

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,

Plaintiff,

v.

ALI MUHAMMAD BROWN,

Defendant.

No. 14-1-03028-9 SEA

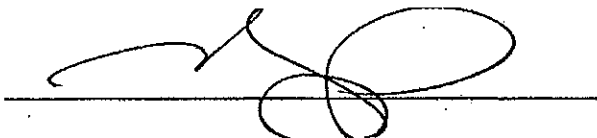
MOTION AND ORDER PERMITTING  
FILING OF AN AMENDED  
INFORMATION

COMES NOW the State of Washington by Daniel T. Satterberg , Prosecuting Attorney, by and through his deputy, and moves the court for an order permitting the filing of an amended information in the above entitled cause.

That Wyman Yip is a Senior Deputy Prosecuting Attorney in and for King County, Washington, and is familiar with the records and files herein, and certifies that:

- Newly available information is set forth in the prosecutor's case summary and request for bail.
- The Amended Information more accurately reflects the Defendant's Conduct.
- The requested amendment is pursuant to Plea Negotiations with the input of the victims.
- \_\_\_\_\_

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct. Signed and dated by me this 20<sup>th</sup> day of August, 2014, at Seattle, Washington.



Wyman Yip, WSBA #28251  
Senior Deputy Prosecuting Attorney

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

ORDER

THIS MATTER having come before this court upon the motion of the Prosecuting Attorney, good cause having been demonstrated, and the defendant not being prejudiced in any substantial right, the State of Washington is allowed to file an amended information herein.

DONE IN OPEN COURT this 20 day of August, 2014.

JUDGE

*[Signature]*  
JAMES E. ROGERS

Presented by:

*[Signature]*

Wyman Yip, WSBA #28251  
Senior Deputy Prosecuting Attorney

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,	)	
	Plaintiff,	)
v.	)	No. 14-1-03028-9 SEA
	)	
ALI MUHAMMAD BROWN,	)	
	Defendant.	)
	)	FIRST AMENDED INFORMATION
	)	
	)	
	)	

I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington, do accuse ALI MUHAMMAD BROWN of the following crimes, which are of the same or similar character, and which are based on the same conduct or a series of acts connected together or constituting parts of a common scheme or plan: **Aggravated Murder In The First Degree (Count 1), Aggravated Murder In The First Degree (Count 2), and Aggravated Murder In The First Degree (Count 3)**, committed as follows:

Count 1 Aggravated Murder In The First Degree

That the defendant ALI MUHAMMAD BROWN in King County, Washington, on or about June 1, 2014, with premeditated intent to cause the death of another person, did cause the death of Ahmed Said, a human being, who died on or about June 1, 2014; that further aggravating circumstances exist, to wit: there was more than one victim and the murders were part of a common scheme or plan or the result of a single act;

Contrary to RCW 9A.32.030(1)(a) and 10.95.020(10), and against the peace and dignity of the State of Washington.

And further do allege the defendant, ALI MUHAMMAD BROWN at said time of being armed with a 9mm handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
W554 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104-2385  
(206) 296-9000 FAX (206) 296-0955

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Count 2 Aggravated Murder In The First Degree

That the defendant ALI MUHAMMAD BROWN in King County, Washington, on or about June 1, 2014, with premeditated intent to cause the death of another person, did cause the death of Dwone Anderson-Young, a human being, who died on or about June 1, 2014; that further aggravating circumstances exist, to wit: there was more than one victim and the murders were part of a common scheme or plan or the result of a single act;

Contrary to RCW 9A.32.030(1)(a) and 10.95.020(10), and against the peace and dignity of the State of Washington.

And further do allege the defendant, ALI MUHAMMAD BROWN at said time of being armed with a 9mm handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

Count 3 Aggravated Murder In The First Degree

That the defendant ALI MUHAMMAD BROWN in King County, Washington, on or about April 27, 2014, with premeditated intent to cause the death of another person, did cause the death of Leroy Henderson, a human being, who died on or about April 27, 2014; that further aggravating circumstances exist, to wit: there was more than one victim and the murders were part of a common scheme or plan or the result of a single act;

Contrary to RCW 9A.32.030(1)(a) and 10.95.020(10), and against the peace and dignity of the State of Washington.

