

FILED

14 JUL 01 PM 3:04

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 14-1-03028-9 SEA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,

Plaintiff,

v.

ALI MUHAMMAD BROWN,

Defendant.

No. 14-1-03028-9 SEA

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 and Aggravated Murder In The First Degree**, 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).

INFORMATION - 1

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

Count 2: Aggravated Murder In The First Degree

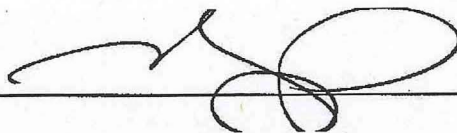
That the defendant ALI MUHAMMAD BROWN in King County, Washington, on or about June 1, 2014, with premeditated intent to cause the death of another person, did cause the death of Dwone Anderson-Young, a human being, who died on or about June 1, 2014; that further aggravating circumstances exist, to wit: 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).

DANIEL T. SATTERBERG
Prosecuting Attorney

By:

A handwritten signature in black ink, appearing to be 'Wyman Yip', written over a horizontal line.

Wyman Yip, WSBA #28251
Senior Deputy Prosecuting Attorney

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

3
4 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR
5 CONDITIONS OF RELEASE

6 The State incorporates by reference the Certification for Determination of Probable
7 Cause prepared by Detective Cloyd A Steiger of the Seattle Police Department for case number
8 14-172165.

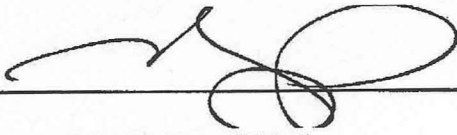
9 The State requests that bail be denied in this matter pursuant to the Washington
10 Constitution, Art. I, Section 20¹ and CrR 2.2(b)(2)(ii). The defendant is charged with two counts
11 of Aggravated Murder in the First Degree, and he has displayed a propensity for violence that
12 creates a substantial likelihood of danger to the community.

13 The defendant essentially executed two people -- one was shot at close range in the back
14 of the head and the other was shot at close range in the face and in the back. There was no
15 evidence that any struggle preceded these murders, no evidence that the victims were armed, and
16 no evidence that these murders were motivated by robbery, drugs, or any other crime. Given
17 these extremely violent, senseless, and seemingly unprovoked killings committed by the
18 defendant, there is clear and convincing evidence of his propensity for violence creating a
19 substantial likelihood of danger to the community, justifying no bail in this matter.

20 The State also requests that the court prohibit the defendant from contacting any
21 members of the families of Ahmed Said and Dwone Anderson-Young.

22
23 ¹ "Bail may be denied for offenses punishable by the possibility of life in prison upon a showing by clear and
24 convincing evidence of a propensity for violence that creates a substantial likelihood of danger to the community or
any persons."

1
2 Signed and dated by me this 1st day of July, 2014.
3
4

A handwritten signature in black ink, consisting of a series of loops and a horizontal line, positioned above a solid horizontal line.

6 Wyman Yip, WSBA #28251
7 Senior Deputy Prosecuting Attorney
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24 Prosecuting Attorney Case
Summary and Request for Bail
and/or Conditions of Release - 2

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

CAUSE NO. _____



SEATTLE
POLICE
DEPARTMENT

**CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE**

GENERAL OFFENSE #
14-172165
UNIT FILE NUMBER
H14-150

That Cloyd Steiger is a Detective with the Seattle Police Department and has reviewed the investigation conducted in Seattle Police Department Case Number 14-172165;

There is probable cause to believe that Ali Muhammad Brown committed the crime(s) of Murder (2 Counts) within the City of Seattle, County of King, State of Washington.

This belief is predicated on the following facts and circumstances:

At 2:21am on June 1, 2014, Seattle Police 911 received multiple calls of gunshots in the area of 29th Ave S and S. King St. in Seattle. Seattle Police Officers arrived at the scene and located two males lying on 29th Ave S, with multiple gunshot wounds, Seattle Fire responded and pronounced both dead at the scene. The victims were later identified as Ahmed Said and Dwone Anderson-Young. Several spent 9mm shell casings were found near the bodies of Said and Anderson-Young.

Detective Jason Kasner and I were assigned this case as the primary investigators.

Detective Kasner spoke with a neighbor who resides near the crime scene. She said that she was asleep and was awakened by the sound of several gunshots. She said she thought that these gunshots were very close to her house. She looked outside and saw an unknown person standing near 29th Ave S and S. King St. This person reached down, picked an item off the ground, and threw it west into the vacant lot. The unknown subject then got into the driver's side of what appeared to be a silver colored 4-door vehicle, and drove from the scene south on 29th Ave S. The neighbor went to the location where she saw the unknown person standing and located the two victims.

The King County Medical Examiner's Office conducted an autopsy on both Said and Anderson-Young. They determined that the cause of death of each was multiple gunshot wounds, and the manner of death in both cases was ruled homicide.

Detectives recovered cellular phones from both victims and both were forensically examined. Dwone Anderson-Young made one phone call on the evening prior to his murder. Detective Steiger called that number and found it belonged to a friend of Anderson-Young, J.R..

J.R. said that Anderson-Young had called him on the evening before the murder and asked J.R. to meet him at R Place, which is a nightclub at Boylston and E. Pine St. on Capitol Hill.

J.R. said that when he went there, he met up with Anderson-Young, Ahmed Said, (whom he said he knows, but is not close to), and another friend, P.P..

J.R. said that Said told them he was meeting a "friend" outside the club when they left. J.R. had the feeling that Said had never met this "friend" before.

At closing time, they all left the bar. They crossed Boylston Ave and met up with Said's friend. J.R. said that he had a bad feeling about this friend. He said that the man, (who was a black male



**CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE**

INCIDENT NUMBER
14-172165
UNIT FILE NUMBER
H14-150

in his late twenties or early thirties, 5'9" to 6' tall wearing a backpack) seemed out of place among them.

Said had his car parked nearby, and offered to give J.R. a ride home. J.R. said he was "creeped out" by this friend of Said's and declined the ride.

P.P. is also a friend of Dwone Anderson-Young and Ahmed Said. He told me that he had made arrangements with Anderson-Young to meet at R Place. He got there early and ran into Ahmed Said. He said that Said was on his cell phone constantly and appeared to be texting. P.P. said that he thought Said was on an app like Grindr or Jack'd. (These are phone apps on which gay men meet up with other gay men.)

P.P. said that Said continually talked about meeting someone outside the club later. P.P. had the impression that this was not someone Said knew previously.

Anderson-Young and J.R. eventually showed up.

At closing, they all left the nightclub. They went across Boylston to the side of the grocery store that is at that intersection and met up with the friend.

P.P. said that he was going to say hello to this person, but the guy didn't look particularly friendly, so he decided not to.

Said offered to drive him home as well also, but he lives in the opposite direction as the others, so he declined.

P.P. told me that he was certain he would recognize this person were he to see him again.

I drove P.P. to the area of Boylston and E. Pine St. P.P. showed me where everyone was standing, the direction they walked, and also where Said's car was parked, which was in a gravel lot a half block north of the intersection. I noted several apparent surveillance cameras in the area.

We sent detectives from the Technical Electronic Support Unit, (TESU) to the area in an attempt to collect video from various cameras.

They collected video footage from the camera we had spotted on the route to Said's car, which belongs to Office Nomads (1617 Boylston Ave). This video showed three males. Two were identified by clothing as Said and Anderson-Young. The third subject matches the description of the friend provided by P.P.; he was wearing a backpack. They can be seen on the video with a time stamp of 1:04 AM. We were told by TESU detectives that the time on that camera is one hour slow, so the actual time was 2:04 AM, (which is seventeen minutes before the first call came in to 911).

