AFFIDAVIT OF BRYCE FERRARA IN SUPPORT OF AN APPLICATION FOR A COMPLAINT

I, Bryce Ferrara, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2019. I am assigned to the FBI Boston Division's Violent Crimes Task Force ("VCTF"), which comprises law enforcement officers from the FBI, Massachusetts State Police ("MSP"), and other local police departments. As a member of the VCTF, I am responsible for investigating kidnappings, murders, robberies, extortion, and other violent 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.
- 2. I make this affidavit in support of an application for a complaint charging Li Wen TANG, a/k/a Tony TANG, YOB 1990 ("TANG"), with affecting commerce by robbery, in violation of 18 U.S.C. § 1951.
- 3. The statements in this affidavit are based in part on information provided by other law enforcement officers, statements of witnesses, information gleaned from third parties, and on other aspects of my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the complaint.
- 4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1951 (robbery affecting commerce) have been committed, are being committed, and will be committed by TANG.

PROBABLE CAUSE

June 12, 2022 Brookline Robbery

- 5. On Sunday, June 12, 2022, at approximately 8:51 p.m., two masked men¹, both displaying firearms, entered the Balance Reflexology Spa (the "Brookline Spa"), located at 1908 Beacon Street, Brookline, Massachusetts, and robbed it. I am aware, based on interviews of the owner of the spa, that the spa offers massage, skin care, and therapeutic services and utilizes products from out of state, employs out of state employees, and processes credit cards as a form of payment for services.
- 6. A report by the Brookline Police Department includes, in part, the following information. At approximately 8:51 p.m., an Asian male "customer" entered the Brookline Spa seeking a massage. The female victim ("FV1") was the only employee in the spa that night. After the Asian male entered, FV1 locked the door behind him. FV1 described the Asian male to be approximately 5'7" tall, having a bald head, wearing black rimmed eyeglasses, and wearing a gray

¹ While two of the robbers entered the business masked and displaying guns, there were three individuals believed to have been involved in the robbery. A third man identified by the victim as an Asian male entered the Spa prior to the two masked men seeking a massage. While pretending to be a customer, the Asian male can be seen on surveillance footage arriving to the Spa and exiting the passenger side of a Porsche Cayenne. The Porsche Cayenne then pulls out of camera range and cannot be seen. A short time later the two masked robbers walk around the corner from where the Porsche had parked and walk towards the Spa. According to the victim, the Asian male then unlocked the Spa door allowing the robbers to enter the business and rob it. Following the robbery the two masked men and the Asian male walked away from the Spa and turned the corner back towards the Porsche.

² Given that he arrived with the robbers, I believe that the "customer" conspired with the two masked robbers who entered the spa, posing as a customer to help facilitate the execution of the robbery.

jumpsuit. FV1 mentioned that shortly afterwards she heard someone push on the locked door but thought it was just another customer. After bringing the Asian male into the back room to begin the massage, he started to ask if there was anyone else in the spa and that if there was, he would like to see them. FV1 repeatedly stated that she was the only one there. After the massage had begun the Asian male almost immediately excused himself to go to the bathroom. When he returned, he began to get dressed and claimed that his stomach was upset, and he no longer wanted a massage. He demanded a refund and FV1 stated she had to call her boss to approve it. While they were in the lobby and FV1 was on the phone with the spa owner, the Asian male unlocked the front door.

7. According to FV1, at that time two males entered the business. The first male was described as a tall white male, wearing a hooded sweatshirt, a mask covering his face, and carrying a black handgun. The second male was described as a tall black male dressed in all black with a hood over his head and wearing a facemask, also carrying a black handgun. FV1 stated the white or black male hit her in the face and knocked her to the floor in the lobby area. She could not recall which male struck her, as her bearings were impacted because she was in a tremendous amount of fear. However, FV1 did recall that when she was on the ground, one of the males put a gun to her head. She described the firearms to be black in color and approximately six inches long. FV1 did not see any orange tip or marking that would suggest the firearms were fake. She believed them to be real. The men then pulled her by her hair into the back hallway where they instructed her to be quiet. They proceeded to bind FV1 with duct tape. They placed her arms in front of her by using duct tape around her wrists, her ankles, and gagged her with a length of duct tape. FV1 stated as they were doing this, they repeatedly yelled at her, "Where is the money?" According to FV1, the group ransacked the spa searching for money for approximately three minutes. They located some

