# UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA

#### UNITED STATES OF AMERICA

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REDACTED
ELECTRONIC CRIMINAL
COMPLAINT

**MELISSA ANN SANTANA** 

**CASE NUMBER:** 

17-04324mJ-001-PCT-DMF

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

#### **COUNT 1**

On or about September 9, 2016, in Coconino County, the District of Arizona, the defendant, MELISSA ANN SANTANA in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false statement and representation, in that MELISSA SANTANA, did falsely represent to three federal officials of the United States Forest Service, W.F., A.P. and G.O., all Flagstaff Hotshot Crew supervisors, that she had a teenaged daughter who was sexually assaulted by Arizona based federal firefighters while fighting a fire in Wyoming, when in fact she created a false e-mail identity, does not live in Wyoming, does not have a daughter and no such assault took place, in violation of Title 18, United States Code, Section 1001(a)(2).

#### COUNT 2

On or about September 29, 2016, in Coconino County, the District of Arizona, the defendant, MELISSA ANN SANTANA in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false statement and representation, in that MELISSA SANTANA, did falsely represent to a federal official of the United States Forest Service, Globe Hotshot Crew Superintendent D.W., that she was a woman who a firefighter had impregnated and that he wasn't returning her calls, when in fact she created a false identity and had no relationship with the firefighter, in violation of Title 18, United States Code, Section 1001(a)(2).

# **COUNT 3**

On or about September 29, 2016, in Coconino County, the District of Arizona, the defendant, MELISSA ANN SANTANA in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false statement and representation, in that MELISSA SANTANA, did falsely represent to a federal official of the United States Forest Service, Flagstaff Hotshot Crew Superintendent W.K., that she was a woman who a firefighter had impregnated and that he wasn't returning her calls, when in fact she created a false identity and had no relationship with the firefighter, in violation of Title 18, United States Code, Section 1001(a)(2).

# **COUNT 4**

Between on or about February 1, 2015, and February 8, 2017, in the District of Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or intimidate M.G., used facilities of interstate and foreign commerce, to-wit, interactive computer services, electronic communication systems of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause or would reasonably have been expected to cause substantial emotional distress to M.G., in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

## COUNT 5

Between on or about June 30, 2016 and August 1, 2017, in the District of Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass, intimidate or place under surveillance with the intent to harass or intimidate N.L., used facilities of interstate and foreign commerce, to-wit, interactive computer services, electronic communication systems of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause or would reasonably have been expected to cause substantial emotional distress to N.L., in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

#### COUNT 6

Between on or about August 31, 2016, and September 22, 2017, in the District of Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or intimidate K.T., used facilities of interstate and foreign commerce, to-wit, interactive computer services, electronic communication systems of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause or would reasonably have been expected to cause substantial emotional distress to K.T., in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

# **COUNT 7**

Between on or about September 8, 2016, and May 26, 2017, in the District of Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or intimidate E.T., used facilities of interstate and foreign commerce, to-wit, interactive computer services, electronic communication systems of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause or would reasonably have been expected to cause substantial emotional distress to E.T., in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

### COUNT 8

Between on or about January 24, 2017, and March 1, 2017, in the District of Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or intimidate D.S., used facilities of interstate and foreign commerce, to-wit, interactive computer services, electronic communication systems of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause or would reasonably have been expected to cause substantial emotional distress to D.S. and members of D.S.'s immediate family, in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

I further state that I am a Special Agent with the United States Forest Service, and that this complaint is based on the following facts:

See attached Affidavit incorporated herein by reference.

Continued on an attachment sheet and made a part hereof: 

Yes No

REVIEWED BY: /s/AUSA Camille Bibles

X Pursuant to 28 U.S.C. §1746(2), I declare that the foregoing is true and correct.

Sophia Fong, Special Agent, USFS
Complainant's Name and Title

X Sworn by Telephone

10/28//2017 9:32 a.m.

Flagstaff, Arizona
City and State

Lynnette C. Kimmins for

Name & Title of Judicial Office

Deborah M. Fine, U.S. Magistrate Judge

# DISTRICT OF ARIZONA REDACTED ELECTRONIC AFFIDAVIT

I, Sophia Fong, being duly sworn, depose and state as follows:

# I. Background

Your affiant, Sophia Fong, is a Special Agent (SA) with the United States 1. Forest Service (USFS) and has been employed as such since November, 2011. Prior to employment as a Special Agent, your affiant served as a Field Staff Law Enforcement Ranger for the Bureau of Land Management on the Arizona Strip from June, 2009 to November, 2011. Your affiant also served as a Wildlife Manager and State Peace Officer for the Arizona Game and Fish Department across the state of Arizona from January, 2005, to June, 2009, and as a field wildlife biologist from 2001 to 2005. Your affiant has a Bachelor of Science Degree in Conservation Biology from Arizona State University (2003), and is a graduate of the Land Management Police Training Program and the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. Your affiant is a graduate of Arizona Peace Officer Standards and Training (AZPOST) Southern Arizona Law Enforcement Training Center's Basic Police Training Program. Your affiant served in the United States Army and was deployed Bosnia-Herzegovina. Your affiant has training and experience in investigating violations of federal criminal laws and regulations and has received training from the USFS related to electronic devices, including cellular phones, mobile devices, computer systems, and the use of these electronic devices during criminal investigations.

- 2. The information contained in this affidavit is from your affiant's personal knowledge, as well as from information provided to your affiant by other law enforcement officers and/or witnesses including those listed herein. Due to the fact that this affidavit is being made to establish probable cause, your affiant has not listed each and every fact known regarding the investigation of this incident.
- 3. This case involves violations of 18 U.S.C. § 1001 False Statements and 18 U.S.C. § 2261A Stalking largely committed through the use of interactive computer services and electronic communications as contained in Addendum A. The subject is MELISSA ANN SANTANA ("SANTANA"), an Associate Professor of Interior Design at Northern Arizona University. SANTANA is married and lives in Flagstaff, Arizona. During the investigation described below your affiant has determined that SANTANA committed offenses using many different identities, e-mail addresses, social media accounts, temporary VoIP telephone numbers and assorted telephone numbers as set out in Addendum B to this affidavit. Your affiant connected the use of these monikers and numbers to SANTANA through search warrants.
- 4. The victims of this case are the United States Forest Service, specifically Flagstaff and Globe Hotshot crews. Two of the stalking victims, REDACTED ("N.L.") and REDACTED ("K.T.") work as members of the Flagstaff Hotshot crew. REDACTED ("M.G.") is a victim of SANTANA's actions and is a student at NAU who believed that he was friends with SANTANA. REDACTED (E.T.) is a victim of SANTANA's actions and was the fiancé (now wife) of N.L.'s friend and co-worker REDACTED ("A.G").

