



1 **AFFIANT**

2 My belief is based upon the following facts and circumstances:  
3

4 My name is James Paulsen; I have been a Police Officer for over twelve years and am currently a  
5 Detective with the Redmond Police Department assigned to the Multi-Agency Eastside Narcotics  
6 Task Force (ENTF). The Eastside Narcotics Task Force is made up of narcotics Detectives from  
7 the Cities of Redmond, Bellevue, Kirkland, Mercer Island, Washington State Patrol, and the  
8 United States Postal Service.

9 I have training in narcotics detection, investigation and identification through the Washington  
10 State Criminal Justice Training Commission (W.S.C.J.T.C) and Redmond Police Department. I  
11 have completed the basic law enforcement-training academy of 720 hours, which included  
12 narcotics training. I have completed 80 hours of undercover training (basic and advanced)  
13 through the Seattle Police Department and an additional 40 hours of undercover training in  
14 techniques and survival. I have attended schools and seminars sponsored by the State of  
15 Washington. Further I have served, or participated in the execution of over 40 + search warrants.  
16 I have investigated numerous auto theft, car prowl, identity theft/fraud, crimes against people,  
17 property crimes, and narcotics complaints throughout my career. I have observed several  
18 controlled 'undercover' narcotics transactions throughout my career and have participated in  
19 several narcotics investigations as an undercover Officer.

20 From October 2005 to December 2010 I was assigned as an officer in the Redmond Police  
21 Department Pro-Act Unit. The Pro-Act Unit was a plain-clothes unit with an emphasis on auto  
22 theft. During my time as an officer in the Pro-Act Unit, I have been part of numerous auto theft,  
23 vehicle prowl, burglary, identity theft, fraud and forgery, possession of stolen property, and  
24 narcotics investigations. As part of these investigations I have conducted surveillance (mobile  
25 and stationary), post arrest interviews, and suspect interrogations.

26 During my career, I have been involved in numerous narcotics related investigations, including  
27 cases involving the possession, sale, and distribution of cocaine, cocaine base (crack), heroin,  
28

1 methamphetamine, marijuana, MDMA (Ecstasy), and prescription medications. I have  
2 participated in the service of search warrants for controlled substances and money laundering.

3  
4 I am familiar with the identification of various controlled substances, the field-testing of those  
5 controlled substances, the proper terminology that is used to identify and make reference to  
6 certain controlled substances, and techniques for conducting controlled substance investigations.

7 I have conversed with drug users and drug dealers about illegal drugs. I have verified  
8 information received from drug users and drug dealers through independent sources such as  
9 police reports, other officers and detectives, reliable informants, and from evidence gathered  
10 during searches. Thus, I am familiar with the methods and ways of drug users and dealers.

11  
12 I have participated in the service of search warrants/consent searches where cocaine was located.  
13 I am familiar with both the appearance and odor of heroin from these arrest and warrant services,  
14 as well as from training classes in which heroin was introduced to familiarize officers with its  
15 physical characteristics. I have also become familiar with how narcotics, including heroin, are  
16 normally packaged for sale.

### 17 **THE INVESTIGATION**

18 On January 9, 2015, Detective Greg Granis with my department applied for a search warrant for  
19 a residence located at [REDACTED] That application was  
20 granted by the Honorable King County Superior Court Judge Barbara Linde and a search warrant  
21 was issued under King County Warrant Number 15-039.

22  
23 This is an addendum to that warrant and by definition incorporates affidavit number 15-039.

24  
25 On January 9, 2015, members of the Bellevue Police Department executed search warrant 15-  
26 039 at [REDACTED] City of Bellevue, King County, Washington  
27 State. The warrant authorized a search for evidence of homicide and identity theft.

28  
SEARCH WARRANT AFFIDAVIT

Page 3 of 5

08.20.14

1 Upon serving the search warrant at 12:07 p.m, evidence of VUCSA (possession of cocaine with  
2 intent to distribute, RCW 69.50.401) was located within the residence. A quart sized clear  
3 plastic bag containing suspected cocaine, several digital scales, and a small black safe containing  
4 suspect cocaine residue was located in the hallway laundry closet. A known cutting agent for  
5 cocaine, Inositol, was located in the master bedroom on the window sill. Green and white plastic  
6 wrap with suspected cocaine residue located within was located in the garbage can in the kitchen.  
7 Additionally, numerous United States Postal Service (USPS) shipping receipts, labels, customs  
8 clearance labels, packaging, and documents with suspected customer names and addresses were  
9 located throughout the apartment.

10 A field test was conducted on suspected cocaine located in the quart size bag and tested positive  
11 for the presence of cocaine.

12  
13 Based on the above I believe the crime of VUCSA – Possession with the Intent to Deliver  
14 Cocaine and Delivery of Cocaine in violation of RCW 69.50.401 has been committed and that  
15 evidence of the crime can be located at the above described residence. I believe there is probable  
16 cause to search the residence for the following items:

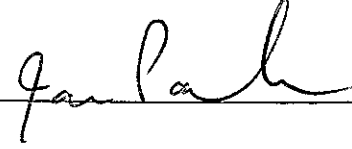
- 17 -Cocaine, and any other unlawfully possessed controlled substances, products thereof or
- 18 byproducts therefrom;
- 19 -Pipes, packaging materials, equipment, scales, containers, paraphernalia, and any other
- 20 items used in the consumption, distribution or manufacturing of controlled substances;
- 21 -Keys, canceled mail, rental agreements, utility bills, notices from governmental
- 22 agencies, and all other items in whatever form evidencing dominion and control of the
- 23 premises searched;
- 24 -Documents which show the acquisition and distribution of illegal drugs;
- 25 -Financial documents which show the distribution of proceeds from illegal drug
- 26 transactions;
- 27 -Monies or assets deemed to be proceeds of illegal drug transactions;
- 28 - United States Postal Service (USPS) shipping receipts, labels, customs clearance labels,
- packaging, and documents that are evidence of drug trafficking;

26 //

27 //

1 I certify under penalty of perjury under the laws of the State of Washington that the foregoing is  
2 true and correct.

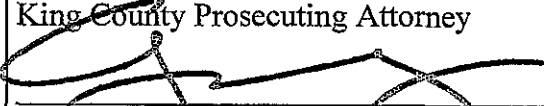
3 Signed this 9 day of January, 2015, at Seattle, WA.

