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7	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON	
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9 10	UNITED STATES OF AMERICA,	NO. MJ20-336
	Plaintiff,	
11		COMPLAINT FOR VIOLATIONS
12	V.	18 U.S.C. § 844(f) 18 U.S.C. § 844(i)
13	MARGARET AISLINN CHANNON,	10 0.5.0. 3 044(1)
14	MAROARET AISLINN CHANNON,	
15	Defendant.	
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17	BEFORE, Michelle L. Peterson, United States Magistrate Judge, Seattle, Washington.	
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21	(Arson)	
22	On of about May 50, 2020, at Seattle, in the western District of washington,	
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23	to damage and destroy, by means of fire, a vehicle, namely, Vehicle 1, that was used by	
~+	the Seattle Police Department in interstate and	foreign commerce and in an activity

affecting interstate and foreign commerce, and that was in whole or in part owned and

possessed by the Seattle Police Department, an institution and organization receiving

COMPLAINT FOR VIOLATIONS - 1

Federal financial assistance.

All in violation of Title 18, United States Code, Section 844(f)(1) and 844(i).

COUNT 2

(Arson)

On or about May 30, 2020, at Seattle, in the Western District of Washington, MARGARET AISLINN CHANNON did maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a vehicle, namely, Vehicle 2, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, and that was in whole or in part owned and possessed by the Seattle Police Department, an institution and organization receiving Federal financial assistance.

All in violation of Title 18, United States Code, Section 844(f)(1) and 844(i).

<u>COUNT 3</u>

(Arson)

On or about May 30, 2020, at Seattle, in the Western District of Washington, MARGARET AISLINN CHANNON did maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a vehicle, namely, Vehicle 3, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, and that was in whole or in part owned and possessed by the Seattle Police Department, an institution and organization receiving Federal financial assistance.

All in violation of Title 18, United States Code, Section 844(f)(1) and 844(i).

COUNT 4

(Arson)

On or about May 30, 2020, at Seattle, in the Western District of Washington, MARGARET AISLINN CHANNON did maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a vehicle, namely, Vehicle 4, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, and that was in whole or in part owned and COMPLAINT FOR VIOLATIONS - 2

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1 possessed by the Seattle Police Department, an institution and organization receiving 2 Federal financial assistance.

All in violation of Title 18, United States Code, Section 844(f)(1) and 844(i).

COUNT 5

(Arson)

6 On or about May 30, 2020, at Seattle, in the Western District of Washington, 7 MARGARET AISLINN CHANNON did maliciously damage and destroy, and attempt 8 to damage and destroy, by means of fire, a vehicle, namely, Vehicle 5, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity 10 affecting interstate and foreign commerce, and that was in whole or in part owned and 11 possessed by the Seattle Police Department, an institution and organization receiving 12 Federal financial assistance.

All in violation of Title 18, United States Code, Section 844(f)(1) and 844(i).

14 This complaint is to be presented by reliable electronic means pursuant to Federal 15 Rules of Criminal Procedure 4.1 and 41(d)(3).

The undersigned complainant, Gregory Heller, being duly sworn, further deposes and states as follows:

INTRODUCTION

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1. I, Special Agent Gregory Heller, am a duly sworn member of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I am currently assigned the ATF Field Office located within the Seattle, Washington Field Division. I have been employed as a Special Agent since September 2014. Prior to this employment, I was employed as a Police Officer and Detective for Gwinnett County, Georgia, from 2007 to 2014. In total, I have approximately thirteen years of state and federal law enforcement experience.

26 2. I am a graduate of Duke University in Durham, North Carolina, where I 27 received a Bachelor's of Science in Engineering (B.S.E.) in Civil Engineering. I

28 completed a twelve week Criminal Investigator Training Program (CITP) and a fourteen **COMPLAINT FOR VIOLATIONS - 3** UNITED STATES ATTORNEY 700 STEWART STREET, SUITE5220 week Special Agent Basic Training (SABT) at the ATF National Academy/ Federal Law
 Enforcement Training Center (FLETC) in Glynco, Georgia. I also completed a 23-week
 Gwinnett County Police Training Academy and was a Peace Officer Standards and
 Training (P.O.S.T.) certified peace officer in the State of Georgia.

