UNITED STATES DISTRICT COURT

for the

Eastern District of Arkansas

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

DEC 14 2020

JAMES W. McCORMACK, CLERK
By: _____ DEP CLERK

United States of America v. Brittany "Dawn" Jeffrey Aline Espinosa-Villegas Renea Goddard Emily Nowlin	)	Case No. 4:20MJ00281

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of 8/25 - 8/28/2020 in the county of Pulaski in the Eastern District of Arkansas, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. 844(f)	Malicious destruction of property belonging to an entity receiving federal funding
18 U.S.C. 844(n)	Conspiracy to commit those acts
26 U.S.C. 5861(d)	Possession of destructive devices

This criminal complaint is based on these facts:

See attached Affidavit.

☑ Continued on the attached sheet.

Issued by telephone pursuant to Rule 4.1 and 41(d)(3) of the Federal Rules of Criminal Procedure

Complainant's signature

David Oliver, SA ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/14/2020 @ 1445 HRS

Judge's signature

City and state: Little Rock, Arkansas

Joe J. Volpe, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, David Oliver, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco Firearms & Explosives ("ATF"), United States Department of Justice, and have been so employed since April of 1999. Prior to this, I was employed as a police detective at the Middletown, Rhode Island, Police Department for approximately ten years. I am a graduate of the Federal Law Enforcement Training Center, the ATF National Academy, and the National Fire Academy. I am certified through by ATF and the International Association of Arson Investigators (IAAI) as a Certified Fire Investigator (CFI). I am currently assigned to the National Response Team, Fire Investigation and Arson Enforcement Division at ATF.

2. As a result of my training and experience as an ATF Special Agent Certified Fire Investigator, I am familiar with federal crime laws and know it is a violation of Title 18, United States Code, Sections 844(n), (f) for any person to maliciously damage any building, vehicle, personal property or real property by means of fire or explosive in whole, or in part, or owned, possessed or leased by the United States of America, or any agency or department thereof, or any institution or organization receiving federal financial assistance. I am also aware that it is a violation of Title 18, United States Code, Section, 844(n), for any person to conspire to commit an offense listed in Title 18, United States Code, Section 844. It is also a violation of Title 26, United States Code, 5861(d) for any person to possess a firearm or destructive device which is

not registered to him/her in the National Firearms Registration and Transfer Record. For purposes of Title 26, a destructive device is defined as a firearm.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18, United States Code, Sections 844(n), and 844(f)(1) have been committed, specifically arson of a vehicle owned by the State of Arkansas, which is an institution receiving federal financial assistance; the vehicle is utilized by the Arkansas State Police (ASP). There is also probable cause to believe that a violation of Title 26, United States Code 5861(d), has been committed, that is a person possessed destructive devices, commonly known as Molotov cocktails.

5. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, Sections, 844(f), and (n), maliciously damaging property owned, possessed or leased by any institution or organization receiving federal financial assistance by means of fire or explosive and conspiracy to commit this act have been committed by MUJERA LUNGAHO, EMILY NOWLIN, RENEA GODDARD BRITTANY "Dawn" JEFFREY, and ALINE ESPINOSA-VILLEGAS. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband, or fruits of these crimes as further described in Attachment B.

PROBABLE CAUSE

6. On May 25, 2020, a subject died while in custody of the Minneapolis Police Department. Bystanders recorded the incident and the video was subsequently released to various media outlets. On May 26, 2020, demonstrators started to gather in Minneapolis and subsequently started protests. The protests gave rise to clashes with police and property damage in the vicinity of the Minneapolis Police Department's 3rd precinct. On May 27, 2020, demonstrations continued and inflamed into widespread civil unrest with mass looting and fires. Similar incidents of peaceful protesting, that escalated into incidents of civil unrest and violence have occurred across the United States, including central Arkansas. Throughout the United States, some of those individuals who were participating in the civil unrest have engaged in various acts of vandalism to include damage and destruction of property by breaking windows, defacing objects with paint, and destroying monuments. They have also engaged in other violent crimes to include arson, felony assaults, and attempted murder. Specifically, they have targeted law enforcement through the use of destructive devices. Molotov cocktails (a destructive device) have been thrown directly at police officers, police vehicles, and police stations. Additionally, they have targeted both state and federal courthouses, and other government owned facilities, to include probation and parole offices, and prosecutors' offices.

7. On or about July 10, 2020, damage was discovered to the Oakland Historic Cemetery, located at 2101 Barber Street, Little Rock, AR. This damage consisted of physical and mechanical damage, as well as defacing memorials with spray paint. Damage to the Unknown Confederate Soldier monument, alone, is estimated at thousands of dollars. According to Little Rock Police Department (LRPD) investigators, phrases left at the scene included, "MURDER, FUCK STATE," "BLM," "NO JUSTICE," "BY ANY MEANS NECESSARY," "POWER TO

THE PEOPLE," "FUCK TRUMP," "BLACK LIVES MATTER," "ICE," "NO HATE," "FUCK COTTON," "FUCK YOUR LEGACY," "NO JUSTICE, DEFUND PIGS, FUCK TOM COT," "BLM FEAR," and "ABOLISH POLICE."

8. Mr. John Raines, the sexton of the cemetery, reported that game cameras had been placed in the cemetery several weeks prior to the incident. Two cameras were located in the cemetery, and images were recovered from them. The captured images reflected that the incident occurred at approximately 1:40 AM on July 9, 2020.

