

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, E. Austin Wozniak, being duly sworn, depose and state that:

INTRODUCTION

1. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am a Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives (ATF) and have been so employed since September 1, 2013. I am currently assigned to the Boston Field Office.

2. I am a graduate of the Federal Law Enforcement Training Center, where I completed ATF Special Agent Basic Training and the Criminal Investigator Training Program. Prior to my employment with ATF, I was a police officer with the Dallas Police Department in Dallas, Texas for three years. I am a graduate of Marquette University where I received a Bachelor of Science in Accounting in 2010. I have received training in the recognition, identification, and testing of controlled substances as well as in common methods of trafficking in narcotics. I have participated in surveillance and interdiction operations at known drug locations and have made numerous arrests for drug related crimes. I have further received training in firearms trafficking and the diversion of legal firearms for unlawful purposes, participated in the investigation of many crimes of violence, including robberies, assaults, and homicides, and made numerous arrests for firearms and violent offenses.

3. I was assigned to the Seattle, Washington, Field Office of ATF for approximately five years, where I worked with agents and other law enforcement agencies to target violent crime. I participated in or directed complex criminal investigations, utilized the National Integrated Ballistic Information Network (NIBIN) to identify violent offenders for prosecution, and helped

create a task force of officers to investigate a series of highway shootings believed to be linked through ballistics evidence. In June 2019, I transitioned to the Albuquerque Field Office in Albuquerque, New Mexico, where I continued to conduct investigations related to firearms, narcotics, and violent crime. In March of 2021, I joined the Boston Field Division, where I am currently assigned.

PURPOSE OF AFFIDAVIT

4. This affidavit is being submitted in support of an application for a criminal complaint charging Daronde BETHEA, a/k/a “Freeze,” with knowingly being a felon in possession of a firearm and ammunition, in violation of Title 18, United States Code, Section 922(g)(1). The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show that there is probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

5. Overview of Cameron Street Investigation. For the past year, I have participated in a multi-agency task force conducting an investigation into members of a violent Boston street gang known as “Cameron Street.” For decades, Boston has been plagued by violent crime committed by certain street gangs that, while using different designations over time, have maintained a roughly consistent geographic area of concentration. One group is primarily based in Dorchester, Massachusetts, in the vicinity of Bowdoin Street and Geneva Avenue, and today is commonly referred to by law enforcement as “Cameron Street.” A second group is based on the Dorchester – Roxbury, Massachusetts neighborhood line, separated by Columbia Road, a major Boston thoroughfare, and is known variously as “NOB,” for “Norton/Olney/Barry” streets, or known more generally as “Wendover,” for “Wendover Street.”

6. Based on the investigation to date, confidential sources of information, personal admissions of affiliation, and publicly available social media images, songs, and videos, I believe that Cameron Street operates in Boston and surrounding communities and that members distribute controlled substances, traffic in firearms, and perpetrate acts of violence – including murder, attempted murder, armed robbery, home invasions, and carjackings – to enhance the status and power of Cameron Street.

7. Members of Cameron Street refer to themselves as such or use abbreviations such as “Cam,” “C,” “Camily,” “Killa Cam,” and “Body Bag Boys” to describe the gang. Some members of the gang mark their bodies with distinguishing tattoos or wear logos for sports teams that feature the letter “C,” including the Chicago Cubs or Cincinnati Reds of Major League Baseball or the National Hockey League’s Calgary Flames or Montreal Canadiens. Members of Cameron Street also feature “KC” (from Major League Baseball’s Kansas City Royals), meant to signify “Killa Cam.” Members obtain and display jewelry or other items marked with “3-1-1-3,” which refers to the third, first, and thirteenth letters of the alphabet (“C,” “A,” “M”). Members of Cameron Street use hand signs to signify their membership in the gang, including displaying three fingers (for “C”). Members of Cameron Street regularly post videos or use social media applications to promote Cameron Street, celebrate murders and other violent crimes committed by Cameron Street, and denigrate gang rivals, in particular NOB/Wendover.

8. To protect the power, reputation, and territory of Cameron Street, members are required to use violence, threats of violence, and intimidation. These acts of violence include murder and assault with deadly weapons, often firearms. Cameron Street members maintain and enhance their status in the gang, and the overall reputation of the gang, by participating in such violent acts. Cameron Street members are responsible for assisting one another with obtaining and

accessing firearms, forming and maintaining drug trafficking connections, resolving territorial disputes with rival gangs, and providing safe havens for members who are wanted by law enforcement.

9. Identification of BETHEA as a Member of Cameron Street. Agents used a variety of methods to identify BETHEA as a member of Cameron Street. In the past five years, BETHEA has been stopped or observed with several other Cameron Street members, including Anthony Centeio, Keiarri Dyette, Devante Lopes, Clayton Rodrigues, and Eric Correia.<sup>1</sup> BETHEA has a tattoo with a ‘C’ logo with wings on his neck. In addition, during this investigation, agents have received information from a cooperating witness who was a member of Cameron Street (CW-1).<sup>2</sup> CW-1 made dozens of controlled purchases of firearms and narcotics from members of Cameron Street and CW-1 identified individuals that CW-1 knew to be members of the gang. Importantly, CW-1 identified BETHEA as a member of Cameron Street.

