

**AFFIDAVIT OF SPECIAL AGENT ZACH BRUNE IN SUPPORT OF  
A CRIMINAL COMPLAINT**

I, Zach Brune, state:

**Introduction and Agent Background**

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since March 2020. Since January 2021, I have been assigned to the Violent Crimes Task Force in the FBI’s Boston office. As a federal agent, I am authorized to investigate violations of United States law and to execute warrants issued under the authority of the United States.

2. In these roles, I have received training in the investigation of violations of federal law, including violent crimes, and I have participated in numerous investigations as both a case agent and with other agents. I have conducted or participated in surveillance, the execution of search warrants, debriefings of subjects, witnesses, and informants, and reviews of consensually recorded conversations and meetings. I have also received training through my position as an FBI Special Agent regarding the investigation of violent crimes. Based on my training and experience as a Special Agent, I am also familiar with federal narcotics laws. I have also received training through my position as an FBI Special Agent regarding the investigation of narcotics trafficking. In addition, as to matters relating to the manner in which drug traffickers conduct their illegal drug trafficking activity, including their use of cellular telephones, I have consulted with, and relied upon information obtained from, agents with experience investigating narcotics crimes.

3. I make this affidavit in support of an application for a criminal complaint charging ELIJAH MELTON and KAREEM PIRES with conspiring to commit murder for hire, in violation of 18 U.S.C. § 1958.

4. I am aware that 18 U.S.C. § 1958(a) makes it a crime to use any facility of interstate commerce with intent that a murder be committed as consideration for the receipt of payment

and/or to conspire to do so.

5. 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, including agents involved in a separate investigation of MELTON, PIRES, and others for drug trafficking crimes. This affidavit is intended to show merely that there is sufficient probable cause for the requested Complaint and does not set forth all of my knowledge about this matter.

### **Probable Cause to Believe That a Federal Crime Was Committed**

#### Background

6. On December 6, 2023, Elijah MELTON was named, along with a co-defendant, in a two-count federal indictment charging him with conspiracy to distribute and possess with the intent to distribute 400 grams or more of fentanyl and the distribution of 400 grams or more of fentanyl. [REDACTED]

7. MELTON made an initial appearance before the Court on December 12, 2023. The government sought detention. However, on December 21, 2023, MELTON was released on conditions.

8. On February 28, 2024, MELTON was arrested and appeared before the Court for a hearing on whether his pre-trial release would be revoked. After a March 13, 2024 hearing, MELTON was ordered detained pending trial. MELTON has been detained in federal custody at Donald F. Wyatt Detention Facility (“Wyatt”) since February 28, 2024.

#### MELTON’s Solicitation to Murder a Cooperating Witness, Rival Gang Members, and Federal Prosecutors

9. At Wyatt, MELTON has been housed with various other detainees. On March 6, 2024, FBI interviewed one of those cellmates, a cooperating witness (“CW-1”)<sup>1</sup> who related that

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1 [REDACTED]

MELTON had solicited CW-1 to murder the person that MELTON believes to be a cooperating witness in MELTON's federal drug case ("the Target Witness") as well as two federal prosecutors.

[REDACTED]

[REDACTED]

10. According to CW-1, MELTON informed CW-1 that MELTON and the members of his gang had placed a \$150,000 "bounty" on the Target Witness. MELTON solicited CW-1 to kill the Target Witness and provided CW-1 with information about the Target Witness, including the city in which he resided, the car he drove, and details about a distinctive watch worn by the Target Witness. CW-1 reported that MELTON offered to arrange for a family member of MELTON ("Juvenile #1") to deliver \$75,000 to a family member of CW-1. CW-1 informed FBI that CW-1 refused the money at that time.

11. According to CW-1, MELTON also solicited CW-1 to kill two Assistant United States Attorneys [REDACTED] ("Target AUSA #1 and Target AUSA #2"). MELTON identified Target AUSA #2 by last name, and Target AUSA #1 by first name. MELTON further related the cities in which he believed they resided. CW-1 reported to the FBI that he tried to dissuade MELTON from killing prosecutors, noting this would only attract unwanted law enforcement attention and was a bad idea.

