

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, Aaron Christensen, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint and warrant for the arrest of TAYLOR LEIGH PLAINBULL (hereafter "PLAINBULL"). As set forth below, there is probable cause to believe that PLAINBULL violated 18 U.S.C. §§ 1153(a) and 1111(a), murder.

2. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since May of 2009. During this time, I have participated in numerous criminal investigations, including investigations involving terrorist financing, organized crime, narcotics trafficking and violent crimes on Indian Reservations. I am currently assigned to the Billings, Montana Resident Agency, where I am responsible for investigating violent crimes on Indian Reservations.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. There are three elements to the crime of murder, in violation 18 U.S.C. §§ 1153(a) and 1111(a), murder:

First, the defendant is an Indian person;

Second, the crime occurred in Indian Country;

Third, the defendant unlawfully killed another person with malice aforethought.

PROBABLE CAUSE

5. PLAINBULL and Victim 1 are enrolled members of the Crow Tribe of Indians.

6. The conduct described below occurred on the south side of State Secondary Highway 416, also known as Blue Creek Road, at approximately the 9-mile mark, south of Billings, Montana, which is within the external boundaries of the Crow Indian Reservation, being Indian Country.

7. On 10/24/2020, Victim 1, an adult female, was driving from Pryor, Montana, to Billings, Montana, in a vehicle with Victim 2, an adult male, and Victim 3, a minor child of Victim 1.

8. PLAINBULL had previously been in an intimate or dating relationship with Victim 1.

9. While Victim 1 was driving westbound on Blue Creek Road, she was passed by PLAINBULL who was driving eastbound towards Pryor. PLAINBULL

was driving what is believed to be a stolen truck. The owner of the stolen truck reported that it contained four firearms, including a .45 caliber Springfield semiautomatic pistol.

10. After PLAINBULL passed Victim 1, he turned around and chased after Victim 1, then passed her vehicle and stepped on the brakes, forcing Victim 1 to drive into the oncoming traffic lane, on the south side of Blue Creek Road. PLAINBULL then forced Victim 1's vehicle off the road into the ditch on the south side of the road.

11. The weather on the afternoon of October 24/2020 was extremely cold and snowy, and Victim 1 was unable to drive the car out of the ditch.

12. Victim 1 locked the car doors while Victim 2 called 911 on his cell phone, and at the same time PLAINBULL approached the car brandishing a black pistol.

13. Victim 2 reported that he saw a flash and heard a gunshot. Victim 2 sustained an injury to his forehead. He reported hearing approximately three gunshots.

14. Based on a preliminary examination of the scene, it appeared that Victim 1 was struck in the face and chest by at least one bullet. She was pronounced dead at the scene by responding emergency medical personnel.

15. PLAINBULL walked around the vehicle to the driver's side and checked on Victim 1's status, while Victim 3 exited the vehicle and stood by the rear passenger tire. PLAINBULL then returned to the passenger side of the vehicle where he grabbed Victim 3 and drove away in the truck.

16. Victim 2 received treatment at the scene from emergency medical personnel and gave a statement to responding officers from the Yellowstone County Sheriff's Office. He was then transported to Billings for further treatment, and he gave a statement to an FBI agent. Victim 2 identified PLAINBULL as the shooter based on a photograph.

17. Victim 3 was located later the same day, and gave a statement confirming that PLAINBULL was the shooter.

18. During a search of the vehicle and its environs, one spent .45 caliber shell was located near the front passenger tire, and one was located under Victim 1's body in the driver's seat.

19. As of this writing, PLAINBULL has not been located and has not provided any statements.

CONCLUSION

20. Based on the forgoing facts, I believe that probable cause supports a criminal complaint alleging that PLAINBULL committed first degree murder, in

violation of 18 U.S.C. §§ 1153(a) and 1111(a). I respectfully request that the Court issue a warrant for the arrest of TAYLOR LEIGH PLAINBULL.

21. I swear that the facts presented herein are true and accurate to the best of my knowledge.



Aaron Christensen
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me on this 25th day of October, 2020.



TIMOTHY J. CAVAN
United States Magistrate Judge