

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

IN THE MATTER OF:

**A COMPLAINT AND ARREST
WARRANT FOR
CLAYTON ALEXANDER MCCOY**

Misc. No. 1:21-mj-593 TMD

UNDER SEAL

AFFIDAVIT IN SUPPORT OF COMPLAINT & ARREST WARRANT

I, Dawn Machon, Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), being first duly sworn, hereby depose and state as follows:

PURPOSE OF THE AFFIDAVIT

1. This affidavit is submitted in support of a criminal complaint and arrest warrant for Clayton Alexander McCoy (“Beck”), born in 1990, for violations of Title 18 U.S.C. Section 844(d) (Transporting Explosives with Intent to Injure);¹ and 18 U.S.C. Section 924(c) (Using, Carrying, or Possession a Destructive Device During and in Relation to a Crime of Violence).

AGENT BACKGROUND

2. I am a Special Agent with the ATF and as such I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 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 18 U.S.C. § 2516.

¹ 18 U.S.C. § 844(d) reads, “Whoever transports or receives, or attempts to transport or receive, in interstate or foreign commerce any explosive with the knowledge or intent that it will be used to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property,” shall be guilty of a crime.

3. I have been employed by the ATF since September 2015. I am currently assigned to the Baltimore Field Division, Arson and Explosives Group. As a result of my training and experience as an ATF Special Agent, I am familiar with federal laws, specifically federal firearm, arson and explosives laws. During my tenure with the ATF, I have participated in numerous investigations involving activity, including: (a) physical surveillance; (b) interviews of defendants, witnesses, informants, and other individuals; (c) undercover operations; (d) execution of search warrants; (e) the consensual monitoring and recording of conversations; and (f) the handling and maintenance of evidence. I have personally authored or assisted with the writing of multiple search warrants and arrest warrants, including warrants to search residences, cellular telephone extractions, social media accounts, and cellular site location information. I have executed or assisted with the execution of multiple search and arrest warrants. I have reviewed, organized, and seized evidence.

4. Prior to my employment with the ATF, I was employed by the Montgomery County Police Department (“MCPD”) in Maryland for approximately seven years. During my tenure with the MCPD, I was a detective with the Wheaton Investigative Section and the Major Crimes Division, Robbery Section. During my employment, I conducted numerous investigations that led to authoring and executing multiple state search and seizure warrants.

5. The information contained in this affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. All conversations and statements described in this affidavit are related in substance and in part unless otherwise indicated. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a search warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts

that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

PROBABLE CAUSE

A. October 30, 2020 Bombing

6. On October 30, 2020, at approximately 5:38 p.m., Carroll County Sheriff's Office (CCSO) responded to 3308 View Ridge Court, Manchester, Maryland 21102 for a possible explosion and fire. CCSO, with responding fire and rescue personnel, arrived on scene and identified the victim, "N.K." N.K. sustained serious injuries and burns consistent with an explosion, and was transported to the hospital.

7. Through investigation, it was learned that N.K. departed for work at approximately 8:00 a.m. that morning, October 30, 2020. N.K. exited through the front door, leaving the interior front door open and the clear exterior storm door shut. N.K.'s grandfather, "J.M.," walked past the storm door at approximately 8:20 a.m. and did not observe any boxes on the front porch. At approximately 8:30 a.m., J.M. observed a clear plastic bag containing a cardboard box on the front porch. J.M. retrieved the items and removed the box from the plastic bag. J.M. observed a printed label addressed to N.K. with the residence address, 3308 View Ridge Court Manchester, Maryland 21102, and no return address. N.K. and J.M. described the box as approximately sixteen inches long, twelve inches wide, twelve inches deep, and weighed approximately ten pounds. J.M. placed the box in the kitchen to await N.K.'s return.

8. At approximately 5:30 p.m., N.K. returned home and observed the cardboard box that was addressed to him. N.K. opened the cardboard box and observed a smaller white box with a red ribbon inside. N.K. took both boxes into his bedroom to open in private. According to N.K., as he opened the smaller white box, a small nail that appeared to be inserted into the white box

was pulled outward. When N.K. removed the nail, he heard a whistling or hissing sound followed by an explosion. N.K. was struck in the front of his body by shrapnel and sustained injuries to his chest, legs and front of body. N.K. was transported to the hospital where he was treated for injuries caused by the shrapnel and explosion. N.K. was released from the hospital on November 17, 2020 and is continuing with rehabilitation.