Detective Kasner called H.M., a relative of Said. Kasner asked if Said had a car. H.M. said that he did and that it had not been accounted for. H.M. described the vehicle as a gold Mitsubishi Gallant 4-dr. Using police databases, we were able to identify a vehicle registered to Said. It was

**CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE**

INCIDENT NUMBER	14-172165
UNIT FILE NUMBER	H14-150

a 2001 Mitsubishi Gallant 4dr, Washington license number AJU-2073. We sent out a bulletin to all Seattle Police units, requesting that they attempt to locate the vehicle.

Shortly after the bulletin was distributed, Seattle Police units located the car in the south end of the city.

The vehicle was impounded to the Seattle Police Processing Room. A search warrant was obtained, and the vehicle was processed by CSI detectives. An exorbitant amount of blood and biological material (suspected brain matter) was found in the front passenger area of the car.

On June 4, 2014, we were advised by Seattle Police Latent Print Examiner Amanda Post that she located and lifted a palm print from the interior rear driver's side door window of Said's car. She entered this print into AFIS and matched the print to the defendant, Ali Muhammad Brown. Moreover, three spent 9mm shell casings were found inside the car.

On June 5, 2014, P.P. met with detectives in the Homicide office. Detective Steiger showed P.P. a photo-montage, which included a photo of the defendant, Ali Muhammad Brown. The montage was shown in sequential order, each of the six photos were shown individually. P.P. was advised that the person he saw with Said and Anderson-Young may or may not be in the group of photos, and that hair-styles and facial hair may be different from what he remembered. P.P. went through each photo, when he came to photo #3, (which was the photo of Brown), P.P. set it aside. He continued through the remaining photos, then came back to photo #3, pointed at the photo and said, "This is him", and that he was one-hundred percent certain.

We submitted the spent shell casings from both the scene and the car, as well as fired bullets to the crime lab. We asked the crime lab to identify a likely weapon that was used in this murder.

The casings were all FC brand 9mm Luger ammunition, and the crime lab determined that they were all fired from the same weapon.

The crime lab opined that the murder weapon was likely a Smith & Wesson M&P 9mm semiautomatic pistol.

As part of this investigation, detectives interviewed Latoya White, who is the mother of Ali Brown's children. During this interview, White told detectives that she had purchased a Smith & Wesson M&P 9mm semiautomatic pistol, and that the pistol was missing. She said that Ali Brown had access to that pistol.

It is evident that the murders were premeditated and unprovoked and part of a common scheme or plan. The evidence from the crime scene, Said's vehicle, and the autopsies suggest that the victims were essentially executed: Anderson-Young was shot in the back of the head at close range while inside Said's car, and Said was shot multiple times in the face (at close range), head, and in the back. There was no evidence that any struggle preceded the murders. The murders took place less than 17 minutes after two witnesses saw Ali Brown leave with the victims in Said's car. There is no evidence to suggest that Said and/or Anderson-Young were armed, and these murders do not appear to be motivated by robbery, drugs, or any other crime.



SEATTLE
POLICE
DEPARTMENT

**CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE**

INCIDENT NUMBER	14-172165
UNIT FILE NUMBER	H14-150

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct to best of my knowledge and belief. Signed and dated by me this 12 day of JULY, 2014, at Seattle, Washington.

AGENCY: Seattle PD	WASPD0000	CASE NUMBER 14-172165	FILE NUMBER	PCN NUMBER	SUPERFORM
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ARREST INFORMATION	
DATE & TIME OF VIOLATION 6/1/2014 2:21 AM	CRIMINAL TRAFFIC CITATION ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO
DATE OF ARREST/TIME 1/1/1800 12:00 AM	ARREST LOCATION
ACCOMPLICES	

SUSPECT INFORMATION							
NAME (LAST, FIRST, MIDDLE/JR, SR, 1st, 2nd) BROWN, ALI MUHAMMAD							
DOB 12/12/1984	ALIAS, NICKNAMES						
ARMED/DANGEROUS <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IDENTITY IN DOUBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						
CITIZENSHIP							
PHYSICAL DETAILS							
SEX M	HEIGHT 509	WEIGHT 190	SKIN TONE MED	RACE B	EYE BRO	HAIR BLK	SCARS, MARKS, TATTOOS, DEFORMITIES
IDENTIFICATION DETAILS							
CCN 1789391	PRIOR BA # 213014726	AFIS # 00305947	FBI # 755799CC4	STATE ID # WA19877448	DRIVER'S LICENSE # [REDACTED]	STATE WA	SSN [REDACTED]
RESIDENCE		EMPLOYMENT / SCHOOL					
LAST KNOWN ADDRESS 27112 139 PL SE KENT, WA 98030		EMPLOYER, SCHOOL (ADDRESS, SHOP/UNION NUMBER)					
RESIDENCE PHONE		BUSINESS PHONE		OCCUPATION			
EMERGENCY CONTACT							
PERSON TO BE CONTACTED IN CASE OF EMERGENCY			RELATIONSHIP		Address		PHONE

CHARGE INFORMATION			
OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE F - Murder	RCW / ORD#	COURT / CAUSE #	CITATION #
OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE	RCW / ORD#	COURT / CAUSE #	CITATION #

WARRANT / OTHER			
WARRANT DATE	WARRANT NUMBER	OFFENSE	AMOUNT OF BAIL
ORIGINATING POLICE AGENCY		ISSUING AGENCY	WARRANT RELEASED TO: (SERIAL # / UNIT / DATE / TIME)

PROPERTY INFORMATION	
LIST VALUABLE ITEMS OR PROPERTY LEFT FOR ARRESTEE AT JAIL	
LIST VALUABLE ITEMS OR PROPERTY ENTERED INTO EVIDENCE (SIMPLE DESCRIPTION, IDENTIFYING MARKS, SERIAL #)	
LIST ITEMS ENTERED INTO SAFEKEEPING	
TOTAL CASH OF ARRESTEE \$0.00	WAS CASH TAKEN INTO EVIDENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO AMOUNT: \$0.00
SIGNATURE OF JAIL STAFF RECEIVING ITEMS / SERIAL #	

OFFICER INFORMATION		
ARRESTING OFFICER / SERIAL # Steiger, Cloyd A 4313	TRANSPORTING OFFICER / SERIAL #	SUPERVISOR SIGNATURE / SERIAL #
SUPERFORM COMPLETED BY (SIGNATURE/SERIAL #) Steiger, Cloyd		CONTACT PERSON FOR ADDITIONAL INFORMATION (NAME/SERIAL#/PHONE) Steiger, Cloyd 4313 2066845562

COURT FILE	
SUPERIOR COURT FILING INFO <input type="checkbox"/> IN CUSTODY <input type="checkbox"/> AT LARGE <input type="checkbox"/> OUT ON BOND	COURT CAUSE (STAMP OR WRITE)
COURT/DIST. CT.NO.	SUP. CT. DATE

EXTRADITE	
PERSON APPROVING EXTRADITION	SEAKING-LOCAL ONLY WACIC-STATE WIDE <input type="checkbox"/>
NCIC-WILL EXTRADITE FROM ID & OR ONLY <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM OR, ID, MT, WY, CA, NV, UT, CO, AZ, NM, HI, AK <input type="checkbox"/>
NCIC-WILL EXTRADITE FROM FROM ALL 50 STATES <input type="checkbox"/>	
CCN _____	DOE _____
WAC _____	TOE _____
NCIC _____	OP _____

PROBABLE CAUSE INFORMATION	
STATEMENT OF PROBABLE CAUSE: NON-VUCSA	
CONCISELY SET FORTH FACTS SHOWING PROBABLE CAUSE FOR EACH ELEMENT OF THE OFFENSE AND THAT THE SUSPECT COMMITTED THE OFFENSE. IF NOT PROVIDED, THE SUSPECT WILL BE AUTOMATICALLY RELEASED. INDICATE ANY WEAPONS INVOLVED. (DRUG CRIME CERTIFICATE BELOW.)	

