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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

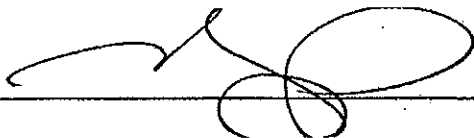
THE STATE OF WASHINGTON,)	
)	
v.)	No. 14-1-03028-9 SEA
)	
ALI MUHAMMAD BROWN,)	MOTION AND ORDER PERMITTING
)	FILING OF AN AMENDED
)	INFORMATION
Defendant.)	

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 20th day of August, 2014, at Seattle, Washington.



 Wyman Yip, WSBA #28251
 Senior Deputy Prosecuting Attorney

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ORDER

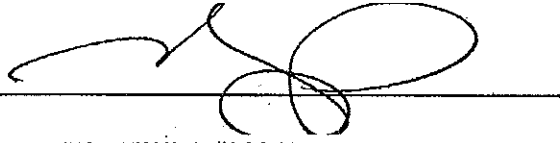
THIS MATTER having come before this court upon the motion of the Prosecuting Attorney, good cause having been demonstrated, and the defendant not being prejudiced in any substantial right, the State of Washington is allowed to file an amended information herein.

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

JUDGE

JAMES E. ROGERS

Presented by:



Wyman Yip, WSBA #28251
Senior Deputy Prosecuting Attorney

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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).

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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 1st
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 27th, 2014 at approx. 2344 hours, a
11 resident of the 12000 block of 68th 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 68th 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 68th 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 28th, 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
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1 An autopsy on Henderson was conducted by the King County Medical
2 Examiner's Office on the morning of April 28th, 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 68th 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 27th, 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.

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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 9th, 2014 I contacted Sgt. Robert Vallor with the
8 Seattle Police Department and asked that he make inquires within his
9 agency for any recent cases in which silver or light color Dodge
Durango vehicles were associated.

10 On Tuesday morning June 10th, 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 1st, 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 75th 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 27th or June
23 1st 2014.

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Certification for Determination
of Probable Cause

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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 12th
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 12th myself and other Detectives located the
10 Dodge Durango at the registered address of 910 75th 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 12th 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 47th 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 12th, 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

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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 16th, 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 32nd 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 11th, 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 30th, 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 25th, 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
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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 29th, 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 14th, 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 18th, 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 21st, 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 21st and the Seattle murders from June 1st. 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 29th, 2014 I learned that **Brown** had re-initiated contact
with Essex County Task Force Det. Sgt McEnroe and Detective Crawley on
July 25th 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

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

2
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
28th?"

6 **Brown:** "All of it"

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

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

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

10 **Brown:** "Yes"

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

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

13
14 As **Brown** had indicated he would be willing to speak to either
Seattle or King County Detectives, Detective Chris Johnson and I
returned to New Jersey.

15
16 On Sunday, August 3rd, 2014 we contacted **Brown** once again at the
Essex County Detention Center. **Brown** indicated that he did not want
17 to speak about specifics of the Henderson murder, but did agree to be
interviewed regarding how he came into possession of both the S&W
18 pistol and the Dodge Durango on the night of April 27th in order to
eliminate Latoya White has having been present or assisted him during
the Henderson murder.

19
20 This interview was audio recorded with **Brown's** knowledge and
permission. At the start of the recording I properly advised **Brown** of
21 Miranda Rights: he acknowledged he understood and then spontaneously
stated "I took the gun and the car without her permission. Simple as
22 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."

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Certification for Determination
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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
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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.

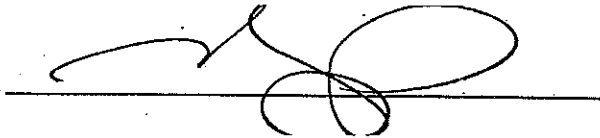
16 The defendant is currently held in-custody in Essex County, New Jersey awaiting
17 prosecution for the various crimes he committed there, including the murder of Brendan Tevlin.
18 He has yet to appear in court in King County to be arraigned on this cause number.

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.

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Signed this 20th day of August, 2014.



Wyman Yip, WSBA #28251
Senior Deputy Prosecuting Attorney