REDACTED ("D.S.") is a victim, as are members of his immediate family. D.S. visited Flagstaff and had one date with SANTANA.

5. Your affiant began investigating this case on September 9, 2016. The details of the investigation are organized by charge below.

## II. Investigation

# **Count 1: False Statements**

On September 9, 2016, at approximately 7:02 am, REDACTED ("W.K."), 6. the Flagstaff Interagency Hotshot Crew (IHC) Superintendent for the Flagstaff Ranger District, received a call from the Coconino National Forest Dispatch Center, ordering the crew to respond to the Soberanes Fire in Mt. Diablo, California. While the members of the Flagstaff IHC are based and live in Flagstaff, Arizona, they respond to fires across the United States. At approximately 9:30 am, W.K. read an email received on his official U.S. purporting be from e-mail address, address to Forest Service e-mail cmcarthydancemom@gmail.com. The message was sent at approximately 8:32 am on September 9, 2016, and the subject line read, "Your Hotshot Crew Behavior." This e-mail, and an identical one from cmcarthydancemom@gmail.com sent at 3:47 pm on that date under the subject line, "Hotshot Behavior," were copied to the U.S. Forest Service work email addresses of REDACTED ("A.P.") and REDACTED ("G.O."), who are also supervisors of the Flagstaff IHC.

The two e-mails contained the message content:

Hello REDACTED

I am disgusted by the behavior of your hotshot crew when they passed

through my town. Several weeks ago your guys were on the way to a fire in Wyoming.

I intercepted messages between your crewmembers and my UNDERAGE, 15 year old daughter. She won't tell me which website they met on but I did read that they invited her back to their hotel, gave her alcohol and had sex with her. This is statutory rape and I want these men charged. She is refusing to talk to me because she doesn't want these men to get in trouble but they took advantage of her and I will do anything to protect my daughter. I want to know the full names of these men and contact info. I will be contacting the police.

From the discussions I can tell there were three men: REDACTED, REDACTED and REDACTED.

I expect to hear from you IN WRITING. I want a record of this conversation and you will not ignore me. I will contact your local papers if I don't hear back.

Cathy McCarthy

- 7. W.K. contacted his superiors and was directed to turn down the assignment to the Soberanes Fire and change their availability status to "not available" until the allegation was investigated by law enforcement.
- 8. Your affiant was assigned to the matter at approximately 3:09 pm that afternoon.
- 9. Your affiant immediately attempted to identify the owner of the e-mail address <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a>. Only one possible "Cathy McCarthy" was found in Wyoming, however the distance of this person from the Flagstaff IHC's locations in Wyoming was not consistent with the information in the e-mail.
- 10. On September 9, 2016, at approximately 10:44 pm, your affiant responded via e-mail to <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> explaining that your affiant was a criminal investigator with the USFS and that the USFS takes any criminal and misconduct allegations very seriously. Your affiant stressed the need for contact with the author of

the e-mail and asked for the author to also contact local law enforcement, along with assurances about the ability of specialist sex crimes investigators to speak with juvenile victims.

- 11. On September 12, 2016, at approximately 10:23 am, your affiant attempted to contact <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> via email a second time after not getting a response over the weekend from the first email. At approximately 10:24 am, your affiant received an automated email from Google stating that the <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> and immediately received another email to the <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> and immediately received another automated email from Google stating that the subject account was not found. On September 13, 2016, at approximately 10:13 am, your affiant sent another email to the <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> to ensure that the undeliverable email was not a server error. At approximately 10:17 am, your affiant received another automated email from Google stating that the e-mail address was not found and that there was no such user.
- 12. On September 13, 2016, at approximately 3:00 pm, your affiant contacted the Rock Spring, Wyoming, Police Department and spoke with Officer Casey Watkins about the investigation. Officer Watkins advised that a search revealed that no Cathy McCarthy existed in their database for any reports or contacts. Officer Watkins also checked police incident logs and was unable to find any possible incidents, including noise complaints. He specifically checked the motels where the Flagstaff IHC stayed for any

events or reports occurring on the dates when the Flagstaff IHC stayed in the motels in Rock Springs, Wyoming.

- 13. Your affiant also contacted the hotels directly and learned that none of the hotels had any incidents, including noise complaints or parties, with any of the crew members. Each motel reported that there were no notable incidents with any of the hotshot crews. Additionally, none of the managers recalled seeing any of the crew members with females.
- 14. Your affiant reviewed the crew roster and daily logs for each day of the fire assignment from the day the crew left Flagstaff, Arizona on July 27, 2016, to the day they returned to Flagstaff on August 12, 2016, and determined that crew was working 14 to 16 hour days on the fires and literally had very little down time during this deployment. Between September 14, 2016 and September 26, 2016, your affiant interviewed the twenty-two members of the Flagstaff IHC that were on the fire in Wyoming. During these interviews your affiant questioned the crew's timeline while they were on the fire assignment. Each crew member accounted for their whereabouts during the entire trip.
- 15. During the interviews your affiant learned that several of the crew members and their family were victims of harassment on various social media sites. One of the crew members, N.L., recently ended a relationship with a married woman, SANTANA, who lives and works in Flagstaff, Arizona. Since ending the relationship he suffered vandalism to his car, multiple vulgar and derogatory messages from unknown numbers to

his personal phone and social media accounts, and had generally been the target of harassing activity.

- 16. As is detailed in Addendum B, your affiant learned that the Google e-mail account <a href="mailto:cmcarthydancemom@gmail.com">cmcarthydancemom@gmail.com</a> was created right before the e-mail was sent to W.K and was deleted on September 10, 2016. This was done from an IP address that was used by an account later linked to SANTANA and that was determined to be utilized to send harassing e-mails to others in this investigation.
- 17. Your affiant determined that the allegation made in the September 9, 2016, anonymous e-mail was unfounded and advised the U.S. Forest Service Supervisor of this fact. The Flagstaff IHC were then changed to be available for deployment. However, as a result of the crew's unavailability for fires during the investigative time period, the fire season was effectively over at this time. The entire crew lost considerable income as they were not available for the last fires of the season as a direct result of this false e-mail.

#### **Count 2: False Statements**

18. On September 29, 2016, at 1:35 pm, U.S.F.S. Globe Hotshot Superintendent D.W. received a text message on his government issued mobile phone from phone number 602-892-5168. The message content was:

Can you please tell REDACTED to call me. He won't return my phone calls, I'm pregnant, it's his. He needs to take responsibility. Thanks.

19. D.W. did have an employee by the name of REDACTED ("S.M.") and D.W. called telephone number 602-892-5168 nine (9) times with no answer. D.W. left a voice

message advising as to who he was, that he did have an employee by the name S.M. and that his number was reserved for fire emergencies only.

