

DISTRICT OF OREGON, ss.

AFFIDAVIT OF CLINTON LINDSLY

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, Clinton Lindsly, being first duly sworn, do hereby depose and say:

**Introduction and Agent Background**

1. I have been employed as a Special Agent (SA) by Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) since August of 2010. I am currently assigned to the ICE/HSI Office of the Assistant Special Agent in Charge, in Portland, Oregon narcotics unit. Previously, I was assigned to the ICE/HSI Office in Los Angeles, California, where I worked for over six years in a money laundering and narcotics group that specialized in undercover operations. My formal law enforcement training includes successfully completing the 23-week HSI basic training course at the Federal Law Enforcement Training Center in Glynco, Georgia. During the training, I learned how controlled substances are manufactured, consumed, packaged, marketed, and distributed. Since then, I have participated in dozens of investigations which utilized wiretaps, controlled purchase operations, physical surveillance, trash searches, electronic vehicle tracking, pole cameras, cars with hidden compartments used to transport drugs, buy/walks, buy/ busts, cell phone geo-location techniques, cell-site simulators, undercover operations including narcotics and money laundering, informants, search warrants, interviews, arrests, and/or pen register/trap and trace orders. I have interviewed and managed informants in drug cases, prepared and executed search warrants, arrested and interviewed suspects, conducted physical surveillance, and operated/utilized electronic and video surveillance during my drug investigations.

Additionally, have conducted financial investigations involving sophisticated money laundering techniques, fraud, and the theft of identities.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for **Dawn Marie WALKER** (date of birth XX/XX/82) for violations of 18 U.S. Code § 1028A(a)(1) and (a)(6) – *Aggravated Identity Theft* (a felony) and *Fraud and related activity in connection with identification documents, authentication features, and information* (Possession of False Identification Documents, a misdemeanor) and hereinafter the “**Target Offenses.**”

**Applicable Law**

3. Title 18 U.S. Code § 1028A(a)(1) provides that it is a felony offense for a person, during and in relation to any felony violation enumerated in subsection c, to-wit: false statements in the use of a passport, to knowingly possess or use, without lawful authority, a means of identification of another person.

4. Title 18 U.S. Code § 1028(a)(6) provides that it is a misdemeanor offense for a person to possess an identification document which is stolen or produced without lawful authority knowing that such document was stolen or produced without such authority.

5. The following information, facts, and occurrences are the result of my knowledge, conversations with other law enforcement officers, and from my review of reports related to this investigation. This affidavit is intended to show there is probable cause for the requested criminal complaint and arrest warrant and does not purport to set forth all of my knowledge of, or investigation into this matter.

### Statement of Probable Cause

#### HSI Contacted by Canadian Law Enforcement for Assistance<sup>1</sup>

6. On August 4, 2022, HSI Portland was contacted for assistance by Canadian officials regarding the location of a child that was taken by the biological mother identified as **Dawn WALKER** from Canada into the United States without permission. In speaking with the assigned Canadian investigators, I learned that several weeks ago on July 22, 2022, **WALKER** picked up her son from the biological father. **WALKER** and the biological father have been engaged in a lengthy custody dispute and there was a standing court ordered custody agreement between **WALKER** and the biological father. The following Monday, **WALKER** failed to show up for a large conference and was reported missing to police. Police were dispatched to **WALKER's** residence and found the door unlocked, her animals unfed, and animal feces on the ground in the house. A subsequent "Be on the Lookout" (BOLO) was sent out to surrounding agencies regarding **WALKER** and the missing child.

