

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
CHRISTOPHER RODRIGUEZ

Case: 1:23-mj-00295
Assigned to: Judge Meriweather, Robin M.
Assign Date: 11/4/2023
Description: COMPLAINT W/ ARREST WARRANT

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of September 24-25, 2023 in the county of Washington in the
District of Columbia, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 970(a), 18 U.S.C. § 844(h), 18 U.S.C. § 844(i), and 26 U.S.C. §§ 5841, 5861(d), and 5871.

This criminal complaint is based on these
facts: See attached statement of facts/affidavit.

Continued on the attached sheet.

Complainant's signature

Special Agent Denise Katolin Arrans
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specify reliable electronic means).

Date: 11/04/2023

Judge's signature

City and state: Washington D.C.

Robin M. Meriweather, United States Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CHRISTOPHER RODRIGUEZ,
Defendant.**

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Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

This affidavit is submitted by Special Agent Denise Katolin Arrans in support of a criminal complaint and an arrest warrant relating to: CHRISTOPHER RODRIGUEZ (Defendant), a U.S. national residing in the Northern District of Florida.

I respectfully submit that there is probable cause to believe that Defendant has committed the following criminal offenses in violation of United States law:

- 18 U.S.C. § 970(a) (Damaging Property Occupied by Foreign Government)
- 18 U.S.C. § 844(h) (Explosive Materials—Commission of a Federal Felony)
- 18 U.S.C. § 844(i) (Explosive Materials—Malicious Use)
- 26 U.S.C. §§ 5841, 5861(d), and 5871 (Receipt or Possession of Unregistered Firearm).

INTRODUCTION AND AGENT BACKGROUND

1. I am “an investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since July 2014. I am assigned to Falls Church Group I of the Washington Field Division of the ATF. This group runs the Washington, D.C., Arson and Explosives Task Force, which is responsible for investigating Arson and Explosives incidents in Washington, D.C., and Northern Virginia. Additionally, I am assigned to the Federal

Bureau of Investigation's (FBI) Washington Field Office, Joint Terrorism Task Force (JTTF). The JTTF is responsible for investigating acts and allegations of terrorism in Washington, D.C., and Northern Virginia. As a Special Agent with ATF, I am authorized to investigate violations of the laws of the United States, and I have been involved with numerous criminal investigations involving violations of federal law.

2. As an ATF Special Agent, I have completed the Criminal Investigator Training Program and ATF Special Agent Basic Training at the Federal Law enforcement Training Center in Glynco, Georgia, where I received training in the investigation of federal crimes involving firearms, narcotics, arson, and explosives. I have specific and extensive additional training and experience with explosives and explosive investigations. I have participated in numerous arrest and seizure warrants involving a variety of offenses, including violations pertaining to arson and explosives. I have participated in a wide variety of investigations including firearms, explosives, tobacco, gang, organized crime, money laundering, drug and terrorism investigations.

3. This affidavit is being submitted in support of a criminal complaint alleging that CHRISTOPHER RODRIGUEZ has (a) knowingly and willfully injured, damaged, and destroyed and attempted to injure, damage, and destroy the back wall and fence of the Embassy of the People's Republic of China (Chinese Embassy), located at 3505 International Place, NW, Washington, D.C., located within the United States and belonging to, utilized by, and occupied by the government of China, a foreign government, in violation of 18 U.S.C. § 970(a); (b) knowingly used explosive materials, namely, approximately 15 pounds of a binary explosive mixture, to commit violations of 18 U.S.C. § 970(a), a felony prosecutable in a court of the United States, and unlawfully carried an explosive during the commission of violations of 18 U.S.C. § 970(a), a felony prosecutable in a court of the United States), in violation of 18 U.S.C. § 844(h); (c)

maliciously damaged and destroyed and attempted to damage and destroy, by means of fire and explosive materials the back wall and fence of the Embassy of the People's Republic of China (Chinese Embassy), located at 3505 International Place, NW, Washington, D.C., used in interstate and foreign commerce, in violation of 18 U.S.C. § 844(i); and (d) knowingly received and possessed a firearm, namely, approximately 15 pounds of a binary explosive mixture, not registered to him in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. §§ 5841, 5861(d), and 5871.