- 20. D.W. contacted S.M., who was a seasonal Globe Hotshot Crew member, and advised him of the text message and number. S.M. tried contacting the number and left a voice message and his own telephone number. S.M. had no idea who this person could be and why they were making this allegation.
- 21. Your affiant interviewed D.W. and S.M. on November 1, 2016. Neither was familiar with the user of telephone number 602-892-5168. Both described that the Globe Hotshot fire crew stayed in Flagstaff on September 16, 2016.
- 22. S.M. described that he used the Tinder application and through that application met a woman who called herself "Amanda." S.M. initially texted with "Amanda" via her telephone number 928-892-8779 and conveyed via text to that number that on September 16, 2016, that he and his crew were eating at Buffalo Wild Wings in Flagstaff. "Amanda" insisted on going to the restaurant to meet S.M. and the crew. S.M. conveyed via text that he did not want to meet her. Sometime later he received a call advising that "Amanda" was outside the restaurant. S.M. went outside and met a blond haired woman who claimed to be "Amanda" who became upset when he told her he didn't want to meet. She became upset and S.M. asked her not to make a scene. "Amanda" walked inside the restaurant and told him and the crew that she would show them what a scene looked like before she left the restaurant. S.M. had no further contact with "Amanda" and no longer responded to text messages from the telephone number.

- 23. Your affiant is familiar through this investigation and through search warrants that SANTANA owns an Android phone that has service through Verizon Wireless with telephone number 928-892-8779.
- 24. Your affiant additionally learned from a search warrant that SANTANA used telephone number 928-892-8779 to text with S.M. numerous times from August 31, 2016 to September 17, 2016, and that she called his phone just after 8:00 pm on September 16, 2016. Your affiant is aware that SANTANA sometimes uses the alias "Amanda" or "Amanda Foster."
- 25. Your affiant learned through a search warrant that telephone number 602-892-5168 was a temporary VOIP number created on September 28, 2016, through Ad Hoc Labs and that it is based on Verizon account number 928-892-8779, SANTANA's Verizon Wireless Android phone number. Additionally, this account (602-892-5168) was named "REDACTED" when it was created. This number was used extensively in SANTANA's contacts with E.T.
- 26. Your affiant has found no support for the substance of the text message sent to USFS Globe Hotshot Superintendent D.W. on September 29, 2016, at 1:35 pm from telephone number 602-892-5168.

#### **Count 3: False Statements**

27. On September 29, 2016, at 1:37 pm, Flagstaff Hotshot Crew Superintendent W.K. received a text on his government issued work cell phone from telephone number 602-892-5168. The text message content was:

Can you please tell REDACTED to call me. He won't return my phone calls, I'm pregnant, it's his. He needs to take responsibility. Thanks Ashley.

- 28. W.K. took a screenshot of the text and accidently sent the image back to 602-892-5168 via text message. He then received a return message, "Thanks."
- 29. W.K. then sent the image to K.T., who was an employee and a member of the Flagstaff Hotshot Fire crew. K.T. advised your affiant of the text message. (K.T. had already been the victim of other harassment). K.T. advised that he has never had a relationship with anyone named "Ashley."
- 30. As previously described and as set out in Addendum B, the number used to send this text to U.S.F.S. Hotshot Crew Superintendent W.K. was determined to be a temporary VOIP number obtained through Ad Hoc Labs that is based on SANTANA's Android cell phone with Verizon number 928-892-8779.
- 31. Your affiant has found no support for the allegation made in the text message sent at 1:37 pm on September 29, 2016, to Flagstaff Hotshot Crew Superintendent W.K. from phone number 602-892-5168.

# Count 4: Stalking (M.G.)

32. On December 7, 2016, your affiant spoke with NAU student M.G. His telephone number was revealed from a result of a search warrant as having called temporary VOIP telephone number 928-216-5605. Your affiant learned from the search warrant that this number was also based on SANTANA's Android Verizon Wireless number 928-892-8779. M.G. was initially reluctant to communicate with your affiant as

someone had been stalking him for years and he was hesitant to trust anyone. M.G. described that the harassment started approximately three years ago on the Northern Arizona University Facebook page. Then, after about six months he started receiving harassing calls from various unknown numbers, emails, and posts on his personal Facebook page and on the Yelp website. He has also received harassing messages on various dating apps that he has used, including Tinder, making it difficult to have a relationship. Some of the cyber harassment includes a "smear campaign" against him, such as posting falsely that he has STDs.

- 33. M.G. explained that any of his friends who posted responses to the Facebook or Yelp posts defending him were then targeted by the same unknown individual with the same type of harassment. M.G. stated that one of his friends lost her job because of the continuous false posts and emails on Yelp because of the nature of her job. M.G. mentioned that her boyfriend works for the USFS. Another friend who defended him online suffered retaliatory false posts claiming that she steals.
- 34. M.G. detailed that he had no idea who was behind the stalking or why he was the targeted. M.G. had hired a private investigator who could only determine that some of the calls that he received were from temporary numbers.
- 35. Your affiant next spoke with M.G. on February 12, 2017, when another victim reported that M.G. was being harassed by "Amanda Foster" but was friends with SANTANA.

- 36. M.G. confirmed that SANTANA was a friend that he confided to about being stalked and the suffering that the stalker caused himself and his friends. M.G. said that he met SANTANA on a Craigslist posting in December, 2014, and that they met in person in February, 2015. He said that the stalking on the NAU Facebook page began about a week later.
- 37. M.G. said that he and his friends had most recently been harassed on-line by someone claiming to be "Amanda Foster." The photo attached to this person matched an "Amanda" who kept trying to contact him on Tinder several months earlier.
- 38. Your affiant confirmed that several on-line pages had been created in M.G.'s name which were filled with demeaning information and images.
- 39. M.G. called your affiant on February 13, 2017, to report that some of the original stalking Facebook accounts had changed their profile name and sex to "Jo Hotshot," a male. This is an identity that has appeared in relationship to other victims in this case.
- 40. Your affiant has learned that M.G.'s life has been dramatically altered for the worse by the stalking of himself and his friends. He is very distraught about the impact that this stalking has had on his life and that of his friends.

# Count 5: Stalking (N.L.)

41. During the investigation of the allegation described in paragraph 6, your affiant learned that N.L. had a sexual relationship with SANTANA starting in November, 2015. N.L. met her through Tinder and knew her profile name as "Ann" (or known as

"Ann, 29") where she said that she was "looking for friends for daytime fun." He met her in person and learned that she was Melissa SANTANA, a professor of Interior Design at NAU. He learned that she was married. They communicated largely via text message from their cell phones and met in her office at NAU and his place (at that time) and once at her house. N.L. described that he became increasingly uncomfortable with the relationship and ended it in June, 2016. SANTANA did not react well to the termination of the relationship. Using a phone that he recognized as hers, Android Verizon Wireless number 928-892-8779, she continued to text him and continued to try to extend the relationship. N.L. either wouldn't answer or he kept his answers short.

