

Magistrate Judge David W. Christel

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

MATTHEW GREENWOOD, and
JEREMY CRAHAN,

Defendants.

CASE NO.

COMPLAINT for VIOLATION
Title 18 U.S.C. § 1366
Title 26 U.S.C. § 5861(d)

BEFORE, David W. Christel, United States Magistrate Judge, Tacoma,
Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

Conspiracy to Damage Energy Facilities

On or about December 25, 2022, at Pierce County, within the Western District of
Washington, MATTHEW GREENWOOD and JEREMY CRAHAN did knowingly and
willfully damage and attempt and conspire to damage the property of an energy facility
and caused and attempted and conspired to cause a significant interruption and
impairment of a function of an energy facility, to wit: damage to and a significant

1 interruption and impairment of a function of an energy facility at the Hemlock Substation
2 (Puget Sound Energy), the Elk Plain Substation (Tacoma Power), the Graham Substation
3 (Tacoma Power), and the Kapowsin Substation (Puget Sound Energy).

4 All in violation of Title 18, United States Code, Section 1366.

5 **COUNT TWO**

6 **Possession of Unregistered Firearms**

7 On or about December 31, 2022, at Pierce County, within the Western District of
8 Washington, MATTHEW GREENWOOD did knowingly possess a short barreled
9 shotgun and a short barreled rifle that were not registered to him in the National Firearm
10 Registration and Transfer Record, to wit; a Sears, Roebuck and Company short barrel
11 shotgun with no serial number and a barrel length of 14 and 7/8 inches, and a short
12 barreled Remington rifle with serial number 351731 and a barrel length of 11 inches.

13 All in violation of Title 26, United States Code, Section 5861(d).

14 And the complainant states that this Complaint is based on the following
15 information:

16 **I, Mark Tucher, being first duly sworn on oath, depose and say:**

17 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and
18 have been since December 2021. I am an “investigative or law enforcement officer of the
19 United States” within the meaning of Title 18, United States Code, Section 2510(7). In
20 my duties as a Special Agent, I have been assigned to the Joint Terrorism Task Force of
21 the Federal Bureau of Investigation’s Seattle Division primarily investigating Domestic
22 Terrorism matters. I completed twenty-and-a-half weeks of training at the FBI academy,
23 including legal classes, investigative techniques, evidence preservation and collection,
24 financial related crimes, and computer related crimes. Through my training and
25 experience, I am familiar with the strategy, tactics, methods, ideology and practices of
26 domestic terrorism, and anti-government and racially motivated extremists. As a Special
27 Agent, I am authorized by law or by a government agency to engage in or supervise the
prevention, detection, investigation, or prosecution of a violation of Federal criminal

1 laws. I have attended training hosted by Special Agents specializing in digital
2 exploitation and cellular analysis in addition to training focused on digital evidence
3 exploitation in support of Counter Terrorism investigations.

4 2. The facts set forth in this Affidavit are based on my personal knowledge;
5 knowledge obtained from other individuals during this investigation, including other law
6 enforcement officers; review of documents and records related to this investigation;
7 communications with others who have personal knowledge of the events and
8 circumstances described herein; and information gained through my training and
9 experience. Because this Affidavit is submitted for the limited purpose of establishing
10 probable cause in support of the application for search warrants, it does not set forth
11 every fact that I, or others, have learned during this investigation.

12 **SUMMARY OF PROBABLE CAUSE**

13 December 25, 2022: Attacks on four Puget Sound Energy and Tacoma Power electrical
14 substations.

15 3. On December 25, 2022, four attacks or acts of vandalism occurred at
16 electrical substations in Pierce County, Washington.¹ The FBI later learned relevant
17 information about these attacks from Puget Sound Energy (PSE), the utility managing the
18 substations. PSE Investigations reported that on December 25, 2022, around 0239 hours,
19 PSE system operations received an alarm from an electrical substation—a part of the
20 electrical transmission grid that provides electricity to residences and businesses—
21 identified as Hemlock substation. Initial reports from PSE crews were that unknown