3. I am responsible for investigations involving specified unlawful activities,
to include violent crimes involving firearms and arsons that occur in the Western District
of Washington. I am also responsible for enforcing federal firearms and explosives laws
and related statutes in the Western District of Washington. I received training on the
proper investigative techniques for these violations. I have actively participated in
investigations of criminal activity, including but not limited to: crimes against persons,
crimes against property, and crimes involving the possession, use, theft, or transfer of
firearms. During these investigations, I have also participated in the execution of search
warrants and the seizure of evidence indicating the presence of criminal violations. As a
law enforcement officer, I have testified under oath, affirmed to applications of search
and arrest warrants, and obtained electronic monitoring orders.

4. The facts set forth in this Affidavit are based on my own personal
knowledge; information obtained from other individuals during my participation in this
investigation, including other law enforcement officers; review of documents and records
related to this investigation; communications with others who have personal knowledge
of the events and circumstances described herein; and information gained through my
training and experience. Because this Affidavit is submitted for the limited purpose of
establishing probable cause in support of a criminal complaint, it does not set forth each
and every fact that I, or others, have learned during the course of this investigation.

SUMMARY OF PROBABLE CAUSE

A. The Arsons of Seattle Police Department Vehicles on May 30, 2020.

Seattle, Washington. Seattle Police Department (SPD) officers and other employees
were in the area to direct traffic and ensure the safety of people and property. SPD UNITED STATES ATTOR

1 officers and employees used several vehicles to respond to the protest, including the
2 following vehicles:

Vehicle 1: A 2018 Ford Transit Connect van owned by SPD and assigned to the Video Unit. This van was not marked as a police vehicle, but was equipped with a police radio and flashing strobe lights. The SPD Video Unit employees used the van for transportation, to record videos of particular locations and events, and to download surveillance video provided by local businesses and residences in support of SPD criminal investigations. During the protest on May 30, 2020, SPD used and intended to use the van for transport and to document acts of violence and property destruction. Vehicle 1 was parked on 6th Avenue between Pine Street and Olive Way.

Vehicle 2: A 2006 Dodge Caravan owned by SPD and assigned to the
Video Unit. This van was not marked as a police vehicle, but was equipped
with a police radio. The SPD used and intended to use Vehicle 2 in the
same manner as Vehicle 1, both generally and during the protest on May
30, 2020. Vehicle 2 was parked on 6th Avenue between Pine Street and
Olive Way, slightly behind Vehicle 1.

Vehicle 3: A 2009 Chevrolet Express Van owned by SPD and assigned to the South Precinct Anti-Crime Team. This van was not marked as a police vehicle, but was equipped with emergency lights and a police radio. The SPD used Vehicle 3 for the general purpose of transporting police officers and law enforcement equipment. During the protest, Vehicle 3 was parked on 6th Avenue between Pine Street and Olive Way, immediately behind Vehicle 2.

Vehicle 4: A 2016 Ford Explorer owned by SPD and used as a patrol car.
Vehicle 4 was not marked, but was equipped with a push bumper, emergency lights, police radio, and other police equipment. During the protest, Vehicle 4 was parked on 6th Avenue between Pine Street and Olive Way, immediately behind Vehicle 3.

Vehicle 5: A 2017 Ford Explorer owned by SPD and used as a patrol car.
Vehicle 5 was not marked, but was equipped with a push bumper, emergency lights, police radio, and other police equipment. During the protest, Vehicle 5 was parked on Pine Street near 5th Avenue.

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COMPLAINT FOR VIOLATIONS - 5

1 6. As described in detail below, during the protest on May 30, 2020, Vehicles 2 1, 2, 3, 4, and 5 were all damaged and destroyed by fire. After the arsons, investigators 3 from SPD, FBI, and ATF, including myself, examined the damaged vehicles. Vehicles 1, 4 3, 4, and 5 were completely destroyed by fire. Most of what remained were the metal 5 frames of the vehicles. Vehicle 2 was also heavily damaged and is no longer operable, 6 with the interior destroyed and the engine compartment burned. ATF Special Agent and 7 Certified Fire Investigator Dawn Dodsworth examined the all five of vehicles. She 8 classified the fires in Vehicles 1, 3, 4, and 5 as "incendiary," meaning they were caused 9 by human action. She further determined that the fire in Vehicle 2 was caused by the 10 natural extension and expansion of the fire in Vehicle 1 into Vehicle 2.