4 Affiant Signature: 

5  
6  
7 Signature:   
8 SUPERIOR COURT JUDGE

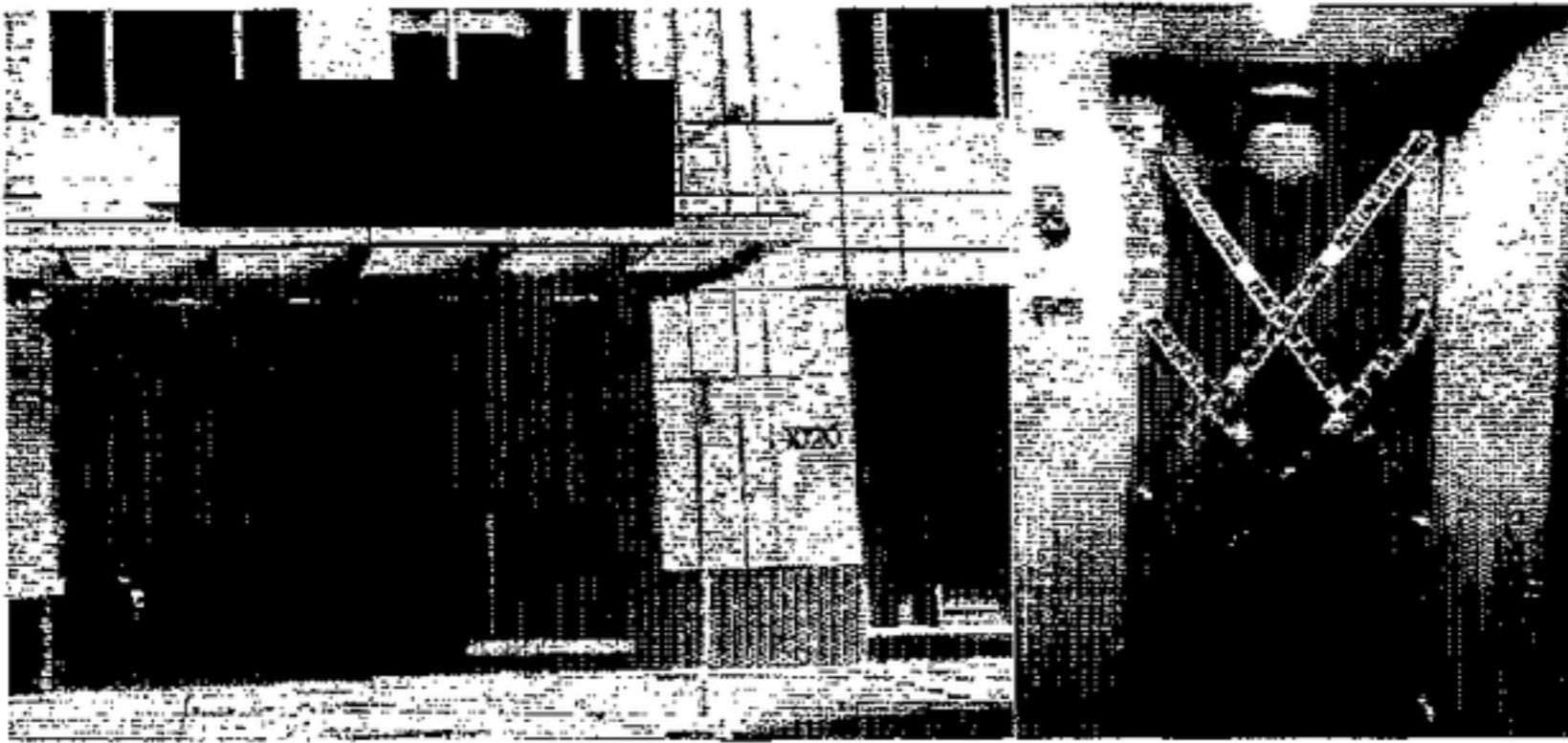
9 Printed Judge's Name: HALPERN

10  
11  
12 Issuance of Warrant Approved:  
13 DANIEL T. SATTERBERG  
14 King County Prosecuting Attorney

15   
16 By: Gary Ernsdorff, WSBA #22461  
17 Senior Deputy Prosecuting Attorney  
18 Criminal Division  
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Seize, if located, evidence of the above listed crime, including but not limited to:

- Diaries, notes, logs, letters, mail, receipts, digital files or emails relating to the Doubletree Hotel or the relationship between Tae Bum Yoon aka Chris Yoon aka Chris Youn, and Ashley Benson
- Photographs of victim Ashley Benson
- Digital or paper bank account information including receipts, cash payments, checks, or transfers of money between Tae Bum Yoon aka Chris Yoon aka Chris Youn, and Ashley Benson
- Digital evidence including computer search history, email access, malicious software or hacking software, files or other digital media that provide evidence of access to the personal communications of Chris Youn
- Papers, receipts, mail, shipping labels, or other documents, that indicate the fraudulent use of the name Chris Youn aka Chris Yoon
- Cellphones, computers, routers and any other electronic device that can be used to create and/or store any of the above listed content.
- Documents of dominion and control over the apartment at [REDACTED]

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Promptly return this warrant to me or the clerk of this court; the return must include an inventory of all property seized.

A copy of the warrant and a receipt for the property taken shall be given to the person from whom or from whose premises property is taken. If no person is found in possession, a copy and receipt shall be conspicuously posted at the place where the property is found.

Date/Time: 1-9-15 10:50 AM

Signature:   
SUPERIOR COURT JUDGE

Barbara Lindie  
Printed or Typed Name of Judge





1 My belief is based on the following facts and circumstances:

2 My name is Gregory M. Grannis. I am a fully commissioned police officer employed by the  
3 City of Bellevue. I have served in this capacity for approximately thirteen years. I have  
4 completed the 720 hour Basic Law Enforcement Training Academy at the Washington State  
5 Criminal Justice Training Center (W.S.C.J.T.C.). I have experience investigating crimes such  
6 as Identity Theft, Theft, Possessing Stolen Property, Trafficking Stolen Property,  
7 Residential/Commercial Burglary, Vehicle Prowl, Assault and Murder among several others. I  
8 have been directly involved in approximately 100+ investigations, including cases related to  
9 the theft, possession, sale, and trafficking of stolen goods. I have conversed with individuals  
involved in these types of crime. Further, I have conversed with other law enforcement  
personnel who have extensive experience investigating such crimes. Through this experience I  
have become familiar with the numerous ways in which criminals often behave before, during  
and after criminal acts.

10 Additionally, I have spent the last three years assigned to the Bellevue Police Department  
11 Special Enforcement Team, specializing in electronic and physical surveillance. I have  
12 received formal as well as on-the-job training in surveillance techniques and developing and  
13 assisting in prosecuting cases based on said surveillance. The Special Enforcement Team  
14 typically investigates vehicle and property crimes such as auto theft, burglary, trafficking  
15 stolen property, and identity theft. However, due to our experience in surveillance we have also  
16 been utilized in bank robbery, kidnapping and murder cases amongst other things. In our  
17 normal duties the overwhelming majority of our cases involve drug users, dealers and addicts.  
18 As such I am familiar with drug trafficking, transactions, products, paraphernalia, types of  
19 drugs, and the tactics of the people who buy, sell and use them.