cash in a room under a pad of paper. FV1 estimates that approximately \$500 was stolen. As the men were exiting, they stole FV1's cell phone. FV1 recalled that the Asian male was not wearing gloves or a mask but was unsure if the other two suspects were. According to the report, responding police collected evidence, including an interior camera that, according to FV1, one of the suspects physically manipulated so that it would be facing toward the wall on which it was mounted, and slippers worn by the Asian male, which have been submitted for fingerprint and DNA processing, respectively. Brookline Police also collected a latent fingerprint from the bathroom door, which is also pending analysis.

- 8. The owner of the Brookline Spa informed Brookline Police the cameras at the business did not record. Surveillance video recorded by means of cameras located near the Brookline Spa depict the robbers and show that one of them was wearing a black jacket with a "V" shaped design across the chest, a black hat, blue jeans, and white sneakers consistent with Yeezy Adidas. The other robber was wearing the other wearing a grey sweatshirt with distinctive lettering. Investigators believe all three men (the "customer" and the two robbers) arrived at the spa in a Porsche Cayenne.
- 9. Surveillance video shows the three men walking away from the Spa following the robbery and towards the Porsche Cayenne. Specifically, video footage from three different cameras from the vicinity of the Brookline Spa depict the following events.
- 10. At approximately 8:37:06 p.m., a camera facing north up Ayer Road (Camera 1), captured images of the Porsche Cayenne arriving near the Brookline Spa and parking on the west-side corner of Orkney and Ayer Road. At approximately 8:39:07 p.m., the individual later identified by FV1 as the Asian male who entered the Spa as a customer is depicted in surveillance

footage captured by Camera 1 exiting the passenger-side door of the Porsche and walking towards the Brookline Spa, ultimately walking beyond the range of Camera 1.

- 11. At approximately 8:46:30 p.m., Camera 1 footage depicts the Porsche pulling forward approximately 100 feet out of the range of Camera 1 but within the range of surveillance footage captured by Camera 2, which faces west down Orkney Road and captured footage of the vehicle parking on the east corner of Orkney Road and Ayer Road.
- 12. At this point Camera 2 ceased recording continuous action and instead began capturing still images at intervals of approximately eight to ten seconds. At approximately 8:48:12 p.m. Camera 2 captured an image of the internal light the Porsche turned on and appears to show that the driver's side door was cracked open. Camera 2 next captured an image at 8:48:18 p.m. that appears to show the driver's seat was empty and a single individual was exiting the rear passenger-side door of the Porsche.
- 13. Video footage captured by Camera 1 at approximately 8:48:23 p.m. shows the masked robber wearing the black hooded jacket, which had a large "V" across the front, turning south onto Ayer Road towards the Brookline Spa. Footage captured by Camera 1 at 8:48:25 p.m. shows the second robber turning the corner in the same direction. A third camera (Camera 3), which faces south down Ayer Road, captured images of the two masked robbers walking south towards the Spa. The masked robbers are depicted in images captured by both Camera 1 and Camera 3 walking up and down Ayer Road before heading back towards the Spa at or around the time of the robbery.
- 14. Images captured by Camera 3 at 8:57:25 p.m. show the two masked robbers and the Asian male proceeding north on Ayer Road away from the Spa and towards the Porsche. As is the case with Camera 2, Camera 3 was not recording continuous action and only depicts still images of these events in approximate eight-to-ten second intervals. The two masked robbers walked

directly down the sidewalk on the eastern side of Ayer Road towards the Porsche. An image recorded at 8:57:31 p.m. shows the Asian male stepping off the east side of the Ayer Road sidewalk into the street and towards the west corner of Ayer Road and Orkney Road where the Porsche initially parked.

