

UNITED STATES DISTRICT COURT
for the
Eastern District of Tennessee

United States of America
v.

Case No. 3:23-MJ-1085

MELODY SASSER

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 1, 2023 through April 27, 2023 in the county of Knox in the Eastern District of Tennessee, the defendant(s) violated:

Code Section 18 USC § 1958 Offense Description Murder for Hire.

This criminal complaint is based on these facts:

(See Attached Affidavit)

Continued on the attached sheet.

Handwritten signature of Gregory Martin

Complainant's signature

Gregory Martin, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/11/2023

Handwritten signature of Debra C. Poplin

Judge's signature

City and state: Knoxville, Tennessee

Debra C. Poplin, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

IN THE MATTER OF A CRIMINAL COMPLAINT)
AND ARREST WARRANT FOR:)
MELODY SASSER)

No. 3:23-mj-1085

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

AFFIDAVIT

I, Gregory Martin, a Special Agent (“SA”) with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), and being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of, and to make arrests for numerous offenses of Title 18 of the United States Code. I have been a Special Agent with Homeland Security Investigations (HSI) since November of 2019. In 2011, I successfully completed the Criminal Investigator Training Program (CITP). In March of 2020 I completed HSI Special Agent Training (HSISAT) at the Federal Law Enforcement Training Academy (FLETC) in Glynco, GA. Prior to my employment at HSI, I was employed as a Special Agent with Internal Revenue Service Criminal Investigation (IRS-CI). I have experience investigating violent crimes and have had communication and worked with law enforcement who specialize in computer-related crimes.

2. This affidavit is based upon my training and experience. Except as noted, all the information contained in this affidavit is either known to me personally or has been told to me by other law enforcement officials. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, 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 to demonstrate that SASSER attempted to hire a hitman to murder Jennifer Wallace, in violation of 18 U.S.C. § 1958. As is detailed below, there is probable cause to believe that Melody SASSER (SASSER) attempted to hire a hitman through a dark net website to murder J ██████ W ██████ thereby violating Title 18, United States Code, Section 1958. This affidavit is being offered in support of a complaint against SASSER for murder for hire.

RELEVANT STATUTES

3. As noted above, this investigation concerns alleged violations of 18 U.S.C. § 1958- Murder for Hire which prohibits an individual from traveling in interstate commerce or using or causing another to use any facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any state or the United States as consideration for the receipt or promise of payment.

PROBABLE CAUSE

4. On April 27, 2023, I received information regarding a murder for hire plot to kill J ██████ W ██████ HSI Birmingham received information from a foreign law enforcement agency that J ██████ W ██████'s name, address, and photograph was named as a target for a murder for hire.

5. The information provided to HSI contained messages between a user and site administrator of a dark web hosted site know as Online Killers Market (OKM). This website

purports to offer “hitman for hire” type services as well as associated services at the would-be customer’s request, such as hacking, kidnapping, extortion, disfigurement by acid attack, and sexual violence. The website claims to have over 12,000 registered members from countries across the world. It consists of a public forum whereby users are encouraged to openly, and publicly, ask any question of either the administrators or the alleged hitmen. There is also an option to create an account where would-be customers are able to submit an “order” detailing their precise requirements, including full intended victim details. They then receive a “quote” for the job and an alleged “hitman” is assigned to the account. There is also an internal messaging system within the website which enables any registered account to directly message any other registered account, an alleged hitman, or the administrators. This internal messaging system is not dissimilar in appearance, and functionality, to a regular email type account. The customers of the website pay for these supposed services with cryptocurrencies.

6. Screenshots taken from the OKM website show the order for the murder for hire from site user “cattree” was placed on January 11, 2023:

Target: J [REDACTED] R [REDACTED] W [REDACTED]

Address: [REDACTED]:

City: *Prattville, AL*

Country: *United States*

BTC: *0.4179*

Description: *it needs to seem random or accident. or plant drugs, do not want a long investigation. she recently moved in with her new husband. she works at home and in office in birmingham. she works at wide orbit office address [REDACTED]*

[REDACTED] *hoover, al when she works in office she works later she drives a blue subaru outback*

*with alabama license plate [REDACTED] her husband drives a maroon jeep grand cherokee
alabama license plate [REDACTED] her husband works at publix part time they have three
dogs that bark and jump but nice dogs*

Submitted on January 11, 5:05 UTC

Status: *Payment submitted and secured in escrow*

The total amount for your orders is: \$9750 USD

7. The information submitted in the description message regarding Jennifer Wallace was verified to be 100% accurate by HSI Birmingham. Additionally, "cattree" uploaded a photo of J [REDACTED] W [REDACTED] to the website to ensure she could be positively identified by the assigned "hitman." Although the initial murder order was submitted on January 11, 2023, SASSER had made contact earlier on the site and had already conducted an initial payment via a Coinhub Bitcoin ATM machine on December 31, 2023.