12. According to CW-1, MELTON was not deterred and indicated that he would provide the money to kill the prosecutors personally. MELTON offered CW-1 a car and a gun to

[REDACTED]

carry out the murders.

13. At this point, MELTON and CW-1 agreed to use the term “Hannah Montana” when referring to the prosecutors and “Minova” when referring to others (hereinafter generally and collectively, “Target Victims”) being targeted for murder.<sup>2</sup> MELTON indicated in the initial conversation that, upon CW-1’s release, they should only communicate via Facetime.

14. MELTON also asked CW-1 to kill two other individuals that were “beefing” with MELTON's crew (“Target Rival #1 and Target Rival #2”).<sup>3</sup>

#### The First Jail Recording

15. In response to the information provided by CW-1, agents introduced a recording device into the Wyatt facility where both MELTON and CW-1 were being held. As a result, CW-1 agreed to and was able to record discussions with MELTON concerning the plot.

16. On March, 14, 2024,<sup>4</sup> CW-1 recorded conversations between CW-1 and MELTON. Those conversations included details of how the plot to kill the Target Victims would be coordinated by an associate of MELTON, “Reem,” outside the prison, including the following:

CW-1	Like real shit, let me tell you something. Explain Reem cuz I don’t know him
MELTON	I already know that
	...
MELTON	So now I’m gonna write Reem the letter, you give it to him, and you can

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<sup>2</sup> “Minova” is the name of a person known to CW-1. As such, the term can be used to either refer to the plot or to CW-1’s acquaintance.

<sup>3</sup> Based on information provided by MELTON about the location and identities of Target Rival #1 and Target Rival #2 in the recordings detailed below, along with information obtained from agents involved in MELTON’s underlying investigation, agents were able to locate individuals believed to be Target Rival #1 and Target Rival #2 in [REDACTED]. Both of the individuals had a first name mentioned by MELTON in the recordings.

<sup>4</sup> Because of environmental noise and the nature of the recording device, certain portions of the recorded conversations are difficult, if not impossible, to hear. Recounting of the conversations herein represent my understanding of the recordings; they are not official transcriptions.



17. I am aware that “Reem” is a nickname used by Kareem PIRES, a close associate of MELTON who is known by agents to be involved in MELTON’s drug trafficking organization. As described below, on April 24, 2024, agents identified PIRES while he met with CW-1.

18. Based on my training and experience, in the conversation detailed in paragraph 18 above, I believe that MELTON was communicating to CW-1 that details of the murder plot would be provided in a letter that MELTON would write to PIRES. Further, PIRES would give CW-1 the addresses of Target Victims and/or identifiers of the Target Victims.

19. Later, MELTON again directed CW-1 to contact PIRES to facilitate the murders:

MELTON Go see Reem  
CW-1 Go see Reem  
MELTON Go see Reem, if you tell him about [REDACTED].  
CW-1 Yup.  
MELTON He’s gonna put you on to the addies<sup>6</sup> and all that.  
CW-1 Okay  
MELTON That’s why you gotta go get that rental.  
CW-1 Okay..  
...  
CW-1 You gonna write this shit, right?  
MELTON I’ll write it,  
CW-1 Alright  
MELTON Imma write it in code they don’t even fucking-  
CW-1 That shits gonna be in a envelope, its gonna be-  
MELTON [REDACTED] [REDACTED] Target Rival #1] [Target Rival #2]  
CW-1 Alright  
...  
MELTON Reem gonna put you onto game bro.  
CW-1 Okay.

20. In the course of the conversation with CW-1, MELTON provided CW-1 with information to identify Target Rival #1, Target Rival #2, and the Target Witness to include information about where they work, how to identify the vehicles they drive, and the location and

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<sup>6</sup> I believe “addies” to be a reference to “addresses.”

names of family members. MELTON told CW-1 that “Reem,” i.e., PIRES, could help identify targets and locations where the targets might be found.<sup>7</sup>

21. MELTON also told CW-1 how to find information about Target AUSA #1 and Target AUSA #2. Specifically, MELTON directed CW-1 to use LinkedIn to find information about the Target AUSAs because that is how MELTON found the Target AUSAs. MELTON specified that CW-1 needed to use someone else’s phone to search for the Target AUSAs so as not to leave a record of the search.