4. This affidavit is based on my personal knowledge, information provided to me by and through other law enforcement agents, law enforcement records, Rule 41 search warrants, witness interviews, and my training and experience, as well as the training and experience of other law enforcement agents.

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause that Defendant violated 18 U.S.C. § 970(a), 18 U.S.C. § 844(h), 18 U.S.C. § 844(i), 18 U.S.C. § 924(c), and 26 U.S.C. §§ 5841, 5861(d), and 5871.

JURISDICTION

6. This Court has jurisdiction to issue the requested warrant because it is a “court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). As discussed more fully below, acts or omissions in furtherance of the offenses under investigation occurred within Washington, DC. *See* 18 U.S.C. § 3237.

PROBABLE CAUSE

7. The ATF Washington Field Division’s Arson and Explosives group is investigating an attempted explosives attack that occurred on or about September 25, 2023, sometime between midnight and 3:00 a.m.,¹ at approximately 3300 Van Ness Street NW, Washington, D.C., 20008 (TARGET LOCATION 1), about 12 feet from the back wall and fence of the Embassy of the People’s Republic of China (Chinese Embassy), located at 3505 International Place, NW, Washington, D.C. TARGET LOCATION 1 is shown in Exhibit A below.

¹ All times below are listed in Eastern Daylight Time (EDT).

Exhibit A



8. On Monday, September 25, 2023, at approximately 2:45 a.m., U.S. Secret Service (USSS) officers discovered an unattended bag at TARGET LOCATION 1, next to a streetlight. The bag, an Ozark brand black backpack, had a strip of reflective tape that had been placed down the front center of the bag. Inside of the backpack was a bag of Expert Grill brand charcoal briquets. Inside the bag of charcoal briquets was approximately fourteen pounds of a grey granular material and two clear plastic containers containing approximately a half-pound each of a similar grey granular substance. One of the containers had a partial bright orange label on it stating, "Rifle Targets." The remainder of the labels had been removed. This packaging (the clear plastic containers with the "Rifle Targets" label) is consistent with exploding targets.

9. Based on my training and experience, I know that exploding targets consist of a binary explosive mixture. This binary mixture is typically ammonium nitrate and aluminum

powder. Based on my review of the material and my training and experience, the grey granular material found concealed in the backpack is consistent with ammonium nitrate and aluminum powder. Based on my training and experience, I know that exploding targets are designed to initiate when shot with an ammunition round traveling approximately 2,000 feet per second or faster.

10. Law enforcement officers have obtained surveillance footage from University of the District of Columbia (UDC), as well as from three businesses and a residence located in the 4400 and 4500 blocks of Connecticut Avenue, NW. The footage captured an unknown individual—since identified as Defendant, as explained below²—travelling on foot and a vehicle (driven by Subject-2)³ in and around the TARGET LOCATION 1 before and after the backpack containing explosives was discovered, as described below in paragraphs 11-19. Defendant was wearing blue jeans, a long sleeve black top, tan boots, light-colored baseball cap, a black mask, and gloves. As detailed below, in some of the surveillance footage, Defendant can be seen carrying a backpack consistent with the one found containing the explosives. When leaving the area, Defendant can be seen carrying a long soft case or bag consistent in shape with a rifle bag, as well as a light-colored messenger bag. The locations described below are shown in Exhibit B, a map of the area. Defendant's approximate movements heading toward TARGET LOCATION 1 are shown by red arrows. The vehicle's approximate movements are shown by blue stars. A yellow star marks TARGET LOCATION 1.

² Although the surveillance footage does not show RODRIGUEZ's face, subsequent investigation, detailed below, has determined that he is the individual shown in the footage.

³ The review of the surveillance footage obtained to date has yet to yield a description of Subject-2 or the vehicle he/she was driving. This vehicle may or may not be connected to RODRIGUEZ's criminal activity.