8. HSI Birmingham advised the Prattville, AL Police Department of the threat and patrol was sent to monitor J [REDACTED] W [REDACTED] residence. HSI Birmingham introduced themselves to J [REDACTED] W [REDACTED] and informed her of the threat to her life and she agreed to an interview. Upon notifying J [REDACTED] W [REDACTED] of the threat to her life, she mentioned SASSER as a suspect. SASSER and J [REDACTED] W [REDACTED]'s husband, D [REDACTED] W [REDACTED], were hiking friends in Knoxville, TN prior to D [REDACTED] W [REDACTED] moving to Alabama. SASSER traveled to Alabama in fall 2022 and arrived at his Prattville, Alabama residence unannounced after he told her he was engaged to be married to J [REDACTED] W [REDACTED] SASSER responded to this news by stating "I hope you both fall off a cliff and die." Also in fall 2022, J [REDACTED] W [REDACTED] reported damage to her vehicle where an unknown perpetrator gashed the sides of her vehicle with what appeared to be a key.

9. Following this incident, J [REDACTED] W [REDACTED] began to receive unpleasant phone calls from a person utilizing an electronic device to disguise their voice. The threatening phone calls were received on J [REDACTED] W [REDACTED]'s phone, [REDACTED] and displayed various call numbers. Incoming phone calls reported to be from Voice Over IP (VOIP) or computer-generated phone numbers and internet calls, which were untraceable. W [REDACTED] eventually contacted her cell phone provider and requested that a block be placed on all incoming voice over IP phone calls.

10. J [REDACTED] W [REDACTED] stated she and her husband use a fitness tracking app called Strava when they hike and exercise. This app is connected to their Garmin watches to share location data. HSI was able to link certain reported communications to the dates and times located on J [REDACTED] W [REDACTED]'s Strava activity and location. On March 27, 2023, during which J [REDACTED] W [REDACTED] was taking a walk in her neighborhood, "Cattree" messaged OKM and stated: "yesterday she worked from home and went for a 2 mile walk by herself." HSI Birmingham verified on J [REDACTED] W [REDACTED]'s Strava app she had indeed walked for exactly 2 miles on March 27, 2023. J [REDACTED] W [REDACTED] also stated she was working from home on that date. An individual following Mr. and Mrs. W [REDACTED] on the Strava app would also know if both were walking at the same time. HSI believes SASSER has been monitoring Mr. and Mrs. W [REDACTED] on Strava.

11. HSI Birmingham interviewed D [REDACTED] W [REDACTED] and he stated he met SASSER on the internet dating website Match.com. D [REDACTED] W [REDACTED] stated SASSER assisted him in his planned Appalachian Trail hike by making reservations at known hostels and other rest points and took care of his vehicle for him in his absence. D [REDACTED] W [REDACTED] stated SASSER is employed by Pilot Headquarters in Knoxville, TN. SASSER drives a Hyundai vehicle which he identified via a photograph of the vehicle. D [REDACTED] W [REDACTED] provided a matching physical description of SASSER and identified SASSER in a photo shown to him by HSI Birmingham.

12. Phone toll analysis conducted of SASSER's cell phone [REDACTED] account indicate three phone calls were made from SASSER's phone to J. [REDACTED] W. [REDACTED]'s phone on November 7, 2022, and six phone calls from SASSER's phone to J. [REDACTED] W. [REDACTED]'s phone on November 14, 2022.

13. On November 9th and 14th, 2022, license plate reader cameras captured Tennessee plate 777 [REDACTED] within the immediate vicinity of J. [REDACTED] W. [REDACTED]'s workplace located in Hoover, Alabama ([REDACTED] Parkway and [REDACTED] Road). The vehicle is registered to SASSER, a 2020 Hyundai Santa Fe bearing vehicle identification number: [REDACTED] 3382, bearing license plate 777 [REDACTED]. According to D. [REDACTED] W. [REDACTED], this is the same vehicle she was driving when she unexpectedly visited D. [REDACTED] W. [REDACTED] in the fall 2022. HSI Birmingham showed D. [REDACTED] W. [REDACTED] a photo of this vehicle and he confirmed that it was SASSER's vehicle. HSI Knoxville observed this vehicle with matching license plate parked at Pilot Headquarters at [REDACTED], TN 37909 on April 27, 2023. The Tennessee Department of Labor confirmed SASSER is employed by Pilot.