The First Letter and Subsequent Debriefs of CW-1

22. On March 18, 2024, agents interviewed CW-1. According to CW-1, MELTON expected CW-1 to be released soon and had provided CW-1 with both a letter and Juvenile #1’s phone number.<sup>8</sup> MELTON instructed CW-1 to provide the letter to PIRES.

23. I have reviewed the letter that was provided to CW-1 in a sealed envelope with certain apparent security features, including writing across the back flap, writing on the interior of the envelope, and warnings to the recipient that the “kite” should be sealed.<sup>9</sup> The content of the letter related to both MELTON’s drug trafficking activities and the murder plot, including references to the following:<sup>10</sup>

- a. An accounting of money owed to and by MELTON by various individuals,

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<sup>7</sup> MELTON identified a location in a city south of Boston where Target Rival #1 and Target Rival #2 work, where Target Rival #1 and Target Rival #2’s mother has a shop, what vehicle Target Witness drives, and the name of Target Witness’s brother.

<sup>8</sup> As detailed below, after his release, CW-1 was able to arrange a meeting with PIRES through Juvenile #1.

<sup>9</sup> CW-1 opened the sealed letter before it was provided to agents.

<sup>10</sup> The letter is handwritten. The following represents the undersigned agent’s best efforts to interpret the handwriting. Particularly unclear words are annotated with “(sic).”

and money owed by MELTON to suppliers.

- b. Information representing that PIRES should trust CW-1 (“this [REDACTED] n---a is good \$”).<sup>11</sup>
- c. Information concerning the plan for CW-1 to murder Target Rival # 1 and Target Rival # 2, including information concerning the money that PIRES was to provide to CW-1 as a downpayment on the plot. For example, “he gonna get [REDACTED] who got the situatay with me. All he need is 3500 to start give him the addy and bro gon get it done.” I believe this portion of the letter relates that PIRES is to provide CW-1 with the addresses of Target Rivals #1 and #2, along with a \$3,500 down payment, and that CW-1 will then carry out the murders. I believe that the letter goes on to detail further aspects of that plan. For example, “No cap he owe me his life he good people told him 75 cents for one 50 cent each if she get both them pregnant and tell this n---a teach you how [REDACTED] he crazy with it.” I believe that this portion of the letter relates to the amount of money offered to CW-1 to murder Target Rivals #1 and #2, \$75,000 for one, or \$100,000 for both. I further believe that the reference to pregnancy is a coded reference to the agreed murders.

24. CW-1 informed agents that MELTON had directed CW-1 to get into contact with PIRES by calling Juvenile #1. Juvenile #1 would then arrange for PIRES to contact CW-1 via Facetime. According to CW-1, the letter reflects that PIRES would provide CW-1 with a down

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<sup>11</sup> “[REDACTED]” is a nickname for CW-1.



payment of \$3,500.

25. CW-1 was not released at this time and thus did not deliver the letter to PIRES. MELTON initially directed CW-1 to maintain the letter until he was released but then took it back at or near the time that the second letter, detailed below, was written.

26. CW-1 was debriefed by agents on further events on or about April 2, 2024. CW-1 informed agents that another detainee had delivered a contraband phone to CW-1, on which he received a call from MELTON, who was apparently using another contraband phone. According to CW-1, MELTON wanted the murder plot to be complete by November.<sup>12</sup>

27. According to CW-1, upon CW-1's release MELTON and CW-1 could communicate through MELTON's issued tablet if CW-1 could be listed as a contact, "Minova." As previously noted, CW-1 also repeated that when communicating about the murders, MELTON and CW-1 agreed to use the terms "Hannah Montana" and "Miley Cyrus" to refer to the two prosecutors. If CW-1 referred to songs like, "Wrecking Ball,"<sup>13</sup> MELTON would know what he was talking about. If CW-1 said something like, "I like that song," it would mean CW-1 was proceeding with the murders, whereas "I'm done listening to that song" would mean the murder was complete. MELTON and CW-1 also agreed to reference the Target Witness by the term

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#### The Second Jail Recording

28. On or about April 18, 2024, agents met with CW-1 at the facility. CW-1 reported that he had spoken to MELTON on April 17, 2024 and that MELTON wanted CW-1 to kill the

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<sup>12</sup> On March 13, 2024, MELTON's trial had been scheduled for November 4, 2024. *See* ██████████ [D. 110].