- 42. On June 30, 2016, N.L. was matched on Tinder with a different "Ann." This person's contact number was 928-288-0199. (Your affiant learned through a search warrant that this number was created on June 30, 2016, through an application from Ad Hoc Labs and was based on SANTANA's Android Verizon Wireless number 928-892-8779.) N.L. communicated with this person until later in the day when "Ann" become insulting after standing him up at a restaurant. She texted N.L., "So, why not be like the granite mountain hotshots and go die in the fire, like the other dumbass losers there."
- 43. In early August 2016, SANTANA texted N.L. several times from her known phone number while he was on the fire in Wyoming asking him to see him because she missed him. N.L. initially agreed, but changed his mind before he returned from the fire. SANTANA continued to text him after this, which he then ignored. On August 15, 2016, between 9:30 pm and 10:00 pm, N.L. was at home in Flagstaff when he found his car had

been vandalized. His vehicle, which he purchased while involved with SANTANA, was parked on the street in front of his residence (also the home of E.T. and A.G.). The entire driver's side and rear of his car was spray painted with white paint.

- 44. On August 16 to 17, 2016, SANTANA texted N.L. several times but he did not respond. On August 17, 2016, at approximately 8:23 pm he received a text message from 774-203-4700, from someone identifying herself as "Ashleigh." After texting that she had the wrong number, "Ashleigh" continued to have a text conversation with N.L. typing that maybe it was "fate" that they met. "Ashleigh" tried to get him to send photos of himself to her. He responded for her to send one first. When N.L. wouldn't send a photo, "Ashleigh" texted rude and derogatory names and that he should go die and that she was going to post his number on all of the "gay sites, bars, and meetups in boston." N.L. immediately believed that SANTANA was behind the texts because during their relationship she had told him that someone had posted her number on a Craigslist casual encounters page resulting in numerous vulgar photos and messages from various men.
- 45. On August 17, 2016 through August 30, 2016, N.L. and the rest of the Flagstaff IHC worked a fire in California. During this time N.L.'s vehicle, as well as the rest of the IHC vehicles, were parked at the Flagstaff Hotshot Crew Ranch located approximately ½ mile north of Snowbowl Road near Highway 180. The road to the ranch and parking area is locked when the crew is not there and is posted with a sign that states the area is for administrative use only.

- 46. On August 18 and 19, 2016, N.L. received 20 30 text messages and 3 to 4 calls from various numbers from men looking to meet up for sex. He learned that his cell phone number was placed on a Craigslist "casual encounters" ad in Las Vegas along with a photo of a girl.
- 47. On August 18, 2016, SANTANA (<a href="www.facebook.com/MelissaSantana99">www.facebook.com/MelissaSantana99</a>) contacted N.L. through a Facebook message. N.L. did not respond. On August 21, 2016, he received a text message from SANTANA on her known cell phone "So you know." He was on a fire and did not respond. On August 30, 2016, on his way back from the fire he responded with "Know what?" and explained that his phone was broken and asks how she is. SANTANA responded from her known number on September 1, 2016, stating she is good and asks how he is. She did not explain her earlier message.
- 48. On August 30, 2016, N.L. and the rest of the Flagstaff IHC returned to Flagstaff. On his way back N.L. was notified by one of the crew members that got to the Flagstaff Hotshot Ranch first that his car had been vandalized. When N.L. arrived he found the entire passenger side of his vehicle was keyed with the word "SHIT," a large obscene drawing, and other scratches along the entire side of the vehicle and that his license plate was gone. N.L. filed a report with Coconino County Sheriff's Office. No other vehicles parked in the lot were damaged.
- 49. On September 13, 2016, N.L. found that his right rear passenger tire was completely flat. The tire was a newer tire with very little wear. The tire had a large

sidewall approximately ¾ inch wide puncture. There was an area where dirt had been rubbed, consistent with the use of a knife with a handle.

- 50. On October 2, 2016, N.L. received an unknown friend request from "Lara Towner" on Facebook, user ID www.facebook.com/profile.php? id=100013536227103. "Lara Towner's" profile was similar to the other unknown profiles that had tried to friend several of the Flagstaff Hotshots or their family members in that there was little to no identifying information on the profile. Around the same time N.L. also received two unknown friend requests on Snapchat, which he also believed to be SANTANA. He blocked all three of the requests. This account was no longer available on January 16, 2017.
- 51. On October 4, 2016, N.L. received a text message from SANTANA on her known phone number stating "REDACTED, I think you've blocked me so maybe I'm talking to air. But, I still don't know why we aren't talking. I miss you so much. I don't know what happened. This hurts. Please talk to me. I don't know if you've left for Prescott yet but the thought of never seeing you again kills me. And especially never talking again. Please REDACTED." N.L. did not respond. N.L continued to receive such messages from SANTANA for months.
- 52. N.L. continues to receive texts and messages from other numbers and identities and has been harassed with the creation of false accounts with his information. For example, on January 27, 2017, he received a text message indicating that someone was responding to a "Fetlife" profile that had been created with N.L.'s name, personal cell

phone number, a link to his Facebook page and his supervisor's government issued cell phone number as the contact information. On March 3, 2017, N.L. received a series of text messages from a number unknown (another temporary VOIP number) to N.L. which included a text with message content: "Because I have to be around you. You just need to be a better person," and then "See you in a few weeks."

- 53. On June 28, 2017, your affiant was contacted by a Flagstaff Hotshot Fire supervisor, with respect to N.L.'s stolen license plate. The stolen license plate (taken in August, 2016) turned up in the firefighting compound for the Boundary Fire on Kendrick Mountain (outside of Flagstaff). This fire was active from June 1, 2017, to early July, 2017. Despite my investigative efforts, it is unclear exactly when the plate appeared in the compound or who found it. The license plate itself displayed little or no sign of exposure to the elements. The Flagstaff Hotshot crew was assigned to fire from June 2, 2017, to June 7, 2017, and June 9, 2017, to June 23, 2017. Your affiant was able to extract Google Earth mapping files of the Verizon Cellular data for the search warrant for 928-890-8779 and 928-890-9078 from October 19, 2016 to August 1, 2017, and can place SANTANA in the area of the Flagstaff Hotshot Ranch on the afternoon of June 3, 2017.
- 54. Through search warrants for activity on accounts linked to SANTANA, your affiant has learned that SANTANA has searched on-line for N.L.'s immediate family members and their on-line presence, including N.L.'s mother.
- 55. On August 1, 2017, N.L. was deployed to a fire in Montana when he received another text message from an unknown number, 928-575-2722, with an associated location

of Parker, Arizona. The text message content was: "How's Montana". N.L. was concerned enough for his car to contact your affiant to ask for a check of his vehicle and personal items. N.L. no longer parks his vehicle in the Hotshot lot when he is deployed.

