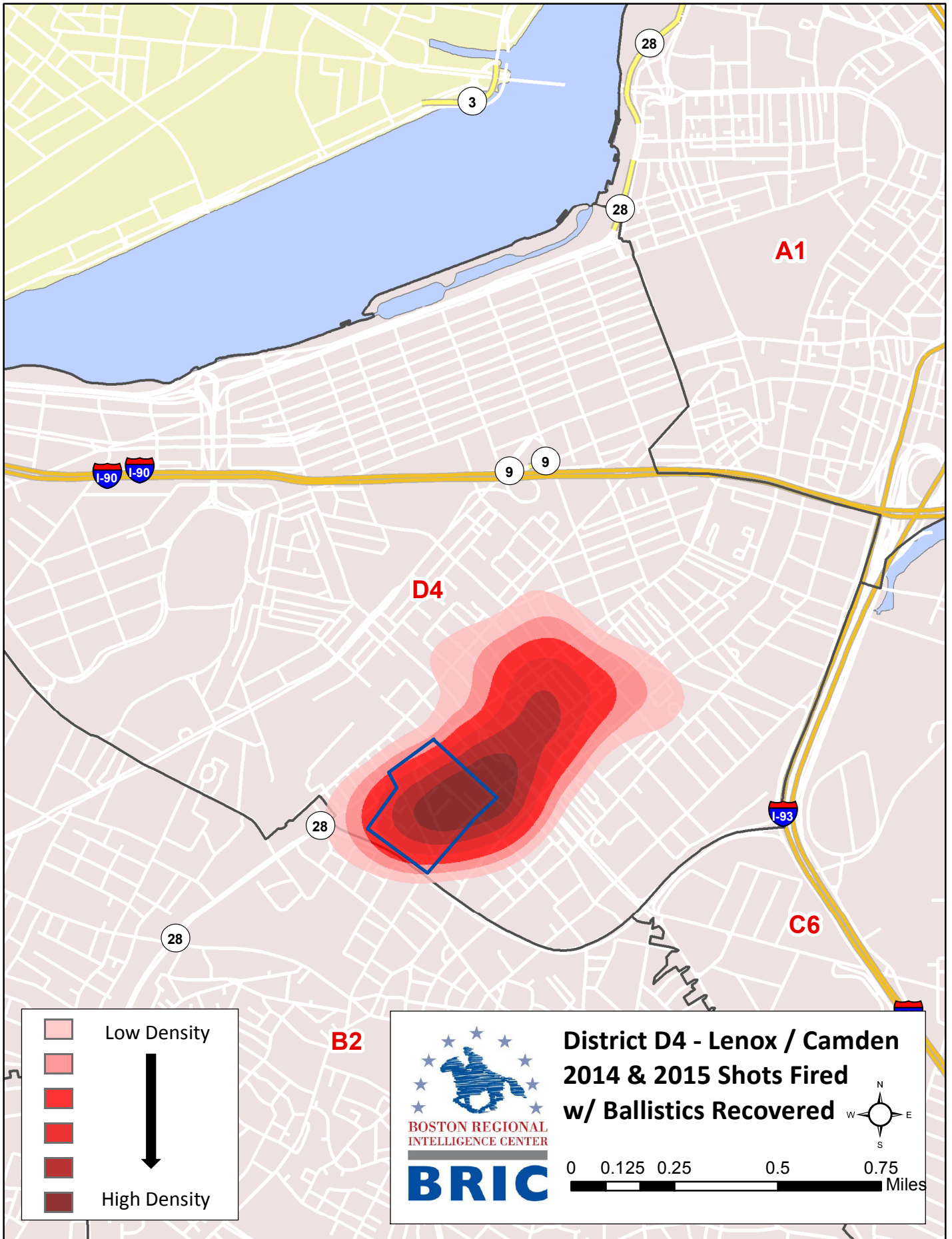


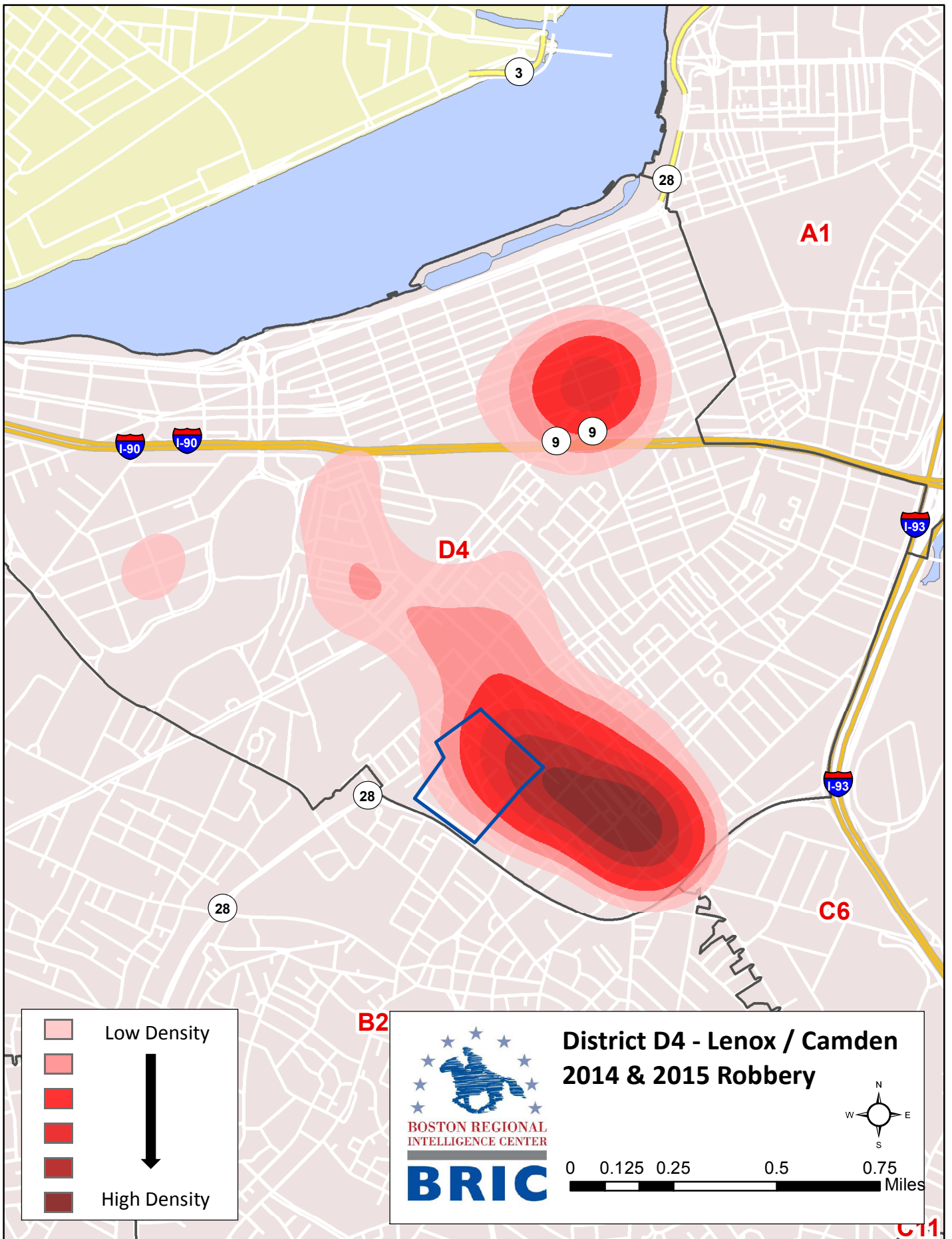
PETER KELLEY
Special Agent
Bureau of Alcohol, Tobacco, Firearms
& Explosives