<sup>13</sup> Hannah Montana is a television character played by Miley Cyrus. Wrecking Ball is a hit song by Miley Cyrus.

Target Witness. MELTON indicated that he would decide what to do about the Target AUSA(s) after MELTON's court hearing on April 24, 2024.

29. On the same day after CW-1 reported that conversation, agents again introduced a recording device into Wyatt with the intent that CW-1 would consensually record conversation(s) with MELTON about the murder plot. I have reviewed the recording; in sum and substance, it captures MELTON informing CW-1 that the plan to conduct the murders is unchanged.

30. On April 22, 2024, when agents spoke to CW-1 about the recording, CW-1 also explained that, according to MELTON, MELTON informed Juvenile #1 in a family visit that CW-1 would be released and needed a firearm from PIRES.<sup>14</sup>

#### The Second Letter

31. On April 22, 2024, CW-1 was released. Prior to his release, MELTON provided CW-1 a second letter to deliver to PIRES.

32. I have reviewed the letter, which was provided to CW-1 in a sealed envelope with certain apparent security features, including writing on the interior of the envelope, a seal on the edge of the pages of paper, and warnings to the recipient that it should be sealed.<sup>15</sup> In the letter, MELTON wrote "this shit is taped shut so make sure it is" and that "if this kite is opened abort."

33. MELTON also described what I believe to reflect past drug proceeds owed, similar to what was related in the first letter.

34. The letter also appears to reference Target Rivals #1 and 2, noting "we aint takin care of what [REDACTED] and [REDACTED] greased us for." I believe that [REDACTED] and [REDACTED] are

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<sup>14</sup> Agents do not know if any written communication was shown during the visits, but Wyatt records reflect a visit from Juvenile #1 on April 19, 2024.

<sup>15</sup> Agents arranged to open and reseal the letter. MELTON later confirmed with PIRES in a monitored communication on April 24, 2024 that PIRES had received this letter unopened.

references to Target Rivals #1 and #2, [REDACTED], and the letter suggests that they were responsible for taking money from MELTON and his associates (“what they greased us for”).

**April 24, 2024 – Recorded Meeting with Kareem PIRES**

35. After his release, on April 22, 2024, CW-1 contacted Juvenile #1 via the cellphone number provided by MELTON using a device that recorded the call. Juvenile #1 answered CW-1’s call and provided CW-1 with PIRES’ cellphone number.

36. CW-1 then made a recorded call to PIRES, who agreed to meet CW-1 on April 23, 2024. CW-1 asked PIRES, “Nice<sup>16</sup> told you about me, right?” PIRES responded “yeah, yeah, yeah.” PIRES then asked, “he also, I don’t know, if you have the, the thing?” which I believe to be a reference to the second letter.

37. On April 23, 2024, CW-1 traveled to Boston with the intent to meet with and provide the second letter to PIRES. CW-1 left the meeting location after waiting for PIRES for several hours. PIRES texted CW-1 asking for CW-1 to leave the letter somewhere or to meet PIRES after PIRES ate lunch, but CW-1 did not respond since he had already left the area.

38. In a subsequent recorded call, CW-1 and PIRES agreed to meet on April 24, 2024 around 2 p.m. or 3 p.m. in Quincy. CW-1 asked PIRES, “You don’t be hollering at Nice? Because I don’t want to just be coming at you blind.” PIRES responded, “I just don’t talk to him too much because I don’t want to like, we don’t talk too much over them phones basically, but I was just, was speaking to him today and all that, but we just don’t talk about, we keep it cordial on the phones.”

