

**In the Circuit Court of the State of Oregon
for Multnomah County**

Verified Correct Copy of Original 4/12/2023

STATE OF OREGON,

Plaintiff,

v.

JACOB ABEL RAMOS
DOB: 10/20/1982
also known as
JOEL A RAMOS
DOB: 10/20/1982

Defendant(s).

FILED

APR 12 2023

CIRCUIT COURT

Court Nbr 23-CR-16979 DA 2459477-1
Crime Report PP 22-164891
PP 22-186442
PP 22-220401
PP 22-311569
PP 22-317408
PP 23-93079

AFFIDAVIT OF PROBABLE CAUSE
TO SUPPORT CONTINUED DETENTION
OF DEFENDANT

PROBABLE CAUSE
☒ **FOUND** ☐ **NOT FOUND**

APR 12 2023

JUDGE

I, Michelle Thomas, swear that I am a Deputy District Attorney for Multnomah County and that I have reviewed the police reports, which have been filed in this case by police officers, and have spoken with Officer Nathan Kirby-Glatkowski regarding ongoing investigations; that the crimes charged against defendant(s) occurred in Multnomah County and that the probable cause for detention following the arrest of defendant(s) is as follows:

I am aware that there has been an ongoing investigation, led by Portland Police Bureau Officer Nathan Kirby-Glatkowski, into prolific graffiti taggers across the Portland-metro area, and that during the course of that investigation, Defendant was identified as a suspect behind the use of the tag "Bier," which led to a search warrant having been granted to search the home, person, and vehicles of Defendant.

On April 27, 2022, two graffiti vandals spray painted tags over murals on the front of Platinum Records Lights & Sound at 104 SW 2nd Avenue in Portland. An initial investigation identified one of the individuals involved. Surveillance video of the tagging was taken by the business and reviewed by law enforcement show that the tagging occurred on or about April 27, 2022. A business owner has reported to law enforcement that the cost to repair the damaged mural and remove the paint damage from the tagging is more than \$1,000.00, and confirmed that the individuals behind the two tags did not have permission to paint those tags on the business. The second individual, who is female and who has not yet been formally charged, was served with a search warrant and evidence was collected at that home, including that individual's cell phone. Pursuant to a search warrant, that phone was searched, and on the phone, digital evidence led to the identification of Jacob Ramos ("Defendant") as the second individual involved in the tagging of Platinum Records Lights and Sounds. The second vandal created the tag, "Bier," which law enforcement has been tracking across numerous locations throughout the city as a re-occurring graffiti tag. Specifically, that the second individual and Defendant discussed, via text message, in the days following the tagging at Platinum Records, including a photo of the tag, and discussion including statements that they will continue to tag and encourage graffiti peers to join in the continued tagging. In that text conversation, the phone number of the person being communicated with regarding the tagging was linked to Defendant.

That on April 11, 2023, officers executed that search warrant upon the home of Defendant.

Surveillance video reviewed by officers of the tagging at Platinum Records on April 27, 2022, identifies two individuals who are distinct in appearance as to gender, clothing items worn, height and weight, creating the tags. The second individual, who paints the tag "Bier" is consistent with defendant's physical appearance as to height and weight. In addition, officers seized shoes that appear consistent with those worn by the second tagger.

Law enforcement has also investigated a graffiti tagging at Firestone Complete Auto Works at 5010 NE Sandy Boulevard in Portland. In that investigation, the same two individuals appear to be involved as in the Platinum Records tagging, after a review of a photo posted to social media on November 13, 2022, by one of the taggers while the tags are being created, which is the same social media account that has produced content featuring the "Bier" tag and tag associated with the other individual. The owner of the business has estimated that the cost to repair the damage is more than \$1,000, and confirmed that the taggers did not have permission to tag to the building. The photo posted to social media depicts an

individual who is consistent in appearance to Defendant. Further, during the search on April 11, 2023, a sweatshirt was located in Defendant's garage consistent with the one in the social media photo.

Additionally, officers located at defendant's home and in his vehicles:

1. Respirators splattered in paint.
2. Dozens partially used cans of spray paint, totaling more than 60.
3. Dozens of spray canister caps.
4. A glass-framed photograph hanging on the wall showing an abandoned building vandalized with the tag, "Bier," on the front.

During the course of the search, officers also located a vast collection of gun-related materials and firearms, including:

In the living room and/or kitchen of the home, officers found:

1. A .22 caliber, "AR style" firearm constructed out of 3D printed parts and milled out metal barrel.
2. Three three-dimensional printed handgun lowers.
3. Numerous magazines, bullets, and gun parts.
4. 3 AR magazines.