22 ¹ Title 18, United States Code, Section 1366 defines offenses for causing destruction to an “energy facility.” Section
23 (a) of the statute makes it a felony offense where one “knowingly and willfully damages or attempts or conspires to
24 damage the property of an energy facility in an amount that in fact exceeds or would if the attempted offense had
25 been completed, or if the object of the conspiracy had been achieved, have exceeded \$100,000, or damages or
26 attempts or conspires to damage the property of an energy facility in any amount and causes or attempts or conspires
27 to cause a significant interruption or impairment of a function of an energy facility.” Section (b) defines a lesser-
included felony offense where one “knowingly and willfully damages or attempts to damage the property of an
energy facility in an amount that in fact exceeds or would if the attempted offense had been completed have
exceeded \$5,000.” The term “energy facility” is defined as “a facility that is involved in the production, storage,
transmission, or distribution of electricity, fuel, or another form or source of energy, or research, development, or
demonstration facilities relating thereto . . .” 18 U.S.C. § 1366(c). Electrical substations are “energy facilities” as
defined by this statute.

1 suspects cut the perimeter chain-link fence to gain entry to this distribution substation. It
2 was later learned the suspects manipulated something called a “bank high side switch,”
3 which caused the outage. The suspects did not steal any copper or cut any wires. PSE
4 crews responded to the scene and were able to re-energize the substation. This incident
5 caused a power outage for about eight thousand customers.

6 4. PSE Investigations reported that later the same day, around 0530 hours on
7 December 25, 2022, Tacoma Power received notification of a second substation, the Elk
8 Plain substation, going offline. Tacoma Power advised that the padlocks were cut on the
9 pedestrian gates to this substation and the suspects manipulated the high side breakers,
10 again causing an outage. Tacoma Power was able to obtain some surveillance photos
11 from that period of time in the morning of the suspect at the Elk Plain substation.

12 5. PSE Investigations reported that shortly thereafter, around 0600 hours on
13 December 25, 2022, Tacoma Power received notification that a third substation, the
14 Graham substation, went offline. At the Graham substation, someone had cut the chain
15 link fence and manipulated the high side breakers, again causing a power outage.

16 6. Tacoma Power reported about 7,500 customers were without power when
17 both the Elk Plain and Graham substations were offline.

18 7. While those three incidents occurred in the early morning hours, PSE
19 Investigations reported that later that night, at around 1925 hours on December 25, 2022,
20 PSE system operations received an alarm from a fourth substation, the Kapowsin
21 substation. When PSE crews arrived on scene, the Pierce County Sheriff’s Office (PCSO)
22 was already on scene. Initial reports showed the unknown suspects cut the chain-link
23 fence to gain entry to the substation. The suspects tampered with the bank high side
24 switch and they tried to pry the linkage open. This caused the substation to start arcing
25 and sparking.

26 8. Damage resulting from the attack on the Elk Plain and Graham “de-
27 energizer taps”, resulted is approximately \$3 million dollars’ worth of damage. Due to
the damage to both “de-energizer taps” each impacted transformer requires replacement,
resulting in up to 36 months repair time. Tacoma Power is currently required to utilize

1 two mobile transformers at each facility in order to maintain power to customers.

2 Combined output went from 50 megawatts to 15 megawatts.

3 9. On December 26, 2022, PSE reported the above to the FBI and took FBI
4 Special Agents to the Hemlock and Kapowsin substations to survey each site. PSE also
5 provided a map showing the close proximity of all four substations attacked on December
6 25, 2022. See below:



19 10. On December 26, 2022, Tacoma Power provided FBI with photos of the
20 suspect seen on surveillance footage at the Elk Plain substation. The photo shows what
21 appears to be a white male with a cloth covering the lower portion of his nose and jaw:

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11. Tacoma Power also provided the FBI with the surveillance footage of a vehicle that arrived at the substation at the time of the attack on the Elk Plain substation. The vehicle is depicted in the screenshot below:



Preliminary identification of Matthew Greenwood and Jeremy Crahan.

12. Based on the examination of cell phone records, FBI investigators identified two phones that were in the vicinity each of the four electrical substations at

1 the time of the attacks described above. TARGET PHONE 1 (phone number xxx-xx-
2 7608), was utilizing cell phone towers in a way that indicated the device was in the
3 vicinity of, and that was consistent with the device being at, the location of each of the
4 four substations at or around the time of the attacks. TARGET PHONE 2 (phone number
5 xxx-xxx-9660) was also utilizing cell phone towers in a way that indicated the device was
6 in the vicinity of, and that was consistent with the device being at, the location of all four
7 substations at or around the time of the attacks.