39. After speaking with PIRES, CW-1 conducted a three-way call with Juvenile #1 and MELTON, which was recorded. CW-1 and MELTON discussed PIRES and CW-1 failing to meet.

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<sup>16</sup> “Nice” or “E-Nice” are nicknames used by MELTON.

CW-1 told MELTON they were planning to meet the next day. MELTON directed CW-1 to download an application to use to message MELTON on his Wyatt-issued tablet. CW-1 provided his phone number in order for MELTON to add it to his contact list for Wyatt. CW-1 created an account to message MELTON with the username “Minova P.” CW-1 messaged MELTON, but never received a response.

40. Before the meeting on April 24, CW-1 called PIRES to determine the time to meet. PIRES told CW-1 he would either be driving an Audi Q8 or a Ford Explorer. Although PIRES arrived at the prearranged meeting place before CW-1, surveillance agents observed PIRES arrive in a Ford Explorer that had damage to the rear windshield consistent with it having been shot out.<sup>17</sup>

41. The meeting was consensually recorded by CW-1. I have reviewed the recording. In sum and substance, it captured the following:

- a. PIRES stated that he had been shot at while traveling to the meeting, the back window of his vehicle was blown out, and there was a bullet hole in the side door.<sup>18</sup> <sup>19</sup> He indicated that the car he arrived in had been borrowed from someone else.
- b. PIRES again stated, “I speak to him [MELTON], but I don’t, we don’t talk to too, we don’t get into too much like that.” CW-1 responded, “Cuz like you know I didn’t drive out here for no bullshit,” and PIRES responded, “Oh okay I didn’t to be honest I didn’t even know where you was from or

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<sup>17</sup> The Ford Explorer was registered to Hertz Vehicle LLC.

<sup>18</sup> During the meeting, PIRES is recording talking to someone about arranging the towing of the vehicle.

<sup>19</sup> Massachusetts State Police is investigating a shooting that occurred on the interstate just before CW-1 and PIRES met.

nothin like that.” PIRES went on to tell CW-1 when someone goes to see MELTON for a family visit, PIRES would write a letter for them to show to MELTON.

- c. During the meeting CW-1 brought up [REDACTED] (the Target Witness). CW-1 stated, “you already know,” and PIRES responded “Yeah, we don’t even gotta talk about it.” PIRES went on to tell CW-1 that PIRES would need a few days but would put together packages for [REDACTED] (Target Rival #1), [REDACTED] (Target Rival #2), and [REDACTED] (Target Witness). This would include “pictures” and “as much info as possible.” My belief that PIRES had knowledge and an understanding of the murder plot is further substantiated by PIRES offering to collect “packages,” including “pictures” of Target Rivals #1 and #2 and the Target Witness. That is consistent with the plot as it was previously laid out to CW-1 by MELTON. During the discussion, CW-1 and PIRES also discussed how [REDACTED] had distinctive luxury watches, and that CW-1 could keep one of the watches for carrying out the murders. PIRES and the CW-1 agreed to reconnect the following weekend.
- d. PIRES told CW-1 he would need time to get the information together because PIRES was told about the plan, but PIRES took it “serious, but not too serious,” so he had not wanted to waste anyone’s time gathering information before meeting with CW-1. I believe this to be further evidence that PIRES had been previously apprised of the nature and scope of the plot with respect to the Target Witness and Target Rivals #1 and #2.

- e. PIRES and CW-1 agreed to speak over the weekend after PIRES had time to collect the agreed-upon information.