9. On July 18, 2020, a protest was held at the Arkansas State Capitol. Video of protestors included a black male wearing a white t-shirt that read, "black thighs matter." Investigators recognized that the black male had a number of physical characteristics – a distinguishable facial scar, a unique pair of shoes, and placement of his hat upon his head to cover his hair (long dreadlocks) – in common with the male perpetrator of the cemetery vandalism. The black male, who LRPD investigators subsequently identified as MUJERA Benjamin LUNGAHO (black male, DOB: 6/5/1990), was determined by investigators to be one of the three individuals who committed the cemetery vandalism.

10. During the course of the continuing investigation, ATF interviewed three cooperating witnesses. The witnesses provided information expecting consideration from the government regarding their participation in the crimes listed in this affidavit. Cooperating Witness #3 (CW3) stated that VIRGINIA DAVIS and BRITTANY JEFFERY participated in the vandalism of the cemetery along with LUNGAHO.

11. On the evening of August 25, 2020, at approximately 11:00 PM, a large group of protestors held a demonstration at the LRPD 12th Street Substation, located at 3999 W. 12th Street, Little Rock, AR. Hours later, on the morning of August 26, 2020, LRPD officers at the

12th Street Substation were reporting for duty. Subsequent to daily shift briefing, PPO Robin Winston entered her marked unit, a 2018 Ford Explorer, Arkansas license plate 497XCY, owned by the City of Little Rock, which had been parked in a fenced area behind the substation. She noticed that the tire pressure monitor light was on inside her vehicle. She also observed two green glass bottles with fluid inside and containing a liquid that she reported smelled consistent with gasoline, which were located between her vehicle and another vehicle, a second LRPD marked unit, a 2018 Ford Explorer, Arkansas license plate 812XHA. She further noted that several vehicles on the parking lot had flat tires. It was subsequently determined that the one or more tires on four LRPD units had been punctured.

12. LRPD's evidence collection unit and the Little Rock Fire Department (LRFD) Fire Marshal's (FM) Office responded to investigate, document and preserve the evidence. It was determined that the two green glass bottles were Stella Artois branded beer bottles that contained suspected gasoline and what appeared to be white fabric consistent with bed linens. LRFD FM Captain John Hogue responded to the scene. He noted that the devices were consistent with improvised incendiary devices, commonly referred to as Molotov cocktails. A Molotov cocktail is typically made by using a container filled with an ignitable liquid and placing a wick in the opening of the container. The wick is ignited and the device is deployed against a surface, typically by throwing it against an object, with the intent that the container will suffer mechanical damage and break. If the Molotov cocktail functions as designed, the container will mechanically fail, spreading ignitable liquid, which will be ignited by the flaming wick/open flame. In this instance, the Molotov cocktails did not function as designed.

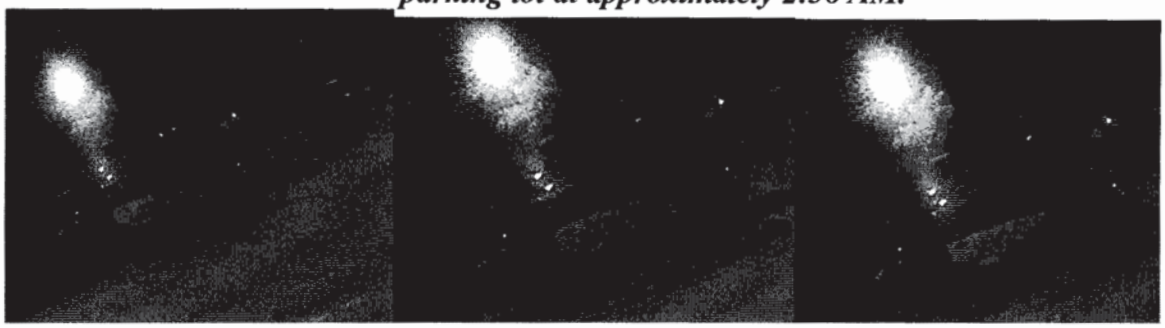
13. Samples of the liquid inside the devices were submitted to the Arkansas State Crime Laboratory (ASCL) for ignitable liquid testing. On August 28, 2020, ASCL reported that

the evidence taken from each bottle (fabric and liquid sample) tested positive for a residue of gasoline.

Photos of the two suspected improvised incendiary devices recovered from LRPD's 12th Street Substation.

14. Subsequently, officers reviewed video surveillance footage covering the 12th Street Substation. It was noted that, following a gathering of protestors disbursing from the August 25, 2020, protest at the substation, video surveillance reflects that, on August 26, 2020, between approximately 2:32 and 2:33 AM, at least two persons are observed to be moving about near the south side of the parking lot. At approximately 2:36 AM, a flaming object can be observed being launched into the parking lot area. Cooperating Witness #1 (CW1), Cooperating Witness #2 (CW2), and CW3 all provided information regarding the Molotov cocktails thrown into the 12th Street parking lot on August 26, 2020. All three witnesses stated six individuals were riding in the same vehicle, belonging to BIANCA JACKSON. JACKSON was driving with BRITTANY JEFFERY in the front passenger seat. VIRGINIA DAVIS, EMILY TERRY, LUNGAHO, and one other were in the back seat. All three cooperating witnesses were present at the 12th Street Substation when the Molotov cocktails were thrown. Each stated that the Molotov cocktails were assembled at BRITTANY JEFFERY's residence. According to the witnesses, LUNGAHO threw the lit Molotov cocktail, and EMILY TERRY threw the unlit Molotov cocktail.

Left to right: flaming object being launched into LRPD 12th Street Substation parking lot at approximately 2:36 AM.