20 I am familiar in ways criminals avoid detection by law enforcement, including using false or  
21 partially false identities, giving false or partially false addresses, frequently changing phone  
22 numbers or the phone itself, and using unregistered or "burner" phones. When travelling they  
23 will also use methods of transportation that do not require identification such as taxis and  
pseudo-taxi services like Uber, buses and other mass transit.

24 I know that individuals involved in such activity and identity theft will often possess mail,  
25 packages, credit/debit cards, state identification(s), bank checks, retail store "club cards", and a  
26 variety of other items in the name(s) of theft, fraud or ID theft victims. Such items are used to  
27 gain access to cash, food, consumer electronics, and other property that is of greater value to  
28 the possessor of such items, or to conceal the identity and behavior patterns of the criminal.

Through the above listed training and experience I know that it is common for individuals  
involved in the criminal activity to conceal evidence, contraband, proceeds of criminal activity,  
and records of such activities in secure locations within their residences, outbuildings, storage  
lockers, and/or businesses, bank safety deposit boxes, vessels and automobiles for ready access  
and concealment from law enforcement detection.

1 I know that individuals involved in criminal activity commonly keep weapons or firearms,  
2 including but not limited to, knives, handguns, pistols, revolvers, rifles, shotguns, machine  
3 guns and other weapons. Said weapons are used to protect and secure the  
4 possessor/trafficker's property and personal safety from others involved in these activities.  
5 Such property may include, but is not limited to, narcotics, narcotics paraphernalia, books,  
6 records, jewelry, U.S. currency, etc. and they keep these firearms on their person, throughout  
7 their residence, outbuildings, curtilage, and vehicles.

8 Finally, I know that persons engaged in crimes as described above frequently use cellular  
9 phones to communicate with each other. Such communications include arranging times to meet  
10 and discuss criminal activity, coordination of the actual crimes and transportation to and from  
11 the crime scene(s), and to communicate with accomplices such as lookouts and drivers during  
12 the commission of such crimes. On occasion they will also communicate to other persons that  
13 they have engaged in such criminal activity after the fact, including by phone, text, email and  
14 other means of electronic communication.

15 This affidavit is related to Bellevue (Washington) Police Department Case #14-64845 (Assist  
16 Official Agency) and Portland (Oregon) Police Bureau Case #14-104265.

17 The statements in this Affidavit are based in part on information provided by Detective  
18 Michelle Michaels and Detective Bryan Steed, Portland Police Bureau of Portland, Oregon,  
19 and on my investigation of this matter. Since this affidavit is being submitted for the limited  
20 purpose of securing a search warrant, I have not included each and every fact known to me  
21 concerning this investigation. I have set forth only the facts that I believe are necessary to  
22 establish probable cause to believe that evidence, fruits, and instrumentalities of the violations  
23 of RCW 9A.32.050, Murder in the Second Degree (Oregon equivalent: Homicide/Murder ORS  
24 163.115) and Identity Theft, RCW 9.35.020 (Oregon equivalent: Identity Theft ORS 165.800  
25 are presently located at [REDACTED] A search warrant  
26 affidavit written and sworn to by Det. Steed is part of the basis for my knowledge of the facts  
27 of this case, attached and hereby incorporated by reference, and relied upon as additional  
28 probable cause for this affidavit, as Search Warrant Appendix A.

On 12/30/2014 I was assigned by Lt. Sullivan to be the liaison in this case between the  
Bellevue Police Department and the Portland Police Bureau. The initial information provided  
by the Portland Police follows:

A Bellevue resident, identified as Tae Bum Yoon, DOB 10/2/90, was a suspect in a homicide  
case that occurred in Portland, Oregon late on 12/25/14 or early on 12/26/14. Tae Bum Yoon  
also goes by the name "Chris." The victim, identified as Ashley R. Benson, DOB 12/4/89, had  
been found dead in a stairwell in the Doubletree by Hilton Hotel, 1000 NE Multnomah ST. in  
Portland, Oregon. The Portland Police investigation determined that Tae B. Yoon had been  
staying in the hotel under a reservation in the name of Chris Youn. Chris Youn is a real person,  
who also lives in Bellevue, WA, and was scheduled to arrive at the hotel the next day. Tae B.  
Yoon arrived on 12/25/14 and pretended to be Chris Youn, but changed the reservation to



1 match the spelling of his name and paid in cash. Portland Police were able to determine that  
2 Yoon and Benson had contact that led to a meeting in Yoon's hotel room. The alleged reason  
3 for this meeting was a sex-for-money transaction based on a previously established relationship  
4 between the two. Yoon left the hotel and Benson's body was later discovered. The real Chris  
5 Yoon then arrived as scheduled on 12/26/2014 and was questioned by police and determined  
6 not to be involved. The investigation continued with Tae Bum Yoon as the focus. After  
7 determining Yoon's driver's license showed an address of [REDACTED]  
8 [REDACTED] Portland Police contacted Bellevue Police for assistance. It was at this point that  
9 the BPD Special Enforcement Team became involved in this case.

7 The initial request for assistance came from Portland Police Detectives Michelle  
8 Michaels and Bryan Steed. I knew both of them from a joint case we assisted them on about a  
9 year prior. They have proven trustworthy and straightforward in our past professional  
10 interactions together. They requested that we conduct surveillance on the known locations  
11 Yoon might go to in Bellevue including his apartment, his parent's home, and any other  
12 locations we might turn up as we investigated. We began about midday on 12/30/14.

11 My team began by setting up surveillance of the apartment at [REDACTED]  
12 [REDACTED] The apartment complex has  
13 controlled access and tight hallways. We limited ourselves to external surveillance aside from a  
14 scouting walkthrough by Ofc. Keene. We watched people come and go but did not observe  
15 Yoon. Towards the end of the afternoon we determined that there was a car registered to that  
16 apartment in a different name. Research via open source internet searches revealed a Caucasian  
17 couple living in that apartment as of Oct. 2014. There was corroborating evidence of this that  
18 led us to believe it was not a good address for Yoon, even though we confirmed via the  
19 Washington State Department of Licensing that that was his most current address. We  
20 discontinued surveillance there and ceased operations for the day. Det. Michaels asked that we  
21 not contact the management at the Ashton at the time. Nobody worked the case the next day  
22 due to the New Year's Day holiday.

19 Over the next few workdays we observed Yoon's family members and conducted  
20 surveillance of his mother and father. That surveillance is or will be documented in the case  
21 report but is not relevant to this warrant except to note that we did not see Yoon during that  
22 time.