15. An image recorded by Camera 1 at approximately 8:57:42 p.m. shows the individual in the "V" jacket turning right onto Orkney Road towards the Porsche. An image recorded at approximately 8:57:48 p.m. appears to show the Asian male walking parallel to the man in the sweatshirt with the distinctive lettering as they proceeded north up Ayer Road. An image recorded at approximately 8:57:54 p.m. appears to show the driver's seat of the Porsche occupied, the rear passenger side door open, and an individual standing outside the vehicle. An image recorded at 8:58:12 p.m. shows the Porsche departing east down Orkney Road. The Porsche is not seen again.

June 12, 2022 Stoneham Robbery

16. I am aware that following the Brookline robbery, a similar robbery occurred at approximately 10:19 p.m. at May's Spa Massage located at 66 Montvale Avenue, Stoneham, Massachusetts (the "Stoneham Spa"). Surveillance images of two of the robbers in the Stoneham Spa appear to match the surveillance images of the two suspects in the Brookline Spa^{3.} Specifically, one of the robbers was wearing, among other things, black jacket with a "V" shaped design across the chest, a black hat, blue jeans, and white sneakers consistent with Yeezy Adidas, and another was wearing what appears to be the same sweatshirt with distinctive lettering as is

³ Stoneham Spa footage depicts what appears to be a fourth individual who is dressed in different clothes than the Asian male who entered the Brookline Spa and appears to indicate the participation of a fourth individual not yet known.

seen in Brookline surveillance. The Stoneham video footage, which is more clear than the Brookline video, shows that the lettering spells the word "Supreme" in a repetitive design.

17. Video surveillance footage shows that at approximately 9:33 p.m., a Porsche Cayenne, similar to the one seen in the Brookline Spa robbery was driving near the Stoneham Spa,⁴ departs the area, and does not appear on surveillance footage again. At approximately 9:49 p.m., a Jeep drove to the rear of the Stoneham Spa in the same direction as the Porsche Cayenne. Shortly thereafter, three masked men, one of whom was armed with a firearm, entered the Stoneham Spa and robbed it.



Figure 1 CCTV Image of Porsche at scene of Brookline robbery

⁴ At this time of night, the Stoneham Spa was the only business open in the vicinity of the strip mall where the Stoneham Spa is located. The Porsche also drove to the rear area of the building, away from the general parking area which is located in the front of the building. That area was the exact same area the Jeep utilized by the Stoneham robbers had parked during the robbery.



Figure 2 CCTV footage of Porsche Cayenne at scene of Stoneham robbery

IDENTIFICATION OF LI WEN TANG

18. On Wednesday June 15, at approximately 1:15 p.m., a Stoneham Police Detective, Steve Carroll, met with the owner of the Stoneham Spa who was present during the time of the robbery (Female Victim 2" or "FV2"). Among other things, FV2 informed Detective Carroll that she received a call on the spa's phone at approximately 9:00 p.m. (before the robbery) from a male who was looking to see if the spa was still open in order to get a massage. Upon learning that the spa was open, the male stated that he would be by later. FV2 subsequently called the male back to advise him not to come to the spa too late because the spa would be closing soon. The male replied that he was on his way and the phone call ended. According to FV2, no customers showed up at the spa after this call, leading her to speculate that it may have been someone involved in the robbery who had called the spa. FV2 stated that the phone number of the caller would show up in the recent calls list on the business phone and granted Detective Carroll permission to access the phone to obtain the caller's phone number.

19. In reviewing the call logs for the Spa on the date of the robbery, Detective Carroll observed the phone call that FV2 had referenced was made to the Spa at approximately 9:00 p.m.

on June 12, 2022. According to the call log on the phone, at 9:11 p.m. on June 12, 2022, a phone call was made to the spa from phone number (781) 797-0381 ("the 0381 number"). At 9:38 p.m. it appeared that FV2 called the number back and then again at 9:39 p.m. These calls lasted ten seconds and four seconds, respectively. At 9:40 p.m., the person utilizing the 0381 number called the spa back. This call lasted ten seconds.