11 7. The Seattle Police Department is involved in interstate and foreign commerce and in activities affecting interstate and foreign commerce.¹ The Seattle 12 13 Police Department also is an institution and organization that receives Federal financial 14 assistance. I have received information from SPD's Chief Administration Officer, who 15 oversees the SPD Grants and Contracts Unit, regarding the numerous federally funded 16 grants SPD is currently receiving. In summary, SPD is presently receiving funding from 17 a variety of federal agencies, including the Department of Justice, the Department of 18 Homeland Security, and the Federal Emergency Management Agency (FEMA). 19 Collectively, these grants total millions of dollars of federal funding provided to SPD in 20 support of a variety of SPD's core duties and missions, including, but not limited to:

¹ See United States v. Odom, 252 F.3d 1289, 1294 (11th Cir. 2001) ("The legislative history of § 844(i) reveals that the statute was crafted specifically to include some non-business property such as police stations and churches.") (citing Russell v. United States, 471 U.S. 858, 860 (1985)); United States v. Laton, 352 F.3d 286, 300 (6th Cir. 2003) 24 ("When it crafted § 844(i) to encompass the arson of police stations, Congress recognized that the provision of emergency services by municipalities can affect interstate commerce in the active sense of the phrase.") (citing 25 Jones v. United States, 529 U.S. 848, 853 n.5 (2000); Russell, 471 U.S. at 860-61); Belflower v. United States, 129 F.3d 1459, 1462 (11th Cir.1997) (holding that § 844(i) covered the bombing of a police vehicle which a local 26 sheriff's deputy used in his law enforcement responsibilities and that destruction of a police car had "a significant impact on interstate commerce" because the deputy patrolled traffic and made arrests on an interstate highway, 27 issued citations to out-of-state drivers, participated in interstate narcotic investigations, assisted out-of-state authorities in apprehending suspects, recovered stolen property from other states, and attended law enforcement 28 training sessions in other states).

COMPLAINT FOR VIOLATIONS - 6

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1 Enhancing the safety of the community in the event of terrorist threats, active shooter threats, natural disasters, and the gathering of information 2 helpful to law enforcement and the community regarding these sorts of 3 serious threats: 4 Providing crime prevention strategies and essential services to elderly, 5 non-English speaking residents, refugees, deaf, blind and developmentally disabled residents of Seattle and working with 6 communities to decrease crime by developing, implementing and 7 coordinating crime prevention programs; 8 Bolstering security measures related to the protection of the Port of 9 Seattle; 10 Funding the investigations of offenses involving acts of terrorism, 11 chemical, radiological, or biological attacks, crimes against children, and human trafficking; and 12 13 COVID Emergency Stimulus Funding used to pay for things such as • personal protective equipment for officers; funding to backfill for 14 officers testing positive for COVID or in quarantine; and the cost of 15 providing protection for lives and property in the event of protests against statewide shelter-in-place orders or re-opening guidelines. 16 17 B. Channon's Involvement in the Arsons of the SPD Vehicles. 18 8. Investigators with SPD, FBI, and ATF have obtained and reviewed videos 19 and photographs taken during the events surrounding the burning of the five SPD 20 vehicles on May 30, 2020. This video and photographic evidence came from various 21 sources, including SPD personnel on scene, neighboring building surveillance cameras, 22 footage aired by local news media outlets, publically reviewable social media posts, and 23 from individuals who attended the protest and took their own photographs and video. 24 9. Based on a review of this photographic and video evidence, FBI and ATF 25 special agents identified a suspect who was involved in the arsons of Vehicles 1, 2, 3, 4, 26 and 5. The suspect is a Caucasian female with long hair. The majority of her hair was 27 blond, but appeared to have dark brown roots. She had what appeared to be tattoos on 28

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her right shoulder, left elbow, and left bicep.² She was wearing a white and black striped 1 2 scarf-type face covering, a black shirt, black pants, light colored socks (that were 3 mismatched), and black shoes. She also wore a black backpack on her back. The 4 backpack had a rectangular top flap that was secured by vertical buckles. In some of the 5 photos and videos, the female suspect was wearing a black hooded sweatshirt with a 6 zippered front, and in others she had a light colored striped garment wrapped around her 7 waist. As described below, investigators have subsequently identified this female suspect 8 as the defendant, Margaret Aislinn Channon.