Exhibit B

11. At approximately 1:55 a.m., before the discovery of the backpack and explosives by USSS officers described above, Defendant walked southeast on a walking path on the campus of the UDC, located at 4200 Connecticut Ave., NW, Washington, D.C. Defendant walked near the UDC Amphitheater, through the woods in between Building 46 West and the Sports Complex, and headed south towards the former UDC athletic fields.

12. At approximately 2:03 a.m., Defendant approached portable toilets located in the construction area of the UDC athletic field. Defendant can be seen manipulating an unidentified object(s) and opening the portable toilet door. Defendant appeared to store an unidentified object(s) in the portable toilet.

13. At approximately 2:17 a.m., Defendant walked south towards Van Ness Street, NW, carrying a single backpack over his or her shoulder. Defendant can be seen carrying the backpack in Exhibit C. Defendant then crossed Van Ness Street and walked west along Van Ness Street, NW on the same side of the street as **TARGET LOCATION 1**, carrying what appears to be a backpack. Defendant appeared to set the backpack down at **TARGET LOCATION 1**, next to a streetlamp, and then crossed the street northbound without it.

Exhibit C



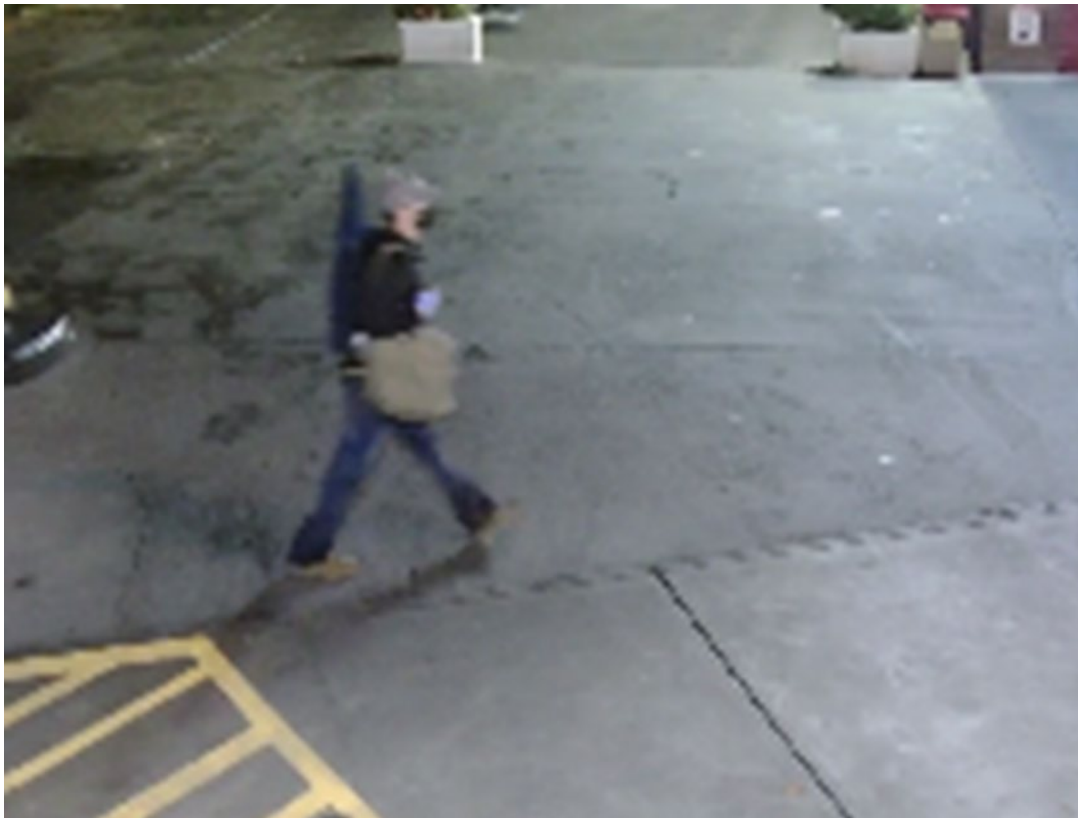
14. At approximately 2:19 a.m., Defendant walked north toward what is believed to be the gravel pile shown on Exhibit B. Defendant returned to the area of the portable toilets but did not open the portable toilets, at approximately 2:21 a.m. At approximately 2:22 a.m., Defendant returned to the area believed to be the gravel pile. At approximately 2:25 a.m., Defendant left the

gravel pile and returned to the area of the portable toilets again. At approximately 2:26 a.m., Defendant walked south toward the gravel pile.