20. By consulting publicly available records, investigators determined that the 0381 number resolved to Bandwidth. In response to a federal subpoena, on July 1, 2022, Bandwidth notified the FBI that from April 1, 2022 through the "present," the 0381 number was on the Bandwidth network but assigned to Google Inc. and was in fact a Voice-over-Internet Protocol ("VoIP")⁵ number.

21. On July 12, 2022, Google Inc. provided records in response to a federal subpoena that indicated that: the 0381 number was assigned Google account number "904921949491," had an associated email of tang90446@gmail.com, and a recovery phone number of (857) 452-3778 (the SUBJECT PHONE). The subscriber records also included the name of "Lu Steven." Google also

⁵ Voice-over-Internet protocol (VoIP) is communications technology that allows users to interact by audio through an internet connection, rather than through an analog connection. Voice-over-Internet Protocol converts the voice signal used in traditional phone technology into a digital signal that travels through the Internet instead of through analog telephone lines. Based upon my training and experience, I am aware that individuals engaged in criminal activity or those wishing to mask their true phone number will often use a VOIP since the phone number displayed on the incoming caller ID is a different phone number than the one assigned to them by their service provider.

⁶ Based upon my training and experience I know that Google account users who wish to mask their identity will frequently provide false names for their Google account information since Google does not attempt to verify identification through validation or picture identification upon registering a Google account. However, Google account users must register a legitimate phone number or email address as a recovery e-mail in the event the account becomes locked and are also

provided information related to IP activity associated to the SUBJECT PHONE. Based upon the data provided, it appears the SUBJECT PHONE had minimal account activity in the months of April and May. The majority of activity appears to have occurred in or around the two-week period in which the Brookline and Stoneham robberies, and another massage parlor robbery that occurred on June 21, 2022, in Boston, were perpetrated.

22. By consulting publicly available databases, investigators determined that the SUBJECT PHONE has a T-Mobile phone number. On July 19, 2022, T-Mobile provided records in response to a federal subpoena that indicated that the phone appeared to be a prepaid phone and was subscribed to under the name of "Zhi WU".

23. A Salem, Massachuetts, police report from April 18, 2022, lists Tony TANG, DOB: XX/XX/1990, as a person present at a residence where there was a noise complaint. Salem Police reported that the incident appeared to be a domestic dispute between TANG and "J.P." (DOB XX/XX/1985). The phone number listed for TANG was the SUBJECT PHONE. Based on my

required to authenticate their Google accounts through phone or e-mail two-step verification. As such, Google users will frequently enter active email addresses or phone numbers to authenticate their accounts.

⁷ From my training and experience I know that individuals purchasing pre-paid phones who wish to disguise their true identify often provide false names to mobile providers when purchasing a pre-paid phone as T-Mobile does not requires identification when purchasing a phone.

⁸ The last name "TANG" corresponds to the name on the email account registered to the Google VoIP account, tang90446@gmail.com.

⁹ "J.P." are the initials of the other individual identified in the report. She is believed to be the girlfriend or a close associate of TANG. According to TANG's phone records, J.P. is TANG's top telephonic contact and TANG is believed to be residing part-time with J.P.

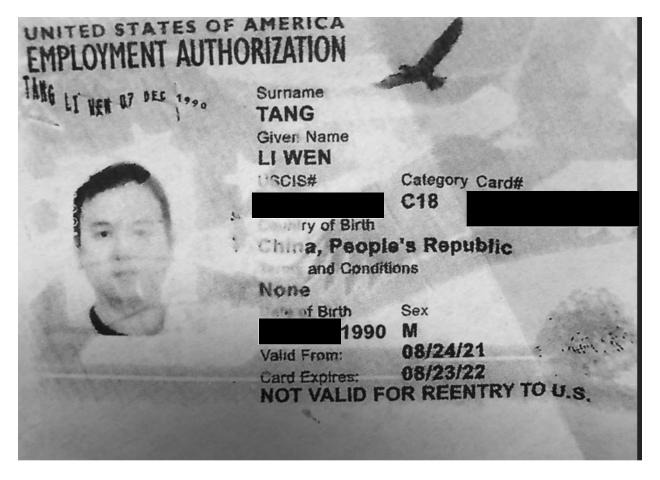
training and experience, I know that phone numbers attributed to civilians identified in police reports are typically supplied by the individual at the time of the report.