8 13. The substations are spread out over dozens of miles; the attacks occurred
9 early in the morning and in the evening; and the first and fourth attacks were separated by
10 over twelve hours. This makes it at least unlikely that an individual would simply happen
11 to be at or near all four locations at around the times they were each vandalized.

12 14. The subscriber of this phone was a female with initials "H.F." However,
13 the following Google accounts were associated to TARGET PHONE 1:
14 matjg90@gmail.com, mattgreenwoodma@gmail.com, zipiddy1990@gmail.com. The
15 subscriber for these Google accounts are as follows:

16 Name: Matt Grrenwood
17 Given Name: Matt
18 Family Name: Grrenwood
19 e-Mail: **matjg90@gmail.com**

20 Name: Matt Greenwoodma
21 Given Name: Matt
22 Family Name: Greenwoodma
23 e-Mail: **mattgreenwoodma@gmail.com**

24 Name: Matt
25 Given Name: Matt
26 Family Name:
27 e-Mail: **zipiddy1990@gmail.com**

15. It is common, in my experience, for individuals to use combinations of their
first and last name, their initials, or other biographical information in their gmail email
addresses. Here, two of the three accounts appear to have combinations (or misspellings)

1 of MATTHEW GREENWOOD's first and last name in the subscriber information: "Matt
2 Grrenwood" and "Matt Greenwoodma." In addition, both email accounts associated with
3 those accounts (matjg90@gmail.com and mattgreenwoodma@gmail.com) use at least
4 some letters from his first and last name; the first email address also uses "90," which
5 corresponds to MATTHEW GREENWOOD's year of birth (1990). Similarly, the
6 "1990" in the final account's email address, zipiddy1990@gmail.com, corresponds to
7 that year of birth. And the first name associated with that account is "Matt." There is no
8 other Google account associated with this device—and importantly, there is no Google
9 Account seemingly associated with H.F., the subscriber for that device. This leads me to
10 believe that the primary user of this device is likely MATTHEW GREENWOOD, not
11 H.F.

12 16. The following GMAIL accounts were associated to TARGET PHONE 2;
13 crahanjeremy@gmail.com. The subscriber for this GMAIL accounts is as follows:

14 Name: Jeremy Crahan
15 Given Name: Jeremy
16 Family Name: Crahan
17 e-Mail: **crahanjeremy@gmail.com**

18 17. Again, in my experience, for individuals to use combinations of their first
19 and last name, their initials, or other biographical information in their gmail email
20 addresses. Here, JEREMY CRAHAN's name appears in both the subscriber information
21 and in his gmail email address (crahanjeremy@gmail.com). The fact that JEREMY
22 CRAHAN is also the subscriber of this device leads me to believe he is the primary user
23 of this device.

24 18. The FBI has further learned that JEREMY CRAHAN is the registered
25 owner of a 1999 Dodge pickup truck with Washington registration B07175T. That
26 vehicle is depicted below, side by side with the surveillance footage provided by Tacoma
27 Power:



17 19. On December 3, 2022, Pierce County Sheriff’s Office deputies conducted a
18 traffic stop on a 1993 Jeep Grand Cherokee with no license plates located at 41st St Ave
19 Ct E, Elk Plain, WA 98387. Call Dispatch logs identified MATTHEW GREENWOOD
20 and JEREMY CRAHAN as being present in the vehicle at that time.

21 Search of Residence located at 15921 95th Ave CT East, Puyallup, WA 98375.

22 20. From approximately December 27 to January 30, 2022, MATTHEW
23 GREENWOOD and JEREMY CRAHAN were under essentially continuous FBI
24 surveillance (either electronic or in-person). This surveillance demonstrated that during
25 this period both GREENWOOD and CRAHAN resided at, or spent extended periods of
26 time at, a residence located at 15921 95th Ave CT East, Puyallup, WA 98375.

27 Surveillance further established that Greenwood at times entered both the primary
residence and a 5th wheel trailer parked in the driveway of the residence.

1 21. On December 30, 2022, the Hon. David W. Christel, United States
2 Magistrate Judge, authorized a search warrant for the residence located at 15921 95th
3 Ave CT East, Puyallup, WA 98375, and the persons of MATTHEW GREENWOOD and
4 JEREMY CRAHAN, the Dodge pickup truck, and the Jeep Grand Cherokee. The warrant
5 specifically authorized the search of a 5th wheel trailer located in the driveway of the
6 residence.