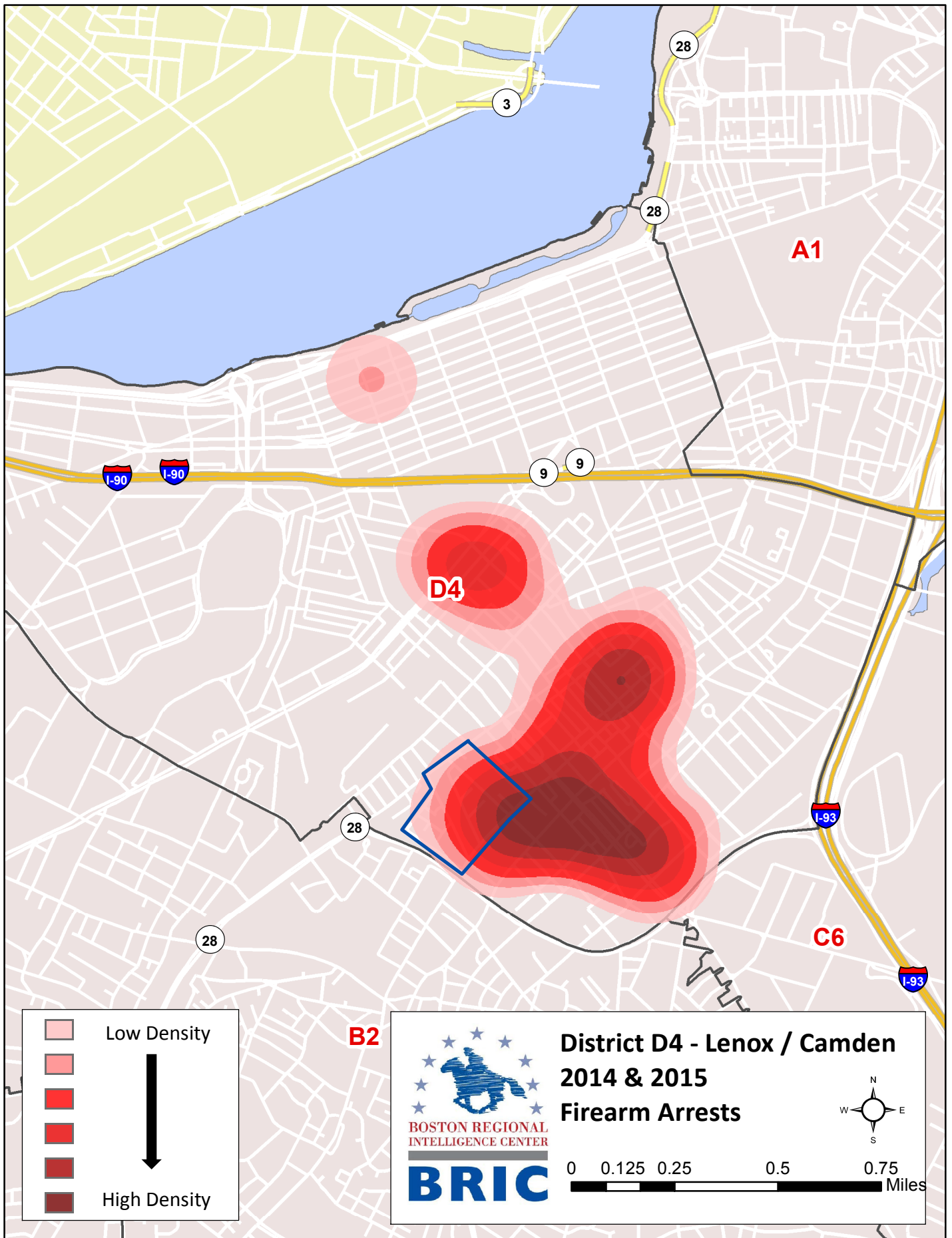
EXHIBIT 1



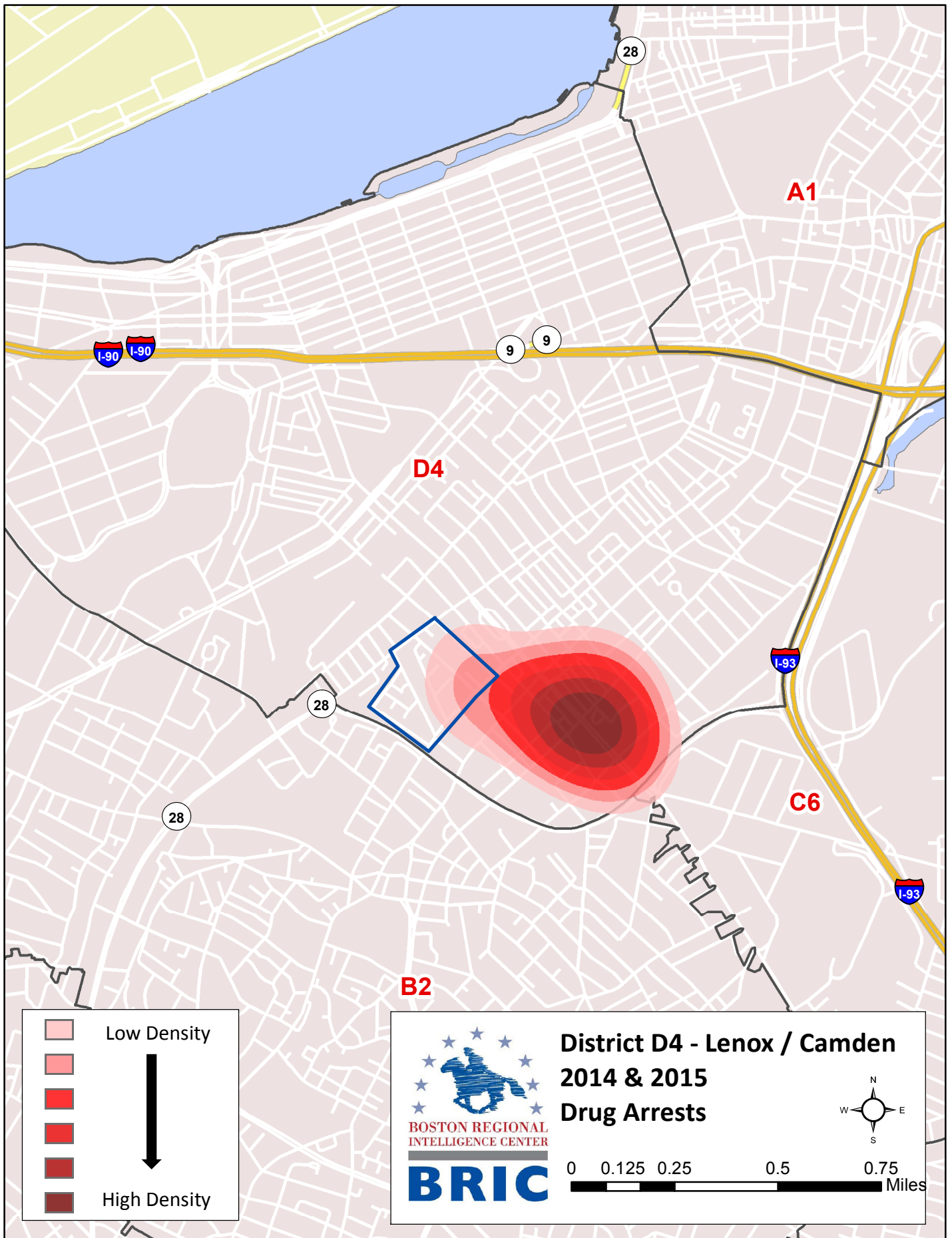






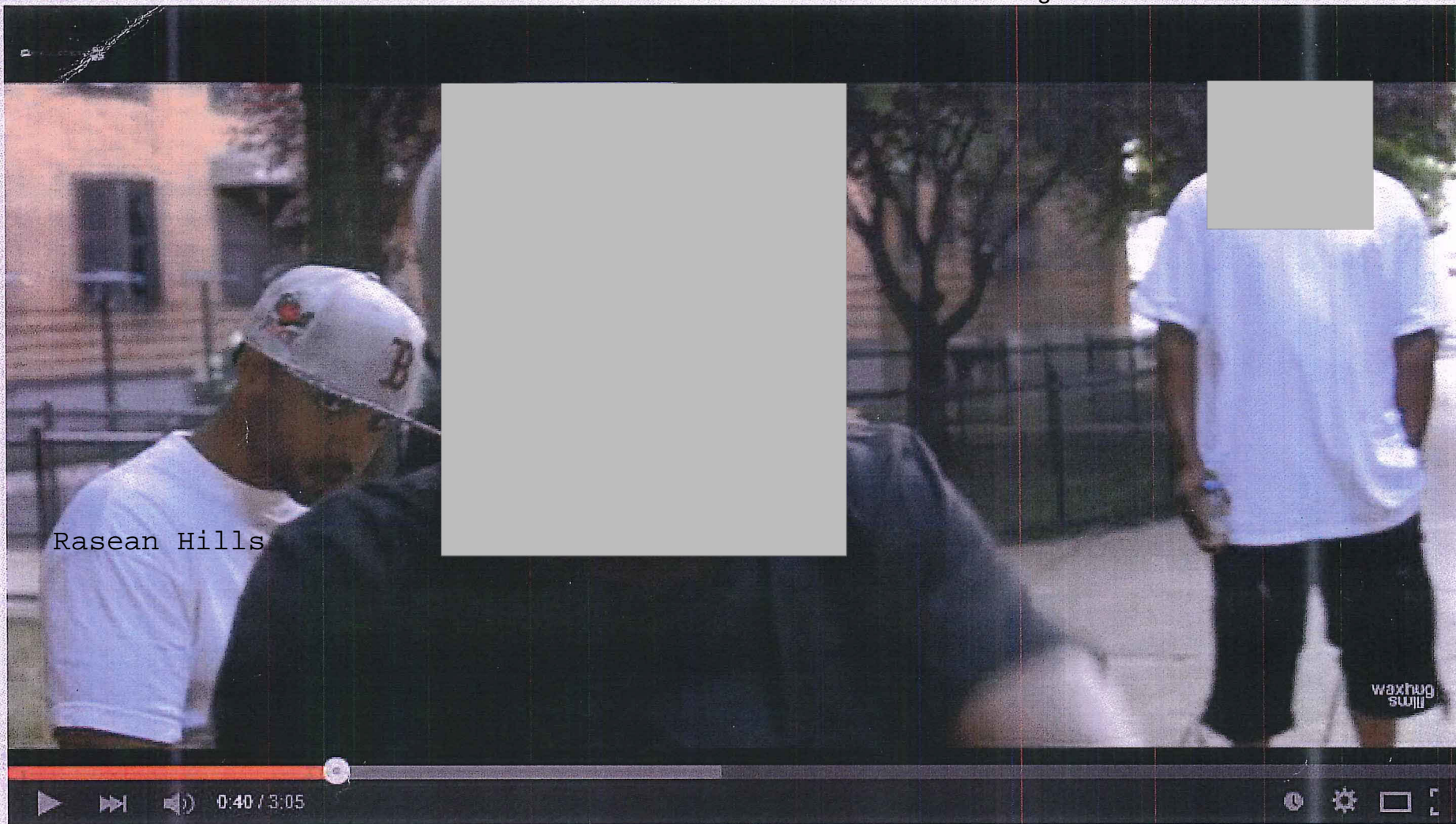


****Firearm Arrest data includes default warrant arrests for past Firearm charges and arrests for Assault by Means of a Firearm where no gun is recovered, in addition to straight firearm arrests with a gun recovery.****



****Drug Arrest data includes default warrant arrests for past Drug charges.****

EXHIBIT 2



Rasean Hills

Southside - Flames Bonds feat Southside Nitty - Waxhug Films - Official



WaxhugFilms

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Published on Jul 19, 2014

Music Video by Flames Bond performing "Southside" featuring Southside Nitty directed by Waxhug Films