56. Your affiant has learned that the negative impact of this stalking on N.L.'s life is considerable. N.L. closed all of his social media accounts and he limits his on-line presence to the extent possible. N.L. has modified his lifestyle dramatically in an attempt to separate himself from any contact with SANTANA and the harassment of himself and his friends and co-workers that he believes stem from SANTANA. He has worked to keep his residence unknown and has placed cameras to secure his vehicle and personal items.

# Count 6: Stalking (K.T.)

- 57. On August 31, 2016, K.T., a Flagstaff Hotshot firefighter, was matched on his Tinder application with "Ann, 29" (SANTANA's profile). SANTANA tried, unsuccessfully, to get K.T. to send her pictures of himself. On September 10, 2016, K.T. sent her a message indicating that he was interested in the type of relationship that she was seeking. K.T. later learned that "Ann, 29" was the same person that was harassing his coworker, N.L.
- 58. Sometime in early September, 2016, K.T. received a Tinder message from someone named "Kendall." K.T. deleted the message and blocked contact with this person. On September 8, 2016, K.T. received a Facebook message from "Kendall Patterson" (www.facebook.com/kendall.patterson.127). The content of the message:

Hey REDACTED..yea, remember me. You are a worthless piece of shit. You do a job that requires no brains what so ever. You are just a tree cutter

and hole digger. The government finds you as a disposable front line against fires. You can easily be replaced by a younger dumber version. You are worthless that they don't really care if a whole crew the the granite mountain guys die...because you guys don't provide a unique service. That's why they give you shit hours and send you away four weeks on end. The don't see you as a person, just a number. The fact that you don't see it mashes your dumb as hell. I live how you mentioned a degree. What like a stupid fire science 2 year degree. Fuck, I think an autistic person could get that. So, do the world a favor. Be a success like the granite guys and die at your next fire.

- 59. K.T. received additional odd on-line contact attempts, which he tried to block or stop. Ultimately he terminated his Tinder account in September, 2016.
- 60. K.T. was the target of a false allegation sent to his supervisor, as referred to in paragraphs 27-31 of this affidavit.
- 61. Believing that he had avoided contact from SANTANA, K.T. opened a new Tinder account in October, 2016. On October 28, 2016, he was contacted on this account by a person named "Amanda." After some communication with this person over the next couple of days, he attempts to meet her and is stood up. The person texts, "So finally caught on. Funny how dumb all the hotshots in this town tend to be. But the assholes get what they deserve." She later sends a message that concerns him about how she is keeping track of his movements:

It's funny...So pathetic, still won't delete someone. I'm much worse. I thought you weren't into tinder...But don't worry. It's a good way to keep tabs on you. I know when you head to Tucson, when you're home and when you're at work...And didn't you have so much fun going on those wild goose chases. Well, at least it was fun to me to see how pathetic you were driving back and forth. So desperate for human connection you'd drive around 2 hours to meet someone. Then drive back again the next day.

- K.T. eventually sends the person a message saying that this is not a joke and 62. asks her to tell him who she really is. "Amanda" (known as Amanda, 25) responds that it is a snapchat game where they post conversations of the guys they "screw over." She stated that Ann and Kendall were probably playing the same game and that you get more points for hotshot crews and less for engine crews. She lists off Hotshot shot crews such as Flagstaff, Blue Ridge, Mesa, Black Mesa, Prescott, Mormon Lake, Carson, Payson, Sawtooth, and Snake River. She said that firefighters are "creepy pervs" and so they "all kinds deserve it." She states that none of them get turned down [for dates] and that the firefighters are "disgusting and horny" and that they all cheat on their girlfriends while on fires. She then states "More points if we can find out who the gf is." (Note: "gf" is commonly used as an abbreviation of "girlfriend.") K.T. responded that he has never cheated and that he is just a single person dating. "Amanda" called him disgusting and sad that he was ready to go over to a strange girls' house for random sex. K.T. told her to reread the text messages since he didn't say anything perverse and that he had tried to get her to meet him somewhere else.
- 63. K.T. continued to be concerned about contacts from SANTANA. On April 4, 2017, at approximately 9:20 pm, K.T. received several text messages from an unknown number, 928-216-2992, asking to obtain information about N.L. and whether or not he was still working for the Flagstaff Hotshot Crew because he owes him money and can't get ahold of him. The sender claimed to be "John Dundry" and that he had met K.T. at the Sportsman's Bar and Grill last year, referring to a Flagstaff Hotshot Crew gathering

in December 2016. K.T. suspected the sender was actually SANTANA, and confronted the sender, telling them that they did not meet and asks who they really were. The sender continued to try to convince him that he knows him and to give the information about N.L. to him. K.T. advised "John Dundry" that N.L. moved and that he asked N.L. if he knew him, which he verified that he does not. K.T. further tells the unknown sender that it is a poor idea to go anywhere near the crew and that they know they are using fake numbers to contact multiple crew members.

- 64. On September 22, 2017, K.T. contacted your affiant to report that on September 20, 2017, his fiancé (they had been engaged for two months) received a Facebook message from someone claiming to be "Kelli Torrence." The message claimed that she had been sleeping with K.T. K.T.'s fiancé received a second message from the person the next day suggesting that K.T. was cheating.
- 65. Your affiant is aware that K.T. has been impacted in a negative way from the stalking from a person that he has had no relationship with in any manner.

# Count 7: Stalking (E.T.)

66. On September 9, 2016, E.T., who was engaged to A.G., a co-worker of N.L., received a friend request on Facebook from "Kendall Patterson" (www.facebook.com/kendall.patterson.127). E.T. saw that "Kendall Patterson" posted the following with the engagement photograph that E.T. had on her page, "Look at these love birds. Too bad I fucker her fiancé over and over while he was out fighting a fire. He even wanted to keep the relationship going. Said he regretted proposing." E.T. did not respond, blocked the

profile, and reported the post to Facebook. (Your affiant learned that at the time N.L. was renting a room from A.G. so N.L. was living with E.T. and A.G.)