9. Multiple agencies, including ATF, responded to the scene for assistance. Investigators and bomb technicians suspect the origin of the explosion was a victim operated pipe bomb containing shrapnel. Shrapnel, such as BB's and triangular shaped pieces of metal, were located at the scene and later removed from N.K.'s person.

B. Examination of Evidence by ATF National Forensic Science Laboratory

10. The ATF National Forensic Science Laboratory completed the following preliminary examinations of the evidence located at the scene of the explosion:

a. Examination and Identification of Explosive Components: Forensic Chemists observed a nitrate explosives mixture (i.e. black powder or a homemade explosive mixture with nitrate); galvanized steel pipe with what appeared to be a fuse hole; two galvanized cast iron end caps; white plumbers or Teflon tape; screw eye; eye bolts; extension spring; nuts; washer; screws; corner brace or corner bracket; clear plastic trash bag with red drawstring; Lowe's cardboard box; white gift box; red ribbon; white paper roll; BB's; welding gussets; photo luminescent strips; white and grey duct tape; clear packing tape; black zip ties; super glue; striker plate; wooden block; fire and extinguisher pull pin. Other evidence that was potentially a component of the device, but may have not survived the blast are a fuse; matches; oxidizer/ fuel mixture; leg wires; and/or bridge wires.

b. Tool Mark Examinations: Examiners advised that the triangular pieces of metal are similar in configuration to angled welding gussets. It appears most of the edges of the pieces of metal were cut by a circular abrasive cutting tool, such as a chop saw with a blade thickness of approximately 1/16 of an inch.

c. DNA Examination: The ATF National Forensic Science Laboratory completed a preliminary deoxyribonucleic acid (DNA) examination on evidence recovered from the scene of the explosion. Swabs were taken from multiple pieces of evidence and then tested by laboratory personnel. A swab was collected from Item number 20/Lab Exhibit 14 – a piece of white cardboard, where ridge detail/smudging was observed near the seam. The examination resulted in the major component male DNA profile that is believed to be suitable for comparison.

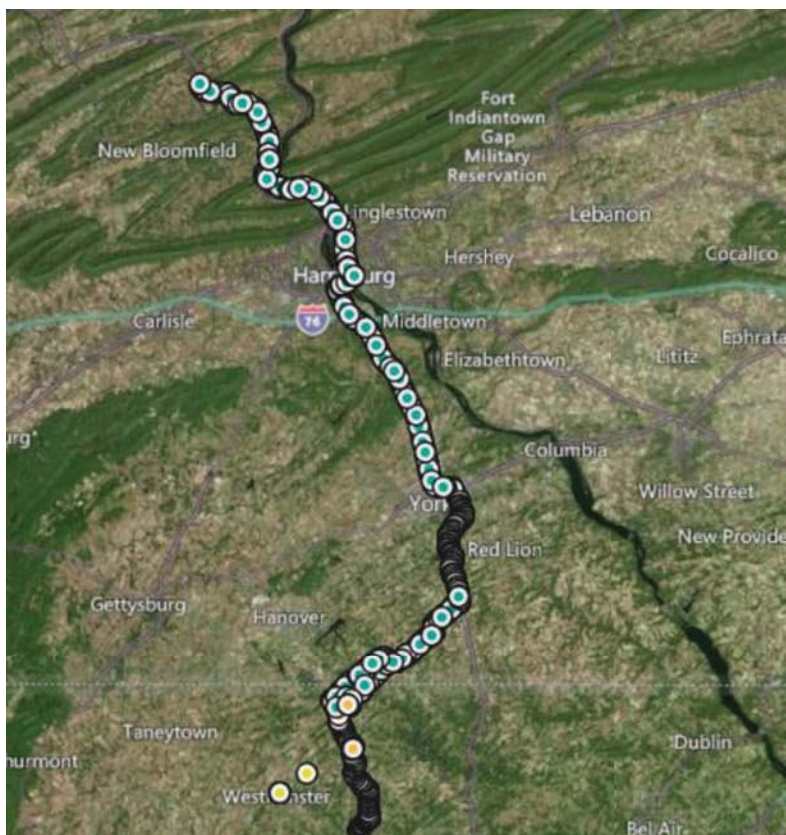
11. ATF laboratory personnel know from their training and experience, that the fluids and tissues of the human body, including saliva, contain DNA, a molecule found in most human cells that encodes an individual's unique genetic information. With a few limited exceptions, the DNA sequences comprising an individual's genome – his or her complete genetic makeup – are identical across all of that individual's cells but totally unique within the population at large, that is, different from every other individual's. DNA typing techniques commonly used in forensic laboratories enable analysts to extract DNA from a sample, analyze the DNA sequences at several specified and standardized locations, and produce a set of DNA identification characteristics called a DNA profile. The number of locations and the variability in the DNA sequences that can be found there help ensure that a DNA profile matches only one individual. Thus DNA typing and comparing the resulting profile of an evidentiary sample to the profile of a reference sample are very powerful techniques for excluding or including an individual as the source of a biological fluid or tissue. In order to compare a DNA profile generated from body fluids or tissues associated with evidentiary materials to the DNA profile of an identified individual, a sample of bodily fluid or tissue containing DNA must be obtained from the latter. A buccal or oral swab – a minimally invasive and painless procedure whereby an individual's DNA sample is collected by applying a cotton swab or filter paper to the inside of that individual's cheeks or mouth – is one commonly used method for collecting such a DNA sample.