22 On 1/6/15 Det. Michaels advised that a warrant had been obtained by the Portland  
23 Police Bureau to gain access to Yoon's cell phone records and activity, effectively tracking the  
24 cell phone electronically. Initially they had been unsuccessful and believed the known phone  
25 numbers were no good. Eventually the service provider, T-Mobile, provided the current phone  
26 number and was able to "ping" the phone for its location. Det. Michaels expected to receive  
27 that information by the end of the day, but pings from the previous number showed activity in  
28 the Eastgate area of Bellevue near his parent's home since the time of the crime. We agreed  
that confirming his address with the management at the Ashton Apartments was important, and  
she authorized me to do so if I felt I could make contact with someone who wasn't likely to  
have a relationship with Yoon or tip him off to the investigation.

1 [REDACTED] are managed by an interstate property management company  
2 called [REDACTED]. They have multiple Bellevue properties, and I decided to contact the management  
3 at a different property called [REDACTED] seek  
4 additional information. At about 1130 hours, I spoke with [REDACTED]  
5 [REDACTED]. I provided my identification and told her I was trying to confirm if Yoon still lived  
6 at the [REDACTED] checked her database and stated Yoon was still in  
7 Unit [REDACTED] and had been for about 3 months. I asked her to confirm that Yoon was at [REDACTED]  
8 [REDACTED] advised Yoon was at [REDACTED]. She  
9 added that the [REDACTED] sit across  
10 the street from each other. On their website they are listed as the same address, but for mailing  
11 purposes they are not the same. In short, Yoon was still living in unit [REDACTED] but in the building  
12 across the street from our earliest surveillance efforts.

13 I briefed Det. Michaels and relocated to [REDACTED]. I contacted Manager  
14 [REDACTED] and Assistant Manager [REDACTED] knew Yoon from a prior  
15 police incident and confirmed he lived alone in unit [REDACTED] of the [REDACTED] building. We discussed  
16 surveillance options if needed and I provided my information. I departed certain in the  
17 knowledge that the correct address for Tae Bum Yoon was [REDACTED].

18 I spoke with Det. Michaels and advised her of what I had learned. We agreed that the  
19 Special Enforcement Team would focus on the [REDACTED] building to see if Yoon turned up. She  
20 agreed to contact me when the phone pings went live. Later that evening, she called back and  
21 informed me that the phone pings showed Yoon was in Federal Way, Washington. This was  
22 significant for two reasons: First, it meant he was back in the area of his home and likely had  
23 been there or was to return there, and second, surveillance could be resumed by my team. We  
24 resolved to start early the next day and attempt to locate and observe Yoon.

25 On 1/7/15 I arrived at work and spoke with Det. Michaels by phone. She stated that the  
26 phone pings now showed Yoon was back in Portland. She had confirmed with Amtrak that  
27 Yoon had taken a late train and was in the area. Portland Police were attempting to locate Yoon  
28 and conduct surveillance. She asked that we be prepared to pick up surveillance if he took the  
train north again. At about 1530 hours Det. Michaels called back and advised Portland Police  
had established probable cause to arrest Yoon for Murder and were likely going to take him  
into custody. A few minutes later she advised they had done so, and asked that his apartment  
be sealed pending a search warrant.

1 I returned to City Hall and collected materials to seal the door to the apartment. I  
2 relocated to the [REDACTED] building at [REDACTED] and contacted [REDACTED]  
3 through the concierge. They met me in the lobby and I explained the situation. They  
4 accompanied me in the elevator to Unit [REDACTED] confirmed that was Yoon's apartment. I  
5 placed yellow caution tape bearing the words "Police Line-Do Not Cross" across the door in  
6 two "X" patterns. I then placed red evidence tape across the door and door jamb bearing my  
7 initials and the date. I placed them in four places, so that if the door was opened the tape should  
8 break. I then taped my business card to the door jamb and photographed the door. It occurred  
9 to me the door might not have been locked as I assumed. I tried the door and it was unlocked. I



1 did not open the door, and pulled it completely shut. [REDACTED] retrieved the key from the  
2 office and locked the deadbolt. I tried the door again and it would not open. The time by then  
3 was about 1655 hours. We spoke to several curious residents and I assured them they were  
4 safe. I advised [REDACTED] I would return the following day with a search warrant. In the  
5 meantime the staff maintenance supervisor, [REDACTED], retained the only key to the  
6 apartment overnight. I advised him nobody was to enter the apartment unless it was an  
7 emergency such as a burst pipe or fire. He stated he would not let the key out of his possession  
8 until I returned. I departed without incident.

9 Based on my observations, Yoon's apartment can be described as a residence at [REDACTED]  
10 [REDACTED] This apartment building is mixed use, residential  
11 over commercial space, on the northeast corner of [REDACTED] City  
12 of Bellevue, King County, Washington State. The building is primarily dark glass on the  
13 exterior, but the bottom floors are grey or beige. There is a tan and blue sign over the door to  
14 the residential units that reads [REDACTED] and is the only unit  
15 numbered as such. It features a brown door with a gray frame, surrounded by beige/yellow  
16 walls. There is a tan number plate to the left of the door bearing black letters reading [REDACTED]  
17 Photos of the exterior of the building and apartment [REDACTED] as I left it follow:



18 On 1/8/2015 I spoke with Det. Michaels again. She stated that in a conversation with  
19 Tae Bum Yoon he acknowledged his address is [REDACTED] Bellevue WA,  
20 98004. Michaels also stated that a search warrant had been served on the phone taken from  
21 Yoon at the time of arrest. On the phone they found photos indicating significant cocaine  
22 trafficking. The photos included screenshots of a computer showing orders for "White  
23 Stallion" cocaine. The order form advertises the cocaine at \$65 a gram. Additional photos  
24 show white "rocks" consistent in appearance with cocaine on a scale and in baggies in front of  
25 the computer. There are also photos of money splayed out on the desktop and mailer envelopes  
26 showing addresses in other states and a return address of [REDACTED]  
27 [REDACTED] One of the envelopes has a date  
28 written on it of 1/5/2015. At least one of the photos has a backdrop that appears to be the wall  
of a residential type room, with a power outlet. Cocaine trafficking would explain how an  
individual with no visible means of support or job might afford the rent at the [REDACTED] which



1 runs about \$3,000 a month.

2 Summation of pertinent facts:

- 3
- 4 1) There is probable cause to believe that Tae Bum Yoon was involved in the unlawful homicide of Ashley Benson on or about 12/25/2014 or 12/26/2014.
- 5 2) In doing so, Tae Bum Yoon portrayed himself as Chris Yoon and benefitted financially from doing so, as well as attempting to conceal his identity.
- 6 3) Phone data from Tae Bum Yoon's cell phone indicates he has returned to the Eastgate area of Bellevue, and the City of Federal Way since the crime was committed, and returned to Portland on 1/6/2015 according to Amtrak ticket sales.
- 7 4) It is reasonable to believe he would return to his known local residence when he returned to the area.
- 8 5) It is reasonable to believe Tae Bum Yoon's address is [REDACTED]
- 9 [REDACTED] This is based on confirmation through the property management records system, firsthand knowledge shared by the assistant manager, [REDACTED] and statements by Tae Bum Yoon himself to that effect.
- 10
- 11
- 12

13 Based on my own observations and the facts provided by the Portland Police Bureau, I believe the residence at [REDACTED] be the home of Tae Bum Yoon (Date of Birth 10/2/90). Based on the foregoing, the information provided by Detectives of the Portland, Oregon Police Bureau, and based on my training and experience I conclude there is probable cause to believe there is further evidence of the crime of Murder in the Second Degree, RCW 9A.32.050, (Oregon equivalent: Homicide/Murder ORS 163115) and Identity Theft, RCW 9.35.020 (Oregon equivalent: Identity Theft ORS 165.800, inside the listed residence, as referenced in the above-mentioned case numbers.