- 67. On September 28, 2016, at approximately 8:30 am, E.T. received a text message from 602-892-5168, "REDACTED, I know you don't want to hear this, but REDACTED and I are in love. He told me he's been trying to break it off with you for a while. I'm the one he wants to be with...We've been seeing each other for a while. And now that he's done with the season, we'll be together more. We are in love." E.T. did not respond or know how this unknown person had obtained her cell phone number. Flagstaff Hotshot Crew AG also had no idea who sent the text message. All of E.T.'s information on social media sites are blocked from the general public. However, her cell phone number is on her resume on her Linkedin business page. When E.T. checked her Linkedin page she saw that on September 27, 2016, her Linkedin page was viewed by someone in "Higher Education" and that they had their account set in "private mode," keeping anyone from viewing their profile or any of their identifying information.
- 68. At approximately 10:47 am, E.T. received another text from the 602-892-5168, "Too scared to actually have a conversation about this?". E.T. didn't respond. At approximately 5:55 pm, E.T. received another text from the 602-892-5168, "You'll regret not talking to me." E.T., who was home alone, did not respond but feels that whoever has 602-892-5168 is threatening her and will cause her, her family, or her property harm. At this time A.G. and the other Flagstaff IHC members met at Sportsman's Grill in Flagstaff for an end-of-season party. E.T. was fearful enough to ask her brother to stay with her

while A.G., N.L., and their other roommate, also a Flagstaff IHC member, were at the end of season party. E.T. and her brother went to dinner in town and then returned to her home around 7:00 pm. At approximately 8:10 pm the power went out at E.T.'s residence. E.T. called 911 and describes that she was so scared that she was shaking, making it difficult for her to dial 911.

- 69. Flagstaff Police responded did not find anything suspicious at that time. During the time the officer was at E.T.'s residence, she received a text from 602-892-5168, "So you're not concerned that we're gonna hook up after the little get together tonight at sportsman's." E.T. did not respond and told the Flagstaff Police Officer, who instructed her to ignore it. At approximately 8:28 pm, 602-892-5168 called E.T.'s phone. E.T. did not answer.
- 70. On September 30, 2016, at approximately 7:46 am, while E.T. was on her way to work, the 602-892-5168 texted her "REDACTED, I will show up at your work to address this." E.T. parked her vehicle in the parking garage in front of the camera near her work in downtown Flagstaff. She left her office in another vehicle to meet with a client for most of the day, returning around 3:20 pm. E.T. was going to meet with a friend but asked her friend come to her office on Aspen Street so she didn't have to walk alone. The two left the office by walking down the back stairwell, through the parking garage, and down to Collins Irish Pub and Grill on North Leroux Street.
- 71. At approximately 4:44 pm, E.T. and her friend walked outside of Collins, when E.T. received a call from the 602-892-5168. E.T. did not answer the call. The two

looked around to make sure they were not being followed and then walked directly across the street to McMillan Bar and Kitchen. Just as they sat down in the back game room E.T. received a text from the 602-892-5168 which read, "Hopefully the mcmillan is fun." E.T. was terrified when she realized that the 602-892-5168 was following her. She was concerned that she was trapped in the back room of the restaurant with only one exit and that if she went out the front the person would follow her and hurt her. E.T. called A.G. to meet her downtown. She also called your affiant, who advised her to not walk anywhere alone and to call the Flagstaff Police Department if she thought she was in danger. E.T. and her friend then walked to Charly's Pub and Grill to see if they were followed. E.T. did not receive any more texts or calls that night from 602-892-5168, but was afraid that she was being watched the rest of the night.

- 72. On October 1, 2016, at approximately 8:34 am, 602-892-5168 again called E.T., who did not answer. The entire day E.T. and A.G. continuously looked out the window of their residence to make sure no one was watching them. On October 2, 2016, they purchased a handgun for personal protection from the stalker.
- 73. Your affiant learned from a search warrant of SANTANA cell phone that on September 30, 2016, SANTANA left NAU and went downtown Flagstaff. SANTANA made the call to E.T. while she was in E.T.'s vicinity. The next day, October 1, 2016, SANTANA was in E.T.'s neighborhood when she called E.T.
- 74. On October 4, 2016, at approximately 7:27 am, E.T. received another text from 602-892-5168 stating "see ya today."

- 75. E.T. continued to report to your affiant various odd anonymous communications over time. For example, on October 30, 2016, E.T. received a text message from 928-216-5605 stating: "So REDACTED, I guess I'll see you in may 27 at the arboretum. REDACTED and I will probably be fucking in the coat check before you walk down the aisle, unless he dumps your ass before then." The text referred to the May 27, 2017, wedding date of E.T. and A.G.
- 76. E.T. continued to get offensive anonymous messages regarding her impending wedding over the next few months into 2017. These messages sometimes included photos that were posted on on-line pages of friends. Due to the messages regarding the wedding the couple believed it was necessary to hire security for their wedding and reception.
- 77. The last of these offensive messages was sent from 602-892-5168 to E.T.'s phone on May 26, 2017. As is described in Addendum B, your affiant learned that 602-892-5168 is a temporary VOIP number created on September 28, 2016, with the name "REDACTED" and was based on SANTANA's known Verizon number.

# Count 8: Stalking (D.S.)

78. On February 12, 2017, your affiant was contacted by a REDACTED ("C.S.") who obtained my contact information from another stalking victim. C.S. described that harassment of his family started on January 26, 2017, after his brother, D.S. met a person named "Ann, 29" on Tinder.

- 79. Your affiant has learned that D.S., who does not live in Arizona, was visiting his father who lives in Flagstaff, Arizona, when he was matched with "Ann, 29" on Tinder. D.S. met in person with Ann, 29 on Tinder on January 17, 2017. Ann, 29 gave D.S. cell phone number 928-890-8779, (SANTANA's known telephone number) and the two agreed to meet during the day at his father's house. Ann, 29 told D.S. that she only wanted a sexual physical relationship. D.S. told her that he wanted to get to know her more first before they had a sexual relationship. This meeting remained platonic.
- 80. Over the following week, SANTANA texted D.S. sexual messages and photos of herself to him from her cell phone number. They then tentatively agreed to meet on January 24, 2017. During the following week heavy snow fell in in Flagstaff and D.S. went snowboarding at Arizona Snowbowl, forgetting about the tentative date with Ann, 29 on January 24, 2017. Ann, 29 continued to text D.S. through January 26, 2017. On the same day the text from Ann, 29 stopped, D.S. started receiving harassing text messages from 928-216-5605, telling him that they were "Your worst fucking nightmare," he would regret what he did, and that he, his brothers, his brother's wife, and dad will all be harassed. 928-216-5605 texted that "We're going to have a lot of fun!," that 928-216-5605 know where D.S. lives and hangs out, and that "actions have consequences."
- 81. Shortly after C.S. and his wife, who live in Arizona, received harassing messages on their Instagram accounts from an "Amanda Foster" (@fosterbabe1999). C.S.' Instagram account is set to private and does not include any personal information in his account identifier. C.S.' wife's Instagram account was set to public and included their

last name. This allowed "Amanda Foster" to post harassing comments and messages to them, including "I'm so happy your wife's disgusting body aborted that bastard child. You two are so superficial that you got exactly what you deserve. A dead baby." The harassment and derogatory comments were extremely upsetting to C.S. and his wife who were still distraught after recently losing their child during pregnancy. They were also concerned about their safety since they believed that this level of harassment and stalking indicated a possible extreme threat to them and their family. The profile photo from Instagram "Amanda Foster" (@fosterbabe1999) matches the profile photo for Amanda, 25 Tinder account and the "Amanda Foster" Facebook account (amanda.foster.56884761).