12. ATF laboratory personnel further advised me that, in order to determine if the defendant's DNA matches any found on the items, they will need a buccal/oral swab sample from the defendant to serve as a reference sample. The laboratory will perform a direct comparison of DNA extracted from the reference sample to any DNA samples recovered from the item mentioned above.

C. Google Geo-Fence Search Warrant

13. On October 31, 2020, Senior Deputy State Fire Marshal (SFM) Deputy Brian Quick, of the Department of State Police, Office of the Maryland State Fire Marshal, applied for a search warrant that directed to Google, Inc. regarding accounts associated with the geographic area surrounding N.K.'s residence (geo-fence) on October 30, 2020 within the time frame of 7:00 am and 9:00 am. The search warrant was signed and issued by the Honorable Judge Fred S. Heckler, of the Circuit Court for Carroll County, Maryland. The warrant directed Google to provide each device corresponding to the location data to be provided, identified only by a numerical identifier, without any further content or information identifying the user of the particular device(s). On January 10, 2021, Google responded to the search warrant and provided the data of four devices that were located within the geo-fence area during the time frame requested. The four devices were identified only by a numerical identifier (851366244, 864406022, 1879352792, and 1575575507).

14. On January 11, 2021, Deputy Brian Quick applied for a second search warrant from Google seeking that directed Google to provide additional location information outside of the predefined area to determine a path of travel, not to exceed thirty minutes before and after the time frame specified in the first warrant. The warrant was signed and issued by Judge Hecker. On January 26, 2021, Google responded to the search warrant with the requested data for the 4 devices. An overview of the four devices with location data plotted on a map appeared as follows:



15. Three of the devices (851366244, 1879352792, and 1575575507) are shown above in yellow and pink dots and appear to stay within close proximity of the neighborhood of N.K.'s residence. The location data appears to indicate each of the three devices had little movement in or around a specific residence.

16. The fourth device (864406022, shown in blue dots above), appears to have traveled to Maryland from the area of Duncannon, Pennsylvania, entered the neighborhood of the incident during the time period when the explosive device is believed to have been placed on N.K.'s front porch, then exited the neighborhood and eventually returned to East York, Pennsylvania where the data stops.

17. All four devices were determined to be relevant to the investigation, and Deputy Quick requested Google disclose the subscriber information for each of the four numerical device numbers provided. As to each device, Deputy Quick requested the account information to include

subscriber name, email addresses, services subscribed to, the last ten months of IP history, SMS account number and registration IP. On February 4, 2021, Google provided the subscriber information for the four devices. Based on an analysis of the returned subscriber information provided by Google, the subscribers for the three devices that were located exclusively in the neighborhood for the requested time period (271931904531, 320582577759, and 296479071882), each appear to reside within the neighborhood.