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18 I am seeking judicial permission to enter the above described residence at 1020 108<sup>th</sup> Ave NE, Bellevue WA 98004, to search for the following evidence of the described crimes including:

19

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- 21 • Diaries, notes, logs, letters, mail, receipts, digital files or emails relating to the Doubletree Hotel or the relationship between Tae Bum Yoon aka Chris Yoon aka Chris Yoon, and Ashley Benson
- 22 • Photographs of victim Ashley Benson
- 23 • Digital or paper bank account information including receipts, cash payments, checks, or transfers of money between Tae Bum Yoon aka Chris Yoon aka Chris Yoon, and Ashley Benson
- 24 • Digital evidence including computer search history, email access, malicious software or hacking software, files or other digital media that provide evidence of access to the personal communications of Chris Yoon
- 25 • Papers, receipts, mail, shipping labels, or other documents that indicate the
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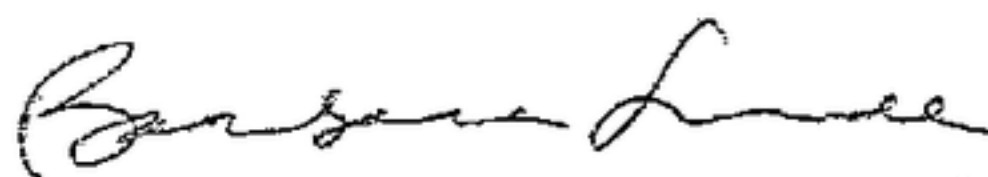
1 fraudulent use of the name Chris Youn aka Chris Yoon

- 2 • Cellphones, computers, routers and any other electronic device that can be used  
3 to create and/or store any of the above listed content.  
4 • Documents of dominion and control over the apartment at [REDACTED]  
5 [REDACTED]

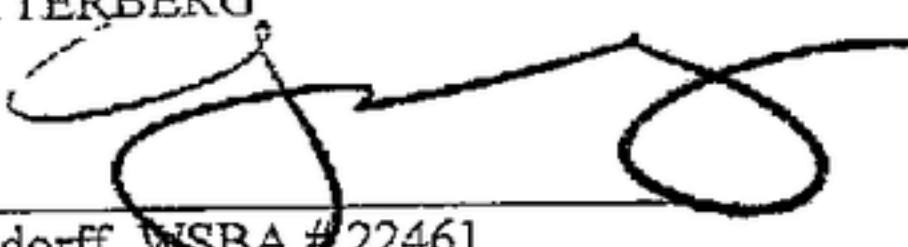
6   
7 Affiant

8 Bellevue Police Dept. # 359  
9 Agency, Title and Personnel Number

10 Subscribed and sworn to before me this 9 day of January, 2015

11  
12  
13   
14 Judge

15 Issuance of Warrant Approved  
16 DAN SATTERBERG

17   
18 By: \_\_\_\_\_  
19 Gary Ernsdorff, WSBA # 22461  
20 Senior Deputy Prosecuting Attorney  
21 Special Operations Unit  
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KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON     )  
                                  ) ss  
COUNTY OF KING         )         NO. 15-039  
                                  )         SEARCH WARRANT

**Appendix A:**

Attached are copies of the search warrant affidavit provided by Portland Police Bureau Detective Bryan Steed, related to Portland (Oregon) Police Bureau Case # 14-104265 and Bellevue (Washington) Police Department Case #14-64845, hereby incorporated by reference, and relied upon as additional probable cause for this affidavit, as Search Warrant Appendix A.

1                                 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**  
2   **FOR MULTNOMAH COUNTY**

3  
4 STATE OF OREGON  
5 COUNTY OF MULTNOMAH  
6

AFFIDAVIT OF PROBABLE CAUSE IN  
SUPPORT OF SEARCH WARRANT

7             I, Bryan Steed, having been first duly sworn, depose and say that I am a Police  
8 Detective, and I have been a police officer with the Portland Police Bureau for twenty  
9 years, and have been a detective there for twelve years. Prior to becoming a Portland  
10 Police Bureau member I was a police officer with the City of Forest Grove Police  
11 Department for six years and a detective there for three years. I have a total of twenty-  
12 six years as a peace officer in the State of Oregon. I have attended the Department of  
13 Public Safety Standards and Training (DPSST) three-hundred and twenty (320) hour  
14 Basic Police Academy, as well as a DPSST-certified three-hundred and sixty (360) hour  
15 Advanced Academy instructed by the Portland Police Bureau. I have also attended an  
16 eighty (80) hour DPSST-certified Detective Academy put on by the Portland Police  
17 Bureau. I have assisted in investigating over one hundred-fifty homicide related crimes,  
18 and have prepared or assisted in preparing search warrants in dozens of homicide  
19 investigations. I am currently assigned to the Homicide Detail of the Detective Division  
20 for the Portland Police Bureau;  
21  
22

23             I am currently investigating Portland Police Bureau case #14-104265, the  
24 homicide of ASHLEY RENEE BENSON, a female white, date of birth December 4<sup>th</sup>,  
25 1989, that occurred on December 26<sup>th</sup>, 2014, at the Doubletree Hotel located at 1000  
26

1 NE Multnomah Street, within the City of Portland, County of Multnomah, State of  
2 Oregon;

3 I spoke to Portland Police Officer Justin Burns, DPSST #47103, who told me  
4 officers responded to the Doubletree by Hilton Hotel located at 1000 NE Multnomah  
5 Street, Portland, Multnomah County, Oregon, after receiving a call from the hotel about  
6 a body found in stairwell 22 on the 8<sup>th</sup> floor on December 26<sup>th</sup> 2014. On arrival, the  
7 body of a female subject wearing black pants and a white shirt was found just inside the  
8 stairwell door. There appeared to be marks on the neck of the deceased female. No  
9 shoes or socks were on the body;  
10