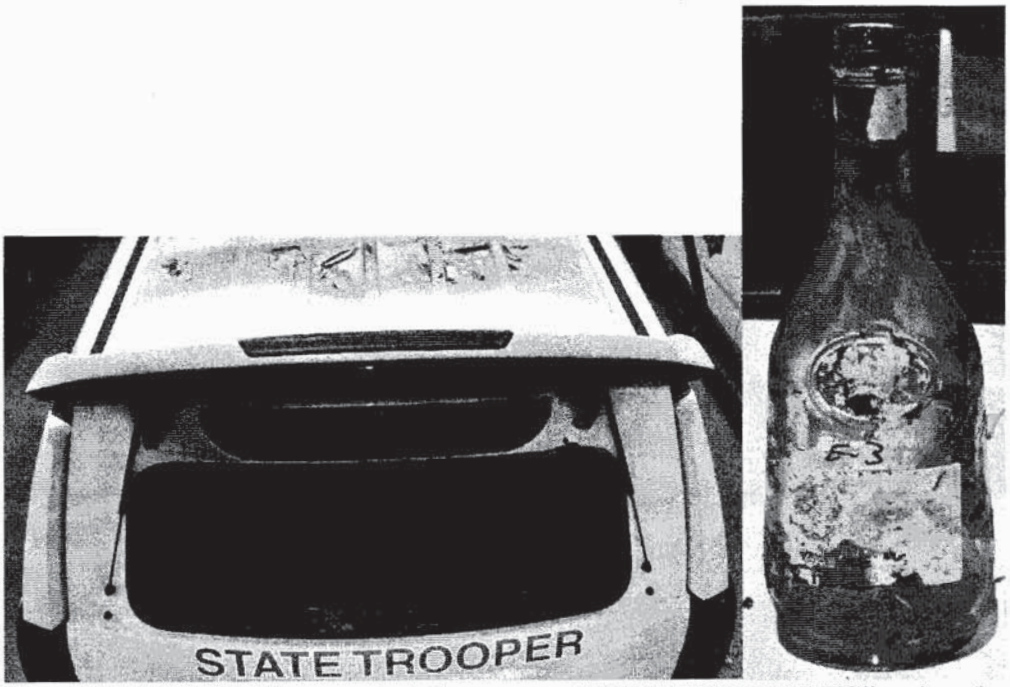
15. The Arkansas State Police (ASP) receives several sources of federal financial assistance to include grants from the Department of Justice, Department of Transportation, and the Department of Homeland Security. ASP receives these grants on an annual basis and received the grants in 2018, 2019, and 2020.

16. On or about August 28, 2020, an Arkansas State Police (ASP) marked unit, described as a 2020 Chevrolet Tahoe 2WD vehicle, VIN 1GNLCDEC6LR160213, owned by the State of Arkansas, was vandalized and burned while stored in a fenced parking lot located at ASP Headquarters, located at One State Police Plaza Drive, Little Rock, Arkansas. The fire was discovered after employees of a neighboring business observed that the chain link fence of the parking lot had been cut. Upon further investigation, it was determined that one unit had been set on fire, one had been vandalized with spray paint, and several others had one or more punctured tires.

17. ASP Fire Marshal's Office conducted a fire scene examination of the fire-affected vehicle. ASP Corporal Arthur Raff authored an origin and cause report related to this fire. The fire-affected vehicle was white in color and had ASP markings placed on the vehicle to be issued to the Highway Patrol Division. The rear window had been broken in. On the vehicle's exterior,

fire patterns on the roof were observed to be greater over the cargo area than the rest of the vehicle.

18. In the rear cargo area, a piece of nylon cloth with some type of design was located. This type cloth is not associated with the manufacturing of a vehicle. The cloth was located approximately one foot from the rear of the vehicle and off center to the right. Around this piece of cloth, the floor of the cargo area was burned more heavily than the rest of the floor. Under the cloth, investigators located pieces of glass from the rear window, which indicates the window was broken from the outside before the piece of cloth was placed in the cargo area. The piece of cloth was the wick used in the Molotov cocktail. In the top right corner of the cargo area, near the right rear passenger seat a glass bottle was located. The glass bottle was labeled in part "Brandy" and had approximately one inch of an amber colored liquid in the bottom. This liquid had a color and odor consistent with gasoline. Investigators subsequently identified the bottle as an E&J branded bottle of apple-flavored brandy.



From left to right: Spray painted message, "STOP KILLING US" painted on ASP unit parked near the fire-affected unit; fire-affected ASP marked unit; suspected improvised incendiary device container recovered from fire scene within ASP marked unit.

19. Evidence gathered at the scene, along with a video, show three people enter the vehicle storage area by cutting away the chain link fence. Once in the area, they punctured numerous tires on different vehicles and spray painted graffiti on one vehicle, using a stencil that stated "STOP KILLING US." They then deploy a suspected Molotov cocktail-type improvised incendiary device to ignite the vehicle that burned.

20. A review of the video shows that, at approximately 4:46 AM, three people entered the vehicle storage area wearing dark clothing and appeared to be wearing backpacks. They can be seen bending down in various places, consistent with puncturing vehicle tires and spray-painting the side of the vehicle. At 4:48 AM, an individual appears to be using a phone to capture images of the spray painted vandalism to the nearby unit. At 4:49 AM, they appear to be breaching the back lift gate. They then back up to the fence line and light an object. They appear to attempt to throw the lighted object into the vehicle, and it appears the burning portion fell out.

They appear to pick up the burning object and throw it into the vehicle, at which time a fuel/air explosion appears to occur, significant enough to white out the camera. The vehicle catches on fire and the subjects flee. The fire self-extinguished prior to discovery.