15. At approximately 2:31 a.m., Defendant moved quickly north, away from what is believed to be the gravel pile and back towards the portable toilets. At approximately 2:32 a.m., Defendant placed what appears to be a bag (different from the backpack containing suspected explosives) in front of the portable toilets and placed an unknown item into the bag.

16. At approximately 2:35 a.m., Defendant walked north away from **TARGET LOCATION 1**, carrying a bag. Defendant can be seen leaving the area carrying a bag consistent in shape with a rifle bag and a messenger bag in Exhibit D (at approximately 2:38 a.m.).

Exhibit D



17. Surveillance footage also shows a vehicle in the area near **TARGET LOCATION 1** in or around the same time as the activity described in paragraphs 11-16 above. Given that the

area is typically has light traffic during timeframe discussed above, it is possible that this activity may be related to that of Defendant .

18. At approximately 2:04 a.m., a vehicle that had been driving southbound on International Court (just west of the construction area) turned east onto Van Ness Street, NW, and stopped at a streetlamp directly east of the intersection. At approximately 2:05 a.m. the vehicle drove forward and stopped again at a second streetlamp in front of TARGET LOCATION 1 where the suspected destructive device was later placed by Defendant. The driver of the vehicle (Subject-2) momentarily got out of the vehicle and walked toward the rear of the vehicle before returning to the driver's seat.

19. At approximately 2:07 a.m., the vehicle drove away, continuing eastbound on Van Ness Street, NW. The vehicle stopped along Connecticut Avenue, NW, just north of the Van Ness/UDC Metro stop, located at 3300 Van Ness Street, NW, before continuing northbound on Connecticut Avenue, NW.

20. On September 26, 2023, law enforcement officers returned to TARGET LOCATION 1, where the suspected destructive device was located and canvassed the area. Law enforcement officers recovered three shell casings near the gravel pile described above and recovered bullet fragmentations from the ground along the outer perimeter wall of the Chinese Embassy. Impact marks located on the wall near the bullet fragments were found behind where the backpack had been located. Based on my training and experience and consultation with ATF Destructive Device Determiners, the concealment of suspected explosives within the backpack, along with the reflective tape and shell casings, are consistent with the tape being used as an aiming point and an attempt to detonate the explosives concealed within the bag. I further believe that the presence of shell casings near the gravel pile and bullet fragmentations near the wall indicates that

one or more subjects attempted to detonate the explosives by shooting at the backpack from in or around that location. The backpack containing the suspected explosives, as well as its contents, are shown in Exhibit E.

Exhibit E



Identification of Defendant Christopher Rodriguez

21. On or about October 6, 2023, law enforcement officers learned that a search of the National DNA Index Systems (NDIS) had resulted in a “moderate stringency match” between DNA recovered from swabs of the left shoulder strap of the Ozark Trail brand backpack found at TARGET LOCATION 1 on September 25, 2023, and a California Department of Justice Arrestee specimen obtained from Christopher Rodriguez, FBI Number 84558MF8.⁴ Law enforcement personnel were able to identify this individual as Defendant,) a licensed Florida attorney believed to reside in Panama City, Florida. Law enforcement personnel were able to identify a 2016 Jeep Patriot, VIN 1C4NJPBB0GD576216, Florida license plate 35AFPD registered to Defendant at 315 E 4th Street, Panama City, Florida. Defendant’s Florida Bar profile lists his cell phone number as xxx-xxx-9526. Google subscriber information for email address chrisrodriguezjustice@xxx.com, with a listed subscriber of Christopher Rodriguez, includes a recovery phone number of xxx-xxx-9526 associated with the account.