11 Deputy Medical Examiner Damon O'Brien responded to the scene and examined  
12 the body. His preliminary findings indicated the female died of homicidal violence by  
13 strangulation. O'Brien told me he saw ligature marks on the victim's neck along with  
14 finger impressions on the neck and petechial hemorrhages in the eyes of the victim.  
15 O'Brien also noted a broken, false fingernail from the right thumb of the victim. The  
16 victim did not have any shoes or socks on and was not wearing any jewelry. No purse,  
17 cell phone, or items of identification were found in the nearby area. There were multiple  
18 tattoos on the body. I attended an autopsy conducted by medical examiner Dr. Karen  
19 Gunson who informed me that the preliminary cause of death was homicidal violence by  
20 manual strangulation. Dr. Gunson informed the time of death was between the evening  
21 of December 25<sup>th</sup>, 2014 and December 26<sup>th</sup>, 2014;  
22

23  
24 Officer Burns used his portable IBIS machine to obtain a fingerprint from the  
25 victim's right thumb. The fingerprint search showed a match to a BENSON, ASHLEY  
26

1 RENEE, a female white, date of birth December 4, 1989 and SID number [REDACTED]

2  
3 Portland Police Detective Michele Michaels, DPSST #40400, spoke to hotel  
4 employee [REDACTED]  
5 told Detective Michaels she had received three phone calls from the same anonymous  
6 female starting about noon on December 26<sup>th</sup>, 2014. The caller stated she was worried  
7 about her friend who met a person the night before and was going to go with him to his  
8 room which was room [REDACTED]. She had not heard from her friend and was concerned for  
9 her welfare. In the last phone call the caller stated the name of the person her friend  
10 was to meet was CHRIS YOON, and the caller stated she had seen the police at the  
11 hotel and was very worried about her friend as she had still not heard from her;

12  
13 Detective Michaels then spoke with [REDACTED]  
14 [REDACTED] is the housekeeping manager and provided Detective Michaels  
15 with a computer generated printout of the room charges for room [REDACTED] on December  
16 25<sup>th</sup>, 2014 that included the name of the person that rented the room, CHRIS YOON.  
17 Included in the room charges were multiple phone calls to a Washington phone number  
18 of [REDACTED]

19  
20 Portland Police Detective Sergeant Ken Whattam, DPSST #24582, did a Google  
21 search on the phone number of [REDACTED] and found it listed in ads for an escort  
22 service. In searching the web site of EscortProfile.xxx and TNA.com, multiple images of  
23 a female matching the description of the deceased, including unique tattoos found on  
24 the victim, are seen on the web site. On the TNA web site BENSON is posting under  
25 the name of Foxy.Veronica with a contact email address of

26



1 [REDACTED]  
2  
3 Detective MICHAELS spoke with [REDACTED]  
4 [REDACTED] who is a receptionist with the Doubletree Hotel. CAZAREZ was  
5 working the front desk the night of December 25<sup>th</sup> at about 9:00pm when a person came  
6 to the desk to check in. [REDACTED] told Detective Michaels the person said he had a  
7 reservation for the next day and wanted to check in early and see if he could have the  
8 same discounted rate. The subject told [REDACTED] his name was CHRIS YOON and  
9 showed he showed her a Washington license with an address in Bellevue, Washington.  
10 [REDACTED] checked the reservations and found one for CHRIS YOUN, not realizing they  
11 were actually two different people. CHRIS YOON who was the person talking with  
12 [REDACTED] at the time provided her with a phone number and email address as contact  
13 information. The email he provided was [REDACTED] and the phone  
14 number was [REDACTED]. It should be noted that the person registering as CHRIS  
15 YOON knew details only known to the true CHRIS YOUN – that CHRIS YOUN had a  
16 true reservation for the following night and received a discounted rate. It should further  
17 be noted that the person later identified and arrested as TAE BUM YOON, aka CHRIS  
18 YOON, has a date of birth consistent with the email address of 10/2/1990.

19  
20 Subsequently, CHRIS YOUN did check in to his hotel room on December 26<sup>th</sup>,  
21 2014. YOUN was detained by police at the hotel for further investigation. [REDACTED]  
22 identified CHRIS YOUN as the person that had checked into the hotel on December  
23 25<sup>th</sup>, 2014 under the name of CHRIS YOON. Detective Michaels and I interviewed  
24 YOUN after advising him of his Miranda Rights. YOUN was very cooperative and gave  
25 written and verbal consent allowing us to search his cell phone, his hotel room of 1466  
26 as well as room 715, and obtain buccal swabs for DNA. YOUN also gave us the name

1 of his fiancée, [REDACTED] who was with him and was also interviewed;

2

3 YOUN denied being at the hotel prior to when he checked in on December 26,  
4 2014. YOUN stated, which was confirmed by [REDACTED] that he had been at home in  
5 Bellevue on the 25<sup>th</sup>, had visited with members of his family as well as [REDACTED] family,  
6 and had taken photographs while in Bellevue that day showing him in that area. YOUN  
7 stated he was a DJ who had come to Portland for a performance the night of December  
8 26<sup>th</sup>, 2014. This was a semi-regular job as he usually performs at this venue once per  
9 month. YOUN did not have any idea how YOON had known he had a reservation at the  
10 hotel as he had not posted anything on his Facebook account or blog about coming to  
11 Portland or where he was staying. YOUN stated he made the reservation online using  
12 his Hilton Rewards identification in early December. After talking to YOUN and  
13 searching the Washington State Department of Motor Vehicles database, we confirmed  
14 YOUN was not the same person as YOON, and was not involved in the homicide of  
15 BENSON. YOUN was immediately released from police detention;

16

17 I spoke with [REDACTED] who was  
18 the housekeeper that had cleaned room [REDACTED] on December 26<sup>th</sup>, 2014. [REDACTED] told me  
19 the room was very clean and that only the bed had been disturbed. Only one washcloth  
20 had been used in the bathroom. She had found a rolled pair of athletic socks on the  
21 floor under the bed and a torn piece of paper in the bathroom trash can. No articles of  
22 women's clothing such as shoes or socks were found in the room. No items of  
23 identification, a purse, cell phone, or jewelry were found in the room;

24

25 Detective Michaels spoke with one of the security guards for the hotel, [REDACTED]  
26 [REDACTED] stated he was

1 working the night shift on December 25<sup>th</sup>, 2014 until the morning of December 26<sup>th</sup>,  
2 2014. As part of his duties he routinely checked the stairwells on the hotel. [REDACTED]  
3 stated he checked stairwell 22 twice during the night, the last time at about 0215 to  
4 0220 hours. There was no body in the stairwell the last time he checked;

5  
6 A search of various computer databases such as the Washington State  
7 Department of Motor Vehicles, the Law Enforcement Database System, the National  
8 Crime Information Center and found a Washington State driver's license issued to a  
9 TAE BUM YOON under the license number [REDACTED] with a Bellevue,  
10 Washington address of [REDACTED] Bellevue Police Department records also  
11 found TAE "Chris" BUM YOON, date of birth October 2, 1990, in their computer system  
12 as a victim of a robbery and forgery. YOON provided the phone numbers of [REDACTED]  
13 [REDACTED] to the police as his current phone numbers. TAE BUM YOON  
14 used the name TAE CHRIS BUM YOON in reports provided by the Bellevue Police  
15 Department. He also identified himself to the clerk at the Doubletree Hotel as CHRIS  
16 YOON;