21. CW3 provided information about the incident at ASP on August 28, 2020. CW3 stated the parties involved were VIRGINIA DAVIS, LUNGAHO, RENEA GODDARD, EMILY NOWLIN, and ALINE ESPINOSA-VILLEGAS. VIRGINIA DAVIS drove the parties to ASP and parked a few streets away. LUNGAHO, GODDARD, ESPINOSA-VILLEGAS, and NOWLIN were gone for a short amount of time and then returned to DAVIS's vehicle. CW3 stated CW3 believed they were going to tag[1] the parking lot at ASP. CW3 stated LUNGAHO later sent a video of the burning ASP patrol vehicle through the Signal application. Signal is known to investigators to be a third-party encrypted voice and data communication application, which includes messaging. When using Signal, parties are not identifiable as voice calls in typical cell phone carrier toll records. CW1 and CW2 also viewed this video in Signal but could not recall who sent it.

22. Based upon this information, ATF obtained federal search warrants for historical cell site information. DAVIS, GODDARD, NOWLIN, and ESPINOSA-VILLEGAS use AT&T as their service provider. AT&T historical cell site information confirms that DAVIS's, GODDARD's, NOWLIN's, AND ESPINOSA-VILLEGAS's cell phones were in the area of LUNGAHO's residence in North Little Rock at approximately 3:00 AM. All four cellphones began traveling southwest at approximately 4:15 AM. DAVIS's, GODDARD's, NOWLIN's, and

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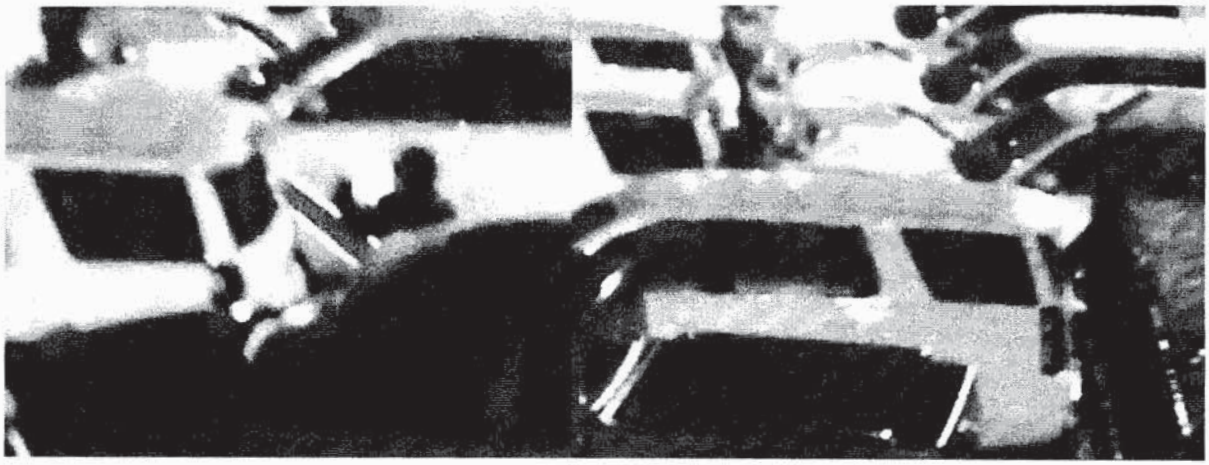
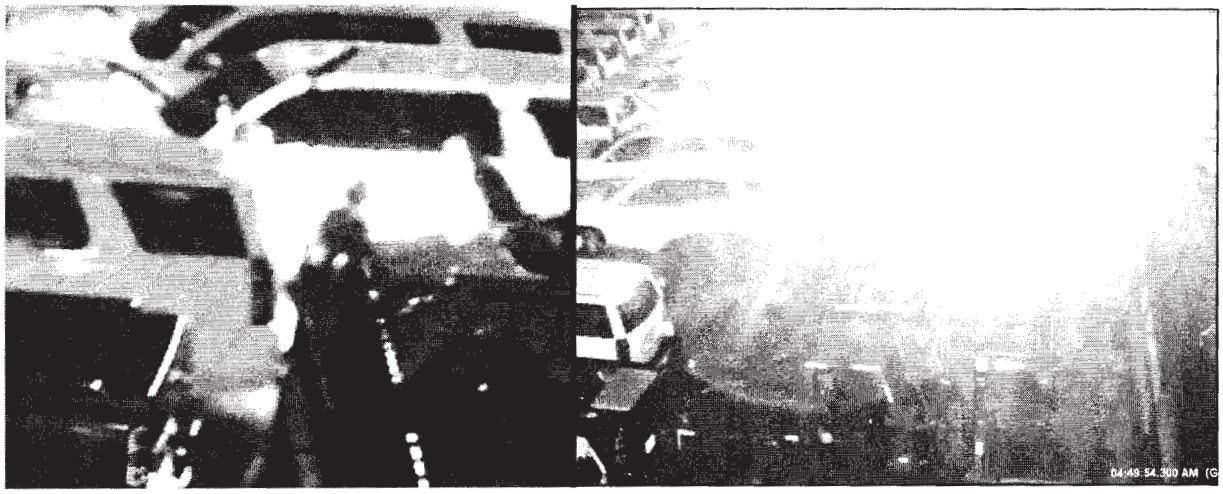
[1] Tagging is defacing/vandalizing property with spray-painted graffiti messages.

ESPINOSA-VILLEGAS's cell phones were in the area[2] ASP Headquarters on August 28, 2020, between the hours of 4:30 AM and 5:15 AM. CW3 provided information that to his/her knowledge the coconspirators were in possession of their cell phones while committing the crimes. Furthermore, an analysis of the video from ASP Headquarters appears to show one of the individuals using a cellular telephone to video the incident.