FILED

14 JUL 01 PM 3:04

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 14-1-03028-9 SEA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,

Plaintiff,

v.

ALI MUHAMMAD BROWN,

Defendant.

No. 14-1-03028-9 SEA

MOTION, FINDING OF PROBABLE
CAUSE AND ORDER DIRECTING
ISSUANCE OF SUMMONS OR
WARRANT AND FIXING BAIL

The plaintiff, having informed the court that it is filing herein an Information charging the defendant with the crime(s) of **Aggravated Murder In The First Degree, Aggravated Murder In The First Degree**, now moves the court pursuant to CrR 2.2(a) for a determination of probable cause and an order directing the issuance of a summons or warrant for the arrest of the defendant, and

☒ fixing the bail of the defendant in the amount of **NO BAIL**; and no contact direct or indirect with any members of the families of Ahmed Said and Dwone Anderson-Young or witnesses John Ross and Patrick Parker. The no contact order issued at the time of first appearance remains in effect until arraignment.

☐ directing the issuance of a summons; and no contact direct or indirect with . The no contact order issued at the time of first appearance remains in effect until arraignment.

In connection with this motion, the plaintiff offers the following incorporated materials: The Seattle Police Department certification or affidavit for determination of probable cause; the Seattle Police Department suspect identification data; and the prosecutor's summary in support of order directing issuance of summons or order fixing bail and/or conditions of release.

If the defendant is not in custody, the plaintiff has attempted to ascertain the defendant's current address by searching the District Court Information System database, the driver's license and identicard database maintained by the Department of Licensing, and the database maintained

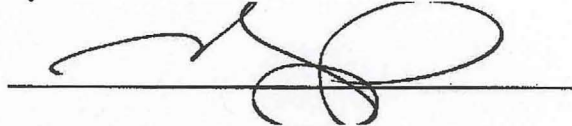
MOTION, FINDING OF PROBABLE CAUSE AND
ORDER DIRECTING ISSUANCE OF SUMMONS OR
WARRANT AND FIXING BAIL - 1

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

1 by the Department of Corrections listing persons incarcerated and under supervision.

2 DANIEL T. SATTERBERG, Prosecuting Attorney

3 By:

4 

5 Wyman Yip, WSBA #28251
6 Senior Deputy Prosecuting Attorney

7 FINDING OF PROBABLE CAUSE AND ORDER FOR ARREST WARRANT

8 The court finds that probable cause exists to believe that the above-named defendant
9 committed an offense or offenses charged in the information herein based upon the police agency
certification/affidavit of probable cause incorporated and pursuant to CrR 2.2(a).

10 IT IS ORDERED that the Clerk of this Court issue a summons or warrant of arrest for the
above-named defendant; and

11 IT IS FURTHER ORDERED that

12 ☒ the bail of the defendant be fixed in the amount of **NO BAIL;**
13 **and no contact direct or indirect with any members of the**
14 **families of Ahmed Said and Dwone Anderson-Young or**
15 **witnesses John Ross and Patrick Parker. The no contact order**
issued at the time of first appearance remains in effect until
arraignment.

16 ☐ directing the issuance of a summons; if the defendant is
17 incarcerated on the investigation charge herein the defendant shall
18 be released from custody; **and no contact direct or indirect with .**
The no contact order issued at the time of first appearance
remains in effect until arraignment.

19 ☐ Additional Conditions: _____
20 _____
21 _____

22 IT IS FURTHER ORDERED that the defendant be advised of the amount of bail fixed by
the court and/or conditions of his or her release, and of his or her right to request a bail reduction.
23 Service of the warrant by telegraph or teletype is authorized.

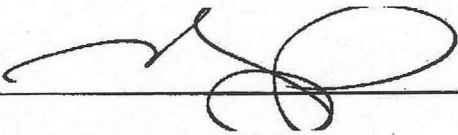
24 MOTION, FINDING OF PROBABLE CAUSE AND
ORDER DIRECTING ISSUANCE OF SUMMONS OR
WARRANT AND FIXING BAIL - 2

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

1 SIGNED this _____ day of July, 2014.

2
3 JUDGE

4 Presented by:

5 
6 _____

7 Wyman Yip, WSBA #28251
8 Senior Deputy Prosecuting Attorney
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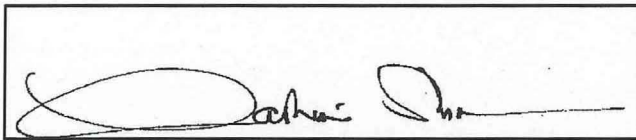
24 MOTION, FINDING OF PROBABLE CAUSE AND
ORDER DIRECTING ISSUANCE OF SUMMONS OR
WARRANT AND FIXING BAIL - 3

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

King County Superior Court
Judicial Electronic Signature Page

Case Number: 14-1-03028-9
Case Title: STATE vs BROWN
Document Title: PROPOSED ORDER/FINDINGS

Signed by: Catherine Shaffer
Date: 7/1/2014 3:04:59 PM

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'Catherine Shaffer' written in a cursive, flowing style.

Judge/Commissioner: Catherine Shaffer

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 02A0B1FE28017BAC78E9BF6CE00C462718609D94

Certificate effective date: 7/29/2013 11:40:17 AM

Certificate expiry date: 7/29/2018 11:40:17 AM

Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,
O=KCDJA, CN="Catherine
Shaffer:PCh7R3n44hGZOTo3YYhwmw=="

RECEIVED

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

AUG 05 2014
Office of the Public Defender

STATE OF WASHINGTON)

Plaintiff)

v)

ALI MUHAMMED BROWN)

CAUSE NO # 14-1-03028-9 SEA

AFFIDAVIT OF COUNSEL

FILED
KING COUNTY, WASHINGTON

AFFIDAVIT

AUG - 7 2014

DEPARTMENT OF
JUDICIAL ADMINISTRATION

STATE OF WASHINGTON)

COUNTY OF KING)

ss

Gary V. Davis, being first duly sworn upon oath, deposes and says:

That your affiant has been assigned as the attorney of record for the above entitled matter after the Associated Counsel for the Accused Division had been assigned by the Dept. Of Public Defense to represent the above-named defendant.

That your affiant is familiar with the records and files herein;

That the above-named defendant is presently charged with two counts of aggravated murder in the first degree. The King County Prosecutor's Office have indicated that they may be seeking the death penalty in this case.

Mr. Brown is currently being held on a variety of local charges in the Essex County jail, located in Newark, New Jersey, as well as warrants for two counts of aggravated murder from Washington state.

Mr. Brown has been assigned a local attorney from Newark's pool of attorney's

Associated Counsel for the Accused
Division of King County Department of Public Defense
110 Prefontaine Pl S, #200, Seattle, WA 98104
Phone: (206) 624-8105 Fax: (206) 624-9339

1 that contract with their public defense agency to represent Mr. Brown on their current
2 charges.

3 Mr. Brown's attorney has met with his client on numerous occasions and
4 information provided by Mr. Brown to his attorney has been forwarded to Mr. Dolan and
5 myself that included an assessment of Mr. Brown's dire legal posture.

6 Mr. Dolan and I next met with the director of the Dept. Of Public Defense,
7 Dave Chapman, to apprise him of the situation regarding Mr. Brown's status after we
8 received information that made a trip to contact Mr. Brown imperative.

9 After assessing the information provided to Mr. Chapman, he agreed with the
10 necessity of the trip.

11 Flight information and costs have already been forwarded to the Dept. Of Public
12 Defense and have been tentatively arranged and approved as part of this funding request.


13 Hotel costs shall be within per diem rates and will be in compliance with King
14 County's current per diem parameters.