7. After the BOLO was sent to local law enforcement, it was learned that several days prior on Saturday (July 23, 2022), a citizen was at a local park and was walking along the riverbank. While walking on the riverbank the citizen observed a blanket laid on the ground, a purse (with ID and other contents), and a broken fishing pole laying halfway in the water. The citizen spoke with several people in the surrounding area and was unable to locate who the items belonged too. Inside the purse, the citizen found a set of car keys but was unable to locate a car in the nearby parking lot. Prior to collecting the items, the citizen took a photograph of the scene. I have provided the photograph for the Court:

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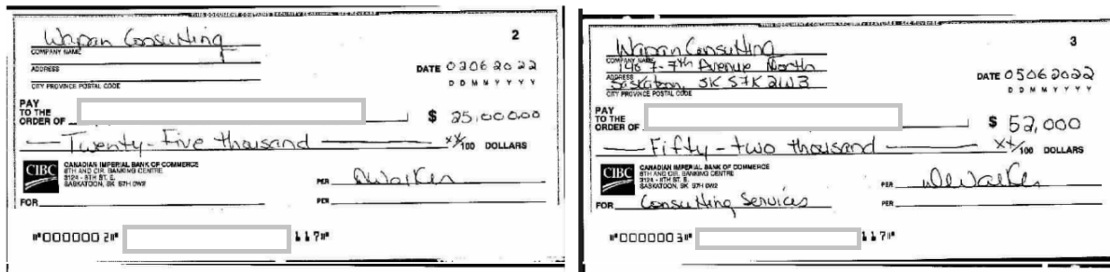
<sup>1</sup> The facts presented in this affidavit appear in chronological order for cohesiveness. However, I learned some of these facts at different times than represented in this affidavit.



8. The items then were cataloged and stored at the local police department until a detective observed the BOLO on Monday and that the contents of the purse matched the missing person (**WALKER**). Suspecting foul play, detectives then canvassed the area of the river and were eventually able to locate **WALKER**'s truck parked in a nearby parking lot. Search and rescue divers, helicopters, volunteers, tracking dogs, and other resources were then deployed over the next several days in an attempt to locate **WALKER** and missing child. Law enforcement also obtained **WALKER**'s cell phone records and financial records which showed no activity since Saturday morning. The preliminary financial records revealed that **WALKER** had several bank accounts with total balances of over \$100,000. Based on the scene at the river's edge and the investigation, local law enforcement believed that **WALKER** and her son were fishing by the water's edge and that they were swept away by the current and likely deceased. However, a \$10,000 dollar reward was offered for any information about the whereabouts of **WALKER** or her son and the investigation continued.

9. On August 4, 2022, Canadian officials obtained additional records from financial institutions known to be used by **WALKER**. It was learned that the financial institution had identified a business account named "Wapan Consulting" that had listed **WALKER** as the only authorized card holder. In reviewing this bank account, investigators observed two large checks

written from **WALKER**'s business account to the name of Adult Victim.<sup>2</sup> These checks were written on June 2, 2022, in the amount of \$25,000 to Adult Victim, on June 5, 2022, in the amount of \$52,000 to Adult Victim, and signed by what appeared to be the name **WALKER**. I have provided a photograph of these checks for the Court:



10. Later that day, Canadian investigators met with Adult Victim to discuss the above checks. During the interview, investigators learned that Adult Victim was close friends with **WALKER** and that they worked together. Additionally, they learned that Adult Victim's child (hereinafter identified as "Minor Victim") and **WALKER**'s child often played together. However, Adult Victim stated that she had no knowledge about the checks. Investigators then were able to identify that the checks were deposited into a bank account that was held with Tangerine Direct Bank, a financial institution in Canada. Records confirmed that this bank account was in fact in the name of Adult Victim and was opened on May 16, 2022. Adult Victim stated that she did not open this bank account but that she (Adult Victim) had their identity documents (Indian and Northern Affairs Canada Certificate of Indian Status card and Saskatchewan driver's license) stolen in April 2022.

11. During a further review of financial transactions in the Tangerine bank account in the name of Adult Victim, investigators observed charges that started to occur on July 25, 2022,

<sup>2</sup> The true name of Adult Victim is known to law enforcement and omitted to protect their identity. At this time, Canadian officials do not suspect any involvement of Adult Victim in the abduction scheme, including the staging her own death, crafted by **WALKER**.

and continued until August 4, 2022. These charges were for Airbnb rentals, food, gas, hotels, and Netflix. In chronological order, the transactions started in Butte (MT) near the Canadian border, then to Billings (MT), to Spokane (WA), to Umatilla (OR), to Rufus (OR), and eventually ending most recently in Oregon City, Oregon. Canadian officials then contacted Airbnb and learned that there was a current rental in Oregon City under the name of Adult Victim. The current balance of this account is over \$70,000. Canadian officials then contacted HSI Portland for assistance.