And further do allege the defendant, Ali Muhammad Brown at said time of being armed with a 9mm handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

DANIEL T. SATTERBERG  
Prosecuting Attorney

By:



Wyman Yip, WSBA #28251  
Senior Deputy Prosecuting Attorney

1 CAUSE NO.

2 CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

3 That John K. Pavlovich is a(n) Detective with the King County Sheriff's  
4 Office and has reviewed the investigation conducted in the King County  
5 Sheriff's case number(s) 14-105223;

6 There is probable cause to believe that Ali Muhammad Brown 12-12-1984  
7 WA SID19877448 FBI#755799CC4 committed the crime(s) of Aggravated Murder 1<sup>st</sup>  
8 Degree per RCW 9A.32.030.

9 This belief is predicated on the following facts and circumstances:

10 On the night of Sunday, April 27<sup>th</sup>, 2014 at approx. 2344 hours, a  
11 resident of the 12000 block of 68<sup>th</sup> Avenue South (in the "Skyway" area  
12 of Unincorporated King County), called to report hearing the sounds of  
13 multiple gunshots being fired near his home. Three to four minutes  
14 later 911 received a call from a motorist reporting an injured male in  
15 the roadway of the 12000 block of 68<sup>th</sup> Avenue South, the same block as  
16 the initial 911 call of the gunshots.

17 Several King County Deputies responded to the 911 calls. They  
18 arrived to find a male lying in the northbound lane of travel nearest  
19 to the residence at 12224 68<sup>th</sup> Avenue South; he was bleeding from what  
20 appeared to be multiple gunshot wounds.

21 Aid crews attempted to treat the victim but were unsuccessful and  
22 he was pronounced dead at the scene by Medic 1 personnel at 0013  
23 hours, Monday morning April 28<sup>th</sup>, 2014. This was approx. 30 minutes  
24 after the first 911 calls were received.

25 The victim was subsequently identified as 30 year old Leroy D.  
Henderson. Your affiant was assigned to investigate Henderson's  
murder and I arrived on scene at approx. 0125 hours. I conducted a  
brief examination of Henderson's clothing, which demonstrated evidence  
of gunshot defect (holes and tears) in multiple areas on the back of  
his jacket.

It was evident from an examination of Henderson's clothing and  
his person that he had been shot multiple times and died as a result  
of gunshot wound. In addition five (5) 9mm spent cartridge casings  
were found in the roadway, within a few feet of Henderson's body, all  
of which were head stamped with "F C 9mm Luger".

Certification for Determination  
of Probable Cause

Norm Maleng  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 An autopsy on Henderson was conducted by the King County Medical  
2 Examiner's Office on the morning of April 28<sup>th</sup>, 2014. The autopsy  
3 revealed that Henderson had sustained 10 separate gunshot wounds,  
4 including a group of 5 shots clustered in the back of his right  
5 shoulder. A total of 6 intact or partially deformed 9mm bullets were  
6 recovered from Henderson's body. These gunshot wounds caused damage  
7 to all of Henderson's major organs to include his heart, kidneys,  
8 liver and right lung, along with breaking several ribs and his right  
9 femur. The cause of death was determined to be from multiple gunshot  
10 wounds and the manner of death was ruled as a Homicide.

11 As part of the investigation into Henderson's murder Detectives  
12 checked the immediate area for homes and/or businesses that had video  
13 surveillance systems. One such home was located just two doors down  
14 from where Henderson was found. This home was equipped with a 4  
15 channel video recording system and 4 cameras. Two of these cameras  
16 are mounted on the front of the home and capture 68<sup>th</sup> Avenue South,  
17 including the sidewalk and entire roadway directly in front of the  
18 home. These cameras are motion activated.

19 A review of this surveillance system's recorded footage revealed  
20 the following events on Sunday April 27<sup>th</sup>, 2014.

21 --11:41PM. A light color SUV passes by the residence, travelling  
22 northbound, with headlights on at a normal rate of speed.

23 --11:42PM. Henderson is seen walking past the house. He is walking  
24 alone, southbound, in the middle of the northbound lane of traffic.

25 --11:43PM. What appears to be the same SUV from earlier passes by  
residence again, this time driving southbound, at a slower rate of  
speed, with ITS HEADLIGHTS OFF. The SUV begins to slow and brake  
lights appear as it goes off camera, approaching the spot where  
Henderson was shot.

(Note that the first 911 call received at 11:44:50PM, with the caller  
stating that they heard shots "1 min ago". Additionally, follow-up  
investigation revealed that it takes approx. 45 seconds to walk from  
the house with the cameras to the spot where Henderson was murdered at  
a normal pace.)