15 Any excess of the established per diem parameters in hotel costs will be borne by
16 the individual attorneys absent specific permission and acknowledgment in writing from
17 the director of the Department of Public Defense, ^{stating that because of} ~~or that circumstances requiring~~
18 exceeding the hotel per diem and the cost will be borne by the Dept. Of Public Defense.
19

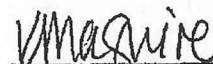
20 All other incidental costs, such as shuttle costs, cab fares, etc, directly related to
21 the purpose of the trip will be submitted, with proof of receipts, for reimbursement.

22 Every effort will be made to keep expenses to a minimum and the use of time will
23 be used expeditiously.

1 Respectfully submitted this 5th day of August, 2014.

2
3 
4 Gary V. Davis, WSBA #14019
5 Attorney for Defendant

6
7 SUBSCRIBED AND SWORN to before me this 5th day of August, 2014.

8
9 
10 NOTARY PUBLIC in and for the State of
11 Washington, residing at King County



State v. Brown

Cause # 14-1-03028-9 SEA

Page 3 of 3

Travel expenses are approved as follows:

Hotel – 5 nights at per diem (\$132) plus estimated tax (\$26) =	\$790
Meals – 2 days (1 st and last at \$42 which is 75% of per diem) =	84
Meals – 4 days at per diem (\$56) =	224
Airfare/travel agency charge =	688.20
Luggage charge=	50
Ground transportation/incidentals=	<u>100</u>
TOTAL	\$1,936.20

ORIGINAL

RECEIVED

JAN 07 2015

Department of Public Defense

FILED
KING COUNTY, WASHINGTON

JAN 20 2015

DEPARTMENT OF
JUDICIAL ADMINISTRATION

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

STATE OF WASHINGTON
Plaintiff

vs

ALI MUHAMMAD BROWN
Defendant

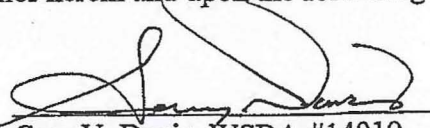
CAUSE NO. # 14-1-03028-9 SEA

MOTION AND AFFIDAVIT FOR ORDER
FOR EXPERT SERVICES AT PUBLIC
EXPENSE

MOTION

COMES NOW the defendant, Ali Muhammad Brown, by and through his attorneys of record, Gary V. Davis & Kevin P. Dolan, and moves the court for an order hiring Michael Ricciardi, to perform expert services in the above entitled cause at public expense. Ali Muhammad Brown is charged with three counts of Aggravated Murder in the 1st degree. The King County Prosecutor's Office has begun to send discovery to the defense prior to the defendant's arrival from New Jersey. The King County's Prosecutors Office has affirmed to the defense that they are interested in reviewing a mitigation packet from defense. This affirmation underscores the King County prosecutors intent that they would otherwise be seeking the death penalty in the event of a conviction of one or more of the aggravated charges.

This motion is based upon the records and files herein and upon the following affidavit of counsel.


Gary V. Davis, WSBA #14019

Attorney for Defendant
Associated Counsel for the Accused
Division of King County Department of Public Defense
110 Prefontaine Pl S, #200, Seattle, WA 98104
Phone: (206) 624-8105 Fax: (206) 624-9339

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1 discovery to defense counsel now instead of waiting for Mr. Brown's return to
2 Washington State from New Jersey, as it would be their usual protocol.

3 Mr. Brown is still incarcerated in Newark, New Jersey, to answer for crimes that
4 he is currently charged with committing in the state of New Jersey. It is unknown when,
5 specifically, Mr. Brown's extradition to Washington State will begin. In King County,
6 Mr. Brown is currently charged with three counts of aggravated murder.
7

8 As of this date, the defense has already received over 2000+ pages of discovery
9 in hard-copy form and have received over 40 CD discs containing discovery for
10 defense's review.
11

12 While our mitigation specialist (Kim Cronin) assists both capital attorneys
13 representing Mr. Brown by conducting a thorough social and psychological history
14 investigation through extensive interviewing, Mr Ricciardi will be assisting both assigned
15 attorneys, Ms. Cronin, and the Kelli Maguire, defense's assigned investigator, with the
16 collection, copying and organizing of all received information regarding Mr. Brown and his
17 family, including, but not limited to:
18
19

- 20 • discovery sent to defense counsel by State's prosecutors related to Mr. Brown's
current charges;
- 21 • records of birth certificates and birth records
- 22 • medical records for the client and his parents
- 23 • school records from every school attended,
- 24 • any adult education records
- 25 • marriage and divorce records
- 26 • death certificates for deceased family members
- 27 • records from any social service agency that worked with the client or his family,
including welfare; public assistance records, and
- 28 • records obtained under the Freedom of Information Act.
- employment,
- military records,
- juvenile court records
- foster home records

- records relating to any other civil or criminal court cases
- records regarding any previous incarcerations, pre-sentence
- probation/parole reports from all previous cases,
- any and all mental health records, including any evaluations, testing, counseling, placement or treatment records,
- media coverage, I
- incident reports,
- any and all documents relating to drug and alcohol treatment.

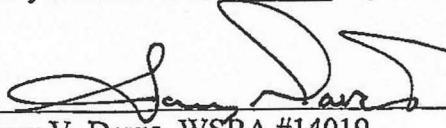
Record collection in this case has become, and will continue to be, labor intensive, and requires an added person to assist.

The defense is requesting that DPD hire Mr. Ricciardi at \$20/hr for an initial six (6) months temporary assignment with the possibility to renew for another six (6) months if required. The defense team for Mr. Brown have been recently approved for six month review periods that are being monitored by ACA's Director, Don Madsen, and the current DPD Director, Dave Chapman. The review periods are designed to monitor progress of the case.

Mr. Ricciardi's assignment will be also be subject to the 180 day review period by ACA's Director Don Madsen and DPD Director Dave Chapman, to monitor the progress and continued necessity for extending Mr. Ricciardi's employment on behalf of Mr. Brown.

Every effort will be made to keep expenses to a minimum and the use of his time will be used expeditiously. The defendant is indigent and unable to apply for the cost of this expert service.

Respectfully submitted this 2nd day of January, 2015



Gary V. Davis, WSBA #14019
Attorney for Defendant

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 7th day of January, 2015

Iris Sevilla Iris Sevilla
NOTARY PUBLIC in and for the State of
Washington, residing at Seattle WA



January 7th, 2015

To: Dept. Of Public Defense
From: Gary Davis, ACA

Please rush these two funding requests. Thank you.

Gary Davis

FILED
KING COUNTY, WASHINGTON

JAN 23 2015

DEPARTMENT OF
JUDICIAL ADMINISTRATION

RECEIVED

JAN 21 2015

Department of Public Defense

**SUPERIOR COURT OF WASHINGTON
COUNTY OF KING**

STATE OF WASHINGTON
Plaintiff

v.

ALI MUHAMMED BROWN

Defendant

NO. 14-1-03028-9 SEA

ORDER AUTHORIZING
EXPERT SERVICES AT
PUBLIC EXPENSE

DENYING

(ORES)

THIS MATTER comes before the undersigned authorized representative of the Office of the Public Defender (OPD) on behalf of the defendant, through his attorneys, **Gary Davis & Kevin Dolan**, for expert services necessary to an adequate defense in this case to be performed at public expense. The services requested are for:

- ☐ Psychological Evaluation
- ☐ Psychiatric Evaluation
- ☐ Evidence Examination
- ☐ Forensic

- ☐ Investigative
- ☐ Sexual Deviancy Evaluation
- ☐ Alternate Placement
- ☒ Other: Assisting in research of radical Islamic fundamentalism.

Defense attorney represents that previous request(s) for funding was/were dated _____ in the amount of \$ _____ for the purpose of addressing issues as to competency and comprehension of Miranda warnings, coerced confessions, mitigation.