14. OKM site user "cattree" and the site administrator had several back-and-forth messages regarding the murder for hire that continued from the initial "order" on January 11, 2023, until the most recent message on April 03, 2023, at 17:17 UTC. Several messages sent by "cattree" were inquiring the status of the "job." Other messages between "cattree" and OKM discuss additional payment of bitcoin for the "job." Pertinent messages from "cattree" to OKM demonstrating "cattree's" intent to have J. [REDACTED] W. [REDACTED] murdered include:

March 22, 2023, at 20:46 UTC "cattree" sent a message to OKM:

Message: i have waited for 2 months and 11 days and the job is not completed. 2 weeks ago you said it was been worked on and would be done in a week. the job is still not

done. does it need to be assigned to someone else. will it be done. what is the delay. when will it be done.

Subject Re: Re: Re: *update Mar 28 17 :03 UTC*

Message: *Hello, she is not aware. He just failed as he did not attempted it yet, he felt like is too risky for him to do it Regards admin*

Subject Re: Re: Re: Re: *update Mar 28 17:57 UTC*

Message: *yesterday she worked from home and went for a 2 mile walk by herself. assign to another that can complete the job.*

Subject Re: Re: Re: Re: Re: *update Mar 29 11: 10 UTC*

Message: *Hello, I have two other hitmen that I can assign on the job, but one wants 0-49 btc and the other 0.485 which one should I assign? Regards admin*

Subject Re: Re: Re: Re: Re: Re: *update Mar29 21:13 UTC*

Message: *assign to 0.485. i will add btc*

15. Bitcoin is a type of virtual currency, circulated over the Internet. Bitcoin are not issued by any government, bank, or company, but rather are controlled through computer software operating via a decentralized, peer-to-peer network. Bitcoin is just one of many varieties of virtual currency.

16. Bitcoin are sent to and received from Bitcoin “addresses.” A Bitcoin address is somewhat analogous to a bank account number and is represented as a 26-to-35-character-long case-sensitive string of letters and numbers. Each Bitcoin address is controlled through the use of a unique corresponding private key. This key is the equivalent of a password, or PIN, and is necessary to access the funds associated with a Bitcoin address. Only the holder of an address' private key can authorize transfers of bitcoin from that address to other Bitcoin addresses. Users

can operate multiple Bitcoin addresses at any given time and may use a unique Bitcoin address for every transaction.

17. To acquire bitcoin, a typical user purchases them from a virtual currency exchange. A virtual currency exchange is a business that allows customers to trade virtual currencies for other forms of value, such as conventional fiat money (*e.g.*, U.S. dollars, Russian rubles, euros). Exchanges can be brick-and-mortar businesses (exchanging traditional payment methods and virtual currencies) or online businesses (exchanging electronically transferred money and virtual currencies). Virtual currency exchanges doing business in the United States are regulated under the Bank Secrecy Act and must collect identifying information about their customers and verify their clients' identities.

18. To transfer bitcoin to another Bitcoin address, the sender transmits a transaction announcement, which is electronically signed with the sender's private key, across the peer-to-peer Bitcoin network. To complete a transaction, a sender needs only the Bitcoin address of the receiving party and the sender's own private key. This information on its own rarely reflects any identifying information about either the sender or the recipient. As a result, little-to-no personally identifiable information about the sender or recipient is transmitted in a Bitcoin transaction itself. Once the sender's transaction announcement is verified by the network, the transaction is added to the blockchain, a decentralized public ledger that records every Bitcoin transaction. The blockchain logs every Bitcoin address that has ever received bitcoin and maintains records of every transaction for each Bitcoin address.

19. While a Bitcoin address owner's identity is generally anonymous within the blockchain (unless the owner opts to make information about the owner's Bitcoin address publicly available), investigators can use the blockchain to identify the owner of a particular

Bitcoin address. Because the blockchain serves as a searchable public ledger of every Bitcoin transaction, investigators can trace transactions to, among other recipients, Bitcoin exchangers. Because Bitcoin exchangers generally collect identifying information about their customers, as discussed above, subpoenas or other appropriate legal process submitted to exchangers can, in some instances, reveal the true identity of an individual responsible for a Bitcoin transaction.

20. HSI served legal process to Coinhub, a cryptocurrency ATM company headquartered in the United States. Coinhub responded to the subpoena and sent all transaction data and customer info for the following Transaction Hashes and Correlating Addresses that match the blockchain analysis of “cattree” transactions to OKM for payment to have J [REDACTED] W [REDACTED] murdered:

- a) [REDACTED] 042rk
- b) [REDACTED] 3d2749
- c) [REDACTED] SGLJv

21. The subpoena returns showed Melody SASSER purchased Bitcoin with cash on four (4) occasions at the Coinhub ATM located at [REDACTED], Knoxville, TN 37918.