7 22. On December 31, 2022, at approximately 8:00 AM, federal agents and local
8 law enforcement officers executed the warrants. MATHEW GREENWOOD was located
9 in the 5th wheel trailer and detained. Inside the trailer, agents located a short-barreled rifle
(with what appears to be a home-made silencer attached) and a short-barreled shotgun:



25 23. MATTHEW GREENWOOD was detained. At the time, GREENWOOD
26 was wearing clothing that matched, in part, the clothing seen in the PSE surveillance
27 photos taken at the time of one of the substation attacks. During a search of the residence,

1 items of evidentiary value seized included: two cellular phones, black cutters, red gloves,
2 grey/black jacket, blue jeans, and work boots which were consistent with the clothing
3 seen during the PSE surveillance video.

4 24. MATTHEW GREENWOOD gave a post-arrest statement to law
5 enforcement after being advised of his Miranda rights. In this statement, GREENWOOD
6 stated that GREENWOOD and CRAHAN have been planning to disrupt power to
7 commit a burglary. CRAHAN drove them both and pointed out the first substation in
8 South Hill. GREENWOOD admitted he entered all four substations utilizing bolt cutters
9 provided by JEREMY CRAHAN. GREENWOOD entered all the facilities, while
10 CRAHAN entered the South Hill station and acted as a get-away driver for the other
11 substations. While the power was out, after the Graham and South Hill attacks, the two
12 went to a local business, CRAHAN drilled out a lock, and GREENWOOD entered to
13 steal from the cash register.

14 Arrest of JEREMY CRAHAN.

15 25. JEREMY CRAHAN was not present at 15921 95th Ave CT East, Puyallup,
16 WA 98375, during the execution of the search warrant.

17 26. Subsequently, on December 31, 2022, at approximately 8:30 AM,
18 CRAHAN was located at 7121 190th St CT East, Puyallup, WA 98375. CRAHAN was
19 detained without incident at that location. In the vicinity of that location was the 1999
20 Dodge truck, described above.

21 ATF examination of the firearms.

22 27. ATF Special Agent Jason Casel responded to the search in progress at
23 15921 95th Ave CT East, Puyallup, WA 98375, and confirmed the following
24 information about each of the firearms recovered from the 5th wheel trailer:

25 Short barreled shotgun
26 Manufacturer: Sears, Roebuck and Company
27 Model: Ranger
Cal: 16 gauge
Serial Number: None
Barrel length: approx.. 14 and 7/8 inches
Overall length: approx.. 25 and 7/8 inches

Short barreled rifle
Manufacturer: Remington
No model name located
Serial Number: 351731
Cal: .22 short or long rifle
Barrel length approx.. 11 inches
Overall length approx.. 21 inches

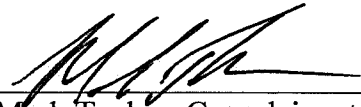
28. The barrel of the shotgun is less than 18 inches long and is thus a firearm as defined by 26 United States Code § 5845 and is considered a short barrel shotgun that must be registered in the National Firearm Registration and Transfer Record pursuant to 26 United States Code § 5861(d). The barrel of the rifle is less than 16 inches long and is thus a firearm as defined by 26 United States Code § 5845 and is considered a short barreled rifle that must be registered in the National Firearm Registration and Transfer Record pursuant to 26 United States Code § 5861(d).

29. An ATF Special Agent has requested a check of the National Firearm Registration and Transfer Record in order to find out if MATTHEW GREENWOOD had a registered short barrel firearms. The result of the check indicated that there was no firearm of any sort registered to MATTHEW GREENWOOD in the National Firearm Registration and Transfer Record.

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1 Conclusion

2 30. Based on the above facts, I respectfully submit that there is probable cause
3 to believe that MATTHEW GREENWOOD and JEREMY CRAHAN did commit the
4 crime of Conspiracy to Damage Energy Facilities, in violation of Title 18, United States
5 Code, Section 1366 and that MATTHEW GREENWOOD did commit the crime of
6 Possession Unregistered Firearms, in violation of Title 26, United States Code, Section
7 5861(d).

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10 Mark Tucher, Complainant
11 Special Agent, FBI

12 Based on the Complaint and Affidavit sworn to me by telephone, the Court hereby
13 finds that there is probable cause to believe the Defendants committed the offenses set
14 forth in the Complaint.

15 Dated this 31st day of December, 2022.

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18 DAVID W. CHRISTEL
19 United States Magistrate Judge
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