The client is: ☒ in-custody or ☐ out-of-custody, and the trial date set is: NOT YET SET.

The attached documentation and declaration of counsel show that such expert services are necessary to an adequate defense, the number of hours and hourly rate expected, and that the defendant is financially unable to obtain them.

NOW THEREFORE, pursuant to CrR 3.1 (f), **IT IS ORDERED** that Morgan Dolan is authorized to perform the expert services indicated above at public expense in the amount not to exceed \$20.00/hr. and a maximum of \$4800.00. (Amounts exceeding \$250 per expert must be submitted to the OPD Administrator.) If the expert is to perform a competency or insanity defense evaluation,

If expert *testimony* is permitted, it shall be compensated at not more than \$_____ per hour for a maximum of _____ hours. (Please check item below).

- ☐ This ORDER approves this additional amount.
☐ An **ADDITIONAL APPLICATION** will be made for testimony if required and permitted.

PAYMENT IN EXCESS OF THE ABOVE LIMIT(S) WILL NOT BE MADE WITHOUT PRIOR AUTHORIZATION.

THIS PROVIDES notification to the Department of Adult Detention that the above-named expert be granted admittance to the King County Correctional Facility at reasonable times as necessary to perform said services, along with the following equipment:

- ☐ Standard psychological testing equipment and materials authorized to be admitted into DJAD facility with expert.
☐ Other electronic equipment authorized to be admitted to DJAD facility with expert, specifically:_____

IT IS FURTHER ORDERED that the attorney shall deliver to the service provider a copy of this order before the expert service begins.

☐ This Expert Order will be Sealed

☒ This Expert Order will NOT be Sealed

Attorney is: ☒ Appointed

☐ Retained

☐ Pro Bono

☐ Pro Se

PRESENTED BY:

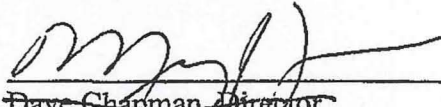
Gary V. Davis

Attorney for Defendant

Email: gary.davis@acapd.org

Telephone: 206-624-8105 x213

*☒ Denied *


Dave Chapman, Director
Department of Public Defense

Date submitted: 1/28/15

Date ORDERED: 1/28/15

State v. Ali Muhammed Brown

Cause #14-1-03028-9 SEA

Page 3 of 3 plus Exhibit I and Exhibit II

If denied, reasons therefore:

Counsel has previously sought \$8,000 in funding for research by Ms. Morgan Dolan. This request was denied by order signed 1/14/15. The denial and explanation of denial at page 3 of the order are incorporated herein by reference and attached as Exhibit I (includes CV).

In the instant Motion, which will be treated as a Motion for Reconsideration, counsel again proposes Ms. Morgan Dolan, who is the daughter of co-counsel, Kevin Dolan. Counsel has reduced his request to \$4,800 and has now listed tasks for Ms. Dolan, including reading and summarizing four books on Islam and reading and summarizing four books on Jihad and Jihadism. In addition, "She [Ms. Dolan] is to become knowledgeable with articles from the many foreign and domestic web-sites on current Jihad thought." Motion/Affidavit at page 4.

Counsel noted in his prior motion (Exhibit II) that Ms. Dolan resides in Spain and will be here in the U.S. until April 11, 2015. Counsel included with his prior motion, Ms. Dolan's CV, which fails to demonstrate familiarity with or training in the subjects for which her expert research services are sought (Islam and Jihadism).

Counsel also in the instant motion renews his request for travel expenses without specifying what travel is necessary.

The Motion for Reconsideration is denied. Counsel may appeal this denial de novo to the Court, as permitted by LCrR 3.1 and King County Superior Court Criminal Department Manual Section 10. This denial including Exhibit I and Exhibit II should be appended to any appeal to the Court.

Exhibit I

copy

RECEIVED

JAN 07 2015

Department of Public Defense

SUPERIOR COURT OF WASHINGTON
COUNTY OF KING

STATE OF WASHINGTON
Plaintiff

v.

ALI MUHAMMED BROWN
Defendant

NO. 14-1-03028-9 SEA

ORDER AUTHORIZING
EXPERT SERVICES AT
PUBLIC EXPENSE

~~DENYING~~*

(ORES)

THIS MATTER comes before the undersigned authorized representative of the Office of the Public Defender (OPD) on behalf of the defendant, through his/her attorney, Kevin Dolan, for expert services necessary to an adequate defense in this case to be performed at public expense. The services requested are for:

- ☐ Psychological Evaluation
- ☐ Psychiatric Evaluation
- ☐ Evidence Examination
- ☐ Forensic

- ☐ Investigative
- ☐ Sexual Deviancy Evaluation
- ☐ Alternate Placement
- ☒ Other: Translation/Assisting in research,

Defense attorney represents that previous request(s) for funding was/were dated _____ in the amount of \$ _____ for the purpose of addressing issues as to competency and comprehension of Miranda warnings, coerced confessions, mitigation.

The client is: ☒ in-custody or ☐ out-of-custody, and the trial date set is: NOT SET

The attached documentation and declaration of counsel show that such expert services are necessary to an adequate defense, the number of hours and hourly rate expected, and that the defendant is financially unable to obtain them.

Exhibit I
page 2

NOW THEREFORE, pursuant to CrR 3.1 (f), IT IS ORDERED that Morgan Dolan is authorized to perform the expert services indicated above at public expense in the amount not to exceed \$20.00/hr. and a maximum of \$8000.00. (Amounts exceeding \$250 per expert must be submitted to the OPD Administrator.) If the expert is to perform a competency or insanity defense evaluation,

If expert testimony is permitted, it shall be compensated at not more than \$_____ per hour for a maximum of _____ hours. (Please check item below).

- ☐ This ORDER approves this additional amount.
☐ An ADDITIONAL APPLICATION will be made for testimony if required and permitted.

PAYMENT IN EXCESS OF THE ABOVE LIMIT(S) WILL NOT BE MADE WITHOUT PRIOR AUTHORIZATION.

THIS PROVIDES notification to the Department of Adult Detention that the above-named expert be granted admittance to the King County Correctional Facility at reasonable times as necessary to perform said services, along with the following equipment:

- ☐ Standard psychological testing equipment and materials authorized to be admitted into DJAD facility with expert.
☐ Other electronic equipment authorized to be admitted to DJAD facility with expert, specifically: _____

IT IS FURTHER ORDERED that the attorney shall deliver to the service provider a copy of this order before the expert service begins.

☐ This Expert Order will be Sealed

☒ This Expert Order will NOT be Sealed

Attorney is: ☒ Appointed

☐ Retained

☐ Pro Bono

☐ Pro Se

PRESENTED BY:

* ☒ Denied * *

[Signature]

Gary V. Davis

Attorney for Defendant

Email: gary.davis@acapd.org

Telephone: 206-624-8105 x213

[Signature]
Dave Chapman, Director
Department of Public Defense

Date submitted: 1/2/15

Date ORDERED: 1/14/15

*If denied, reasons therefore:
* See attached page 3.*

Exhibit I
page 3

State v. Brown

Cause # 14-1-03028-9 SEA

Page 3 of 3

If denied, reasons therefore:

Counsel's description of the research to be done here is vague and wide ranging, including "the translating of foreign documents and papers." (Motion at page 3) Counsel fails to provide meaningful parameters on the research to be done and also does not make clear why inclusion of foreign documents and papers (which require translation) is necessary to the defense of this case.

Counsel proposes a researcher, Ms. Morgan Dolan, who resides in Spain, but is here in the U.S. until April 11, 2015. Counsel has noted that Ms. Dolan is the daughter of co-counsel. Ms. Dolan's CV (attached) does not demonstrate background in the subjects to be researched. Counsel proposes 400 hours at \$20/hour for a total of \$8,000, which includes "travel expenses." (Motion at page 4). Counsel does not provide any description of or justification for any travel expenses.