22. Defendant has a current driver’s license issued by the State of Florida identifying him as a 5’11” Hispanic male. Based on the State of Florida Department of Highway Safety and Motor Vehicles, a 2016 Jeep Patriot, gray in color with Florida license plate 35AFPD, is registered to Christopher Rodriguez (plate issued 6/18/2021, renewed 12/10/2022, expires 11/2/2024).

23. On June 27, 2021, Defendant was arrested in Los Angeles County, California, by California Highway Patrol. Defendant was in a 2016 Jeep Patriot, with Texas license plate BC53303, at the time of his arrest. California Highway Patrol queried the Texas license plate and

⁴ The government has not yet compared the DNA obtained from the backpack to a new sample provided by RODRIGUEZ, as would be required to determine the specific probability of the NDIS match. “Moderate stringency search” refers to a search parameter. Conducting a moderate stringency search is an effective means of searching forensic profiles from crime scene evidence that contains DNA from more than one individual (a forensic mixture).

determined it did not match the vehicle. Law enforcement queried the vehicle's VIN and determined Florida license plate 35AFPD was the license plate assigned to the vehicle, and that the vehicle was registered to Defendant. Law enforcement officers approached the vehicle and observed a firearm on the center console. Law enforcement recovered two additional firearms and charged Defendant with possession of loaded/concealed firearm in a vehicle, possession of an unregistered firearm, and possession of a switchblade knife.

24. California Highway Patrol subsequently obtained a search warrant for the vehicle. During the search of the vehicle law enforcement located several bags and jars labeled Tannerite. Tannerite is a brand of exploding targets, which is consistent with the substance recovered from the backpack found outside the Chinese Embassy, as discussed above at paragraph 8-9.

26. On or about October 10, 2023, law enforcement officers received License Plate Detection records from the Gwinnett County, Georgia Police Department. These records captured a Jeep bearing Florida license plate 35AFPD in the area of Buford Drive in Gwinnett County Georgia, on September 23, 2023, at approximately 7:02 p.m.

27. On or about October 10, 2023, law enforcement officers received License Plate Detection records from the Statesville North Carolina Police Department. These records captured a Jeep bearing Florida license plate 35AFPD in the area of 103 C Street, Statesville, North Carolina, on September 24, 2023, at approximately 5:01 a.m.

Purchases of Components Used in Attempted Attack on the Chinese Embassy

28. On or about October 6, 2023, law enforcement officers received sales records from U.S. Company A for sales of Ozark Trail brand (a U.S. Company A product) hiker backpacks and Expert Grill brand charcoal briquets by U.S. Company A for the last six months ending with the date of September 25, 2023. These two items (Ozark Trail brand hiker backpack and Expert Grill

brand charcoal briquets) are consistent with components recovered from TARGET LOCATION 1 on September 25, 2023 (described in paragraph 8, above).

29. On or about October 10, 2023, law enforcement officers received License Plate Detection records from the Harrisonburg Virginia Police Department in Harrisonburg, Virginia. These records captured a Jeep bearing Florida license plate 35AFPD in the area of 35 Burgess Road, Harrisonburg, VA, on September 24, 2023, at approximately 10:19 a.m., 12:05 p.m., and 12:38 p.m. A photo of this Jeep is shown in Exhibit F.

Exhibit F



30. On or about October 10, 2023, law enforcement officers identified a U.S. Company A transaction of interest at U.S. Company A Store 1726, located at 171 Burgess Road, Harrisonburg, VA 22801 (TARGET LOCATION 2), This is approximately 0.5 mile from where the License Plate Detection device captured the aforementioned vehicle. This transaction occurred on September 24, 2023, at approximately 11:21 a.m., around the same time Defendant's car was seen in the area. On October 11, 2023, law enforcement personnel received the sales receipt from U.S. Company A for this transaction. The receipt included the purchase at TARGET LOCATION 2 of nitrile gloves, an Ozark Trail brand black backpack, and automotive reflective tape. These items are consistent with components recovered from the device at TARGET LOCATION 1 and described in paragraph 8, above.