18. Google records reveal that the fourth device (864406022) that traveled to N.K.'s house from Pennsylvania, has the following subscriber information:

Subscriber Name:	Clay McCoy
Email address:	mccoy90@gmail.com
Recovery e-mail address:	funkman328@gmail.com
Phone: ²	4405476761
Created on:	2005-10-05 21:08:54 UTC

19. The path of travel for the fourth device (86440602) was analyzed and a zoomed-in view of the neighborhood where the explosion occurred is shown below (X indicating 3308 View Ridge Court, the location of the bombing):

² Google provided this number as Recovery SMS, Sign-in Phone Numbers, and 2-Step Verification Phone Numbers.



20. Based on the data, it appears the device travelled south on Lineboro Road (1), turned left onto Valley Vista Court, and entered the neighborhood at approximately 8:18 a.m. (2). The device then appeared to make a left turn onto View Ridge Circle where it appeared to idle for approximately two minutes in the area in front of 3428 View Ridge Circle (3). The device appears to continue around View Ridge Circle, made a right back on to Valley Vista Court (4), and then approached the intersection of Valley Vista Court, View Ridge Court, and View Ridge Circle at approximately 8:22 a.m. (5). The next location data point received is on Valley Vista Court close to the intersection of Lineboro Road at 8:25 a.m., the device then exited the neighborhood onto Lineboro Road.

21. Witness J.M. recalled observing an empty front porch at approximately 8:20 a.m., then observing a package on the front porch at approximately 8:30 a.m. The above analysis of movement of the device is consistent with J.M.'s account of when the package was possibly placed on the front porch.

22. The resident of 3438 View Ridge Circle provided Nest camera footage to law enforcement from the morning of October 30, 2020. The camera is located on the front door of the residence facing the street, View Ridge Circle. The video shows an unknown vehicle enter the video screen from the left, driving from the direction of Valley Vista Court and View Ridge Circle. The vehicle remains stationary for approximately two minutes before proceeding on View Ridge Circle toward the right side of the screen. The movement of this vehicle appears consistent with the geo-fence location data as described in paragraph 22. The vehicle appears to be a dark pickup truck with a “cap” over the bed of the truck, and is pictured below:



D. Clayton McCoy

23. On October 30, 2020, “S.B.,” the recent girlfriend of N.K. was interviewed at the scene of the explosion. The interviewers requested S.B. consider anyone who could be responsible for the incident. On October 31, 2020, S.B. called and indicated that she remembered a recent interaction with a friend, Clay McCoy (“McCoy”), which may be related to recent events. S.B. has known McCoy for approximately seven years, since McCoy became a member of the Dagorhir community. Dagorhir is a live action role-playing battle game with full contact melee fighting and ranged combat as its primary focus. Dagorhir members communicate both in person and on social media and online platforms, including Discord. McCoy is also friends with N.K. through

Dagorhir. S.B. and McCoy communicate often on the Discord application. McCoy and S.B. were planning a camping trip together and discussing possible locations. S.B. estimated that sometime during the week of October 12, 2020, McCoy told S.B. that he had feelings for her. S.B. told McCoy that she did not feel the same way and that she was in a relationship with N.K. S.B. and McCoy agreed to remain friends. Following the call, S.B. was not comfortable going on a camping trip with McCoy, and she cancelled the trip, and told McCoy it was due to a busy work schedule.

24. On February 2, 2021, S.B. provided McCoy's Discord account as username Funk Man #2439, and phone number as 440-547-6761.

25. On November 2, 2020, investigators conducted a follow-up interview with N.K. while he was at the hospital. During the interview, N.K. was asked about Clayton McCoy. N.K. advised he has known McCoy for approximately three years. N.K. also advised that McCoy, like most members of Dagorhir, is proficient at wood and metal and may have the ability to have created the device that exploded. N.K. did not think McCoy would be responsible for this incident.

26. Clayton Alexander McCoy ("McCoy") has a valid Ohio State driver's license and an expired Maryland driver's license. McCoy was convicted of Pandering Obscenity Involving a Minor in March 2013, a crime punishable by imprisonment for a term exceeding a year, in the Geauga County (Ohio) Court of Common Pleas. McCoy was sentenced to 4 years imprisonment on May 16, 2013, and is currently on the Ohio sex offender registry.