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Open source social media

News footage

SPD Video

10. A review of video footage shows that at approximately 4:06 p.m., Vehicle 5 was damaged by acts of vandalism conducted by several unknown suspects (not Channon). These unknown suspects broke Vehicle 5's windows and doors and caused a fire on the ground underneath the front passenger door. An unknown suspect is seen placing a cardboard box into the flames underneath the car. Channon then approached Vehicle 5 and threw an item of black clothing into the fire. Moments later, Channon held

<sup>27
&</sup>lt;sup>2</sup> The female suspect had a distinct tattoo on her right shoulder, which appeared to be a design with two halves, connected in a shape similar to an "X-pattern" in the middle. In addition, the female suspect had an irregular shaped tattoo outline near her right elbow, and another tattoo on the outside of her left elbow that may extend up her forearm.

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a spray can up to a small flame and lit the exhaust.³ Channon sprayed the rear hatch of
the Vehicle 5 for several seconds, until the flame went out. Channon then re-ignited the
can's exhaust. She leaned into the open rear door of the vehicle and sprayed the back
seat with flame. Shortly thereafter, she left the area of Vehicle 5. After she left, the
vehicle was smoking heavily, and flames were visible inside. Shortly thereafter, flames
filled the passenger compartment and rose well above the roof of the vehicle. The fire
progressed until Vehicle 5 was fully engulfed in flames.

8 11. Video footage shows that after leaving Vehicle 5, Channon went to the Old
9 Navy store across the street at 511 Pine Street. A crowd was smashing the windows,
10 throwing items at the store, and stealing items from inside the store. The video shows
11 Channon entering Old Navy through the smashed storefront. She left the store moments
12 later, carrying a light colored, striped long sleeve shirt.

13 12. Various videos and photographs that I have reviewed show that Channon 14 (now with the stolen striped shirt wrapped around her waist) next approached the 15 passenger side of Vehicle 3 and began striking it with something she held in her right 16 hand. Channon stood at the smashed passenger window and spraved flaming exhaust 17 from a can into Vehicle 3. Smoke then started rising from the vehicle. She then ran 18 away from Vehicle 3 towards Vehicle 4 with the flaming can in her hand. Channon next 19 sprayed flames into the front passenger window of Vehicle 4 and smoke began to 20 emanate from Vehicle 4.

13. Video shows Channon then ran back towards Vehicle 3. Channon no
longer had the light colored striped shirt around her waist, having discarded it in or
around Vehicle 4. Channon stood next to Vehicle 3 and sprayed flaming exhaust from a
can into the passenger window of Vehicle 3. Video footage shows smoke rising from
Vehicle 3.

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²⁷ ³ Based on my training and experience, I know that many pressurized cans contain a propellant that is flammable. If the aerosol exhaust from the can is ignited with a flame, and the nozzle is held in the open position, a continuous shorting flame can be produced. This appears to be how Chappen burned Vahioles 1, 3, 4, and 5.

S || shooting flame can be produced. This appears to be how Channon burned Vehicles 1, 3, 4, and 5. COMPLAINT FOR VIOLATIONS - 9

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1 14. Additional video footage shows that Channon next approached the driver's 2 window of Vehicle 1 and ignited the exhaust from an aerosol can, causing it to spew 3 flames. She then held the flaming can inside the van, first aiming the flame towards the 4 driver's seat and then towards the headliner. After several seconds, the flame went out. 5 Channon brought the can back towards her body and appeared to reignite it. She then 6 aimed the flame at the driver's seat for approximately 13 seconds until the flame went out 7 again. Channon lit the exhaust from the can again and, for several seconds, aimed it at 8 the seat and then the headliner. When the flames again went out, Channon again lit the 9 exhaust from the can and aimed it at the seat for another second, until the flames went 10 out.

11 15. At that point, the video footage shows Channon handing the can to an
12 unknown male subject. While she was doing so, a glow, consistent with fire, can be seen
13 coming from inside Vehicle 1. The male ignited the exhaust from the can and sprayed
14 flames into Vehicle 1 for several seconds. At approximately 4:20 p.m., Channon and the
15 male ran down 6th Avenue towards Olive Way. In other video footage, Channon can be
16 seen in front of the Verizon store at the corner of 6th Avenue and Olive Way. Channon
17 smashed the windows of the store with something she was holding in her right hand.

18 16. Immediately after Channon ran away from Vehicle 1 (as noted above) the
19 flames inside of Vehicle 1 expanded and spread to the adjacent Vehicle 2. Video footage
20 shows that the fires in vehicles 1, 2, 3, and 4 continued to burn until each of the cars were
21 fully engulfed in flames. Flames from the vehicles extended vertically from the vehicles
22 and at times flared high enough to touch the roof/awning of the Nordstrom store in front
23 of which the vehicles were parked.