12. At approximately 12:01 a.m., HSI Special Agents established surveillance at the Airbnb in Oregon city and observed a blue Chevrolet Equinox bearing a Saskatchewan license plate parked in the driveway. Canadian officials were able to confirm that the Equinox was registered to Adult Victim. Again, Adult Victim confirmed that she in fact had never purchased the Equinox.

13. Suspecting that **WALKER** had used the stolen identities of Adult Victim and possibly Minor Victim to enter the United States illegally and to avoid detection, HSI investigators conducted a search of border crossing records. This search revealed that on July 23, 2022, at approximately 9:15 a.m. (PDT) a person purporting to be Adult Victim and Minor Victim entered the United States from Canada while driving a blue Chevrolet Equinox with the exact same license plate as the one parked in front of the Airbnb in Oregon City, Oregon. It is unclear exactly what document(s) the person purporting to be Adult Victim used but based on my training and experience and the fact that a passport wasn't presented, the person purporting to be Adult Victim would have had to present a government issued form of identification and/or a birth certificate in order to enter the United States. The child individual who purported to be Minor Victim presented a Canadian passport in the name of Minor Victim with assigned passport

number XXXXX223. Investigators have spoken with Adult Victim, the mother of Minor Victim, who also confirmed that they did not enter the United States from Canada on July 23, 2022.<sup>3</sup> As further discussed below, I believe that it was in fact **WALKER** who entered the United States from Canada and presented the stolen identity documents of Adult Victim and Minor Victim (a passport). As such, I believe that **WALKER** committed the offense of 18 U.S. Code § 1543 - *False Use of a Passport*.<sup>4</sup>

14. At approximately 9:50 a.m., I was conducting surveillance at the Airbnb in Oregon City, Oregon. I observed a female walk from the direction of the Airbnb, get into the Chevrolet Equinox, and shut the door as if she were going to drive away. While wearing police markings I then approached the car and ordered the driver of the vehicle to exit the vehicle. I immediately identified the female as **WALKER**. I am familiar with the appearance of **WALKER** and her son based on my review of several photographs provided by Canadian investigators. When asked where her son was at, **WALKER** stated that her son was inside the Airbnb. **WALKER** was handcuffed and detained. Concerned about the safety and welfare of the child, and the fact that she was appearing to leave the child alone, investigators used the Airbnb provided code to enter the Airbnb rental and located the child in the living room. Investigators then conducted a protective sweep of the Airbnb and located no additional occupants.

15. While detained, I asked **WALKER** to tell me her name and not to lie to me. **WALKER** then immediately stated “Dawn Walker.” I asked **WALKER** where her

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<sup>3</sup> No surveillance footage is available from the Port of Entry.

<sup>4</sup> Whoever willfully and knowingly uses, or attempts to use, or furnishes to another for use any such false, forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport, or any passport validly issued which has become void by the occurrence of any condition therein prescribed invalidating the same shall be fined under this title and imprisoned not more than 10 years (in the case of the first or second such offense, if the offense was not committed to facilitate such an act of international terrorism or a drug trafficking crime).

identification and phone were located, to which **WALKER** stated that it was in her purse in the car. I also told **WALKER** that people presumed that she and her son died in the river, to which she spontaneously stated “he doesn’t want to be with his father.”

16. Looking through the driver side window, I observed a black purse sitting on the front passenger seat. Knowing that **WALKER** was likely traveling under a stolen identity (i.e. possession of fraudulent documents), and that it appeared that **WALKER** was getting ready to drive away, I conducted a mobile conveyance search of the Chevrolet Equinox. I reached into the car, retrieved the purse, and then examined the contents of the purse. During a search of the purse, I located a cell phone, a large amount of Canadian currency, prepaid Visa cards, a Tangerine bank debit card in the name of Adult Victim (consistent with the bank account fraudulently opened using Adult Victim’s stolen information), a Indian and Northern Affairs Canada Certificate of Indian Status card and Saskatchewan driver’s license issued to Adult Victim, and a vehicle registration documents for the Chevrolet Equinox in the name of Adult Victim. An additional search of the car revealed a large plastic binder with numerous documents and several notebooks with handwritten notes.