27. On January 18, 2021, McCoy met with members of the Geauga County Sheriff's Office, Sex Offender Unit in Ohio. McCoy attested to his current address as **8100 Sherman Road Chesterland, Ohio**; his current vehicle as **1996 Chevrolet Suburban, Ohio registration FZT1580, VIN 1GNFK16RXTJ388361**; and his current telephone number as 440-547-6761.

E. Search Warrants for Google, Discord and Verizon

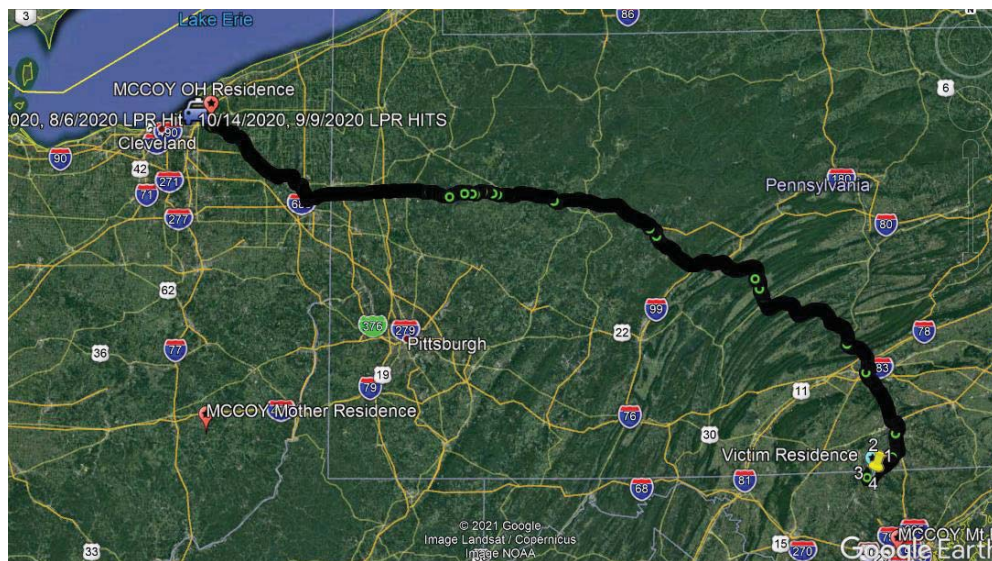
28. On February 10, 2021, United States Magistrate Judge Thomas M. DiGirolamo issued search warrants for the following accounts associated with McCoy:

- a. Google accounts associated with `mccoy90@gmail.com` and `funkman328@gmail.com`;
- b. Discord account associated with Funk Man #2439; and
- c. Verizon accounts associated with phone number 440-547-6761.³

29. On February 12, 2021, Google provided activity and location data for the Google accounts for October 30, 2020, the date of the above-referenced bombing. The location data revealed that in the morning of October 30, 2020, a device associated with McCoy's Google accounts was located at McCoy's residence, **8100 Sherman Road Chesterland, Ohio**. At approximately 1:24:41 a.m. the device used the Google Maps function to search for and obtain directions to "View Ridge Court Manchester, MD 21102," the location of the bombing. At approximately 1:28 a.m., the device moved from **8100 Sherman Road Chesterland, Ohio**. Seven minutes later, at 1:35 a.m., two Chesterland Township Police Department patrol units queried the Ohio registration plate **HWE6520** at 1:35 a.m. EST, in the area of Chesterland, Ohio.⁴ Over the next approximately 6 ³/₄ hours, the device traveled from Ohio to Manchester, Maryland, and made stops along the route at gas stations and/or food stores. The device entered N.K.'s neighborhood at approximately 8:18 a.m. as described in detail above. The device's route of travel from McCoy's residence to N.K.'s residence is depicted on the following map:

³ Complete Discord and Verizon records have not been received as of time of the writing of this affidavit.

⁴ As discussed below, Ohio registration **HWE6520** is a 1994 Toyota truck, with VIN 4TARN01P1RZ288328, registered to Marilyn McCoy, believed to be McCoy's mother.



30. Based on the speed and consistency of movement of the location data, I believe the device was travelling in a vehicle, and possibly on a route that avoided tolls.