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C. The Identification of Channon as the Arsonist.

1. Photographs of Channon at the Protests on May 29, 2020.

26 17. After the arsons, FBI and ATF special agents commenced an investigation
 27 in an effort to identify the female arsonist depicted in the above-referenced videos and
 28 photographs. Among other things, FBI agents contacted a Seattle resident who posted on COMPLAINT FOR VIOLATIONS - 10

his social media account a photograph of the female arsonist setting fire to Vehicle 3. On
 June 8, 2020, FBI special agents met with this individual and he provided them with
 numerous additional photographs he had taken of the female arsonist and other
 individuals at the protests in downtown Seattle on Friday, May 29, 2020, and Saturday,
 May 30, 2020 (the day of the arsons).

6 18. On the night of May 29, 2020, at the protest in Seattle, this individual took 7 photographs of a female who, as described below, has been identified as Channon. By comparing the photos to footage taken by SPD body worn cameras, I have been able to determine that these photos of Channon were taken on May 29, 2020, at approximately 9:30 p.m. The photos depict a line of police officers and protestors (including Channon) facing each other in the area of 5th Avenue between James Street and Jefferson Street. Channon's back is to the camera and she has her hands up, palms facing the police officers. Because these photographs are of very high quality, agents were able to zoom in on the female's left hand and see that she had a distinctive tattoo. Specifically, she had the letters "W-A-I-F" tattooed on the fingers of her left hand, with the "W" on her index finger; "A" on her middle finger; "I" on her ring finger; and "F" on her pinkie finger. The letters were oriented such that the bottom of the letters faced towards her fingertips. Also visible on the suspect's left hand was a heart tattoo on her middle finger between the "A" and the fingertip.

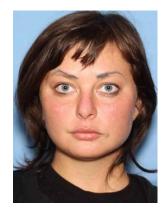


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1 19. After reviewing the "W-A-I-F" tattoo, agents checked numerous jail 2 booking systems in Washington and Oregon for females with hand or finger tattoos 3 spelling "W-A-I-F." There were no matches. Agents also conducted searches over 4 publically available social media accounts and located Facebook posts relating to a 5 missing person report from the Brewster County Sheriff's Department in Texas. These 6 posts indicated that a person named Margaret Aislinn Channon had gone missing in 7 February of 2019. Channon was described in one post as a white female who was five 8 feet and five inches tall with "tattoos on her leg shoulder and left wrist." Another post 9 indicated that Channon had "many tattoos, including WAIF on fingers."

20. Agents reviewed records of the Washington Department of Licensing
(DOL) and confirmed that Margaret Aislinn Channon currently lives in Washington. The
photograph of Channon on file with the DOL (below) matches the photographs of
Channon on the above-referenced missing person report.



21. Agents were able to locate a publically viewable Instagram page ("Maggotslaw") with the user name of "Margaret Aislinn Channon." The user of this account posted numerous photographs of herself that match Channon's DOL photograph. Moreover, on March 25, 2015, the user posted a photograph that depicted a left hand with the same "W-A-I-F" and heart tattoos that were seen on the female protestor on May 29, 2020. Additional photographs posted on the "Maggotslaw" Instagram account depicted Channon holding her left hand so that parts of the "W-A-I -F" and heart tattoos were visible.

COMPLAINT FOR VIOLATIONS - 12

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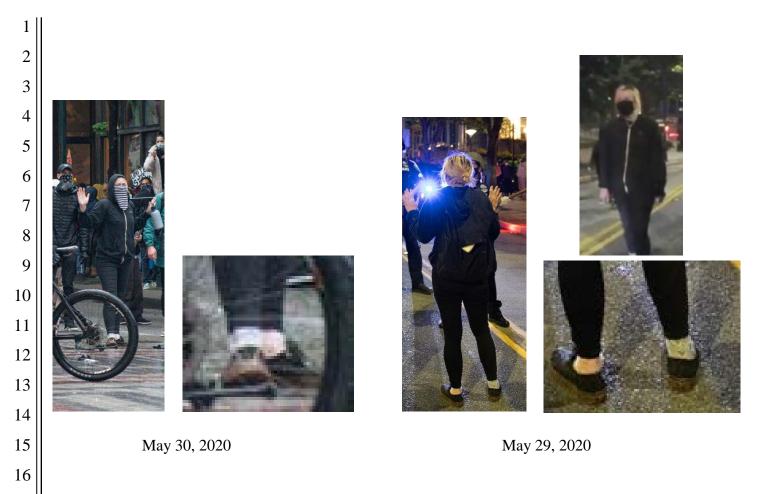
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2. The Comparison of Photos of the Arsonist on May 30, 2020, with Photos of Channon on May 29, 2020, and other Known Photos of Channon, Confirms that Channon was the Arsonist.