Research into Islam and jihadism is reasonably necessary. However, the research proposed to be done by Ms. Dolan does not appear to make reasonable use of the research time to be funded in this case. Counsel may appeal this denial to the Court or may propose another method to accomplish the necessary research.

Page 3 of 3 plus attachment/CV

11

Exhibit I page 4
Attachment

Morgan Dolan

CELL (206)-522-1299 • E-MAIL dolan.mml@gmail.com • 7040 33rd Ave NE • Seattle, Washington • 98115

EDUCATION Anthropology • Bachelor of Arts 2012
New College of Florida, Sarasota, FL 54243

EXPERIENCE

Export Manager

Transmo Wire Co. December 2014- Present

- Responsible for maintaining and developing client relationships and sales in Brazil.
- Completed company sponsored Portuguese language courses
- Work closely with the CEO to evaluate client relationships and sales in Europe, Latin America and the United States.

Co-Owner & Lead Marketing Strategist

The General Store Seattle November 2014- Present

- Developed and launched a 100% locally sourced retailer
- Oversee advertising, marketing to make budget decisions and media buying
- Work closely with onsite partners to track business development and customer base

Zhuhai Branch Manager & North American Marketing Manager

InternChina January 2013- November 2014

- Led highest performing sales team two financial quarters
- Managed and responsible for all programs, sales and clients in South China region
- Designed and implemented corporate North American marketing strategy
- Responsible for China-based business development of corporate partnerships including contract negotiation and signing

Policy Assistant Director

Triumph Guide Culture Trans. Co. September 2012- December 2013

- Responsible for communication with a dozen international clients
- Immersed in a 100% Chinese team
- Researched and implemented theories of Chinese business culture and negotiation

Assistant Team Manager & Tournament Coordinator

Chendgu Rugby Football Club September 2009- June 2010

- Organized tournaments around China and managed over 40 players and guests
- Responsible for logistics, fundraising, event planning and communication
- First point of contact for emergencies and organization

SKILLS

Professional Fluency: Mandarin & Cantonese Chinese • French • Spanish

Special Experience: Qualitative Research • Project Management • Recruitment

CELL (206) 522-1299 • E-MAIL dolan.mml@gmail.com

Exhibit #II

Copy

ORIGINAL
RECEIVED

JAN 07 2015

Department of Public Defense

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

STATE OF WASHINGTON)
Plaintiff)
vs)
ALI MUHAMMED BROWN)
Defendant)

CAUSE NO. # 14-1-03028-9 SEA
MOTION, AFFIDAVIT FOR
ORDER FOR EXPERT SERVICES
AT PUBLIC EXPENSE

MOTION

COMES NOW the defendant, Ali Muhammad Brown, by and through his attorneys of record, Gary V. Davis and Kevin P. Dolan, and moves for an order appointing Morgan Dolan, a multi-linguist and translator, to perform expert services in the above entitled cause at public expense. Ali Muhammed Brown is charged with three counts of aggravated murder in the 1st degree. Preliminary defense contacts with the King County Prosecutor's Office have affirmed that a defense mitigation package will be necessary when Mr. Brown is returned to the jurisdiction of Washington state from his current incarceration in New Jersey. This motion is based upon the records and files herein and upon the following affidavit of counsel.

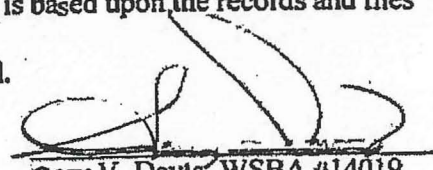

Gary V. Davis, WSBA #14019
Attorney for Defendant

Exhibit II
page 2

AFFIDAVIT

STATE OF WASHINGTON)
COUNTY OF KING) ss
)

Gary V. Davis, being first duly sworn upon oath, deposes and says:

That your affiant is the attorney of record for the above-named defendant and is familiar with the records and files herein;

That your affiant was appointed attorney of record for the defendant in the above entitled matter after the King county Public Defense Program had determined the defendant to be indigent;

That it is necessary for an adequate defense in the above-entitled cause for Morgan Dolan, a multi-linguist and translator, to perform expert services, to wit: to assist defense counsel in radical Islamic research, i.e., assist in the collection and translation of foreign Arabic newspapers, writings and other periodicals on the subject of radical Islamic ideals; to assist the defense in preparing, translating and constructing summation papers explaining the many facets of radical Islamic and Jihadist tenets for the edification of all present, and future members, of the defense team.

Mr. Ali Muhammad Brown has declared himself to his Seattle and New Jersey defense teams, and to local and foreign law enforcement, to be a Jihadist, who subscribes to a extreme form of Islamic fundamentalism. He has stated to law enforcement that the killings that he is presently charged with committing in Seattle, and the one murder that he is charged with in New Jersey, as "just kills" that were carried out in retaliation for the American killing of Muslims in the Middle East.

That one major aspect of research necessary in this case for both the mitigation

1 package and for trial purposes is the necessity of having a complete understanding of the
2 radical forms of the Islamic religion. It is imperative for all members of the defense team
3 to have a deep understanding both of Islam in general, and Jihadism specifically, to
4 explain Mr. Brown's motivations to the prosecution for mitigation purposes, and to a
5 jury, for trial purposes.
6

7 Mr. Brown has been educated and steeped in radical Islamic fundamentalism and
8 is a self-proscribed American Jihadist. Homegrown Jihadist terrorism continues to be in
9 the news and such incidents have occurred in Canada, Europe, Australia, England, and
10 the United States, and various countries in the Middle East.
11

12 Murders and other terrorist acts by "lone wolf" Jihadists are of immediate
13 and grave concern, especially in light of the ongoing struggles against Al-Quaida, the
14 Taliban, Hamas and ISIS. Much has been written about such acts in the foreign press.
15

16 The defense team requires a firm grasp of these topics which will require a great
17 deal of research and assistance to obtain it. The required research will naturally entail the
18 translating of foreign documents and papers. This type of research will continue while
19 other conventional avenues of mitigation are explored through family background,
20 schools, mental health history records, etc.
21

22 Ms. Dolan is fluent and conversant in multiple languages and is currently tutoring
23 currently tutoring in both Portugese and the Arabic languages. She currently resides in
24 Spain but is presently here in the United States until April 11th, 2015. She has agreed to
25 assist the defense during her stay.
26

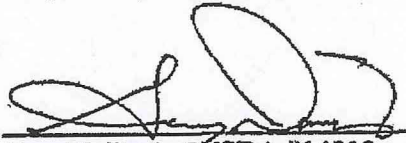
27 The defense is making a request for \$8000 for her services. This breaks down to
28 \$20/hr for Ms. Dolan, for a total, not to exceed 10 weeks. The sum of the request will

1 include all services as indicated above, including travel expenses. It is not necessary for
2 lodging expenses to be a part of this request.