- 24. Call detail records for the SUBJECT PHONE show that at approximately 9:09 p.m. on June 12, 2022, the SUBJECT PHONE attempted to place a phone call to the Stoneham Spa prior to the robbery.
- 25. According to call detail records received on August 3, 2022 from Comcast LLC, telephone number 617-232-0110 is utilized by the Brookline Spa.
- 26. On June 12, 2022, the Brookline Spa received two incoming calls from "the 0381 number," at 6:39:53 p.m. and 6:47:11 p.m. Again, the SUBJECT PHONE is listed in Google records as a recovery number for the "0381 number". The SUBJECT PHONE is linked to TANG, as shown above.
- 27. A review of the SUBJECT PHONE call detail records revealed a phone call on June 3¹⁰, 2022, at approximately 11:01 a.m., to a cab company in the city of Malden, Massachusetts. The owner of that cab company informed Malden Detective Robert DiSalvatore that their records revealed someone utilizing the SUBJECT PHONE called for a cab pick-up at the Econo Lodge hotel located at 321 Broadway, Malden, Massachusetts, on June 3, 2022. The individual who was picked up at the Econo Lodge was later dropped off at 8 Pleasant Street, Malden. Detective DiSalvatore spoke with an employee of the Econo Lodge about guests who checked out on June 3, 2022 and was informed that an individual by the last name of TANG had checked out at

¹⁰ Prior affidavits submitted in this matter mistakenly provided the date June 2, 2022 as the date this phone call was made.

approximately 11:00 a.m. that day, approximately one minute after the SUBJECT PHONE called the cab company.

28. The employee of the Econo Lodge provided a copy of the identification TANG provided and informed Detective DiSalvatore that TANG had rented a room for two days and paid for the room with cash.



29. FBI records checks of TANG revealed a 2016 Suffolk County arrest for multiple counts of deriving support from prostitution, trafficking a person for sexual servitude, money laundering, and maintaining a house of ill repute. The arrest was the result of a Boston Police Department ("BPD") investigation into a prostitution ring being run by TANG and another individual. Detective Jarrod Gerro, who had worked on the investigation and was familiar with TANG,

informed agents he knew this individual as "Tony Tang," the same name provided to Salem Police along with the SUBJECT PHONE number.

- 30. TANG'S NCIC criminal history record lists TANG as approximately five feet six inches in height, approximately 130 pounds in weight, and as having black hair.
- 31. A review of Cellular Site Location Information ("CSLI")¹¹ between the hours 2:00 a.m. and 5:00 a.m. for the SUBJECT PHONE between the dates of 6/1/2022 and 7/16/2022 reveals that between those hours the phone was consistently in one of two locations. The first location is in the vicinity of Blaney Street, Swampscott, Massachusetts. J.P., the aforementioned individual, who was TANG's top telephonic contact, lives in the area, at 6 Blaney Street. The second location in which CSLI data showed the SUBJECT PHONE to have been located between 2:00 a.m. and 5:00 a.m. is the vicinity of the Wyoming Hill area of Melrose, Massachusetts, near Gould Street.
- 32. On August 3, 2022, at approximately 7:00 p.m., TANG was observed being picked up by what appeared to be a ride share service outside the 6 Blaney Street address. TANG was dropped off in the vicinity of a residence located at 11 Ashmont Park, Melrose, Massachusetts. This residence is located in the Wyoming Hill area of Melrose.
- 33. CSLI data also provides timing advance measurements. Timing advance measurements record the cellular network's estimate as to the phone's distance from a cell tower at that time.
- 34. Review of timing advance measurements from T-Mobile Inc. for the SUBJECT PHONE place the SUBJECT PHONE in the vicinity of the Brookline Spa robbery prior to the