Frank Melo

Ellis Santos

Hills

Stephen Freeman

Southside - Flames Bonds feat Southside Nitty - Waxhug Films - Official



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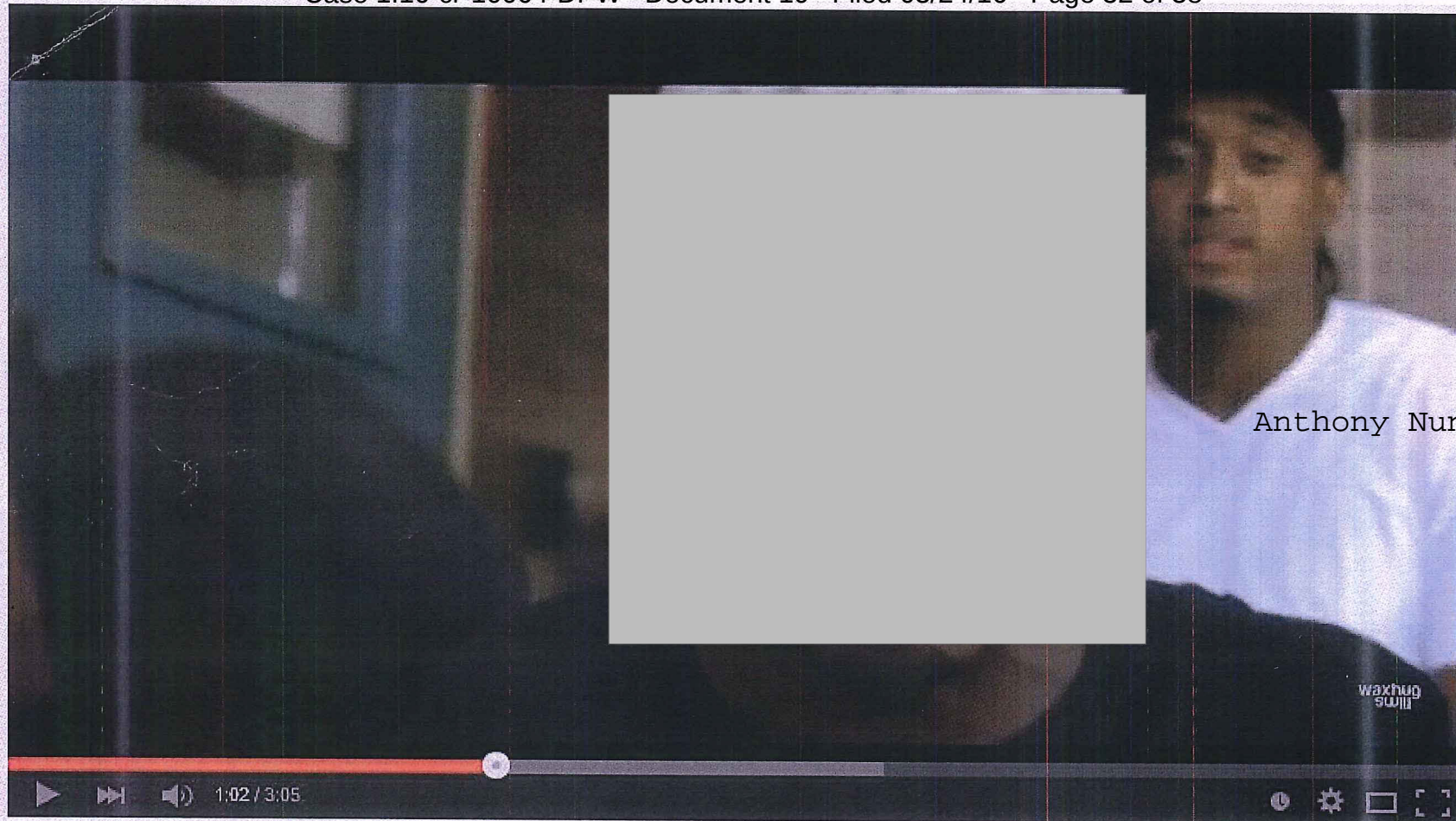
4,754

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Published on Jul 19, 2014

Music Video by Flames Bond performing "Southside" featuring Southside Nitty directed by Waxhug Films