23. During the execution of the search warrant on LUNGAHO's cell phone, investigators identified multiple named "group chats" within LUNGAHO's Signal application. One of the groups was named "The Unit." Through open source records and LRPD's report management system, investigators were able to identify the members of "The Unit" chat as VIRGINIA DAVIS EMILY NOWLIN, ALINE ESPINOSA-VILLEGAS, and RENEA GODDARD. "The Unit" group chat includes each person that CW3 stated participated in the ASP incident.



[2] Aline ESPINOSA-VILLGAS lives at 9424 Southboro Little Rock, Arkansas. According to Google Earth Pro, 9424 Southboro Little Rock, Arkansas, is approximately 1430 meters away from the ASP lot where the fire occurred. The data provided by AT&T states that the location accuracy "is better than 1500 meters" on the cell phone pings that occurred around the time of the fire.



24. Based on the systematic fire scene examination, electronic data, analysis of fire and heat patterns, and the application of fire dynamics, it was the unanimous opinion of investigators that the fire originated within the interior of the ASP marked unit in the cargo area behind the passenger compartment. The fire was initiated by a Molotov cocktail-type improvised incendiary device being deployed against available combustibles in this area.

25. Evidence was collected, including a sample of the amber-colored liquid (suspected gasoline) from the recovered brandy bottle, which was transmitted to the ATF Forensic Science Lab in Atlanta, GA, for forensic testing/analysis. Preliminary results are that the sample of liquid tested positive for the presence of gasoline.

26. According to CW1 and CW3, in the late hours of September 1, to the early morning hours of September 2, LUNGAHO, EMILY NOWLIN, EMILY TERRY, and

VIRGINIA DAVIS went to a police recruiting billboard in Little Rock to tag it. DAVIS and LUNGAHO climbed the ladder to the billboard and spray painted "STOP KILLING US!" The stencil used to spray paint the billboard is the same stencil used on the ASP patrol car on August 28, 2020. CW1 stated LUNGAHO had the stencil, and it had red paint on it.

27. On September 3, 2020, multiple law enforcement properties and vehicles in both Little Rock and North Little Rock were discovered as having been tagged. These incidents were reported/discovered between approximately 3AM and 3:30 AM. The targeted City of Little Rock properties targeted were all located in close proximity in the downtown area. These targets included LRPD Headquarters at 700 W. Markham Street; Little Rock District Court at 600 W. Markham Street; and the Pulaski County Prosecutor's Office, located at 224 S. Spring Street.

28. At approximately 3:00 AM, an LRPD headquarters desk officer located graffiti outside the building. The graffiti consisted of messages that had been tagged at LRPD headquarters, the Fallen Officer Memorial located on the same grounds, a mobile communications vehicle, and a prisoner transport van, all located at 700 W. Markham, reading: "DEFUND THE POLICE," "DEFUND POLICE," "BREONNA TAYLOR," and "ARREST KILLER COPS."

29. During an area canvased by LRPD officers, similar messages were found tagged at the Little Rock District Court Building at 600 W. Markham: "CHARGE KILLER COPS," "DANIEL PRUDE SAY HIS NAME," "DEFUND THE POLICE." Likewise, additional tagging was located at the Pulaski County Prosecutor's Office at 224 S. Spring Street reading: "PIG LOVERS," "ABOLISH THE SYSTEM," "ARREST KILLER COPS," "DEFUND THE POLICE," and "JUSTICE BRADLEY BLACKSHIRE JR." Investigators noted that the colors of spray-paint used at the various scenes included red, hot pink, and orange.

30. The City of North Little Rock participates in the United States Department of Justice, Bureau of Justice Assistance, Edward Byrne Memorial Justice Assistance Grant (JAG) Program. As a JAG award recipient, over the past three fiscal years, the City of North Little Rock received Award letters from the JAG Program in the following fiscal years and amounts: 2017 ($41,314), 2018 ($41,340), and 2019 ($41,021). The US Department of Justice's Bureau of Justice Assistance reports that the JAG Program is the leading federal source of criminal justice funding to state and local jurisdictions, providing critical funding necessary to support a range of program areas including: law enforcement; prosecution and court; prevention and education; corrections and community corrections; drug treatment and enforcement; planning, evaluation, and technology improvement; and crime victim and witness initiatives, and mental health programs and related law enforcement and corrections programs, including behavioral programs and crisis intervention teams.

31. Furthermore, the City of North Little Rock received funding in 2020 from the FY 2020 Coronavirus Emergency Supplemental Funding Program. Specifically, the City of North Little Rock received $132,168.

32. In the City of North Little Rock, at approximately 3:20 AM on September 3, 2020, a NLRPD marked unit was found to be on fire and vandalized. NLRPD Officers Brown and Gray were on routine patrol when they observed and reported a fire burning in the rear of the NLRPD Rose City Substation, located at 4609 E. Broadway Street, North Little Rock, AR.

North Little Rock Fire Department (NLRFD) was dispatched, responded to, and extinguished the fire. Upon further investigation, they discovered that NLRPD marked Unit 1801, owned by the City of North Little Rock, was on fire. Officers further noted that additional units in the parking lot had punctured tires. Unit 1717, Unit 11-265 and Unit 10-71 all had one or more punctured tires. Officers located a suspected gasoline-soaked rag in the parking lot near Unit 1801, as well as several discarded rubber gloves in that area, and another pair of rubber gloves in the field north of the Substation.