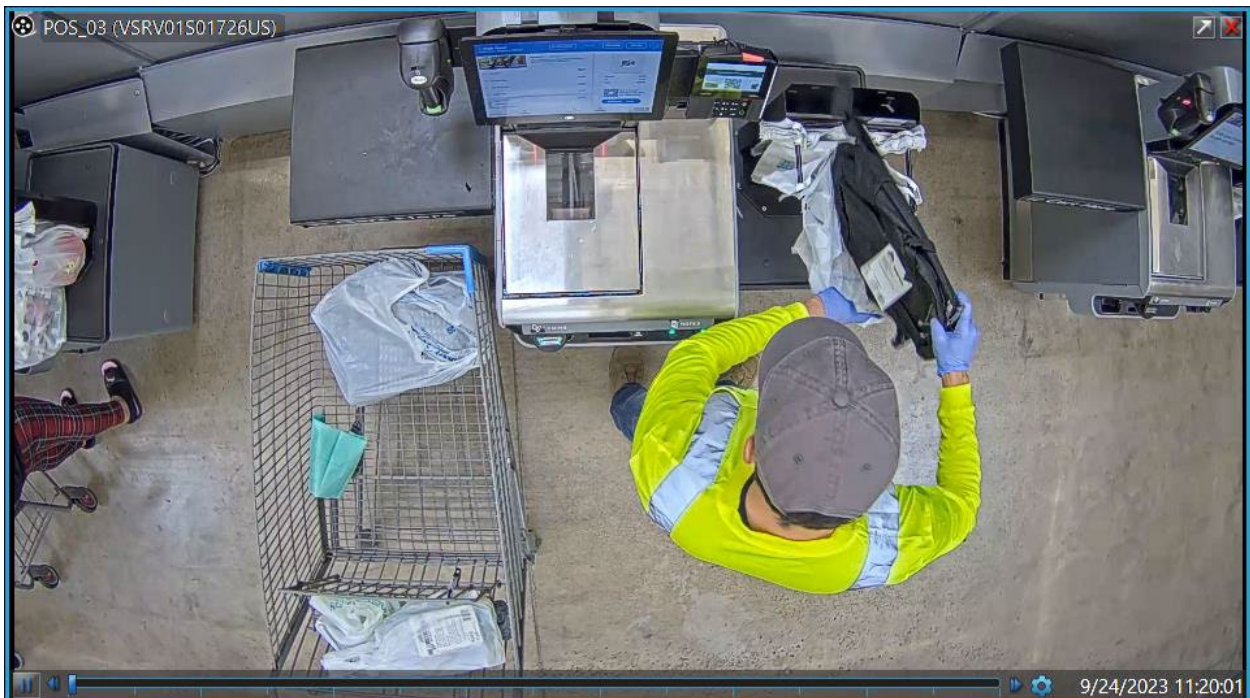
31. On October 11, 2023, law enforcement reviewed U.S. Company A surveillance camera photos of the individual conducting the purchase described in paragraph 30 (believed to be RODRIGUEZ). In Exhibit G, the individual can be seen opening the box of nitrile gloves during the purchase, with the Ozark brand black backpack still in the shopping cart. In Exhibit H, the individual can be seen wearing nitrile gloves and placing the backpack into a grocery bag. The individual is wearing blue jeans, tan boots, and a light-colored baseball cap, which are consistent with the clothes worn by Defendant, as seen in the surveillance video described above in paragraph 10. The individual is wearing a neon yellow long-sleeved shirt and appears to be wearing a black shirt underneath. A comparison of the items purchased to the items recovered from the crime scene, and of the clothing worn by the purchaser to the surveillance footage of Defendant, as well as the License Plate Detection records (paragraph 29), the timing advance data for xxx-xxx-9526, associated with Defendant (paragraph 34), and the DNA evidence (paragraph 21), though inconclusive, support the inference that Defendant is the individual who purchased the backpack

and other items and that those items were used in the attack against the Chinese Embassy on September 25, 2023.