22. Having identified Channon as being at the protest on May 29, 2020, agents then compared the photos of Channon taken on May 29th and other known photos of Channon with images of the arsonist on May 30, 2020. For the reasons set forth below, this this comparison confirmed that Channon was, in fact, the arsonist.

23. First, the arsonist was wearing nearly the identical clothing that Channon wore on May 29th. The matching clothing included a black hooded sweatshirt with a vertical zipper in the front, black tight-fitting pants, a black backpack, black shoes, and distinctive mismatched socks. Regarding the socks, both Channon (on May 29) and the arsonist (on May 30) had on their right foot a green/grey sock with a triangle pattern and on their left foot a pink/peach sock with a red or pink pattern.



24. Second, both the arsonist and Channon in her DOL photograph have unique eyebrows. As depicted in Channon's DOL photograph, she has both tattooed eyebrows and natural eyebrows, with the two failing to line-up perfectly. This results in uneven eyebrows that are thicker and thinner in certain places and are thus irregularly shaped. Specifically, the tattooed portion of Channon's right eyebrow has a steep, sharp peak that is not seen on her left eyebrow. This unique eyebrow feature is also seen on the arsonist in still frames of a video taken on May 30, 2020, while the arsonist was outside the Old Navy store (after burning Vehicle 5).

1



Arsonist on May 30



Channon's DOL photo

25. Third, as noted above, the arsonist had a unique "X-pattern" tattoo on her right shoulder. Agents located a second Instagram page ("qualities of ass") that appears to be used by Channon under the user name "Marge" (her first name is Margaret). This Instagram page has numerous photos of Channon, including one that clearly depicts a tattoo on her right shoulder that appears to match the tattoo on the arsonist. This photograph appears to have been taken into a mirror, so the right and left sides are reversed. (The viewer can tell Channon's right side by the steep incline on her right eyebrow tattoo.). On Channon's right shoulder, there is a tattoo with various lines that include an X-shape pattern towards the middle of the shoulder. This tattoo appears to match the tattoo seen on the arsonist's right shoulder as she was burning Vehicle 1.



Instagram photo on "qualitiesofass" **COMPLAINT FOR VIOLATIONS - 15**



Arsonist on May 30 UNITED STATES ATTORNEY 700 STEWART STREET, SUITE5220 SEATTLE, WASHINGTON 98101

(206) 553-7970

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Fourth, agents found additional photographs of Channon on a third
 Instagram account that further depict her with tattoos matching those of the arsonist.
 This Instagram account ("lapacurb") contained several photographs of Channon. One
 relevant photograph showed the front portion of the distinctive "X-pattern" tattoo on
 Channon's right shoulder. A second photograph showed that Channon has a tattoo on her
 left bicep and the outside of her left elbow. The location and general character of these
 tattoos appears to match tattoos seen on the arsonist during the arsons on May 30, 2020
 (the tattoo on her left bicep is more apparent on the video from which the below still shot
 is taken).



Instagram photo on "lapacurb"



Tattoo on arsonist's left elbow COMPLAINT FOR VIOLATIONS - 16



Instagram photo on "lapacurb"



Tattoo on arsonist's left bicep

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1	CONCLUSION	
2	27. Based on the foregoing, I respectfully submit that there is probable cause to	
3	believe that MARGARET AISLINN CHANNON committed the above-referenced	
4	offenses.	
5	GREGORY HELLER	
6	Date: 2020.06.11 01:35:47 -07'00'	
7	GREGORY HELLER Special Agent, ATF	
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9		
10	The above agent provided a sworn statement attesting to the truth of the contents	
11	of the foregoing affidavit on the 11 th day of June, 2020. Based on the Complaint and the	
12	sworn statement, the Court hereby finds that there is probable cause to believe the	
13	Defendant committed the offenses set forth in the Complaint.	
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16	MICHELLE L. PETERSON United States Magistrate Judge	
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28	COMPLAINT FOR VIOLATIONS - 17 UNITED STATES ATTORNEY	