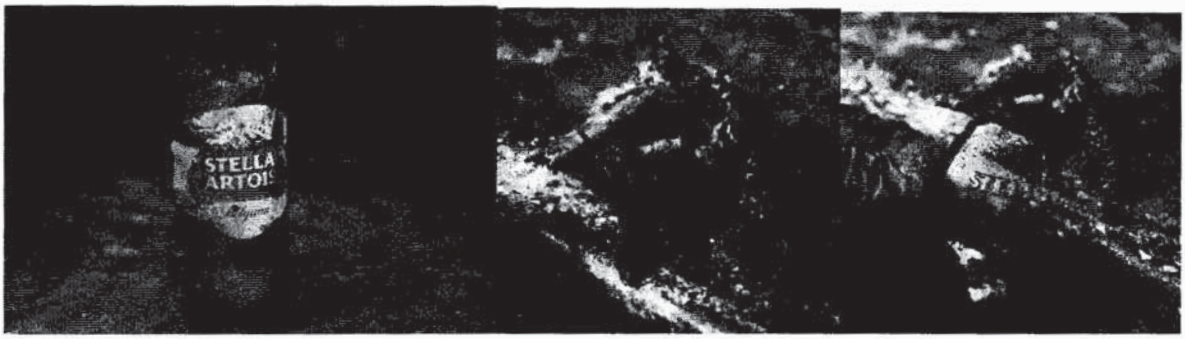
33. Subsequent to the fire and prior to fire scene examination, Unit 1801 was towed to the NLRPD city lot at 1216 Sycamore, North Little Rock, where it was examined by NLRPD, NLRFD, ASP, and ATF. Investigators also examined the original fire scene in the parking lot of the NLRPD Rose City Substation at 4609 E. Broadway Street, North Little Rock, AR. The vehicle is described as a 2018 Ford Explorer, Arkansas license place 807XLE, vehicle identification number (VIN) 1FM5K8ARXJGA44281.

34. NLRFD Engine 2 was dispatched at approximately 3:22 AM and arrived on scene at 3:27 AM. NLRFD Captain Ben Evans reported that, upon arrival, the vehicle was

approximately 20% involved in fire. He reported the fire being in the rear of the vehicle. He reported the vehicle suffered exterior damage in the rear and extensive damage to the interior. He further noted that the vehicle had been vandalized and the chain-link fence had been cut.

35. At the time of the fire, the vehicle had been parked in the rear (northwest) parking lot of the Rose City Substation, surrounded on three sides by chain link fence. The fence had been cut in close proximity to the left (driver's side) rear cargo area of the vehicle, which had been backed in to the parking space. There was thermal damage to the plastic privacy strips interwoven into the chain link fence. On the backseat driver's side door, the message, "DEFUND POLICE" was spray painted in red paint. There was extensive thermal damage to the rear portion of the roof and rear exterior of the cargo compartment, as well as the rear passenger side quarter panel.

36. Within the interior of the cargo area, investigators located the remains of two green glass Stella Artois branded beer bottles. One bottle was missing the neck portion; the other bottle was mostly shattered. Each of the Stella Artois bottles/remnants were collected and transmitted to the ATF Forensic Science Lab in Atlanta, GA, for forensic testing/analysis. Preliminary results are that gasoline was present in each of the exhibits.



37. Based on the systematic fire scene examination, electronic data, analysis of fire and heat patterns, and the application of fire dynamics, it was the opinion of investigators that the fire originated within the interior of Unit 1801 in the cargo area behind the passenger compartment. The fire was initiated by a Molotov cocktail-type improvised incendiary device being deployed against available combustibles in this area.

38. On that same date, LRPD officers located LUNGAHO at 400 Mills Street, where he is known to reside with his mother. Officers had an arrest warrant for LUNGAHO for first degree criminal mischief related to the July 9, 2020, vandalism at Oakland Historic Cemetery, and went to that address in an attempt to execute the arrest warrant. Upon arrival, officers observed LUNGAHO standing in the carport area of the residence as they approached. When LUNGAHO observed officers approaching, he fled on foot. During his flight from officers, he was observed to have his cell phone in his hand and appeared to be deleting data. LUNGAHO was observed to throw his phone as he fled. Officers apprehended LUNGAHO after a short foot pursuit and placed him in custody. They also recovered the cell phone he tossed during flight. Officers noted that the clothing LUNGAHO was wearing at the time of arrest appeared to have reddish or orange paint spatter and/or smears on his shirt and shoes. LRPD investigators noted that the shoes LUNGAHO was wearing at the time of arrest were consistent with those they observed and documented him wearing on multiple occasions during protests.

39. LRPD Detective Brandon Smith obtained a search warrant for LUNGAHO's recovered cell phone. During the course of searching LUNGAHO's phone, an image of the rear cargo compartment of NLRPD Unit 1801, with the back glass broken out and fire present within the cargo compartment, was located. The image was taken from the perspective of the driver's side rear end of NLRPD Unit 1801 during the incipient stage of fire development. The image date of September 3, 2020, with a time stamp of 3:10:57 AM, indicates that the photo was taken approximately ten minutes prior to NLRPD officers discovering the fire.

At left, image recovered from LUNGAHO's phone dated September 3, 2020, at 3:10:57 AM of fire involving NLRPD Unit 1801 at the incipient stage, prior to discovery by NLRPD officers; at right, ATF post-fire comparison photograph of rear cargo exterior of NLRPD Unit 1801.

40. Further analysis of the cell phone and image recovered on the phone, by Corporal Corwin Battle of the Arkansas State Police, revealed that the image recovered on the phone was a screen shot. The screen shot was made using LUNGAHO's phone. CPL Battle examined the other apps on the phone and determined that the image was not transmitted to the LUNGAHO's phone.

41. During examination of LUNGAHO's phone, LRPD investigators also located a number of text message conversations, both before and after the fire, between LUNGAHO's phone and other involved persons within the Instagram and Signal messaging applications on his phone. Instagram is known to investigators to be a social media and data communication application, which includes messaging. On the specific messages that follow, the content of each text message is underlined.