17  
18 On December 26, 2014, an Affidavit and Order for the phone number of [REDACTED]  
19 [REDACTED] was presented to, and signed by, Multnomah County Circuit Court Judge Amy  
20 Holmes-Hehn, allowing for the release of GPS locations for that phone number. The  
21 phone was found on December 28, 2014 by members of the Multnomah County Sheriff  
22 Department Search and Rescue team;

23  
24 The phone, a LG GSM LG-D415 Optimus L90, belongs to BENSON. That phone  
25 was delivered to Officer Fred Wiechmann, DPSST #30431, who is trained in the  
26 forensic analysis of cell phones and examined the telephone. The contents of the



1 phone revealed an email sent to [REDACTED] from the email address of  
2 [REDACTED]. Parts of the email read, "Let me make this clear before  
3 you read my message. You WILL be COMPENSATED for all the time you invested in  
4 me. I have every intention of PAYING you....Before you blame me 100%, I want you to  
5 know that you did break our agreement. You did post and although I forgave you, I did  
6 find new listings in Houston texas backpage". There was a link to a Backpage ad for an  
7 escort inserted in the email;

8  
9 Detective Michaels spoke to [REDACTED]  
10 [REDACTED] told Detective Michaels BENSON was his girlfriend and  
11 they lived together. [REDACTED] stated BENSON had told him about a male subject named  
12 CHRIS YOON that she had met on more than one occasion, and YOON had paid her  
13 for the dates and had also given her large sums of money for doing nothing at all;

14  
15 On January 6<sup>th</sup>, 2014, I received a phone call from [REDACTED] an  
16 employee at T-Mobile. [REDACTED] advised me the phone number of [REDACTED] had  
17 been changed in November of 2014 to a different number, then changed again to  
18 another number and finally changed to [REDACTED]. That number has also been  
19 changed as of December 27<sup>th</sup>, 2014 to a new number of [REDACTED]

20  
21 On January 7, 2015, a search warrant was signed by Multnomah County Circuit  
22 Judge Nan Waller authorizing the seizure, search, and testing of a black Apple iPhone 5  
23 belonging to TAE BUM YOON. A forensic examination of that phone was completed by  
24 Detective Cory Stenzel, DPSST #45663. Detective Stenzel has been certified by  
25 Cellbright in the forensic examination of cell phones using Cellbright Mobil Data  
26 Extraction. Detective Stenzel performed that forensic examination of the Apple iPhone

1 5 and found multiple photographic images of evidence of drug dealing contained in  
2 those images. The photographic images included bags of cocaine, money, packaging,  
3 shipping containers addressed to various individuals and addresses in multiple states,  
4 and photographs of computer screens, including one showing, "White stallion's flame  
5 cocaine, all rock". The photographic images were from multiple dates showing an  
6 ongoing enterprise over an extended time period;

7  
8 I examined the photographs of the cocaine and saw they were extremely large  
9 quantities of cocaine. They appeared in large brick forms and, based on my visual  
10 estimation, would be far in excess of any user quantities. Based on my training and  
11 experience, I recognized this quantity of cocaine to be indicative of large scale drug  
12 distribution dealing in the thousands of dollars in value. Based on my training and  
13 experience, such large scale drug distribution is, more likely than not, accomplished  
14 through the use of many associates who either supply even larger quantities of drugs or  
15 distribute drugs down to users. Based on my training and experience, I know that this  
16 level of large scale drug distribution over the internet is a highly sophisticated  
17 organization that will, more likely than not, keep extensive records of drug debts and  
18 drug quantities along with sale prices in ledgers kept either electronically or on paper;

19  
20 Forensic examinations of the LG phone belonging to BENSON and the Apple  
21 iPhone belonging to YOON conducted by Officer Wiechmann and Detective Stenzel  
22 found both phones had portions of the contents deleted from the phones. The deleted  
23 content partially consisted of SMS messages, as well as the call logs to and from the  
24 phone numbers of [REDACTED], and [REDACTED]. The Call  
25 Detail Records and the historical cell site information received from T-Mobile showed  
26 the dates and times of the calls and SMS messages between the two phones that had

1 been deleted from the phone's contents;

2

3 On January 7, 2015, YOON was arrested by members of the Portland Police  
4 Bureau at the Union Station train station. While he was being taken into custody  
5 YOON's only question was, "How did you find me?";

6

7 YOON was interviewed on January 7, 2015. During that interview, YOON was  
8 very vague about when he started his relationship with BENSON as well as dates and  
9 times he met with, called her, or sent her text messages. YOON stated he first called  
10 BENSON because it was difficult for him to meet females. YOON stated their  
11 relationship progressed into one of good friends but he was concerned about BENSON  
12 and her escort activities. YOON was asked when he first met BENSON and he was not  
13 sure, that it could have been about one month ago. YOON later stated he first met  
14 BENSON about three or four months ago. When asked when he last had spoken to  
15 BENSON, YOON was not sure saying maybe a week or ten days ago. When asked  
16 specifically about Christmas Day and any text messages or phone calls, YOON stated  
17 he had sent her a text on Christmas Day. Records to include historical cell site  
18 information received under court order from T-Mobile for the phone number YOON was  
19 using at the time, showed YOON to have sent or received over 25 text messages from  
20 BENSON'S phone on Christmas Day and called her phone number twice that day;

21

22 Detective Michaels contacted Amtrak Police Detective Erik Vanderfange who  
23 located a ticket on the Amtrak 509 train from Seattle to Portland on December 25<sup>th</sup>,  
24 2015 in the name of TAE BUM YOON. The ticket was physically scanned by the  
25 conductor indicating it was given to the conductor by the passenger upon boarding.  
26 The train was scheduled to leave at 5:30 pm and arrive in Portland at 9:20pm. No



1 return reservation was found by Det. Vanderfange;

2

3 An Order was presented to, and signed by, Multnomah County Circuit Court  
4 Judge Susan Svetkey on January 2<sup>nd</sup>, 2015 authorized T-Mobile to release Call Detail  
5 Records and historical cell site information for the phone number of [REDACTED] the  
6 number used by YOON. The phone call detail records and historical cell site records  
7 received from T-Mobile for the phone number YOON was using on December 25<sup>th</sup>,  
8 2014, reflect six phone calls made or received by the phone used by YOON between  
9 5:33pm and 7:23pm on December 25<sup>th</sup>, 2014. T-Mobile records reflect three of the calls  
10 were captured by a cell phone tower located in the area of 6<sup>th</sup> and Pike Street in Seattle  
11 at a time when Amtrak train schedules show the train to be between Centralia and  
12 Kelso, Washington;