Exhibit G (subject opening gloves)



Exhibit H (subject purchasing backpack)



32. On October 13, 2023, law enforcement reviewed U.S. Company A surveillance camera footage of the individual conducting the purchase described in paragraph 30. During the review of the footage, a bag containing a yellow box can be seen in the shopping cart. U.S. Company A surveillance camera footage also shows the individual shopping prior to checkout, and the yellow box can be seen in the shopping cart. On or about October 17, 2023, U.S. Company A provided law enforcement with the purchase receipt for the yellow box. The individual purchased a Straight Talk Moto G device.

33. On October 13, 2023, a U.S. Magistrate Judge issued search and seizure warrants (ECF No. 23-sc-2214) for information held by AT&T, Verizon Wireless, and T-Mobile regarding TARGET LOCATION 2. ATF law enforcement officers executed these search warrants the same day. Law enforcement personnel are continuing to analyze the returns from the warrants issued in 23-sc-2214.

34. On October 13, 2023, law enforcement received call detail records from T-Mobile associated with xxx-xxx-9526 (the phone number listed in Defendant's Florida bar profile) that provided an associated International Mobile Subscriber Identity (IMSI) of 310240191570535. Timing advance data for IMSI 310240191570535 (received in response to the search warrants issued in 23-sc-2214) places xxx-xxx-9526 in the vicinity of TARGET LOCATION 2 between the hours of 10:17 a.m. and 11:56 a.m. on September 24, 2023, around the time of the U.S. Company A transaction described above.

Purchase of "Burner" Phone to Use in the Attack on the Chinese Embassy

35. On or about October 24, 2023, ATF agents received a copy of surveillance camera footage from U.S. Company A Store 1726 located at 171 Burgess Road, Harrisonburg, VA. The footage captures the purchase of a Straight Talk Moto G phone (described in paragraph 32) by an

individual (believed to be Defendant) wearing blue jeans, tan boots, florescent yellow long sleeve top, light-colored baseball cap, and face mask on September 24, 2023, at approximately 11:10 a.m.

36. On October 25, 2023, law enforcement officers received transaction records from TracFone regarding the purchase of the Moto G phone described above. The Account ID associated with the purchase was ThomasJeffersonFree@gmail.com. Law enforcement officers also determined that the device was returned on September 24, 2023, to U.S. Company A Store 1780, located at 975 Hilton Heights Rd, Charlottesville, VA, at approximately 6:22 p.m.

37. Law enforcement officers reexamined the previously received sales records from U.S. Company A for Ozark Trail brand backpacks and Expert Grill brand charcoal briquets and identified a transaction of interest at U.S. Company A Store 1780 in Charlottesville, VA, that occurred on September 24, 2023, at approximately 4:02 p.m.

38. On or about October 27, 2023, law enforcement officers obtained surveillance camera footage and transaction receipts from U.S. Company A Store 1780 in Charlottesville, VA. In the footage from September 24, 2023, at approximately 4:02 p.m., an individual wearing blue jeans, tan boots, a black short-sleeved shirt, a light-colored baseball cap, a dark face mask, and nitrile gloves can be seen purchasing a bag of Expert Grill brand charcoal briquets. The individual—believed to be Defendant—then can be seen exiting the store.

39. On September 24, 2023, at approximately 6:22 p.m., surveillance camera footage shows an individual, believed to be Defendant, wearing blue jeans, tan boots, a black short-sleeved shirt, a light-colored baseball cap, and a dark face mask returning an item at the electronics section of U.S. Company A Store 1780. At approximately 6:25 p.m., the individual purchased a different Straight Talk device and subsequently returned it at approximately 6:37 p.m. At approximately

6:39 p.m., the individual purchased a U.S. Company A Family Mobile device. Exhibit I shows this individual exiting U.S. Company A Store 1780.