31. A further review of McCoy’s Google accounts reveals the following searches that occurred prior to October 30 2020, on the dates listed:

a. October 4, 2020 at 4:04 a.m.:

“How do I change download location from memory to external ...”

b. October 23, 2020 at 3:04 p.m.:

“1994 toyota pickup gas tank capacity”

F. Vehicles of Clayton McCoy and Marilyn P McCoy

32. Clayton McCoy advised the Geauga County Ohio Sheriff’s Office, Sex Offender Unit that his current vehicle is a **1996 Chevrolet Suburban with Ohio registration FZT1580, VIN 1GNFK16RXTJ388361**. The Ohio Department of Motor Vehicles (“DMV”) produced records revealing this vehicle is registered to Marilyn McCoy at **8100 Sherman Road Chesterland, Ohio**.

33. Marilyn McCoy also owns a **1994 Toyota truck, Ohio registration HWE6520, VIN 4TARN01P1RZ288328** (among other registered vehicles), with a listed address in Quaker City, Ohio. This 1994 Toyota truck is the year and make of the vehicle the Google accounts searched for the gas tank capacity on October 23, 2020, referenced above.

34. On October 11, 2020 at 10:40 a.m., and a fixed License Plate Reader (“LPR”)⁵ captured the **Toyota Truck, bearing Ohio tag HWE6520** traveling West on Mayfield Road in the area of Interstate 271. On October 14, 2020, at approximately 12:26 p.m., the same LPR captured the **Toyota Truck, bearing Ohio tag HWE6520** traveling East on Mayfield Road. The location of the LPR is approximately 6.5 miles from McCoy’s residence.

35. As observed in the photographs taken by the LPR system immediately below, the vehicle appears to be dark in color with a cap on the bed of the truck, consistent with the vehicle observed in front of 3438 View Ridge Circle and captured on the Nest video on the morning of October 30, 2020.



G. McCoy’s Residence – 8100 Sherman Road Chesterland, Ohio 44026

⁵ LPRS’s are high-speed, computer-controlled camera systems that are typically mounted on street poles, streetlights, highway overpasses, mobile trailers, or attached to police cars. LPR’s automatically capture license plate numbers that come into view, along with the location, date, and time. The data, which includes photographs of the vehicle is then uploaded into a central server and accessible to law enforcement.

36. Records from the Geauga County (Ohio) Auditor's office reflect that **8100 Sherman Road** is owned by Marilyn McCoy. Based upon the investigation, I know that McCoy resides at **8100 Sherman Road Chesterland, Ohio 44026**. Social media show "Clayton McCoy" listed as Marilyn McCoy's son. McCoy has a current Ohio Driver's License, issued on January 20, 2021, listing the address **8100 Sherman Road**. Furthermore, as mentioned above, McCoy provided this as his home address to the Geauga County Ohio Sheriff's Office, Sex Offender Unit on January 18, 2021. Also on January 18, 2021, McCoy attested to his vehicle as a **1996 Chevrolet Suburban, Ohio tag FZT1580, VIN 1GNFK16RXTJ388361**, currently registered to Marilyn McCoy, at **8100 Sherman Road**. The vehicle has been observed by law enforcement parked at the residence of **8100 Sherman Road** on multiple days in February 2021, as discussed below. On February 20 and 23, 2021, a subject matching the description of Clayton McCoy was observed walking to a Honda SUV and driving away from the residence.

CONCLUSION

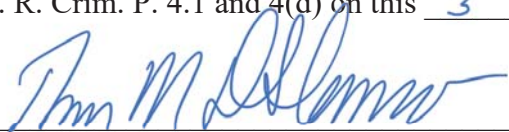
37. Based upon the foregoing information set forth in this application, I respectfully submit that there is probable cause to believe that **Clayton Alexander McCoy** violated Title 18 U.S.C. Section 844(d) (Transporting Explosives with Intent to Injure); and 18 U.S.C. Section 924(c) (Using, Carrying, or Possession a Destructive Device During and in Relation to a Crime of Violence).

DAWN
MACHON

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DAWN MACHON
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Special Agent Dawn Machon
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) on this 3 day of March 2021



Thomas M. DiGirolamo
United States Magistrate Judge