17. During a later review of the contents of the large plastic binder, I located a genuine Saskatchewan birth certificate in the name of Adult Victim, a genuine Saskatchewan birth certificate in the name of Minor Victim, and a genuine Canadian passport in the name of Minor Victim but depicted the photograph of **WALKER**’s son (i.e. it’s real but with not the correct photograph). The issued passport number was an exact match to the one presented by the purported Minor Victim on July 23, 2022, in order to enter the United States. The birth certificates were in their original opened mail envelope, which was addressed to Adult Victim’s



address.<sup>5</sup> I also located a notarized letter titled “STATUTORY TRAVEL DECLARATION” that purported to provide travel authorization by Minor Victim’s father for Minor Victim to travel into the United States, which was dated on June 28, 2022. The purpose of the travel claimed to be a wedding in South Dakota. Investigators have confirmed that Minor Victim’s father never provided such authorization. As such, I believe that this document was created by **WALKER** in order to further her son’s entry into the United States by falsely using a passport in violation of 18 U.S. Code § 1543. **WALKER** did not have permission to have or use the documents associated with Minor Victim.

18. During a review of the notebooks with handwritten notes, I found several pages that seemed consistent with a “check list” of staging the odd circumstances of their disappearance (i.e. making it look like she and her son fell into the river). This list included things such as dying her hair, packing the car, getting toys, throwing her phone into the water, ditching her car by the bridge, possibly buying a “fishing rod,” “find nearest border,” covering her tattoo (**WALKER** has a distant tattoo on the web of her hand), and other things. I have provided photographs of these for the Court:

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<sup>5</sup> Due to the friendly relationship between Adult Victim and **WALKER** and that **WALKER** had frequent access to Adult Victim’s house, I believe that **WALKER** ordered the birth certificates and then stole them from Adult Victim’s mailbox without Adult Victim knowing.

Garbage  
toys  
Pack car - night  
Pack car (blackwig) - go home  
→ ditch phone in water.  
Pack cap + (? shoes)  
book 2 days in Vinniv (Edsky)  
leave @ 3p.m.  
→ dye hair  
→ keep hair dye + garbage  
ditch vehicle by bridge  
find nearest border

Monday

1. Negative Covid test
2. Fishing Rod
3. Phone (dead)
4. Vehicle / bike
5. Dye hair
6. Cover tattoo

19. In coordination with Canadian law enforcement, Oregon Department of Human Services took custody of **WALKER's** son and notified the biological father. The biological father is anticipated to be reunited with his son today (August 5, 2022).

20. Believing that **WALKER** had committed offenses in violation of the **Target Offenses**, I arrested **WALKER**. **WALKER** was subsequently transported to the Multnomah County Detention Center.

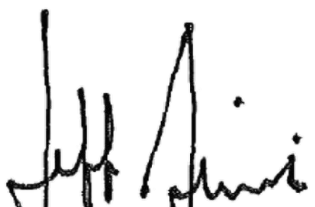
**Conclusion**

21. Based on the foregoing, I have probable cause to believe, and I do believe, that between July 23 – August 5, 2022, within the District of Oregon, **Dawn Marie WALKER** committed the **Target Offenses**. I therefore request that the Court issue a criminal complaint and arrest warrant for **WALKER**. \

22. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney Scott Kerin. AUSA Kerin advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

*By phone pursuant to Fed R. Crim. P. 4.1*  
Clinton Lindsly  
Special Agent  
Homeland Security Investigations

Subscribed and sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 10:50 p.m. on August 5, 2022.

  
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HON. JEFFREY ARMISTEAD  
United States Magistrate Judge