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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA
v.
ALISON ANN BROWN,

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)
)
)

Case No.

13-mj-464 (MKK)

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 4, 2013, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, defendant Alison Ann Brown an Indian, did unlawfully kill a human being, Byron James Lussier, also an Indian, with malice aforethought in violation of Title 18, United States Code, Section(s) 1111(a), 1151 and 1153(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

CB

Complainant's signature

CHARLES BONSER, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: July 11, 2013

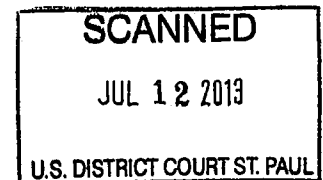
Mary Kay Klein

Judge's signature

City and state: Bemidji

The Honorable Mary Kay Klein

Printed name and title



1 STATE OF MINNESOTA)
2)
3 COUNTY OF BELTRAMI) ss. AFFIDAVIT OF CHARLES EDWARD BONSER
4)
5)

13-mj-464 (MKK)

- 7 1. Your affiant, Charles Edward Bonser, being duly sworn,
8 does depose and state as follows:
- 9 2. I am a Special Agent (SA) of the Federal Bureau of
10 Investigation (FBI). I have been a Special Agent of
11 the FBI since December 2010. I am currently assigned
12 to the Bemidji, Minnesota Resident Agency of the FBI
13 with the primary responsibility of investigating
14 violent crimes that occur on the Red Lake Indian
15 Reservation.
- 16 3. The facts and information contained in this Affidavit
17 are based on my training, experience, observations,
18 and personal knowledge; upon my discussions with other
19 law enforcement officers and agents directly involved
20 in this investigation; and upon my review of official
21 reports submitted in relation to this investigation.
- 22 4. This Affidavit does not contain all facts known to me
23 regarding these matters, but only those sufficient to
24 support a finding of probable cause for the requested
25 warrant.
- 26 5. On July 4, 2013, at approximately 4:22 a.m., Red Lake
27 Police Department (RLPD) officers were dispatched to
28 the scene of a stabbing at the Byron James Lussier
29 residence, located on the Red Lake Indian Reservation.
- 30 6. When officers arrived, they found Byron James Lussier,
31 Indian male, date of birth XX/XX/1962, lying on the
32 floor with multiple stab wounds.

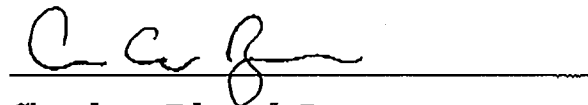
- 1 7. Byron James Lussier was transported by ambulance to
2 the Red Lake Hospital, where he was pronounced dead by
3 hospital staff.
- 4 8. Witness 1 was interviewed on July 4, 2013, by RLPD
5 Criminal Investigator Geoffrey Pierre. Witness 1
6 advised he/she was at the residence of Byron
7 James Lussier when the stabbing occurred, along with
8 Witness 2 and Witness 3. Witness 1 stated that Alison
9 Ann Brown, Indian female, date of birth XX/XX/1988,
10 was also present.
- 11 9. Witness 1 advised that he/she heard Alison Ann Brown
12 say something to Byron James Lussier and then Brown
13 began physically fighting with Byron James Lussier.
- 14 10. Witness 2 was interviewed by FBI SA Charles E. Bonser
15 and Criminal Investigator Geoffrey Pierre on July 4,
16 2013. Witness 2 observed Alison Ann Brown arm herself
17 with a heavy duty grilling fork. Witness 2 was able
18 to take the fork away from Alison Ann Brown. Witness
19 2 then threw the fork on the floor against the wall.
- 20 11. Witness 2 advised that Alison Ann Brown then armed
21 herself with a large kitchen knife with a brown
22 handle. Alison Ann Brown stabbed Byron James Lussier
23 multiple times. Witness 2 took the knife away from
24 Alison Ann Brown and dropped it on the floor.
- 25 12. Witness 2 advised Alison Ann Brown next armed herself
26 with a smaller knife, similar to the size of a pocket
27 knife.
- 28 13. Witness 2 advised that Byron James Lussier collapsed
29 on the floor.
- 30 14. Witness 3 was interviewed by Criminal Investigator
31 Geoffrey Pierre on July 4, 2013. Witness 3 said
32 he/she grabbed Alison Ann Brown and forced her from

- 1 the Byron James Lussier residence after Byron James
2 Lussier collapsed on the floor.
- 3 15. Witnesses reported that Alison Ann Brown fled on foot
4 to her residence located at 23838 Back of Town Drive,
5 approximately four houses down the street from the
6 Byron James Lussier residence.
- 7 16. Alison Ann Brown was located by the Red Lake Police
8 Department at her residence and arrested at
9 approximately 4:40 a.m.
- 10 17. While processing the crime scene at the Byron James
11 Lussier residence, your affiant located a heavy duty
12 grilling fork on the floor against the wall between
13 the kitchen and living room. Your affiant also located
14 a large kitchen knife with a brown handle on the
15 kitchen table. The knife appeared to have a blood-
16 like substance on it.
- 17 18. During the execution of a federal search warrant at
18 the residence of Alison Ann Brown, a small kitchen
19 knife was located on a couch near the front door of
20 the residence.
- 21 19. I know that Alison Ann Brown and Byron James Lussier
22 are both enrolled members of the Red Lake Band of
23 Chippewa Indians.
- 24 20. Based upon the above information, I believe that there
25 is probable cause to believe that Alison Ann Brown,
26 Indian female, date of birth XX/XX/1988, did commit
27 the offense of the unlawful killing of Byron James
28 Lussier, Indian male, date of birth XX/XX/1962, which
29 occurred within the exterior boundaries of the Red
30 Lake Indian Reservation, Minnesota, a location within
31 the special territorial jurisdiction of the United

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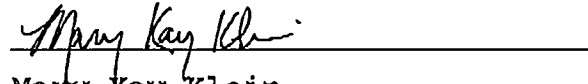
States, in violation of Title 18, United States Code,
Sections 1151, 1152, 1153(a), and 1111(a).

21. Further your affiant sayeth not.



Charles Edward Bonser
Special Agent
Federal Bureau of Investigation
Bemidji, Minnesota

Subscribed and sworn to before me this 11th day of July, 2013.



Mary Kay Klein
U.S. Magistrate Judge