Subsequent Jail Calls

42. On April 24, 2024 at approximately 9 p.m., CW-1 attempted to call MELTON through Juvenile #1. Juvenile #1 said MELTON was upset about his court date and was not making calls. In an earlier recorded jail call between MELTON and Juvenile #1, at approximately 5:26 p.m. that same day, MELTON had informed Juvenile #1 that he did not want to speak with CW-1 because he was upset about the outcome of his court appearance. In a second earlier recorded jail call between MELTON, Juvenile #1, and PIRES, at approximately 5:46 p.m., PIRES relayed to MELTON that he was shot at earlier in the day. Juvenile #1 told MELTON that PIRES had met with CW-1, which PIRES confirmed. MELTON asked if the letter was opened. PIRES told MELTON that CW-1 did not open the letter and that CW-1 said he was going to call. MELTON then told PIRES, “you don’t even have to link that n---a no more.” MELTON informed PIRES that CW-1 lied and told inmates at Wyatt that he was in Wyatt for beating up a confidential informant, when in reality he [REDACTED]

43. On April 26, 2024, CW-1 attempted to call PIRES multiple times but could not connect because PIRES’ phone had calling restrictions preventing the connection.

44. Later on April 26, 2024, at approximately 8:40 p.m., CW-1 called Juvenile #1 and had a three-way call with Juvenile #1 and MELTON. MELTON told CW-1 that his court date went poorly. CW-1 asked about PIRES but MELTON stated that he had not spoken with him. CW-1 asked what MELTON’s “Girlfriend [Target AUSA #1’s first name]” had to say. MELTON

[REDACTED]

replied “Minova,” which CW-1 took to mean the planned murder of Target AUSA #1 remained active. CW-1 relayed that he sent a message to MELTON via the messaging application to MELTON’s tablet.

45. CW-1 asked MELTON if there were [REDACTED] in the snack machine. MELTON responded, “them shits is gone.” Later in the call, CW-1 stated, “Minova said she knows you like them [REDACTED] and she bought a whole bunch so now I’m just going to tell her to throw it away.” Melton responded, “Yeah, facts because I ain’t, I ain’t coming home anytime soon I guess.” CW-1 believed both statements referring to [REDACTED] to mean the plan to murder Target Witness was still active. MELTON also told CW-1 that PIRES would put him onto the moving company, PIRES would get him an application. CW-1 told MELTON that PIRES’ phone was off, and CW-1 needed MELTON to put PIRES into contact with CW-1. MELTON also told CW-1 to contact his cousin Claudia through Instagram to get the “thing,” which CW-1 believed meant Claudia had information for him related to the planned murders.

46. In a jail call at approximately 9:17 p.m. on April 26, 2024 between Juvenile #1 and MELTON, MELTON and Juvenile #1 discussed CW-1. MELTON told Juvenile #1 he thought CW-1 was annoying, and directed Juvenile #1, “you don’t even answer the n---a’s phone. Tell Neutron too, same shit, that n---a’s annoying.” Neutron is an alias MELTON and Juvenile #1 use for PIRES. MELTON went on to say, “oh dog I don’t know what he talkin about fuckin [REDACTED] he knows when he was here talking about [REDACTED] give me [REDACTED] out the machine n---a like uh the peanut ones, this shit is fucking weak,” and later says, “I know bro I don’t even know half the time what he be talking about bro.”

47. I believe that MELTON may be seeking to create the appearance, on a line he knows is recorded, that he does not understand what CW-1 is saying about the plot

48. On April 27, 2024 CW-1 requested to “follow” what was believed to be Claudia’s Instagram account on both a new Instagram account and his previously used Instagram account; neither of those friend requests were accepted.

49. On April 28, 2024, CW-1 called Juvenile #1 and asked Juvenile #1 to connect CW-1 and MELTON. CW-1 also called PIRES but could not connect because PIRES’ phone had calling restrictions preventing the connection.

50. In a recorded jail call on April 28, 2024, Juvenile #1 told MELTON that he and PIRES were at AP’s,<sup>21</sup> a relative of PIRES’. During that call, the following conversation occurred:

MELTON don’t even yo don’t even give the n---a [REDACTED]<sup>22</sup> your jack too n---a fuck that.  
Juvenile #1 that n---a called me today.  
MELTON Yeah, tell him, bro, you answered?  
Juvenile #1 yes I don’t know why I did.  
MELTON what did he say?  
Juvenile #1 he wants to talk to you.  
MELTON talk to who?  
Juvenile #1 you n---a  
MELTON yeah, bro, tell him  
PIRES I ain’t gonna lie, he’s probably tight because, n---a, my shit, my shit is off,<sup>23</sup> and it’s not going back on. On dogs.  
MELTON yeah, yeah leave it like that no bullshit, and tell that n---a I’m not talking to him bro. Fuck n---a, I got nothin to talk about.  
MELTON Yo G, don’t even answer that n---a no more when he calls you.  
MELTON Yo G, you know what you tell him, be like yo, bro said he can’t talk to you because you be freestyling every time he calls. Straight like that.  
Juvenile #1 Word.

