

**AFFIDAVIT**

1 I, Aaron D. Christensen, being first duly sworn, depose and state as  
2 follows:  
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4 **A. Introduction and Agent Background**

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6 1. I make this affidavit in support of a criminal complaint and  
7 warrants to arrest DIMARZIO SWADE SANCHEZ and ANGELICA JO  
8 WHITEMAN. As set forth below, there is probable cause to believe that  
9 SANCHEZ and WHITEMAN have violated Title 18, United States Code,  
10 Sections 1153(a), 113(a)(1), and 2, assault with intent to commit  
11 murder/aiding and abetting assault with intent to commit murder.  
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14 2. I am employed as a Special Agent with the Federal Bureau of  
15 Investigation (FBI) and have been so employed since May of 2009. During  
16 this time, I have participated in several criminal investigations, including  
17 investigations involving terrorist financing, organized crime, narcotics  
18 trafficking and violent crimes on Indian Reservations. I am currently  
19 assigned to the Billings, Montana Resident Agency, where I am responsible  
20 for investigating violent crimes on Indian Reservations.  
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24 3. The facts in this affidavit come from my personal observations,  
25 my training and experience, and information obtained from other agents and  
26 witnesses. This affidavit is intended to show merely that there is sufficient  
27 probable cause to support the criminal complaint and arrest warrants, and  
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does not set forth all of my knowledge about this matter.

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**B. The Crime of Assault with Intent to Commit Murder/Aiding and Abetting**

4. There are four elements to the crime of assault with intent to commit murder, in violation of 18 U.S.C. §§ 1153(a) and 113(a)(1):

First, the defendants are Indian persons;

Second, the crime in Indian country;

Third, the defendants intentionally struck and wounded the victim; and

Fourth, the defendants did so with the specific intent to commit murder.

There are four elements to the crime of aiding and abetting assault with intent to commit murder, in violation of 18 U.S.C. §§ 1153(a), 113(a)(1), and 2:

First, the crime of assault with intent to commit murder was committed by someone;

Second, the defendants aided, counseled, commanded, induced, or procured that person with respect to at least one element of assault with intent to commit murder;

Third, the defendants acted with the intent to facilitate assault with intent to commit murder; and

Fourth, the defendant acted before the crime was completed.

**C. Probable Cause**

**Indian Person Status of the Defendants**

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3 5. Dimarzio Swade Sanchez is an enrolled member of the Northern  
4 Cheyenne Tribe of Indians.

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6 6. Angelica Jo Whiteman is an enrolled member of the Crow Tribe  
7 of Indians.

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9 **Location of the Criminal Activity**

10 7. The conduct described below occurred near Castle Rock Road,  
11 about one third of a mile north of Highway 212 between Crow Agency,  
12 Montana and Busby, Montana, which is located within the exterior  
13 boundaries of the Crow Indian Reservation.  
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15 **Description of the Criminal Activity**

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17 8. On April 17, 2016, RR was at the Kirby Saloon in Kirby,  
18 Montana, with her boyfriend. Witnesses at the Kirby Saloon told  
19 investigators that RR and her boyfriend got in an argument, after which RR  
20 asked Angelica Whiteman for a ride home to Crow Agency. RR and  
21 Whiteman got in a car driven by Dimarzio Sanchez. Four other individuals,  
22 F.S., L.S., J.T. and S.F. were also in the vehicle. The following narrative is  
23 derived from interviews of F.S., J.T. and S.F.  
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27 9. During the drive from Kirby to Crow Agency, at about the 10  
28 mile marker, Whiteman began to argue with RR. Whiteman, who had been

1 sitting in the front passenger seat, jumped into the back seat and began to beat  
2 RR. Whiteman told Sanchez to turn the vehicle around so she could beat RR.

3 10. Sanchez turned the car around and drove to Castle Rock Road,  
4 located at the 17 mile marker of Highway 212, which is within the exterior  
5 boundaries of the Crow Indian Reservation, and drove north for a couple of  
6 miles.  
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8 11. Once they stopped, Whiteman dragged RR out of the car and  
9 continued to beat her. During the course of the beating, Whiteman attempted  
10 to strangle RR to death, and RR lost consciousness. Whiteman then got back  
11 into the vehicle and started crying, believing she had killed RR. Sanchez told  
12 Whiteman that RR was still alive, and brought Whiteman back to RR, who  
13 was still lying in the field unconscious. Sanchez made the statement, "I'm  
14 only going to show you this once," referring to showing Whiteman how to  
15 strangle someone to death, and then Sanchez strangled RR with a bandana.  
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20 12. Sanchez then ordered F.S. to get a gas can from the trunk of the  
21 vehicle. F.S. complied and handed the gas can to Sanchez. RR was then  
22 doused with gasoline and set on fire. Sanchez and Whiteman were the only  
23 two individuals near RR when she was doused in gasoline and set on fire.  
24 The witnesses could not or would not tell investigators who doused RR with  
25 gasoline and who set RR on fire, but it was either Sanchez or Whiteman or  
26 both.  
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13. Sanchez, Whiteman, and the other four individuals in the vehicle  
1 left the area. RR remained in the field where she was beaten, strangled and  
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3 burned for approximately fourteen hours until she was discovered and given  
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5 emergency medical treatment.

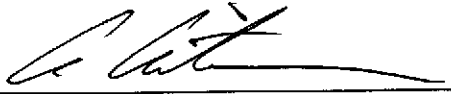
6 14. RR suffered third degree burns over forty-five percent of her  
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8 body. She also suffered severe frostbite on her legs.

9 **C. Conclusion**

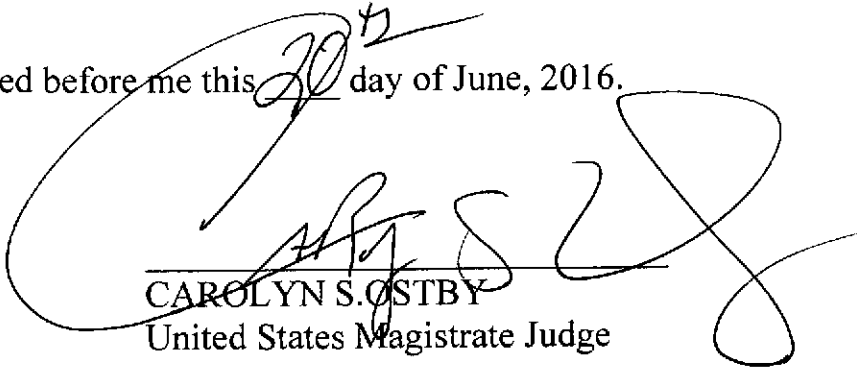
10 15. Based upon the foregoing facts, I believe that probable cause  
11  
12 supports a criminal complaint alleging that Dimarzio Swade Sanchez and  
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14 Angelica Jo Whiteman committed assault with intent to commit  
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16 murder/aiding and abetting assault with intent to commit murder, in violation  
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18 of 18 U.S.C. §§ 1153(a), 113(a)(1), and 2. I respectfully request that the  
19  
20 Court issue warrants for the arrest of Dimarzio Swade Sanchez and Angelica  
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22 Jo Whiteman.  
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Dated this 20<sup>th</sup> day of June, 2016.

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Aaron D. Christensen  
FBI Special Agent

Sworn to and subscribed before me this 20<sup>th</sup> day of June, 2016.

  
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CAROLYN S. OSTBY  
United States Magistrate Judge