Anthony Nunez

Southside - Flames Bonds feat Southside Nitty - Waxhug Films - Official





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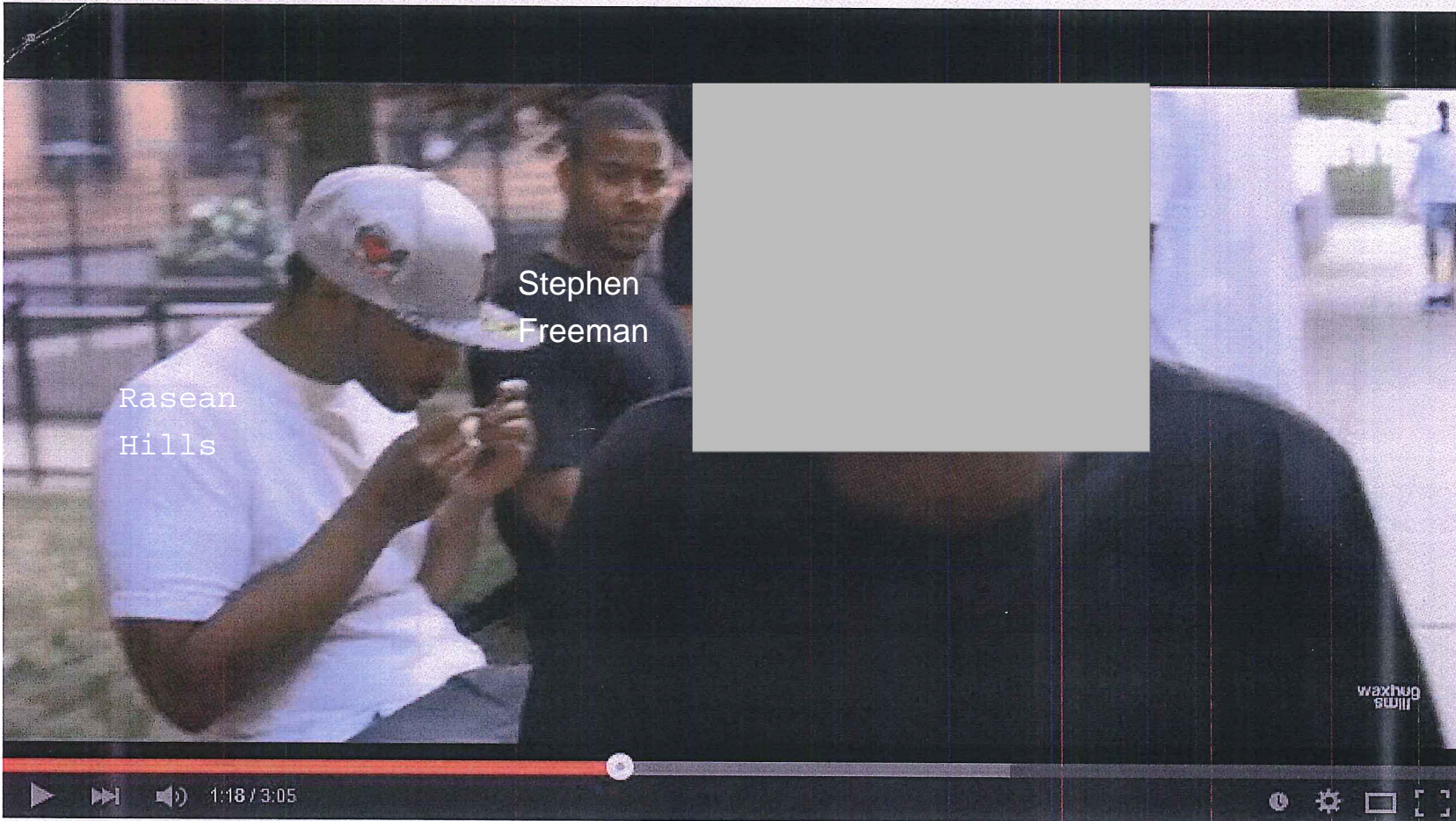