After lengthy review of the surveillance video footage Detectives  
Chris Johnson, Mike Mellis, I and others believed the suspect vehicle  
to be a 2006-2009 model year Dodge Durango. This conclusion was based  
on the distinctive 4-piece grill, unique to Dodge manufactured  
vehicles, and overall body style of the vehicle as seen passing by the  
residence. I later showed this footage to other Detectives in the  
South King County Auto Theft Emphasis Unit who agreed. The color  
appears to be light silver or light gray.

Certification for Determination  
of Probable Cause

**Norm Maleng**  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 Of particular interest when watching the video is the point where  
2 the SUV, when travelling southbound with the headlights off, slows.  
3 At this point it is clear the SUV has no front license plate attached  
4 and, when braking, the center mount rear brake light does not come on,  
i.e. is not working. Dodge Durango's of the model year 2006-2009 all  
are equipped with three brake lights including one mounted in the  
center of the vehicle above the rear center hatch.

5 The video footage supports the conclusion that the Dodge Durango  
6 was involved in Henderson's murder.

7 On Monday, June 9<sup>th</sup>, 2014 I contacted Sgt. Robert Vallor with the  
8 Seattle Police Department and asked that he make inquiries within his  
9 agency for any recent cases in which silver or light color Dodge  
Durango vehicles were associated.

10 On Tuesday morning June 10<sup>th</sup>, 2014 I received a phone call from  
11 Seattle Police Homicide Detective Cloyd Steiger, who informed me that  
12 he was investigating a double homicide which occurred in Seattle on  
13 June 1<sup>st</sup>, 2014. During that investigation it was determined that the  
victims, identified as Ahmed Said and Dwone Anderson-Young, had been  
shot while inside Said's vehicle. Spent 9mm cartridge casings head  
stamped "F C 9mm Luger" had been recovered at that scene.

14 Said's vehicle was processed for evidence pursuant to a search  
15 warrant. As part of the processing, SPD Latent Print examiners  
16 processed the vehicle for latent prints. On the interior of the back  
seat driver's side window, they recovered a palm print. That palm  
print was run through AFIS, and came back as a match to one **Ali  
Muhammad Brown, B/M 12/12/84, WA SID19877448 FBI#755799CC4.**

17 Seattle Detectives discovered that **Brown** had been arrested in  
18 Syskiyou County California in early April of 2014 by the California  
19 Highway Patrol. At that time, he had been driving a Silver '08 Dodge  
20 Durango with no license plates attached. The VIN attached to the  
vehicle came back registered to Latoya White, at an address in Tacoma  
WA, 910 75<sup>th</sup> Street Court East. It was learned that White and **Ali  
Brown** have a child in common.

21 Additional research also revealed that **Ali Brown** was not in  
22 custody in any correctional institutions on either April 27<sup>th</sup> or June  
23 1<sup>st</sup> 2014.

24  
25  
Certification for Determination  
of Probable Cause

**Norm Maleng**  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 As part of the investigation, the Washington State Patrol Crime  
2 Lab was asked to forensically compare the 9mm cartridge casings  
3 recovered from the Seattle homicide scene to the 9mm cartridge casings  
4 recovered from where Leroy Henderson was killed; on Thursday June 12<sup>th</sup>  
5 the lab confirmed that the cartridge casings from both homicide scenes  
6 were fired from the same 9mm handgun. The lab also opined that the  
7 likely make and model of the handgun used to fire the cartridges was a  
8 Smith and Wesson 9mm "M & P" model semi-automatic pistol.

9 On Thursday, June 12<sup>th</sup> myself and other Detectives located the  
10 Dodge Durango at the registered address of 910 75<sup>th</sup> Street Court East.  
11 Surveillance was commenced and during the day Latoya White was seen  
12 driving the Durango; I and other Detectives verified that the rear  
13 middle brake light was not working and that there was no front license  
14 plate attached. These features, along with the overall body style,  
15 were consistent with the surveillance video footage from the night  
16 Henderson was killed.

17 Later on the afternoon of June 12<sup>th</sup> I and other Detectives made  
18 contact with Latoya White while she was in the Dodge Durango. White  
19 was subsequently interviewed and provided her current address as 3005  
20 South 47<sup>th</sup> Street, apartment 108, Tacoma WA, the "Signature Point"  
21 apartments.