13

14 On January 8, 2015, TAE BUM YOON was booked into the Multnomah County  
15 Jail for the murder of ASHLEY BENSON. As part of the booking process, Detective  
16 Michaels asked YOON for his current address. YOON told her his current address is

17 [REDACTED]

18

19 Detective Michaels spoke to Radio Cab driver, [REDACTED]  
20 [REDACTED] told Detective Michaels  
21 he was dispatched sometime after midnight on December 26<sup>th</sup>, 2015 to the Residence  
22 Inn at 1710 NE Multnomah Street to pick up a fare named CHRIS. On his arrival  
23 [REDACTED] picked up a subject named CHRIS that he described as an Asian male,  
24 in his thirties, black hair, glasses and having a pudgy build. CHRIS stated he needed to  
25 go to a hotel that took cash as this one did not. After driving around looking for a hotel,  
26 [REDACTED] suggested CHRIS call a hotel and then they would go there. CHRIS told

1 [REDACTED] he did not have a phone so [REDACTED] called the Roadway Inn in  
2 Beaverton and took CHRIS there where he dropped him off. [REDACTED] was  
3 shown a photograph of TAE BUM YOON. [REDACTED] immediately identified the  
4 photograph as that of the CHRIS he picked up on December 26<sup>th</sup>, 2015 at the  
5 Residence Inn. Detective Michaels later found the actual dispatch time to be 2:06am;  
6

7 At the Residence Inn Detective Michaels told me that she reviewed video  
8 surveillance from the early morning hours of December 26<sup>th</sup>, 2014. In that video she  
9 told me she saw CHRIS YOON come into the lobby of the Residence Inn and interact  
10 with the clerk at the front desk before leaving the hotel;  
11

12 Detective Michaels told me she also spoke to Residence Inn employee,  
13 [REDACTED] was the  
14 clerk working on the night of December 25-26, 2014 when YOON came to the hotel.  
15 [REDACTED] stated to Detective Michaels that YOON had come into the hotel late that night  
16 sometime well after midnight. [REDACTED] recalled YOON as being sweaty, as though he  
17 had just been running. She also noticed he was bleeding from multiple scratches on his  
18 face and neck, and thought, "Somebody just whooped his ass". She asked if he needed  
19 her to call 911 to which YOON declined. [REDACTED] asked YOON what had happened and  
20 he told her he had a fight with family and wanted a place to be away from them. YOON  
21 asked the price of a room and then pulled out, what [REDACTED] described as a "wad of cash  
22 like a crack dealer". [REDACTED] told YOON they did not take cash and called a cab for him;  
23

24 I believe, more likely than not, that TAE BUM YOON utilized the identity of  
25 CHRIS YOUN to register for room 715 at the Double Tree Hotel on December 25<sup>th</sup>,  
26 2014. I believe, more likely than not, that TAE BUM YOON committed the crime of

1 murder under ORS 163.115 and Identity Theft under ORS 165.800 and evidence of that  
2 murder and identity theft will be discovered within the cell phone history of TAE BUM  
3 YOON and the email accounts of TAE BUM YOON and ASHLEY BENSON. Based on  
4 my training and experience, I know that prostitutes that solicit prostitution over the  
5 internet will utilize email, text messages, and digital technology to facilitate the  
6 prostitution acts and maintain a contact with regular customers. I therefore believe,  
7 more likely than not, that evidence of the ongoing relationship between TAE BUM  
8 YOON and ASHLEY BENSON will be located in their digital media including emails and  
9 cell phone use. I believe that evidence of the cell phone locations for TAE BUM YOON  
10 and ASHLEY BENSON on and around the date of the murder will further provide  
11 evidence as to the location of TAE BUM YOON and ASHLEY BENSON during the time  
12 frame of the murder and further establish that TAE BUM YOON was the person who  
13 committed Identity Theft by appropriating the identity of CHRIS YOUN to obtain the  
14 hotel room;

15

16 I know, based on my training and experience, that persons who change their  
17 phone number multiple times in a short period of time and utilize the names of other  
18 persons are, more likely than not, doing so to avoid detection by law enforcement. I  
19 believe, more likely than not, that TAE BUM YOON is attempting to avoid law  
20 enforcement by repeatedly changing his phone number;

21

22 Based on the aforesaid information, I have probable cause to believe the crime of  
23 Murder, (ORS163.115), and Identity Theft, (ORS 165.800), occurred at the Doubletree  
24 by Hilton Hotel, located at 1000 NE Multnomah Street, within the City of Portland,  
25 Multnomah County, Oregon, on December 26<sup>th</sup>, 2014;

26

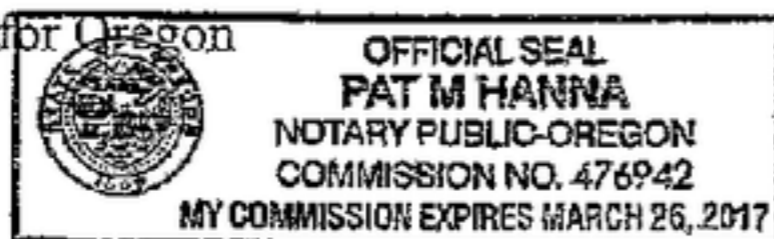
1 Therefore, I believe more likely than not that the following items of evidence will  
2 be located in the residence of TAE BUM YOON AKA CHRIS YOON at [REDACTED]

3 [REDACTED]  
4  
5 Diaries, notes, logs, letters, mail, receipts, digital files, or emails relating to the  
6 Doubletree Hotel or the relationship between TAE BUM YOON AKA CHRIS YOON  
7 AKA CHRIS YOUN and ASHLEY BENSON, photographs of ASHLEY BENSON,  
8 digital or paper bank account information including receipts, cash payments, checks,  
9 or transfers of money between TAE BUM YOON and ASHLEY BENSON, digital  
10 evidence including computer search history, email access, malicious software or  
11 hacking software, files or other digital media that provide evidence of access to the  
12 personal communications of CHRIS YOUN, papers, receipts, mail, shipping labels,  
13 or other documents that indicate the fraudulent use of the name CHRIS YOUN,  
14 cellphones, computers, routers and any other electronic device that can be used to  
15 create and/or store any of the above listed content, documents of dominion and  
16 control for TAE BUM YOON AKA CHRIS YOON AKA CHRIS YOUN over the  
17 apartment at [REDACTED]

18  
19 Bryan Stead  
20 Affiant

21  
22 SUBSCRIBED AND SWORN TO before me this 9<sup>th</sup> day of January, 2015.

23  
24 Notary Public for Oregon



25 Pat M Hanna  
26 My Commission Expires: 26 March 2017