22. On December 31, 2022, at 11:42 EST (16:42 UTC), SASSER deposited \$1,000 in cash into the ATM; after subtracting the BTC network and Coinhub fees, a total of \$750.89786 worth of Bitcoin was sent to Bitcoin address: [REDACTED] 042rk. The funds were sent from this Bitcoin address to b [REDACTED] dtuk on January 4, 2023 at 20:31 EST (January 5, 2023 01:31 UTC). On January 14, 2023 at 14:33 EST (19:33 UTC), the funds were sent to address

[REDACTED] FFQAe. This address is identified in the screenshot "MRS BTC Payment 14.01.23.png" as the receiving address belonging to CATTREE on OKM.

23. On January 28, 2023 at 16:03 EST (21:03 UTC), SASSER deposited \$1,300 in cash into the ATM. After subtracting the BTC network and Coinhub fees, a total of \$1,026.50052 worth of Bitcoin was sent to address

[REDACTED] 274 9. On the same day at 18:09 EST (23:09 UTC), the funds were sent to address [REDACTED] 8hvP. This address is identified in the screenshot "MRS Cattree 01.01.23.png" as the receiving address belonging to CATTREE on OKM.

24. On March 29, 2023 at 16:02 EST (20:02 UTC), SASSER deposited \$2,000 in cash into the ATM. After subtracting the BTC network and Coinhub fees, a total of \$1,579.26363 worth of Bitcoin was sent to address

[REDACTED] SGLJv . On the same day at 19:56 EST (23:56 UTC), the funds were sent to address [REDACTED] EbZW. This address is identified in the screenshot "MRS Cattree 27.03.23.png" as the receiving address belonging to CATTREE on OKM.

25. On April 2, 2023 at 17:14 EST (21:14 UTC), SASSER deposited \$510 in cash into the ATM. After subtracting the BTC network and Coinhub fees, a total of \$402.02125 worth of Bitcoin was sent to address [REDACTED] 4HGF. On the same day at 18:24 EST (22:24 UTC), the funds were sent to address

[REDACTED] EbZW. This address is identified in the screenshot "MRS Cattree 27.03.23.png" as the receiving address belonging to CATTREE on OKM.

26. In order to purchase Bitcoin at a cryptocurrency ATM, the user must already have a Bitcoin address (which is part of a Bitcoin wallet) that will receive the Bitcoin during the cash-for-crypto transaction. The QR code for the Bitcoin receiving address is scanned at the ATM, the user then deposits the cash into the machine, and the ATM sends the purchased Bitcoin amount to the address from the QR code. The Coinhub ATM requires KYC (know your customer) identification to complete the transaction, which includes inputting a name and phone number for text message verification. Phone number 865-300-██████ was provided for the aforementioned bitcoin transactions. AT&T phone records identify Melody SASSER as the subscriber for phone number 865-300-██████. Additionally, SASSER used this same phone number on her Tennessee Driver's License application and provided the same phone number to Knoxville Utilities Board for her contact information at her residence at ██████████, Knoxville, TN.

27. Prior to reaching out to HSI Knoxville, HSI Birmingham attempted to contact SASSER in an undercover capacity by directly messaging her phone number on the messaging application WhatsApp. SASSER did not respond to the message.

28. The Coinhub ATM captures photographs of each user during each transaction. The photographs assigned to the four transactions match SASSER's Tennessee driver's license picture and her open-source Facebook profile picture.

29. The Coinhub transaction site photographs, the receiving Bitcoin wallets and addresses, and the Coinhub verification phone number link SASSER to OKM user "cattree." Accordingly, I believe SASSER necessarily used a facility in interstate and foreign commerce, specifically the Internet, to arrange for the murder of J ████████ W ████████. Specifically, SASSER used the Internet to arrange murders in exchange for money. SASSER further used the Internet to provide the would-be killer with J ████████ W ████████'s name, address, a description of her

vehicle, a specific place where J [REDACTED] W [REDACTED] could be found. In exchange for J [REDACTED] W [REDACTED]'s murder, SASSER used the Internet to transmit Bitcoin, with an approximate total value of \$9750, on the dates outlined herein.

CONCLUSION

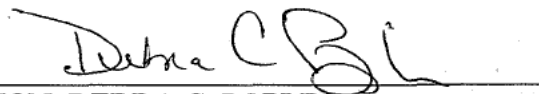
30. Based upon the information provided in this affidavit, I respectfully submit there is probable cause to establish that Melody SASSER attempted to hire a hitman to murder J [REDACTED] W [REDACTED] in violation of Title 18, United States Code, Section 1958, murder for hire.

FURTHER AFFIANT SAYETH NAUGHT.



Special Agent Gregory Martin
Homeland Security Investigations

SUBSCRIBED and SWORN to be me on this 11th day of May, 2023



HON. DEBRA C. POPLIN
UNITED STATES MAGISTRATE JUDGE