22 White stated that she had been in a relationship with **Brown** for  
23 about 5 years and that they do have children in common. She further  
24 stated that **Brown** has access to her apartment and her Dodge Durango  
25 SUV and does come to the apartment several times a month to either  
visit or watch their children and/or borrow the Dodge Durango. White  
stated that **Brown** will at times take the vehicle without her  
knowledge, as he had done when he was arrested in California in March  
of 2014.

White further revealed that she is the owner of a Smith and  
Wesson 9mm "M & P" handgun which she kept in the apartment; she  
further told Detectives that **Brown** knows of this handgun and she  
believed he had "stolen" it recently. White told Detectives that both  
ammunition for the handgun and the original box that the handgun was  
packaged in were currently at her apartment, and that additional  
ammunition for the handgun was in the Dodge Durango.

On June 12<sup>th</sup>, 2014 your affiant made application for and was  
granted a search warrant for both the 2008 Dodge Durango and the  
apartment of Latoya White. This is a one bedroom apartment. In the  
only bedroom, on a closet shelf, Detectives recovered a box for a

Certification for Determination  
of Probable Cause

**Norm Maleng**  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

49



1 Smith and Wesson 9mm "M&P" semi-automatic pistol. Inside the box were  
2 documents with the serial number for the pistol of HPL3418. Also  
3 included in the gun box was a test fired cartridge from the factory.  
4 In addition a file folder containing multiple documents in the name of  
5 **Ali Brown** was on the same shelf and next to the gun box, and various  
6 items of men's clothing were in the apartment as well.

7 On June 16<sup>th</sup>, 2014 I and Detective Chris Johnson conducted a  
8 search of White's Dodge Durango pursuant to a signed search warrant.  
9 Inside the Durango we recovered two (2) 9mm fired cartridge casings  
10 head stamped "F C 9mm Luger"; one of these was found between the seat  
11 cushions of the middle seat. In addition several documents were  
12 located; two of them contained handwritten notations that read "Glock  
13 \$600 Bothell 206 499 2406" and "West Coast Armory 13216 SE 32<sup>nd</sup> Street  
14 Bellevue WA 425-641-2877 11-9 Issaquah 240 NW Gilman Blvd Suite D  
15 Issaquah, WA 425-391-4867 10-6". It was clear from these notes that  
16 either **Brown** or White was actively seeking to purchase a handgun.  
17 During an interview Latoya White was shown these documents and  
18 identified the writing as being **Brown's**.

19 I conducted a trace on the Smith and Wesson 9mm purchased by  
20 Latoya White and discovered that she had purchased this handgun on  
21 April 11<sup>th</sup>, 2014 at "Surplus Arms and Ammo" in Lakewood WA. In  
22 addition White also purchased two silhouette targets and two boxes of  
23 "Federal" brand 9mm ammunition; this ammunition is head stamped "F C  
24 9mm Luger" and consistent with the cartridge casings recovered from  
25 the street where (V) Henderson was killed and from the scene where  
victims Said and Anderson-Young were killed.

On June 30<sup>th</sup>, 2014 I received a message from SPD Detective  
Steiger. He had learned of a homicide in the Newark, New Jersey area  
that occurred on June 25<sup>th</sup>, 2014. He had been in contact with the  
investigating agency and learned that their victim, Brendan Tevlin,  
had been shot multiple times and that several spent 9mm cartridge  
casings, head stamped "F C 9mm Luger", had been recovered. Initial  
ballistic exam indicated that these rounds had also been fired from a  
S&W "M&P" model handgun.

Detective Steiger subsequently sent 9mm cartridge casings  
recovered from the location where (V) Anderson-Young and (V) Said had  
been killed to the Newark Police Department Crime Lab where firearm  
examiners forensically matched the spent 9mm cartridge casings from  
the Tevlin homicide scene to the Anderson-Young/Said scene and by  
extension to the Henderson scene.

Certification for Determination  
of Probable Cause

Norm Maleng  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1           Additionally it was learned that **Brown** had attempted a robbery  
2 and carjacking in the Point Pleasant Beach, New Jersey area on the  
3 morning of June 29<sup>th</sup>, 2014. **Brown** was positively identified by the  
4 victim in that case and during the commission of the crime **Brown** left  
5 behind a backpack that contained several items, including a fully  
6 loaded magazine for an S&W 9mm "M&P" semi-automatic pistol.

7           On July 14<sup>th</sup>, 2014 **Brown** committed another robbery in West  
8 Orange, New Jersey and was positively identified by the victim of that  
9 robbery. **Brown** was subsequently located and arrested on Friday, July  
10 18<sup>th</sup>, 2014. At the time of his arrest **Brown** was in possession of the  
11 S&W 9mm "M&P" semi-automatic pistol that had been originally purchased  
12 by Latoya White, serial #HPL3418.