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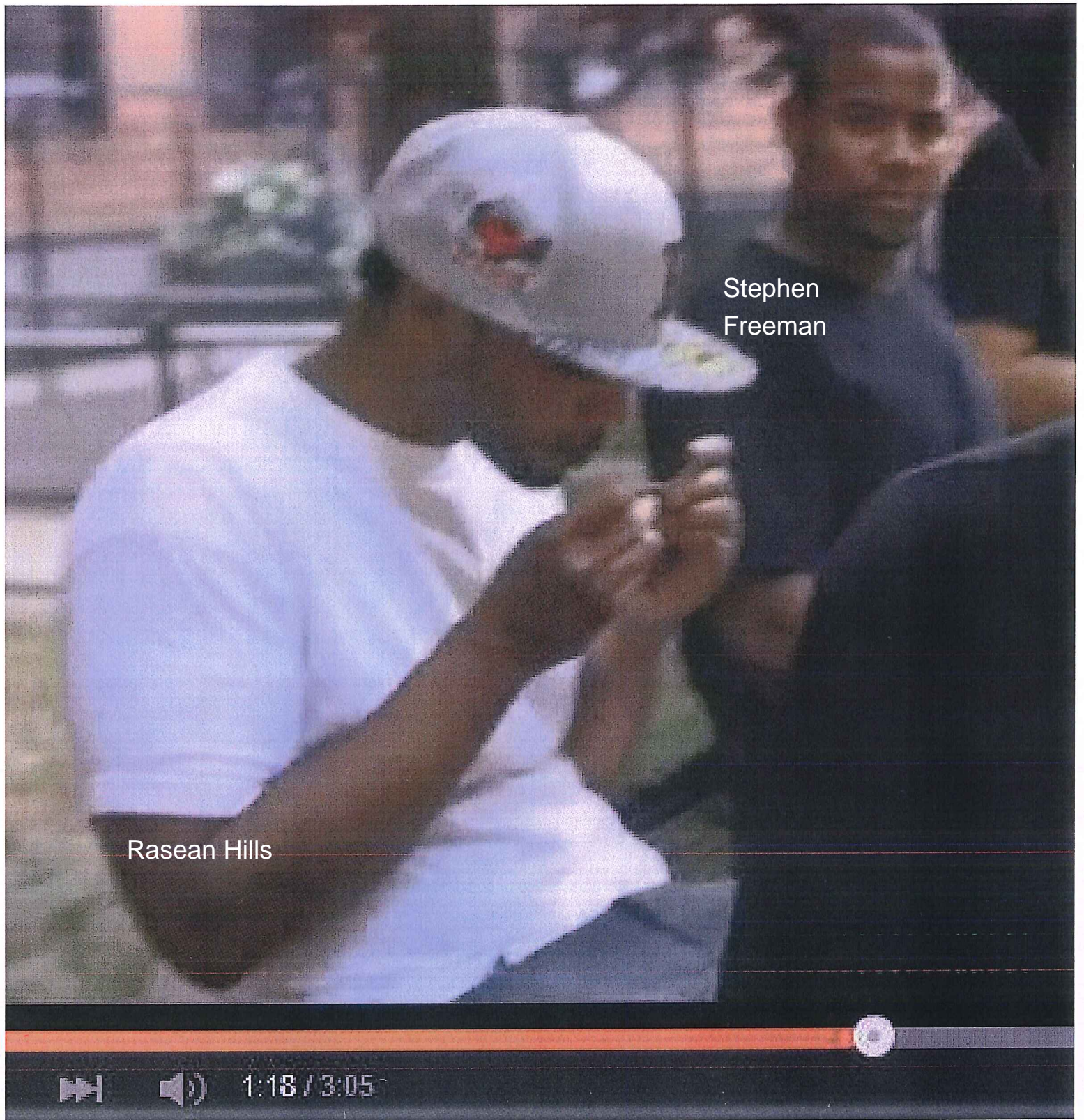
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