42. The first messaging conversation takes place in the Instagram Direct Messages application between LUNGAHO under the display name "gensutheblerdphilosopher" and VIRGINIA DAVIS [SUBJECT PHONE: 501-425-2453] This conversation was initiated by LUNGAHO on September 1, 2020, at 7:38:34 PM and continues through 9/2/2020 at 9:46:32 PM:

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/1/2020 7:38:34 PM
Not sure what the move is in the chat but can you keep me posted. I'm doing some recon on spots to hit tonight. if you don't mind, can you let the group know so if a body wants to join they are welcome.

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:05:14 AM
hey if you bsee this can you check on E [EMILY TERRY]. i just saw a message saying her broke down

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:37:22 PM
You guys touch base today? I'm getting my phone situated now.

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:37:22 PM
I'm down for action if there some folks available

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:46:32 PM
Can you do me a favor and send me a message in both chats so I can have them in my new signal feed?

Based on the content of the conversation, there is a chat group of involved persons involving communications that LUNGAHO wants to be kept apprised of. He also stated he is doing

"recon" (reconnaissance) on some "spots to hit tonight" (potential target locations) and he is "down for action" (willing to commit acts of vandalism) if there are "folks available" (other involved persons). He asks that DAVIS "let the group know" so that she can recruit other persons to assist him. He also makes reference to "both chats" and his "new signal feed" indicating there are multiple group chats in various applications being utilized by the involved persons.

41. The second messaging conversation takes place in the Instagram Direct Messages application between LUNGAHO under the display name "gensutheblerdphilosopher" and EMILY TERRY This text conversation was initiated by LUNGAHO on September 2, 2020 at 8:32:14 PM:

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 8:32:14 PM
Can you do me a favor and send a message to those that were in the car with us about the op tonight, asking if anyone is available?

EMILY TERRY ↙ 9/2/2020 8:32:36 PM
Will do.

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 8:32:56 PM
Situating my phone now ♂

EMILY TERRY ↙ 9/2/2020 8:33:52 PM
Really.

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 8:59:51 PM
yep

Gensutheblerdphilosopher [LUNAHGO] ↗ 9/2/2020 9:00:11 PM
ill be glad when its done

EMILY TERRY ↙9/2/2020 9:02:48 PM
My car is fucked or I would be going

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:37:38 PM
Can you send me a message on signal

Gensutheblerdphilosopher [LUNGAHO]↗ 9/2/2020 9:38:27 PM
Also can you tell sky [VIRGINIA DAVIS] to send a message to me in both chats

Gensutheblerdphilosopher [LUNGAHO] ↗ 9/2/2020 9:38:43 PM
I should be able to recieve them now and respond

Based on the content of the conversation, LUNGAHO is asking EMILY TERRY to communicate with a group of people who were "in the car with us about the op tonight" to determine if anyone is available to assist in the "op." This appears to reflect that LUNGAHO is organizing a group of persons to participate with him in an "operation" involving acts of vandalism overnight on September 2-3, 2020, the date when multiple government buildings were vandalized and the NLRPD Unit 1801 was set afire. He also makes reference to wanting EMILY TERRY to contact him via the Signal app and tell DAVIS to do the same.

42. The third messaging conversation takes place in the Signal Messages – IOS application between LUNGAHO under local user name "Streets" and REASIA McKISSICK. This text conversation was initiated by REASIA McKISSICK on September 2, 2020, at 11:35:33 PM:

Reasia McKissick ↙ 9/2/2020 11:35:33 PM
Yooo what's the addy

Streets [LUNGAHO] ↗ 9/2/2020 11:35:51 PM
400 Mills St

Reasia McKissick ↙ 9/2/2020 11:57:20 PM
Outside

Streets [LUNGAHO] ↗ 9/3/2020 3:33:04 AM
You straight?

Based on the content of this conversation, the REASIA McKISSICK is an involved person who is asking LUNGAHO for his address. LUNGAHO provides the user with his home address, and approximately 22 minutes later, the person arrives and reports being outside the residence. The final message that LUNGAHO sends reading, "You straight?" at 3:33:04 AM indicates that the two of them are not in each other's company any longer at 3:33 AM, and LUNGAHO is making

sure that the other person has not gotten injured and/or apprehended by law enforcement. This timing is significant in that NLRPD officers discovered the fire to Unit 1801 approximately 13 minutes prior to this text message.

43. The fourth messaging conversation takes place in the Signal Messages – IOS application between LUNGAHO under local user name "Streets" and EMILY TERRY. This text conversation was initiated by LUNGAHO on September 3, 2020 at 3:14:00 AM (approximately 3 minutes after the photograph of NLRPD Unit 1801 on fire was screen captured on LUNGAHO's phone):

Streets [LUNGAHO] ↗ 9/3/2020 3:14:00 AM
<u>You up?</u>

EMILY TERRY ↙ 9/3/2020 7:34:22 AM
<u>I'm up now</u>

Streets [LUNGAHO] ↗ 9/3/2020 8:27:49 AM
<u>Morning</u>

EMILY TERRY ↙ 9/3/2020 8:28:01 AM
<u>Morning dear</u>

Streets [LUNGAHO] ↗ 9/3/2020 8:32:15 AM

EMILY TERRY ↙ 9/3/2020 8:32:47 AM
Oh shit

EMILY TERRY ↙ 9/3/2020 8:33:35 AM
What did you guys do

Streets [LUNGAHO] ↗ 9/3/2020 8:35:49 AM
Tagged the shit out of police involved buildings

Streets [LUNGAHO] ↗ 9/3/2020 8:36:02 AM
All except one downtown

Streets [LUNGAHO] ↗ 9/3/2020 8:36:16 AM
And that one by my house ☺

EMILY TERRY ↙ 9/3/2020 8:36:30 AM
Someone burnt up a nlr police car.