13           Subsequent to his arrest, the Newark Police Department Crime Lab  
14 forensically examined the S&W pistol, comparing a fired cartridge from  
15 the pistol to cartridges from the Tevlin scene and the Anderson-  
16 Young/Said scene. This examination and comparison revealed that this  
17 specific S&W 9mm semi-automatic pistol was the weapon that was used to  
18 murder (V)Tevlin, (V)Anderson-Young, (V)Said and by extension (V)Leroy  
19 Henderson.

20           On July 21<sup>st</sup>, 2014 Detective Cloyd Steiger and I conducted an  
21 audio recorded interview with **Brown** at the Essex County Detention  
22 Center, where he was in custody on charges stemming from the West  
23 Orange robbery on July 21<sup>st</sup> and the Seattle murders from June 1<sup>st</sup>. The  
24 interview was recorded with **Brown's** knowledge and permission. At the  
25 start of the interview I properly advised **Brown** of Miranda Rights,  
which he acknowledged and waived.

          During this interview **Brown** stated that he strictly followed the  
Muslim faith and as part of his beliefs, he had become angry with  
"evil" that the government was allowing to take place in the United  
States, and was also angry with the role the United States government  
was taking in the countries of Iraq, Iran and Afghanistan that had led  
to the death of innocent civilians and children there. **Brown**  
mentioned drug use as an "evil act" amongst others. During the  
interview **Brown** also stated that, as part of his beliefs, if a "man  
sees evil then he must take action against that evil."

          On July 29<sup>th</sup>, 2014 I learned that **Brown** had re-initiated contact  
with Essex County Task Force Det. Sgt McEnroe and Detective Crawley on  
July 25<sup>th</sup> and during a Post-Miranda statement had confessed to the  
murder of (V)Brendan Tevlin. **Brown** described Tevlin as a "just kill",  
describing a "just kill" as a target that was an adult male, and not a

Certification for Determination  
of Probable Cause

Norm Maleng  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 woman, child or elderly person nor in the company of any women,  
2 children or elderly persons. During the interview, which was audio-  
3 recorded, **Brown** made the following statements about his motivation for  
4 that murder:

5 --"My mission is my mission between me and my lord. That's it."

6 --"My mission is vengeance. For the lives, millions of lives are lost  
7 every day."

8 --"Iraq, Syria, Afghanistan, all these places where innocent lives are  
9 being taken every single day."

10 --"All these lives are taken every single day by America, by this  
11 government. So a life for a life."

12 --"This is why this happened in West Orange."

13 **Brown** was then asked about the "Seattle and King County" murders.

14 Det: "The vengeance that you're seeking, was there any other  
15 vengeance you exacted? I mean, I don't want to talk about your  
16 Seattle thing unless you're comfortable talking about what happened in  
17 Seattle. But is that what happened out there?"

18 **Brown:** "Same thing."

19 Det: "Which? Tell me which? The one in the City of Seattle on June  
20 1st?"

21 **Brown:** "All of it's the same."

22 Det: "How about the one on April 28th in King County?"

23 **Brown:** "It's the same."

24 Det.: "Are you admitting responsibility for the one on April 28th in  
25 King County?"

**Brown:** "All of it's the same."

Det: "I know that you're saying that all of it's the same, but are  
you admitting responsibility that you were out in King County?"

**Brown:** "Yes, I am."

Det asks him to explain about what happened that night.

**Brown:** "Let them come out here and I'll explain it to them."

Det: "They were here Monday."

Certification for Determination  
of Probable Cause

**Norm Maleng**  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 **Brown:** "Well, I'm giving you what you wanted, so that's what matters  
2 to me."

3 **Det:** "But it's all for vengeance?"

4 **Brown:** "Yes"

5 **Det:** "Life for a life - that's why that King County happened on April  
6 28th?"

7 **Brown:** "All of it"

8 **Det:** "The one in King County on the 28th, the two in Seattle on June  
9 1st, and the one in West Orange on June 25th?"

10 **Brown:** "All of it."

11 **Det:** "Those 4 murders that we're talking about were all done for  
12 vengeance for the actions of the United States in the Middle East?"

13 **Brown:** "Yes"

14 **Det:** "Are you taking responsibility for that?"

15 **Brown:** "Just doing my small part."