¹¹ Cell Site Location Information allows investigators to identify general locations of cell phones based upon cell phone connections to cellular towers. Unlike GPS data, CSLI allows investigators to give approximate locations or areas where the phone has likely been.

robbery. Specifically, timing advance measurements from T-Mobile Inc. show the SUBJECT PHONE accessing a cell tower in the area of 290 Harvard Street, Brookline, Massachusetts on June 12, 2022. Timing advance measurements were taken at 6:54 p.m. and 6:55 p.m. from this tower, approximately two hours prior to the robbery.

35. Timing advance measurements from T-Mobile Inc. also show the SUBJECT PHONE accessed a cell tower in the area of 331 Montvale Avenue, Woburn, Massachusetts on June 12, 2022. Timing advance measurements were taken at 9:35 p.m., 9:39 p.m., 9:40 p.m., and 9:43 p.m. from the tower. The Stoneham Spa is located on Montvale Avenue. Montvale Avenue continues from Stoneham into Woburn, which adjoins Stoneham. Accordingly, the timing advance measurements show that the SUBJECT PHONE was in the vicinity of the Stoneham Spa between the time the Brookline Spa was robbed and the time the Stoneham Spa was robbed.

36. On August 9, 2022, Lyft Inc. provided records in response to a federal subpoena that indicated that an account associated to TANG utilized Lyft Inc. services¹² to arrange for an individual to be picked up on June 12, 2022, at 7:22 p.m. from 10 Corporate Drive in Burlington,

Lyft to Brookline.

¹² For the requested rides on June 12, 2022, the requestor name, payer name, and passenger name are all listed in the account holder's name of Li Tony. Li Tony is the name on the account associated with the SUBJECT PHONE. From my training and experience, I am aware ride sharing apps allow account holders to order rides for other individuals. Timing advance measurements from T-Mobile Inc. show that the SUBJECT PHONE accessed a cell tower in the area of 290 Harvard Street, Brookline, Massachusetts on June 12, 2022 at 6:54 p.m. and 6:55 p.m. Lyft records for the account associated to TANG show a ride pick-up at 7:22 p.m. at 10 Corporate Drive in Burlington, Massachusetts. According to Google Maps the approximate drive time on June 12, 2022 at 6:58 p.m. between these two locations would range from twenty-six to forty minutes. Investigators at this time do not know if the SUBJECT PHONE traveled to 10 Corporate Drive or instead requested the ride for another individual, but the likelihood is that BARBOSA took the

MA, the vicinity of a known address of Alfeu BARBOSA, and dropped off at 7:53 p.m. at 1894 Beacon Street in Brookline, Massachusetts. The Brookline Spa is located at 1908 Beacon Street, approximately 300 feet from the Lyft drop off.

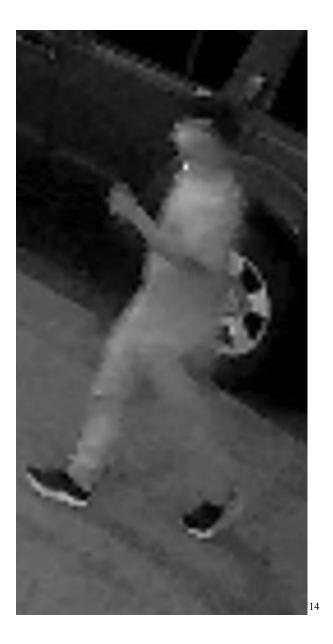
37. BARBOSA was arrested on June 30, 2022 and charged with the Robbery of the Stoneham Spa. *See* 22-mj-02169-DLC. The evidence against BARBOSA includes the fact that the GPS data associated with a court-ordered ankle bracelet he was wearing at the time places him in the vicinity of both the Stoneham Spa and the Brookline Spa at the times of those robberies, and the fact that a cell phone stolen from one of the victims of the Stoneham robbery was recovered the day after the robbery from the roof of the spa and proved to have BARBOSA's palm print on it. The Lyft information is consistent with BARBOSA having used TANG's Lyft account to travel to the vicinity of the Brookline robbery.