51. Based on my training, experience, and review of other jail calls, I believe MELTON was reiterating to PIRES and Juvenile #1 that he did not want to speak to CW-1 and for PIRES

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<sup>21</sup> The identity of A.P. is believed to be known to investigators but is omitted in the interest of privacy.

<sup>22</sup> I believe “[REDACTED]” is a reference to CW-1.

<sup>23</sup> I believe that PIRES is referring to his phone.



and Juvenile #1 to not to answer calls from CW-1. I further believe that MELTON was concerned about CW-1 talking too much about the conspiracy (i.e., “freestyling everytime he calls”).

52. MELTON did not communicate to either Juvenile #1 or PIRES that they should inform CW-1 that the plot should not go forward.

53. CW-1 has received no communications from Juvenile #1 or PIRES after the April 28, 2024 call with Juvenile #1.

### Summary

54. As detailed above, MELTON solicited CW-1 to murder the Target Witness, the Target AUSAs, and the Target Rivals. During initial communications about the plot, MELTON indicated that CW-1 should go see “Reem” who would provide CW-1 with the “addies” (addresses) of the Target Victims. MELTON later wrote a first letter that he intended to be delivered to PIRES (“Reem”) that outlined aspects of the solicitation and murder plot, including that money would be paid to CW-1 to carry out the murders of the Target Rivals.

55. Upon CW-1’s release, CW-1 arranged to meet Kareem PIRES (“Reem”), through cellphone calls to Juvenile #1 and PIRES. This sequence of events is consistent with how recorded conversations demonstrate that MELTON had arranged the scheme.

56. When CW-1 met with PIRES in Quincy, the nature of the communications establish that PIRES was aware of the nature and scope of the plot to murder the Target Witness and the Target Rivals. In this regard, when CW-1 brought up the Target Witness, and asked if PIRES knew about the plot, PIRES replied, “Yeah, we don’t even gotta talk about it.” The conclusion that PIRES had knowledge and an understanding of the murder plot is further substantiated by PIRES subsequently offering to collect “info” and “packages,” including “pictures” for Target Rival #1, Target Rival #2, and the Target Witness. Those statements and this discussion are similarly

consistent with the plot as it had been previously laid out to CW-1 by MELTON in recorded communications.

57. Based on the plain language of the statute, I believe that the conspiracy to use a facility of interstate commerce with the intent that a murder be carried out in exchange for payment was completed when CW-1, Juvenile #1 and PIRES, utilized cellphones in furtherance of the plan to murder the Target Victims.

58. I further believe the foregoing facts establish that neither PIRES nor MELTON have withdrawn from the conspiracy to murder the Target Witness, Target Rival #1, or Target Rival #2, as I understand that doing so requires them to affirmatively act to defeat the purposes of the conspiracy, which is accomplished either by a full confession to authorities or a communication to co-conspirators that they have abandoned the conspiracy and its goals. Mere cessation of activity in furtherance of the conspiracy does not constitute withdrawal.

### **Conclusion**

59. Based upon the foregoing, I submit that there is probable cause to believe that MELTON and PIRES conspired to use a facility of interstate commerce with the intent that a murder be committed in exchange for payment, in violation of 18 U.S.C. § 1958.

Sworn to under the pains and penalties of perjury,

Zach Brune /by Paul G. Levenson

Zach Brune  
Special Agent, FBI

Sworn to before me telephonically in accordance with Fed. Rule Crim. P. 4.1 on May 20, 2024,

  
Paul G. Levenson  
United States Magistrate Judge