- 82. C.S. reported that during this time a car drove across and spun its tires on D.S.' father's patio, which left marks on the patio bricks.
- 83. C.S. looked up the 928-890-8779 number on a Google online internet search and found that it belongs to SANTANA. This was further verified by a private investigator C.S. hired to look into the cyber harassment. D.S. also verified that the SANTANA photo posted on the Northern Arizona University website as an Associate Interior Design Professor was the same individual he had the date with on January 17, 2017, and was the same individual that sent photos via text message.
- 84. On February 10, 2017, at approximately 11:53 pm, a screenshot of a Facebook post on the closed group page, Flagstaff Buy, Barter, Sell and Services was posted on the Flagstaff Memes page. This screenshot was of a post stating "Does anyone know how to contact this guy? He got my cousin pregnant and won't take responsibility.

# REDACTED" and included a photograph of a white male wearing a backwards baseball cap, leather jacket, and shorts. The post was posted by an "Amanda Foster" whose profile photo was the same as the Amanda, 25 Tinder account. The photo is of D.S., who posted the photo on his page in January 2015.

85. On February 28, 2017, at approximately 4:03 pm, D.S. received a text message from 928-216-5605, "Who's black Subaru is that in your driveway." D.S.' father has a black Subaru which was parked in front of his house at that time. On March 1, 2017, he receives another text message from unknown number 928-362-5714 "REDACTED, you're a piece of shit. Just thought you should know."

#### **Additional Relevant Information**

86. Your affiant secured search warrants for accounts Kendall Patterson 127 (www.facebook.com/kendall.patterson.127), Kendall Patterson 7393 (www.facebook.com/kendall.patterson.7393), Ann Santa 73 (www.facebook.com/ann.santa.73), and Amanda Foster (Facebook ID /amanda.foster.56884761) and conducted additional investigation which revealed that all of the accounts belong to SANTANA. These accounts all utilized Suddenlink Communications IP address 47.215.183.207 and were utilized at SANTANA's residence located at 6757 E. Anazazi Drive, Flagstaff, Arizona. Facebook account Kendall Patterson 7393 had also utilized Verizon IP address 174.238.148.206 which belongs to SANTANA's cell phone number 928-890-8779. The accounts were all pinged for GPS coordinates on separate days, which also all returned to SANTANA's residence.

Your affiant determined that all Wi-Fi accounts in the vicinity of SANTANA's residence were all locked with a password to only allow permitted users.

87. Your affiant was able to extract Google Earth mapping files of the Verizon Cellular data for the search warrant for 928-890-8779 and 928-890-9078 from October 19, 2016 to August 1, 2017. SANTANA utilized IP address or made calls from the Highway 180 / Snowbowl Road area a total of nine (9) times during this time period. Eight (8) of the nine times were between March 4, 2017 and July 24, 2017. This is the area where the Flagstaff Hotshot Ranch is located and where the Flagstaff Hotshot crews were assigned to the Boundary Fire on Kendrick Mountain in June 2017. SANTANA utilized her phone at two (2) additional times in the area between the Flagstaff Hotshot Ranch and Bellemont in February and April 2017. SANTANA had also been in the area near E.T. and A.G.'s neighborhood area at least nine (9) times between October 2016 and April 2017.

88. Your affiant also is able to link the following social media accounts to SANTANA:

Tinder App- Ann, 29

Tinder App- Ann, 27

Tinder App- Amanda, 25

Tinder App- Kendall

Tinder App-Ann

Facebook- Melissa Santana

Facebook- Ann Santa 73

Facebook- Kendall Patterson 127

Facebook- Kendall Patterson 7393

Facebook- Amanda Foster

Facebook- Jo Hotshot

Facebook-Kelli Torrance

Facebook- Lara Towner

Facebook-Lauren Kholey
Facebook- Brandi Scroggins
Instagram- Amanda Foster
Instagram- Msantana1030
Kik messenger- ms1030
Craigslist Las Vegas

#### III. Conclusion

14. Based on the foregoing, your affiant believes that there is probable cause to believe that between February 1, 2015, and September 22, 2017, the defendant, MELISSA ANN SANTANA did commit violations of Title 18, United States Code, Section 1001(a)(2), False Statements, and Title 18, United States Code, Sections 2261(b) and 2261A(2), Stalking.

15. Your affiant respectfully requests that this Court issue an arrest warrant for MELISSA ANN SANTANA.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 27, 2017

Sophia Fong, Special Agent United States Forest Service

X Sworn by Telephone

Date/Time:

10/28/2017 9:32 a.m.

LYNNETTE C. KIMMINS for

DEBORAH M. FINE

United States Magistrate Judge

# ADDENDUM A

# Glossary of Terms

- 1. Ad Hoc Labs, Inc. is a company that provides disposable cellular telephone number access to the general public through their mobile smartphone "Burner" application.
- 2. **Burner** application (app) is a an mobile application for iOS, Android, and smartphone users, and is owned by Ad Hoc Labs, Inc.. The Burner App, allows users to create temporary, anonymous phone numbers which can be used for voice, SMS (short message service), and MMS (multimedia messaging service) communications through telecommunications and VoIP (Voice over Internet Protocol) technology. A user can create and use multiple anonymous phone numbers for multiple types of communications from one device without having to reveal the user's actual cellular phone number. The application uses the users cellular data for phone calls. Voicemail and text messages are through the application and do not affect the users cellular data. Once the user is finished with a number, they can "burn" or remove the number from their Burner account.
- 3. Craigslist is a classified advertisements website with sections devoted to jobs, housing, personals, for sale, items wanted, services, community, gigs, résumés, and discussion forums.
- 4. Facebook is a social networking site (SNS) that connects people with friends and others who work, study and live around them. People use Facebook to keep in touch with friends, post photos, share links and exchange other information. Facebook users can control their privacy settings so other users can see only the profiles of confirmed friends

and the people in their networks. Facebook users can send direct messages to other users even if they are not confirmed friends.