10. BETHEA’s Home Invasion With a Firearm. During this investigation, agents have identified numerous acts of violence committed by BETHEA to further the goals of Cameron Street. One of those incidents took place on July 13, 2018, when BETHEA and at least two other Cameron Street members or associates committed a home invasion with firearms at a residence at

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<sup>1</sup> Each of these Cameron Street members were charged in a superseding indictment with conspiracy to participate in the Cameron Street racketeering enterprise. Several were also charged with drug trafficking and firearm related counts. United States v. Kenny Romero, a/k/a “KG,” et al., Cr. No. 21-10354-WGY.

<sup>2</sup> CW-1 has a criminal record for, among other things, illegal gun possession. CW-1 is providing information to law enforcement in the hopes that its cooperation will eventually enable CW-1 to lawfully remain in the United States. Agents obtained temporary status for CW-1 to facilitate its cooperation with this investigation. CW-1 has also been paid for its work in this investigation. Agents have advised CW-1 that they will take steps necessary to protect CW-1 and CW-1’s family. CW-1’s information has been corroborated by other sources of information, controlled purchases of evidence, and evidence obtained through court-authorized intercepted communications or search warrants. For these reasons, I believe CW-1’s information is reliable.

147 Rockland Street in Canton, Massachusetts. According to incident reports, state grand jury minutes, and interviews with victims and witnesses, two victims were at home when BETHEA and two other men, wearing ski masks and hoodies, burst through the back door of the residence armed with guns. Victim 1 fled out the front door and called 911. Victim 2 was detained in the house by BETHEA and his co-conspirators. Victim 2 was placed in a choke hold and assaulted while BETHEA and his co-conspirators searched the residence for money, eventually stealing around \$2,000 in U.S. currency.

11. As Canton Police officers approached 147 Rockland Street, BETHEA and his co-conspirators fled in a gray Ford F-150 truck. Officers pursued the truck until it eventually came to a stop in the vicinity of 164 Mill Street in Stoughton. BETHEA fled from the truck and officers chased him on foot. Body camera video from one of the Canton officers showed BETHEA with a gun in his hand:



12. Officers eventually caught up to BETHEA and after a brief struggle arrested BETHEA. The other two co-conspirators were able to escape. As officers retraced BETHEA's steps, they recovered a Smith and Wesson M&P 9 millimeter semiautomatic pistol, serial number HPW3645, containing fifteen (15) rounds of ammunition, from his flight path.

13. BETHEA was originally charged in Norfolk Superior Court with home invasion, unlawful possession of the firearm described above, and other offenses related to the July 13, 2018 incident. An ATF agent successfully test-fired the firearm. A trace of the firearm showed that after it was manufactured it had moved from Springfield, Massachusetts to West Virginia to Maine, and thus had moved in and affected interstate commerce prior to its recovery on July 13, 2018. In addition, an ATF interstate nexus expert likewise examined the firearm and determined that the frame of the gun was manufactured outside the Commonwealth of Massachusetts prior to being assembled into a firearm in Springfield and therefore traveled in or affected interstate commerce.

14. On or about June 20, 2022, BETHEA failed to appear in Suffolk Superior Court for trial on a second, unrelated home invasion case. A warrant issued for his arrest. On August 30, 2022, members of the United States Marshals Service (USMS) located BETHEA in Framingham and placed him under arrest. After he was arrested, agents with ATF read BETHEA Miranda warnings. BETHEA acknowledged that he understood his rights and agreed to speak with agents. Among other topics discussed, BETHEA admitted to possessing a gun in the Ford truck on July 13, 2018.

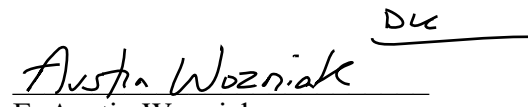
15. Based on my review of BETHEA's Board of Probation record, I know that on or about July 23, 2015, BETHEA pleaded guilty in Suffolk Superior Court to carrying a dangerous weapon and received a sentence of two (2) years in a house of correction, nine (9) months to serve, the balance suspended for two (2) years. After he violated probation, BETHEA was sentenced to serve the fifteen-month balance of the sentence. On or about September 14, 2012, BETHEA was convicted in Suffolk Superior Court of unlawful possession of a firearm and served a sentence of three (3) years in state prison. From these records, I believe that prior to July 13, 2018, BETHEA had been convicted in a court of a crime that carried a potential penalty of more than one year in

prison. Further, BETHEA knew he had been convicted of a crime that carried a potential penalty of more than one year in prison because on both occasions noted above, he served a prison sentence with a duration of longer than one year.

CONCLUSION

16. Based on the information described above, I have probable cause to believe that on July 13, 2018, Daronde BETHEA, a/k/a "Freeze," was knowingly a felon in possession of a firearm and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

Sworn to under the pains and penalties of perjury this 25th day of October 2022.

  
E. Austin Wozniak  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and  
Explosives

Signed electronically and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on this 25th day of October 2022.



The Honorable Donald L. Cabell  
United States Magistrate Judge