In the master bedroom of the home, officers found:

1. 8 firearms that appeared to be fully functional, 4 of which had a serial number, to wit: a H&K pistol, a S&W pistol, a Glock pistol, and a Burgo revolver. The remaining 4 did not have a serial number, to wit: a Glock clone pistol, a 9mm "AR-15 style" pistol with a milled receiver, a short-barreled rifle AR-15 in .223 caliber with a milled receiver, and a AR-15 in .223 caliber with a milled receiver. Out of the latter two firearms, officers measured the first and found the barrel to be approximately 9.5 inches and did not have a pistol brace, therefore constituting a short-barreled rifle. The fourth aforementioned firearm was measured to be approximately 10 inches, but did appear to have a pistol brace rather than a rifle stock, and was not considered by law enforcement to constitute a short-barreled rifle.
2. A significant amount of ammunition in several, different calibers, approximately 500 rounds total.
3. A kevlar and ballistic panel vest.
4. Numerous miscellaneous gun parts.
5. Two 3Dprinted handgun receivers (lowers) with no serial numbers.
6. One Glock handgun receiver (lower) with a serial number.
7. Two 3D printed suppressors.

In a spare bedroom downstairs in the home, officers located:

1. A Creality Ender 3D printer which appeared to be paused in the course of printing a gun part.
2. Five micro SD cards, which the officer is aware, based on personal knowledge and use of the Creality Ender printer, to be used to transfer 3D print files from a computer with 3D slicer software to the printer for printing.
3. 6 boxes of plastic filament used as raw material for the printer in the process of printing.

In the basement of the home, officers found:

1. A 9mm Bryco Arms pistol with serial number.
2. A jig specified for polymer handguns. Receivers (lowers) for handguns can be put inside the jig and then, following the template of holes in the jig, drill bits can be driven through the jig and through the handgun receivers to accurately drill holes in the handgun receives to make them functional.
3. A second, metal, jig, which functions in a similar way as above, to do milling work on AR receivers.
4. A drill press and router prepared with machining tips for use with the aforementioned jigs.
5. A large bucket filled with metal shavings found next to the aforementioned tools.
6. 7 aluminum AR receivers (lowers), not serialized and not yet milled, also placed near the aforementioned tools and bucket of shavings.
7. A box of miscellaneous gun parts.

I am aware, through reviewing the register of actions in Washington County Circuit Court case number C080948CR, that Defendant was convicted of a Class B felony on April 14, 2008. Further, during an interview with Defendant following service of the search warrant on April 11, 2023, Defendant admitted to officers that he is a convicted felon.

It should also be noted that officers in the course of this investigation conducted surveillance of the defendant's home in the two weeks leading up to service of the search warrant. During that time, officers were able to verify that it appears Defendant lives alone, and gets very few visitors. During that time, officers were able to view only occasional instances where other individuals stopped by the home for brief visits, most of which appeared to be brief visits with children who have been identified as Defendant's. Additionally, during the course of serving the search warrant on

April 11, 2023, officers spoke with one of Defendant's neighbors who confirmed that, to her knowledge, defendant lived in the home alone, and that to her knowledge the defendant's last roommate had moved out more than a year ago. Two vehicles were located at or near the home, both of which were registered to the defendant. No additional individuals were identified as being associated with living or staying at the home.

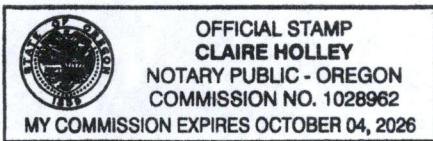
I believe there is probable cause to believe the defendant, **JACOB ABEL RAMOS**, has committed the crime(s) of: COUNT 1 - UNLAWFUL MANUFACTURE, IMPORT OR TRANSFER FIREARM, COUNT 2 - UNLAWFUL POSSESSION OF A SHORT-BARRELED RIFLE, COUNT 3 - FELON IN POSSESSION OF A FIREARM - C FELONY, COUNT 4 - CRIMINAL MISCHIEF I (DESTROY/DAMAGE, \$1,000 OR MORE) and COUNT 5 - CRIMINAL MISCHIEF I (DESTROY/DAMAGE, \$1,000 OR MORE).

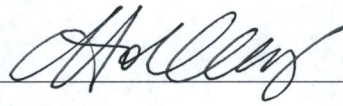
Date 4/12/23


Signature

Michelle Thomas, DDA, OSB# 164904

SUBSCRIBED AND SWORN TO BEFORE
ME ON THE ABOVE DATE:




☒ Notary Public For Oregon:
My Commission Expires: 10/4/26
☐ Deputy Clerk of the
Circuit Court
☐ Judge of the Circuit Court

AFFIDAVIT OF PROBABLE CAUSE