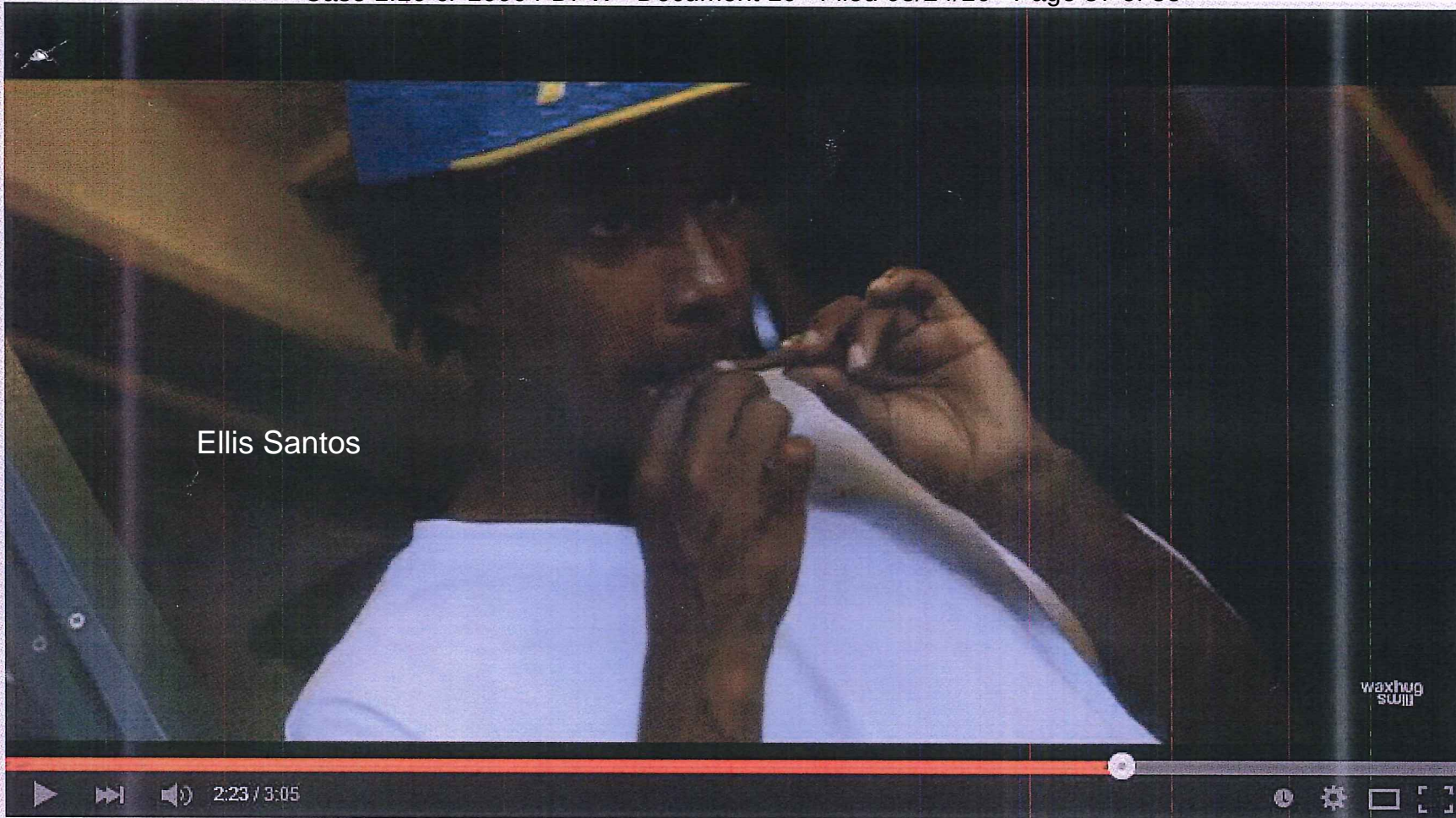
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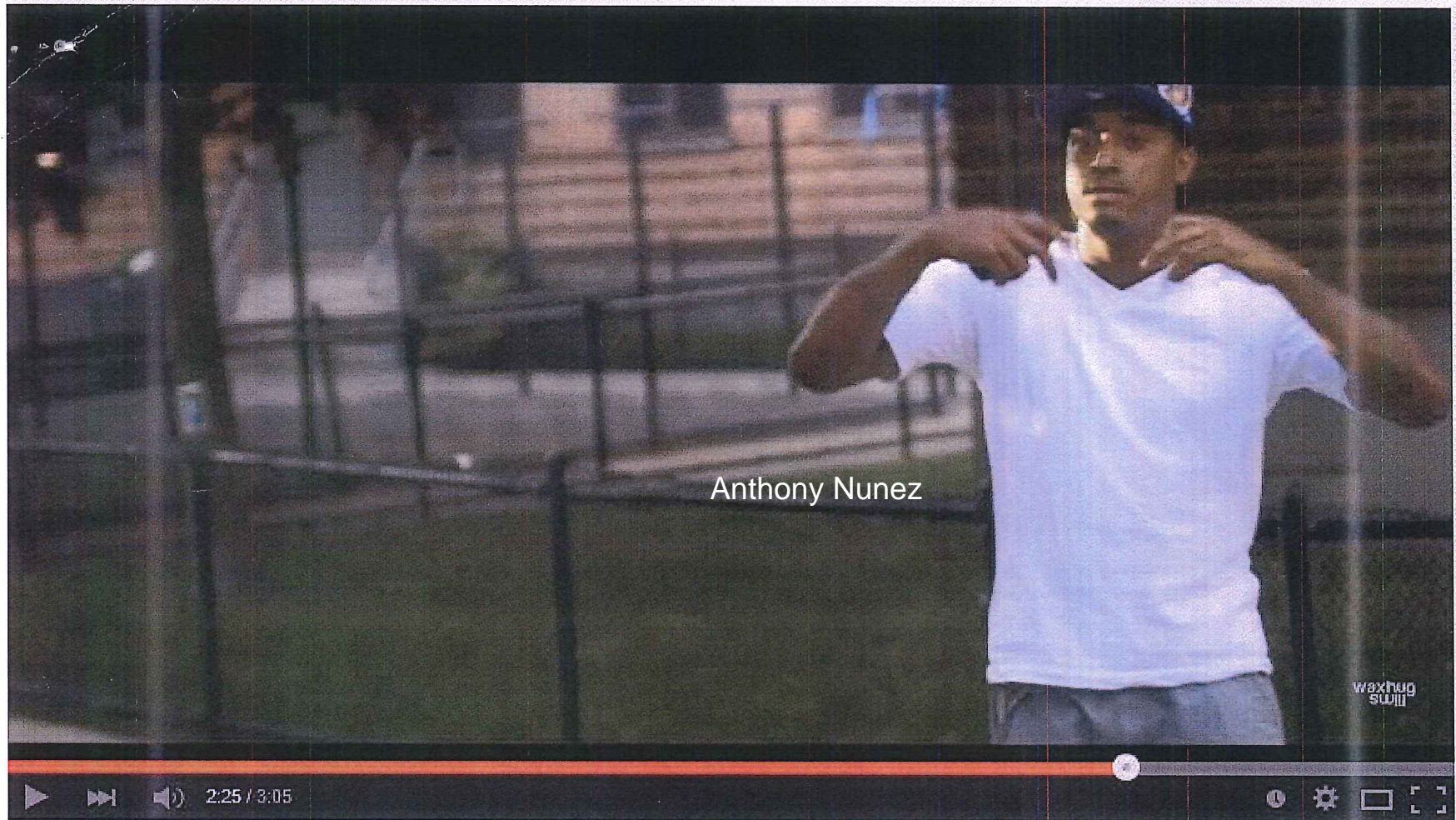
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