## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Jessica S. Allen

:

v. : Magistrate No. 22-8230

:

KAITLIN ARMSTRONG :

CRIMINAL COMPLAINT

I, Jonathan Riley, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

#### SEE ATTACHMENT A

I further state that I am a Special Deputy United States Marshal with the United States Marshals Service, and that this complaint is based on the following facts:

#### SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Jonathan Riley
Jonathan Riley
Special Deputy United States Marshal
United States Marshals Service

Special Deputy United States Marshal Jonathan Riley attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 7th day of July, 2022.

\_\_\_\_\_/s/ Hon. Jessica S. Allen Hon. Jessica S. Allen United States Magistrate Judge

## ATTACHMENT A

# Count One (Misuse of Passport)

On or about May 18, 2022, at Newark Liberty International Airport, in the District of New Jersey and elsewhere, the defendant,

## KAITLIN ARMSTRONG,

did willfully and knowingly use, or attempt to use, a passport issued or designed for the use of another.

In violation of Title 18, United States Code, Section 1544.

### ATTACHMENT B

I, Jonathan Riley, am a Special Deputy United States Marshal with the United States Marshals Service (USMS). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance footage, photographs, business records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

- 1. On or about May 17, 2022, the City of Austin, Travis County, Texas obtained a warrant authorizing the arrest of Kaitlin Armstrong ("Armstrong") on the charge of Murder, in violation of Section 19.02 of the Texas Penal Code. According to the investigation, the murder is alleged to have occurred on or about May 11, 2022, in Austin, Texas. The victim (the "Victim") sustained multiple gunshot wounds and succumbed to her injuries.
- 2. On or about May 12, 2022, Officers with the Austin Police Department (APD) interviewed Armstrong regarding her knowledge of the events surrounding the murder of the Victim. On or about May 14, 2022, Armstrong entered Austin-Bergstrom International Airport ("Austin Airport") and boarded a flight from Austin, Texas to Houston, Texas and then a flight from Houston to New York La Guardia Airport, located in Queens, New York. Armstrong used airline tickets issued in Armstrong's name for these flights.
- 3. On or about May 18, 2022, Armstrong entered Newark Liberty International Airport ("Newark Airport") in Newark, New Jersey. Armstrong, who travelled alone, boarded a flight bound for Juan Santamaría Airport, Costa Rica and presented a ticket in another individual's name ("Individual-1"),¹ a person known to Armstrong and whom Armstrong represented as herself. Video surveillance footage shows Armstrong presenting a passport while at Newark Airport. According to records maintained by the Department of Homeland Security, Armstrong presented a United States Passport ("Passport-1") in the name of Individual-1 in connection with her departure from the United States.

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<sup>&</sup>lt;sup>1</sup> The ticket contained what appears be a slight misspelling of Individual-1's name.

4. On or about June 29, 2022, law enforcement located and arrested Armstrong in Costa Rica. At the time of Armstrong's arrest, Armstrong was found in possession of Passport-1, along with a United States Passport issued to Armstrong.