- 5. **FetLife** is a social networking website that serves people interested in BDSM (bondage, discipline, dominance, and submission), fetishism, and kink. The website advertises itself as a social networking site, rather than a dating site.
- 6. **Instagram** is an online mobile photo-sharing, video-sharing, and social networking service that enables its 500 million users to take pictures and videos, and share them either publicly or privately on the app, as well as through a variety of other social networking platforms, such as Facebook, Twitter, Tumblr, and Flickr.
- 7. **Linkedin** is a business-oriented social networking service mainly used for professional networking. Users can control their privacy setting, limiting what is available for viewing to the public or other Linkedin users. This includes the ability to view someone else's profile and personal information in private mode, prohibiting the user from knowing who viewed their profile.
  - 8. Snapchat is an image messaging and multimedia mobile application.
- 9. Temporary VOIP telephone numbers can be created through various internet applications. These numbers provide an anonymous manner to create and use a telephone number that is disposable and largely anonymous. Once a person creates a telephone number through one of these applications, they can terminate it and clear all data related to the number from their mobile device.
- 10. **Tinder** is a location-based social search service application that facilitates communication between mutually interested users, allowing matched users to chat. The

app is commonly used as a dating services application, and has branched out to provide more services, making it more of a general social media application. Users are "matched" with other users of similar interests in the same location, allowing users to view more of each other's profile information, and direct messaging abilities. Both users have to "swipe right" to accept the "match" and allow for communication via the app messaging feature. "Unmatching" disconnects this ability.

- 11. Verizon Wireless (Cellco Partnership, LLP dba) is a wireless communications company that provides mobile communications services through various electronic devices and applications, including cell phones, smartphones, tablets, with voice, SMS, MMS communications and internet connection technology headquartered in Bedminster, New Jersey.
- 12. Yelp is a website and app that publishes crowd-sourced reviews about local businesses and provides online reservations to subscriber businesses via Yelp Reservations, and online food order and delivery services via Eat24. The company also trains small businesses in how to respond to reviews, host social events, and data for businesses.

# ADDENDUM B (REDACTED)

COUNTS	MONIKER/NUMBER	CONNECTION TO SANTANA
1	cmcarthydancemom@gmail.com	The account was created on September 9,
		2016 at 15:13:29 hours (UTC) (8:13 AM
		MST) from IP address owned by Kaia
		Global Networks Ltd. The user logged out
		of the account at 22:48:55 hour (UTC)
		(3:48 PM MST) on the same day. The user
		logged into the account again on
		September 10, 2016 at 19:53:48 hours and
		20:11:26 hours (UTC) (12:53 PM and 1:11
		PM MST) from IP address
		2600:1011:b107:3d71:89da:8ba5:23bf:8aff.
]		An IP internet search revealed that this IP
		address returns back to Verizon Wireless
		based out of Tempe, Arizona. The user
		deleted the account on September 10, 2016
		at 20:12:26 hours (UTC) (1:12 PM MST),
		after affiant sent a response email back to
		the sender.
		On September 10, 2016, the same Verizon
		IP address
		2600:1011:b107:3d71:89da:8ba5:23bf:8aff
		that was used to login to the above email
		address was also used to login to the
		Facebook account Kendall Patterson 127 at
		19:50:30 (UTC) and 20:54:35 hours (UTC)
		which is also being used to harass victims.  The Kendall Patterson 127 account was
		frequently utilized by Suddenlink
		Communications IP address
		47.215.183.207 which was found to belong
		to SANTANA.

2, 3, 7	602-892-5168	This is a temporary VOIP number created on September 28, 2016 at 15:26 hours (UTC) through an application from Ad Hoc Labs. The user named this account "REDACTED" and used number to send messages to E.T. and sent texts on September 29, 2016, to USFS Globe Hotshot Fire Superintendent D.W. and to Flagstaff Hotshot Fire Superintendent W.K. This number came back as based on cell phone with number 928-892-8779, SANTANA's Verizon phone number.
2,8	928-892-8779	This account was created on August 20, 2012 by Melissa Santana, SSN XXX-XX-0274, with the address of 6757 E. Anazazi Drive, Flagstaff, AZ. The cellular number was assigned to IMEI device number 990005878458390. The number is connected to an Android cell phone with a Verizon Wireless cell phone number. This account number is used to create temporary VOIP telephone numbers through Ad Hoc Labs
2, 4, 6, 8	Amanda; Amanda Foster; Amanda25	Names used with temporary VOIP number 928-216-5605. Also name created on September 27, 2016, with an email address of REDACTEDhater1999@gmail.com and a listed date of birth as 09/16/1991. The account was created from IP address 134.114.101.31 which returns to the internet provider Northern Arizona University after an online IP address search. The account activity revealed that the user repeatedly searched for N.L., M.L., N.L.'s brother, N.L.'s mother, K.T., M.G. and Jo Hotshot. The user also searched the NAU Confessions Page, Flagstaff Buy, Barter, Sell, and Services Page, and several other local Flagstaff pages on February 7, 2017. On February 7, 2017, Amanda Foster "liked" an April 2014 photo of N.L. That N.L.'s had posted on her Facebook account.
4, 8	928-216-5605	This is a temporary VOIP number created on October 28, 2016, at 22:31 hours (UTC) through an application from Ad Hoc Labs.

4	Jo Hotshot	The user named this account "Dumbasses." Account information revealed that it was used to send messages to K.T., M.G., E.T. and another Flagstaff Hotshot crew member. This number came back as based on cell phone with number 928-892-8779, SANTANA's Verizon phone number.  Name given in 2017 to a Facebook profile. Profile indicated person was male. Profile connected to several Hotshot firefighters in
		case.
5, 6	Ann; Ann, 29	Tinder name used by SANTANA in her initial relationship with N.L., initial contacts with K.T. and initial contacts with D.S.
5	928-288-0199	This is a temporary VOIP number that was created on June 30, 2016 at approximately 19:55 hours (UTC) through an application from Ad Hoc Labs. This number came back as based on cell phone with number 928-892-8779, SANTANA's Verizon phone number.
5	774-203-4700	This is a temporary VOIP number that was created on August 18, 2016 at approximately 03:22 hours (UTC)) through an application from Ad Hoc Labs. This number came back as based on cell phone with number 928-892-8779, SANTANA's Verizon phone number.
5	Ashleigh	Name used by user of a burner phone linked to SANTANA's phone
5	928-575-2722	This is a temporary VOIP number created through an application from Ad Hoc Labs.
6, 7	Kendall Patterson; www.facebook.com/kendall.patterson.127	This account was registered on August 16, 2016 at 14:41:00 (UTC) with email address REDACTEDhater2016@gmail.com and listed a date of birth of 10/30/1993. The user accessed the account from IP address 24.206.234.14 which returns to Suddenlink. The account was frequently utilized by Suddenlink Communications IP address 47.215.183.207 which was found to belong to SANTANA.