16 As **Brown** had indicated he would be willing to speak to either  
17 Seattle or King County Detectives, Detective Chris Johnson and I  
18 returned to New Jersey.

19 On Sunday, August 3<sup>rd</sup>, 2014 we contacted **Brown** once again at the  
20 Essex County Detention Center. **Brown** indicated that he did not want  
21 to speak about specifics of the Henderson murder, but did agree to be  
22 interviewed regarding how he came into possession of both the S&W  
23 pistol and the Dodge Durango on the night of April 27<sup>th</sup> in order to  
24 eliminate Latoya White has having been present or assisted him during  
25 the Henderson murder.

This interview was audio recorded with **Brown's** knowledge and  
permission. At the start of the recording I properly advised **Brown** of  
Miranda Rights: he acknowledged he understood and then spontaneously  
stated "I took the gun and the car without her permission. Simple as  
that. She had nothing to do with it, nothing to do with the car,  
nothing to do with the gun. I stole the gun from her. Okay."

Certification for Determination  
of Probable Cause

**Norm Maleng**  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1        **Brown** went on to accurately state that he had taken the gun from  
2 a box on top of a shelf in the kitchen (consistent with Latoya White's  
3 earlier statement that the pistol was sometimes stored in the kitchen  
4 on a shelf) and further clarified that he had taken the pistol from  
5 apartment #108 at the Signature Pointe apartments and furthermore that  
6 he had a key to this apartment.

7        **Brown's** statements to Detective McEnroe on July 25th, coupled  
8 with his statements to myself and Detective Steiger on July 21st,  
9 establish that he committed the murders of Leroy Henderson, Ahmed  
10 Said, Dwone Anderson-Young and Brendan Tevlin behind the common motive  
11 of vengeance for perceived acts of wrongdoing committed by the  
12 government of the United States. In addition each murder shares common  
13 circumstances - all victims were male (no children or women present),  
14 all were shot late at night in quiet locations and all were shot  
15 multiple times and under circumstances that essentially amount to  
16 execution.

17        Furthermore, in the murder of Leroy Henderson, there is no  
18 evidence to suggest that any struggle preceded his murder, no evidence  
19 to suggest Henderson was an aggressor or armed himself, no evidence to  
20 suggest that Henderson and **Brown** had a prior relationship or contact  
21 and his murder does not appears to have been motivated by robbery,  
22 drugs or any other crime.

23        Under penalty of perjury under the laws of the State of Washington,  
24 I certify that the foregoing is true and correct. Signed and dated  
25 By me this 18th day of August, 2014, at Seattle, Washington.

JJP

DET. J.K. PAVLOVICH # 71196  
J.K.P.

Certification for Determination  
of Probable Cause

Norm Maleng  
Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1  
2 CAUSE NO. 14-1-03028-9 SEA

3 SUPPLEMENTAL PROSECUTING ATTORNEY CASE SUMMARY

4 The State incorporates by reference the Certification for Determination of Probable  
5 Cause prepared by Detective Cloyd A. Steiger of the Seattle Police Department for case number  
6 14-172165 and the Certification for Determination of Probable Cause prepared by Detective  
7 John K. Pavlovich of the King County Sheriff's Office for case number 14-14-105223.

8 The defendant was originally charged on July 1, 2014 with the senseless and unprovoked  
9 violent murders of Ahmed Said and Dwone Anderson-Young. Since that time, law enforcement  
10 has discovered that the defendant left a much larger wake of death and violence. As outlined in  
11 Detective John Pavlovich's Certification for Determination of Probable Cause, the defendant was  
12 on a bloody crusade, executing four innocent men (three here in King County and one in Essex  
13 County, New Jersey) with the same murder weapon, over the course of approximately two  
14 months, and all under the common and single scheme of exacting "vengeance" against the  
15 United States government for its foreign policies.

16 The defendant is currently held in-custody in Essex County, New Jersey awaiting  
17 prosecution for the various crimes he committed there, including the murder of Brendan Tevlin.  
18 He has yet to appear in court in King County to be arraigned on this cause number.

19  
20 REQUEST FOR BAIL

21 The court has previously denied bail in this case, and the State requests that remain  
22 unchanged. Additionally, the State requests the court prohibit the defendant from contacting any  
23 members of the families of Ahmed Said, Dwone Anderson-Young, and Leroy Henderson.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Signed this 20<sup>th</sup> day of August, 2014.



Wyman Yip, WSBA #28251  
Senior Deputy Prosecuting Attorney