3 As with every case, every effort will be made to keep expenses to a minimum and
4 the use of her time will be used expeditiously. Any unused money will be returned or
5 remain with the King County Department of Public Defense.
6

7 The defendant is indigent and unable to apply for the cost of this expert service.
8

9
10 Respectfully submitted this 30th day of January, 2015

11
12 

13 Gary V. Davis, WSBA #14019
14 Attorney for Defendant

15
16 Subscribed & Sworn to ~~me~~ Before me on
17 this 7th day of January 2015
18

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20 Is Surlle
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JAN 21 2015

Department of Public Defense

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

ORIGINAL

FILED

KING COUNTY, WASHINGTON

JAN 23 2015

DEPARTMENT OF
JUDICIAL ADMINISTRATION

STATE OF WASHINGTON)
Plaintiff)

vs)

ALI MUHAMMED BROWN)
Defendant)

CAUSE NO. 14-1-03028-9 SEA

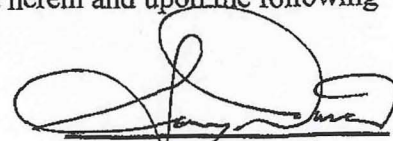
MOTION FOR RECONSIDERATION AND
~~SECOND MOTION, AFFIDAVIT AND~~ AFFIDAVIT
~~ORDER FOR EXPERT SERVICES~~ m/7

AT PUBLIC EXPENSE

MOTION

COMES NOW the defendant, Ali Muhammad Brown, by and through his attorneys of record, Gary V. Davis & Kevin P. Dolan, and moves for an order hiring Morgan Dolan, to perform expert services in the above entitled cause at public expense. Ali Muhammad Brown is charged with three counts of Aggravated Murder in the 1st degree. The King County's Prosecutors Office has affirmed that they are interested in reviewing a mitigation packet from defense. This affirmation underscores the King County prosecutors intent that they would otherwise be seeking the death penalty in the event of a conviction of one or more of the aggravated charges.

This motion is based upon the records and files herein and upon the following affidavit of counsel.



Gary Davis WSBA#
Attorney for Defendant

1
2 AFFIDAVIT

3 STATE OF WASHINGTON)
4 COUNTY OF KING) ss
5)

6 Gary Davis, being first duly sworn on oath, deposes and says:
7

8 That your affiant is an attorney of record for the above-named defendant and is
9 familiar with the records and files herein;
10

11 That your affiant was appointed one of the attorneys of record for the defendant in
12 the above entitled matter after the King County Office of Public Defense determined the
13 defendant to be indigent;
14

15 Mr. Ali Muhammad Brown has declared himself to his Seattle and New Jersey
16 defense teams, and to local and foreign law enforcement, to be a Jihadist, who subscribes
17 to an extreme form of Islamic fundamentalism. He has stated to law enforcement that
18 the killings that he is presently charged with committing in Seattle, and the one murder
19 that he is charged with in New Jersey, are "just kills" that were carried out in retaliation
20 for the American killing of Muslims in the Middle East.

21 That one major aspect of research necessary in this case for both the mitigation
22 package and for trial purposes is the necessity of having a complete understanding of the
23 radical forms of the Islamic religion. It is imperative for all members of the defense team
24 to have a deep understanding both of Islam in general, and radical Islamic jihad
25 specifically, to explain Mr. Brown's motivations to the prosecution for mitigation
26 purposes, and to a jury, for trial purposes.
27

28 Mr. Brown has been educated and steeped in radical Islamic fundamentalism and
is a self-proscribed American Jihadist. Homegrown Jihadist terrorism continues to be in

1 the news and such incidents have occurred in Canada, Europe, Australia, England, and
2 the United States, and various countries in the Middle East.

3
4 Murders and other terrorist acts by "lone wolf" Jihadists are of immediate
5 and grave concern, especially in light of the ongoing struggles against Al-Quaida, the
6 Taliban, Hamas and ISIS. Much has been written about such acts in the foreign press.-the
7 terrorist attack at the shop in Australia; the terrorist attack at the Parliament in Ottawa;
8 and the recent killings in France. In order to effectively communicate with and build a
9 rapport with Mr. Brown, and to adequately defend him at trial, the defense team members
10 must have a basic understanding both of Jihadism and Islam.

11 Islam and Jihad are two vast and complicated areas of concern for the defense that
12 requires some basic research done in these areas. At this point in our case preparation, the
13 use of an "Islamic Jihad Expert" would not be appropriate. Firstly, Michael Filipovic,
14 Director of the Federal Public Defenders office was contacted by your affiant regarding
15 their use and experiences with Islamic Jihad experts while their office represented Islamic
16 extremists. Mr. Filipovic stated that his office is not aware of any Islamic Jihad expert
17 residing here in Washington state.

18
19 Secondly, Mr. Filipovic stated that their office had last used an Islamic interpreter
20 who charged \$150 /hour when their office was representing an Islamic Jihadist several
21 years ago. He added that any Islamic Jihadist expert would have to be sought out of state
22 and that their consulting fees would be much more expensive than the interpreter fees that
23 were paid out in their last case.

24 That the high consulting fees for Islamic experts would not include their travel
25 expenses, housing costs and meal expenses during the time they would be here in
26 Washington state assisting the defense for Mr. Ali Muhammad Brown. Any such experts
27 would be prohibitively expensive if their function is simply to provide a basic
28 rudimentary understanding of Islam and Jihadism.

1 What is required for the defense at this early stage of our representation is
2 utilizing Ms. Dolan, who has a demonstrated ability to absorb large amounts of
3 information and has the necessary linguistic and writing skills to synthesize the
4 information for the defense team to better communicate with the client.

5
6 We propose the following for the six weeks of research:

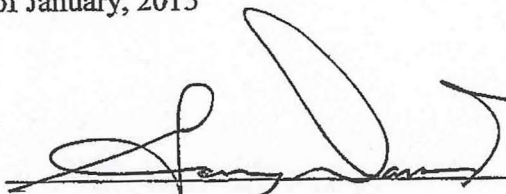
- 7
- 8 1. That Ms. Dolan read, take notes and summarize four (4) books on Islam,
9 concentrating on main religious beliefs, practices and how various branches of
10 Islam differs within each other and Western thought.
 - 11 2. That Ms. Dolan read, take notes and summarize four (4) books on Jihad and
12 Jihadist principles, which would include the ISIS manifesto The Management of
13 Savagery;
 - 14 3. She is to become knowledgeable with articles from the many foreign and
15 domestic web-sites on current Jihad thought. Her focus will be to summarize the
16 conceptual relationship of "lone- wolf Jihadism" as it pertains to Islamic
17 militancy groups in America and to Jihad organizations worldwide.
 - 18 4. Ms. Dolan will present a 50 - 100 page report of her findings for all members of
19 the defense team at the end of her tenure.

20 The defense anticipates the research and presentation to be completed in six (6)
21 weeks at a cost of \$20 per hours for a total request of \$4800 for Ms. Dolan's services.
22 The sum of the request will include all services as indicated above, including travel
23 expenses. It is not necessary for lodging expenses to be a part of this request.

24 As with every case, every effort will be made to keep expenses to a minimum and
25 the use of her time will be used expeditiously. Any unused money will be returned or
26 remain with the King County Department of Public Defense.

27
28 The defendant is indigent and unable to apply for the cost of this expert service.

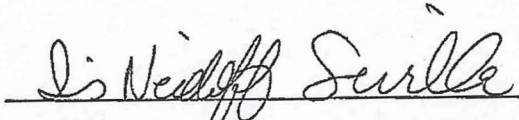
1 Respectfully submitted this 20th day of January, 2015

2
3
4 

5 Gary V. Davis, WSBA #14019

6 Attorney for Defendant

7
8 SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 20 day of January, 2015.

9
10
11 
12 NOTARY PUBLIC in and for the State of
13 Washington, residing at Seattle



ORIGINAL

RECEIVED

FILED
KING COUNTY, WASHINGTON

APR 14 2015

APR 21 2015

Department of Public Defense

DEPARTMENT OF
JUDICIAL ADMINISTRATION

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

STATE OF WASHINGTON
Plaintiff

vs

ALI MUHAMMAD BROWN
Defendant


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

MOTION, AFFIDAVIT AND
ORDER FOR EXPERT SERVICES:
TRAVEL FUNDS REQUEST
BY MITIGATION SPECIALIST
FOR CLIENT CONTACT

MOTION

COMES NOW the defendant, Ali Muhammad Brown, by and through his attorneys of record, Gary V. Davis and Kevin Dolan, requesting funding for travel expenses for **Kim Cronin, Mitigation Specialist**, to initiate contact with Mr. Ali Muhammad Brown who is presently being incarcerated in Essex County, Newark, New Jersey.