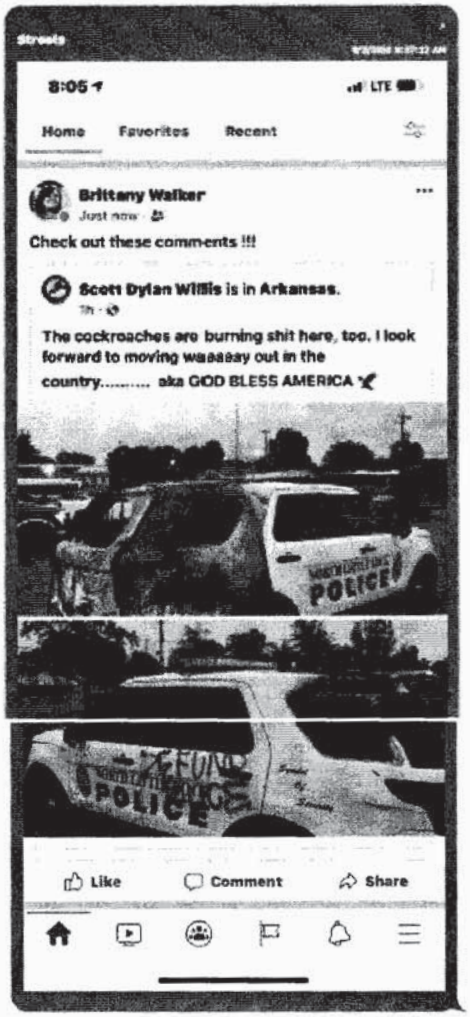
EMILY TERRY ↙ 9/3/2020 8:36:36 AM
Crazy right lol

Streets [LUNGAHO] ↗ 9/3/2020 8:36:39 AM
Indeed

Streets [LUNGAHO] ↗ 9/3/2020 8:36:47 AM
Super cray cray

EMILY TERRY ↙ 9/3/2020 8:37:08 AM
I was asleep everything went boom

Streets [LUNGAHO] ↗ 9/3/2020 8:37:12 AM



EMILY TERRY ↙ 9/3/2020 8:46:04 AM
<u>Yeah I saw that wild</u>

Streets [LUNGAHO] ↗ 9/3/2020 8:51:33 AM
<u>Indeed</u>

Based on the content of the conversation, LUNGAHO first attempts to contact EMILY TERRY just after NLRPD Unit 1801 is set on fire. After he determines the recipient is awake when she responds approximately four hours later, he initiates a conversation with her by providing screen captured images from his phone from social media, documenting that law enforcement has discovered the various tagging of law enforcement targets from the early morning hours of September 3, 2020. EMILY TERRY believes that "you guys" (a group of persons) were responsible prior to LUNGAHO's admission that they "tagged the shit out of police involved buildings" "and that one by my house ☺."

44. LUNGAHO's residence at 400 Mills Street is less than one mile from the scene of the fire to NLRPD Unit 1801, parked at the NLRPD Rose City Substation at 4609 E. Broadway Street. Based on the content of the conversation, LUNGAHO admitted tagging "police involved buildings" and "that one by my house." On September 11, 2020, NLRPD Detective/ATF Task Force Officer Michael Gibbons confirmed that, aside from vandalized Unit 1801, NLRPD had

received no other reports of and made no reported discoveries of tagged or otherwise vandalized "police involved buildings" in the Rose City area of North Little Rock, or elsewhere within the city.

CONCLUSION

42. Based on the foregoing, there is a group of individuals, including Mujera LUNGAHO, Brittany JEFFREY, Emily NOWLIN, Aline ESPINOSA-VILLEGAS, and Renea GODDARD who have conspired together, aided and abetted one another, and committed multiple acts of vandalism and property damage in the Eastern District of Arkansas in Pulaski County since approximatley June 2020. These events have routinely involved multiple persons and occur in the early morning hours under cover of darkness. Activities began with acts of civil disobedience, but escalated into damaging personal and government property, puncturing law enforcement vehicle tires, and committing violent acts involving arson against law enforcement vehicles, thus hindering governmental operations. These individuals are using encrypted applications to communicate with one another in an attempt to thwart law enforcement detection of group criminal activities.

43. The facts above show that there is probable cause to believe that Mujera LUNGAHO, Emily NOWLIN, Aline ESPINOSA-VILLEGAS, and Renea GODDARD maliciously damaged and destroyed; attempted to damage and destroy; conspired with other person(s) and aided and abetted in the damage and destruction of a vehicle by means of fire, which vehicle was owned by the Arkansas State Police, an organization receiving federal financial assistance. Therefore, I submit this affidavit in support of a criminal complaint charging Emily NOWLIN, Aline ESPINOSA-VILLEGAS, and Renea GODDARD with violations of 18 U.S.C. §§ and 844(f)(1), and (n).

The facts above show that there is probable cause to believe that Mujera LUNGAHO and Brittany JEFFREY; conspired with other person(s) and possessed a firearm (destructive device more commonly known as a Molfotov cocktail).Industry Operations Investigative Analysis Sandra Dillon queried the National Firearms Registration and Transfer (NFRTR) and determined that Brittany JEFFREY does not have anything, including a destructive device, registered to her. I therefore submit this affidavit in support of a criminal complaint charging Brittany JEFFREY with violations of 26 U.S.C. § 5861(d).

44. The information above is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Issued by telephone pursuant to Rule 4.1and 41(d)(3)
of the Federal Rules of Criminal Procedure
e 1445 ec

DAVID OLIVER
Special Agent
ATF

Subscribed and sworn to before me on 12/14, 2020

JOE J. VOLPE
UNITED STATES MAGISTRATE JUDGE