38. At 11:58 p.m. on June 12, 2022, an individual using the account associated to TANG was picked up at 11 Ashmont Park in Melrose, Massachusetts and dropped off at 6 Blaney Street in Swampscott, Massachusetts approximately 22 minutes later. Both of these locations are associated with TANG in the manner discussed above.

39. I have met TANG twice. TANG is the person depicted in the two surveillance images that were taken outside 6 Blaney Street, Swampscott, MA on August 3, 2022. He was wearing black-rimmed glasses, a black hat with a white emblem on the front, and black sneakers with what appear to be white soles. These items of apparel are consistent with the attire of the Asian male involved in the Brookline robbery, a still image of whom also appears below.



¹³ Surveillance images of an individual believed to be TANG outside 6 Blaney residence on August 3, 2022.



40. An individual named Jonas NUNEZ has been charged with the Brookline robbery. *See* 22-mj-1311-DLC. Pursuant to search warrants, agents recovered from a Porsche Cayenne registered to NUNEZ, among other things, a black jacket with a "V" shaped design across the

¹⁴ CCTV footage of the Asian male involved in the June 12, 2022 robbery of the Brookline robbery.

chest consistent with the jacket one of the robbers, and agents recovered from NUNEZ's apartment, among other things, Yeezy Adidas consistent with those worn by that same robber.

41. Records obtained for the SUBJECT PHONE, used by TANG, and for phones used by BARBOSA and NUNEZ¹⁵ show, among other things, the following contacts on June 12, 2022:

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12:58:29 p.m. – call (no duration provided) – BARBOSA phone to Stoneham Spa
1:38:32 p.m. – text message – SUBJECT PHONE to NUNEZ phone
1:41:21 p.m. – 2.8 minute call – SUBJECT PHONE to NUNEZ phone
2:39:06 p.m. – 41 second call – SUBJECT PHONE to NUNEZ phone
2:39:54 p.m. – call (no duration given) – SUBJECT PHONE to NUNEZ phone
4:19:23 p.m. – 3.3 minute call – SUBJECT PHONE to NUNEZ phone
5:15:34 p.m. – 15 second call – SUBJECT PHONE to NUNEZ phone
6:16:03 p.m. – 28 second call – NUNEZ phone to SUBJECT PHONE
6:17:33 p.m. – 30 second call – NUNEZ phone to SUBJECT PHONE
6:39:52 p.m. – 0 second call – 0381 Phone to Brookline Spa
6:47:11 p.m. – 2.57 minute call – 0381 Phone to Brookline Spa
BROOKLINE ROBBERY COMMENCED AT APPROXIMATELY 8:51 P.M.
9:09:14 p.m. – call (no duration given) – 0381 Phone to Stoneham Spa
STONEHAM ROBBERY COMMENCED AT APPROXIMATELY 10:19 P.M.
10:30:22 p.m. – 18 second call – SUBJECT PHONE 1 to BARBOSA's phone
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42. Based on the foregoing, I submit that there is probable cause to believe that on June 12, 2022, TANG did rob the Brookline Spa by obstructing, delaying and affecting, in any way and degree, commerce and the movement of any article and commodity in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951; that is, by taking and obtaining property, consisting of money and other valuable items, from the owners of the property against their will by means of actual and threatened force, violence, and fear of injury, in violation Title 18, United States Code, Section 1951.

¹⁵ BARBOSA provided the number for the phone attributed to him to Massachusetts Probation as his phone number. T-Mobile records show NUNEZ to be the subscriber for the phone attributed to him.

Respectfully submitted,

Juc_

BRYCE FERRARA Special Agent, FBI

Sworn to before me in accordance with Fed. Rule Crim. P. 4.1 on August 18, 2022.

HONORABLE DONALD L. CABELL UNITED STATES MAGISTRATE JUDGE