Mr. Brown is presently charged with three counts of aggravated murder in the 1st degree in Seattle, WA. The King County Prosecutor's Office has indicated to defense that it may be actively seeking the death penalty in the event of a conviction on one or both of the aggravated charges. This motion is based upon the records and files herein and upon the following affidavit of counsel.


Gary V. Davis, WSBA #14019

Attorney for Defendant

Associated Counsel for the Accused
Division of King County Department of Public Defense
110 Prefontaine Pl S, #200, Seattle, WA 98104
Phone (206) 624-8105 Fax (206) 624-9339

APR 14 2015

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

STATE OF WASHINGTON)
)
 Plaintiff)
)
 v)
)
 ALI MUHAMMED BROWN)
 _____)

CAUSE NO # 14-1-03028-9 SEA

AFFIDAVIT OF COUNSEL

AFFIDAVIT

STATE OF WASHINGTON)
)
 COUNTY OF KING)

ss

Gary V. Davis, being first duly sworn upon oath, deposes and says:

That your affiant has been assigned as the attorney of record for the above entitled matter after the Associated Counsel for the Accused Division (ACAD) had been assigned by the Dept. Of Public Defense to represent the above-named defendant.

That your affiant is familiar with the records and files herein;

That the above-named defendant is presently charged with three counts of aggravated murder in the first degree. The King County Prosecutor's Office has indicated that they may be seeking the death penalty in this case.

Mr. Brown is currently being held in-custody in the Essex County Detention Facility located in Newark, New Jersey, on a variety of serious charges. The King County Prosecutors Office has already filed a extradition warrant for Mr. Brown's return to Washington State at a non-specified time in the future to address the three counts of

1 aggravated murder.

2 Mr. Brown has been assigned a local attorney, Mr. Al Kapin, from Newark's pool
3 of attorney's that contract with their public defense agency to represent Mr. Brown on all
4 QNew Jersey charges.
5

6 Mr. Brown's New Jersey attorney, Al Kapin, has met with his client on numerous
7 occasions and information provided by Mr. Brown to his attorney has been forwarded to
8 Mr. Dolan and myself that included an assessment of Mr. Brown's dire legal posture.
9

10 Mr. Dolan and I have enlisted Kim Cronin as our mitigation specialist who has
11 been assigned to prepare an extensive mitigation package on behalf of Mr. Brown.

12 Ms Cronin's responsibilities is to assist defense counsel and other
13 mitigation experts in the specific and unique area of collecting and presenting mitigation
14 evidence on behalf of Mr. Ali Muhammad Brown.
15

16 Ms. Cronin must interview Mr. Brown to obtain a detailed look at his
17 personal history information, including but not limited to the following: the client's
18 birth; his developmental history, as well as family background and history, including any
19 significant childhood experiences such as the death of any family member, divorce,
20 abandonment, abuse, and neglect and interjection of inter- and intra-family violence in
21 Mr. Brown's family history.
22

23 Information regarding the client's health, education, employment, residential
24 history, significant relationships, religious background and beliefs, history of
25 alcohol and substance abuse by the client or his family, military history, marriages
26 and divorces, any serious accidents or illnesses, and adult legal history must also be
27 obtained from the client.
28

1 Ms Cronin will be assisting both capital attorneys representing Mr. Brown by
2 conducting a thorough social and psychological history investigation. Initially, she
3 must review the charging documents, the autopsy reports and photographs, law
4 enforcement reports relating to the offense, the client's criminal history, jail booking
5 and visitation records, audio-taped or video-taped statements made by the client,
6 and the notice of any aggravating factors alleged by the State.
7

8 Ms. Cronin's responsibilities and investigation will be the collection of records
9 regarding Mr. Brown and his family, including, but not limited to: birth certificates and
10 birth records of the client medical records for the client and his parents, school records
11 from every school attended, any adult education records, marriage and divorce records,
12 death certificates for deceased family members, records from any social service agency
13 that worked with the client or his family, including welfare; public assistance
14 records, and records obtained under the Freedom of Information Act.
15

16 In addition, the mitigation specialist must obtain employment and military
17 records, juvenile court records, foster home records, records relating to any other
18 civil or criminal court cases, records regarding any previous incarcerations, pre-
19 sentence and probation/parole reports from all previous cases, any and all mental
20 health records, including any evaluations, testing, counseling, placement or
21 treatment records, media coverage, incident reports, and any and all documents
22 relating to drug and alcohol treatment.
23

24 After assessing the need for client contact by Ms. Cronin, Mr. Don Madsen,
25 Director of ACAD, has agreed with the necessity of the trip.
26

27 Flight information and costs have already been forwarded to the Dept. Of Public
28

1 Defense and have been tentatively arranged and approved as part of this funding request.

2
3 Hotel costs shall be within per diem rates and will be in compliance with King
4 County's current per diem parameters. Below is the general cost assessment for travel to
5 Newark, New Jersey.

6 On Monday, April 20th, 2015, Ms. Cronin is scheduled to depart Seattle, WA.,
7
8 for Newark, New Jersey. Her return date from New Jersey back to Seattle, WA is
9 scheduled for April 24th, 2015. The travel package includes:

	<u>Purpose</u>	<u>Item</u>	<u>Approx. Expense</u>
12	1. Airline expenses	One round-trip ticket	\$700 (approx.)
13		from Seattle to Newark and	
14		return to Seattle.	
15	Date of Departure:	April 20 th , 2015	
16	Date of Return:	April 24 th , 2015	
17	2. Hotel Expenses	One room for 4 days	\$650 (approx.)
18	3. Travel expenses	Rental car for 4 days.	\$ 250.
19	a) Parking, gas, etc		\$ 125.
20	4. Meal expenses	food for one person	\$ 395. Automatically
21			reimbursed at the per
22			diem rate per day.
23		Grand total:	\$2,120.00
24			(approximate cost)

25
26 The Associated Counsel for the Accused Division has already assumed the
27 responsibility in reserving hotel accommodations necessary for Ms. Cronin and has
28 forwarded the necessary completed forms to the hotel allowing permission for them to

1 directly charge the Dept. Of Public Defense for Ms. Cronin's lodging.

2 Ms. Cronin will be financially responsible for any related travel or lodging costs that
3 are beyond the established per diem rates for each travel venue unless other arrangements
4 have been made with the Dept. Of Public Defense Director prior to departure.
5

6 Airline reservations and car rental reservations have been completed by Passport
7 Travel Agency and the travel itinerary has been forwarded to Ms. Cronin.
8

9 Meal expenses will be automatically reimbursed to Ms. Cronin at the established
10 day-to-day per diem rates without Ms. Cronin providing receipts.

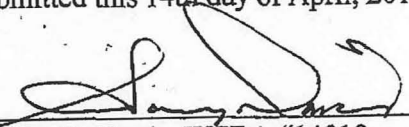
11 Reimbursement will be accepted by way of a cash advancement from the
12 Department of Public Defense prior to her initial departure. The cash advancement will
13 also include funding for a car rental and gasoline.
14

15 Any reasonable expenditures that are case-related spent beyond the amount provided
16 by the initial cash advancement will be reimbursable upon providing the receipts.
17

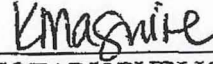
18 The defendant is indigent and unable to pay for the cost of this expert service.
19



21 Respectfully submitted this 14th day of April, 2015.

22 
23 Gary V. Davis, WSBA #14019
24 Attorney for Defendant

25 SUBSCRIBED AND SWORN to before me this 14 day of April, 2015.

26 
27 NOTARY PUBLIC in and for the State of
28 Washington, residing at King Co.