Exhibit I



40. On October 5, 2023, a U.S. Magistrate Judge issued search and seizure warrants (ECF No. 23-sc-2161) for information held by AT&T Corporation, Verizon Wireless, and T-Mobile US, Inc., regarding TARGET LOCATION 1. ATF law enforcement officers executed these search warrants the same day. Defendant's phone number xxx-xxx-9526 does not appear in these results. Law enforcement personnel are continuing to analyze the returns from these warrants.

41. On October 20, 2023, a U.S. Magistrate issued search and seizure warrants (ECF No. 23-sc-2266) for information held by T-Mobile regarding Defendant's phone number xxx-xxx-

9526. ATF law enforcement officers executed these search warrants the same day. Law enforcement personnel are continuing to analyze the returns from the warrants issued in 23-sc-2266. Analysis to date indicates that Defendant's phone number xxx-xxx-9526 was in the Charlottesville, VA area on September 24, 2023, from approximately 3:00 p.m. to 9:00 p.m.

42. Based on search warrant results for Defendant's phone number xxx-xxx-9526, the device first used a cell site in the Charlottesville area at 3:03 p.m. on September 24, 2023. The device appears to consistently use cell sites in the Charlottesville area until approximately 9:02 p.m. There is no cell site location data recorded on this device from approximately 9:02 p.m. on September 24, 2023, to 10:52 a.m. on September 25, 2023, when the device is again using a cell site in the Charlottesville area. The device then appears to leave the Charlottesville area at approximately 1:12 p.m. on September 25, 2023.

43. On November 3, 2023, law enforcement received call detail records from TracFone associated with xxx-xxx-1785 that provided an associated Electronic Serial Number (ESN) of 016439000109944. These records also include call detail records showing use of the phone from approximately September 24, 2023, to October 25, 2023. Based on the facts described above and below, it is reasonable to believe that Defendant purchased the Moto G phone assigned xxx-xxx-1785 and used it in connection with the TARGET OFFENSES.

44. The TracFone records show an outgoing call from the Moto G phone assigned xxx-xxx-1785 to a phone number used by a taxicab company servicing Northern Virginia at 1:14 a.m. on September 25, 2023. Records obtained from the taxicab company show that the passenger using xxx-xxx-1785 was picked up at 542 23rd Street South, Arlington, VA, 22202, at 1:28 a.m. on September 25, 2023, and dropped off at 4500 Connecticut Avenue N.W., Washington, 20008, a few blocks from the Chinese Embassy.

45. The TracFone records show an outgoing call from the Moto G phone assigned xxx-xxx-1785 to a phone number used by a taxicab company servicing Washington, D.C. and Northern Virginia at 3:09 a.m. on September 25, 2023. Records obtained from the taxicab company show that the passenger using xxx-xxx-1785 was picked up at 4500 Connecticut Avenue N.W., Washington, 20008, at 3:11 a.m. on September 25, 2023, and dropped off at 542 23rd Street South, Arlington, VA, 22202.


Rodriguez's Recent Activity

46. Defendant is believed to reside in Panama City, Florida. On October 12, 2023, law enforcement observed Defendant arrive in the area of 315 E. 4th Street, Panama City, Florida, in a gray 2016 Jeep Patriot bearing Florida license plate 35AFPD. Defendant was most recently observed in this vehicle in Panama City, FL, on November 3, 2023.

47. On or about November 4, 2023, GPS tracking data from Defendant's Jeep Patriot bearing Florida license plate 35AFPD revealed Defendant traveling west from his residence in Panama City, Florida, to Louisiana, with an unknown destination.

CONCLUSION

48. Based on the facts described above, I submit that there is probable cause to believe that, on or about September 25, 2023, Defendant CHRISTOPHER RODRIGUEZ committed violations of 18 U.S.C. § 970(a) (Damaging Property Occupied by Foreign Government); 18 U.S.C. § 844(h) (Explosive Materials—Commission of a Federal Felony); 18 U.S.C. § 844(i) (Explosive Materials—Malicious Use); and 26 U.S.C. §§ 5841, 5861(d), and 5871 (Receipt or Possession of Unregistered Firearm), and request that the Court issue the proposed arrest warrant.



Denise Katolin Arrans
Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on November 4, 2023.

ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE