

UNITED STATES DISTRICT COURT

for the

District of Maryland

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2:38 pm, May 17 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY TTD Deputy

United States of America
v.
Richard Michael Roe

Case No. 1:24-mj-01235

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2020-2021 in the county of in the
District of Maryland, the defendant(s) violated:

Code Section Offense Description
18 U.S.C. §2261A Cyberstalking

This criminal complaint is based on these facts:
see attached complaint

Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Alessandra P. Serano

Steve Fantigrossi
Complainant's signature

Steve Fantigrossi, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: May 17, 2024

City and state: Baltimore, Maryland

Erin Aslan
Judge's signature



Hon. Erin Aslan

Printed name and title

2:38 pm, May 17 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

RICHARD MICHAEL ROE,

Defendant.

Case No. 1:24-mj-01235

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Steven Fantigrossi, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, state the following:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted in support of a criminal complaint and arrest warrant.

a. I submit, pursuant to the facts set forth in this Affidavit, that there is probable cause to believe that **RICHARD MICHAEL ROE** committed the following violation of federal law, 18 U.S.C. § 2261A(2)(B) (Cyberstalking).

2. I am a Special Agent with the FBI and have been since August 2020. I am currently assigned to the FBI Baltimore Field Office in Baltimore, Maryland. During my employment as an FBI Agent, I have been assigned to investigate violations of federal law, including those concerning fraud and related activity in connection with computers. I have participated in the execution of federal search warrants on physical properties, vehicles, and digital media and have seized and transported digital evidence, in accordance with FBI procedures.

3. I have received training and have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, and the execution of searches and seizures.

I have also received training on computer evidence identification, computer forensics, electronic device evidence seizure and processing, and various other criminal laws and procedures.

4. The facts set forth in this affidavit are based upon my personal knowledge and knowledge obtained during my participation in this investigation, including my review of documents related to this investigation, communication with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit does not contain all of the information known to me regarding this investigation. I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known that would defeat a determination of probable cause.

PROBABLE CAUSE

5. Since 2021¹, the FBI has been investigating **RICHARD MICHAEL ROE** (hereinafter “**ROE**”), for violations of federal law to include cyberstalking under 18 U.S.C., Sec. 2261A(2)(B) (Cyberstalking).

6. The FBI’s investigation revealed that **ROE** engaged in an extensive scheme, over a period of approximately a year, to harass and stalk Victim 1, an adult female (hereinafter “V1”), as well as other victims, further described below. Roe attempted to gain unauthorized access to V1’s online accounts in furtherance of his stalking. Among other instrumentalities, Michael Roe used spoofed² and fraudulent email accounts and phone numbers to falsely create communications, later purporting the communications came from V1. Roe also filed fraudulent police reports against V1, which resulted in court cases being opened in Montgomery County, MD, Washington, D.C., and New York, NY. Further, Roe’s counsel reported to the FBI Baltimore Field Office on his behalf that he was

¹ All dates included in the complaint should be considered approximates.

² “Spoofing” refers to the technique of using computer software to send an email that appears to be sent from another account, or to send a text message that appears to be sent from another phone number.

the victim of cyberstalking, despite evidence later obtained through this investigation which would indicate Roe was the perpetrator of the acts he was claiming to be a victim of.

7. In addition to V1, Roe's cyberstalking campaign directly and indirectly involved and/or implicated other individuals in this matter, including, but not limited to the following victims:

- a. VICTIM 2 – V1's then boyfriend
- b. VICTIM 3 – V1's then roommate
- c. VICTIM 4 – V1's Aunt
- d. VICTIM 5 – work colleague of V2
- e. VICTIM 6 – work supervisor of V2
- f. VICTIM BUSINESS 1 – V1's Employer
- g. VICTIM BUSINESS 2 – V2's Employer

8. Through the course of its investigation, the FBI identified thousands of text messages, phone calls, and emails believed to have been sent by Roe. The FBI did not identify any evidence to suggest that anyone else, including any of the above listed victims, controlled the accounts associated with the criminal activity.

BACKGROUND

9. On August 24, 2020, V1 reported to the Montgomery County Police Department (MCPD) she was victim of Roe's harassment. MCPD referred the complaint to the FBI Washington Field Office (FBI WFO) and FBI WFO opened an investigation in September 2020. On February 24, 2021, Silverman, Thompson, Slutkin, and White, LLC contacted the United States Attorney's Office - Maryland (USAMD) to report that their client, Roe, was the target of unwanted and hateful attacks via email, social media, text messages, and phone calls from V1, V6, and their associates. In March 2021, the FBI Baltimore Field Office opened a full investigation to identify the individual(s) that were alleged to have cyberstalked and harassed Roe. As part of its investigation, the FBI conducted

numerous interviews with victims and witnesses of the stalking, served legal process to over a dozen electronic service providers, and forensically analyzed mobile devices based on consent to learn the following:

10. In November 2018, V1 visited her friend in New York and met Roe on the dating application called “Bumble.” V1 and Roe met in-person for the first time on January 26, 2019, at a University of Maryland basketball game at Madison Square Gardens. In total, V1 traveled to New York approximately five times to see Roe. Roe traveled to Baltimore, Maryland frequently to visit his parents, but never spent time with V1 when he was in Maryland. V1 did not see the relationship progressing and communication between the two became less frequent until it eventually stopped. V1 met V2, her now husband, in November 2019 and began dating in December 2019.

11. According to records provided by Verizon, on December 20, 2019, telephone number 410-xxx-xx50, a telephone number used by Roe, called and held a 28-minute call with 301-xxx-xxx7, V1’s registered cell phone number. On December 21, Roe called V1 three times, but she did not answer his calls. On December 27, Roe again called V1, but she did not answer. From April to August 2020, Roe called V1 approximately 42 additional times using the same phone number. Verizon’s records indicate that V1 did not answer any of the 42 calls.

12. On January 4, 2020, V1 posted an image on Instagram which depicted herself at Penn Station, but blocked Roe from viewing it. Following the post, Roe sent V1 a text message from 410-xxx-xx50 telling her he saw her at Penn Station. V1 believed Roe used an Instagram account unknown to her to monitor her Instagram account.

13. On the same date, Roe used email address richard.michael.roe@icloud.com to email V1 at a gmail account the following¹:

From: Michael Roe <richard.michael.roe@icloud.com>
Date: January 4, 2020 at 9:41:30 PM EST
To: [REDACTED]
Subject: Goodbye [REDACTED]

[REDACTED]

I'm sorry it had to end this way. I really am. I'm sincerely heartbroken. I think the world of you, but clearly we aren't meant to be together and maybe we will never make sense. This relationship isn't fun for me anymore, and hasn't been fun for a while; I think (you're welcome to disagree) it's become the epitome of hypocrisy with today being the nail in the coffin. Simply put, today was embarrassing for me and the worst first impression you could ever directly or indirectly give my sisters. I almost didn't believe Kate until I saw your Instagram story which you blocked me from viewing. It hurt and it sucked and made me look like a complete idiot and fool. I would never do something like that to you. Ever. Directly or indirectly.

I will always love you and care about you, but clearly we can't be together. If you ever need me, I'll always be there for you, but I can't keep doing this. I'm sorry.

I've blocked you on everything for no other reason than I don't want the temptation or potential emotional dagger. I hope you understand.

Love,

Mike

ROE's STALKING CAMPAIGN

14. Once V1 began dating V2, Roe escalated his campaign to harass and stalk V1 via thousands of emails via re-mailers, prank calls via but not limited to the spoof phone call services Prankowl and PrankDial.

15. According to its website, Prankowl is an online service used to play light-hearted jokes ("pranks") on your friends, family, and co-workers through multiple different methods. Prankowl's terms of use states that, "Prankowl is provided on an as is basis for the entertainment of its customers and users" and that, "users are prohibited from using Prankowl to harass, threaten, or annoy any person." Users can access the Prankowl website via a web browser and enter in both the destination phone number as well as a number that will show up on the recipient's caller ID. Free users of the website are given 3 free tokens a day and each token resets 24 hours after you've used it. Calls placed by Prankowl are made via "Voice over Internet Protocol" or VoIP. VoIP is the transmission of voice and multimedia content over an Internet connection. VoIP allows users to

make voice calls from a computer, smartphone, and other mobile devices. Below is a screenshot of the Prankowl website.

The screenshot shows the Prankowl website interface for spoofing a caller ID. At the top, there is a header for "Spoof Caller ID" with the tagline "Change your phone number". Below this, there are social media-style icons for likes (25.6K), a share icon, and a "Premium" badge. The main form is divided into two sections: "Your Number" and "Friend". The "Your Number" section has a single input field labeled "Phone number". The "Friend" section has two input fields: "Phone number" and "Caller ID". Below the input fields, there is a note: "Add country code for non-USA numbers." Underneath, there is an "Options" section. It includes a "Maximum duration of call" section with a note "Unused tokens will be returned to you." and a yellow badge indicating "1 minute per token". A dropdown menu is set to "1 minute". There is a checked checkbox for "Record the call *". At the bottom of the options is a blue button labeled "Start the call". Below the form, there is a disclaimer: "By submitting this form, I agree that this call follows the Terms of Use and does not have malicious intent. I also agree not to record this call without consent of the recipient if the recipient resides in: CA, CT, FL, IL, MA, MD, MI, MT, NH, NV, PA, or WA."

16. According to its website, PrankDial is provided for personal entertainment purposes only. PrankDial's Terms of Agreement, among other things, prohibits "using PrankDial to defraud, cause harm, wrongly obtain anything of value, send indecent or obscene content, or to annoy, abuse, threaten, harass, or make repeated telephone calls to another person."

17. Like Prankowl, PrankDial uses VoIP to make calls. PrankDial users also enter in a recipient's phone number as well as the number that will show up on the caller ID. Below is a

screenshot of the Prankdial website.

The screenshot shows the Prankdial website interface. On the left, there are two input fields, each with a US flag and a '+1' icon. The first field is labeled 'Friend's number' and the second is labeled 'Send from'. Below these fields is a large green button labeled 'Send This Prank'. On the right side, there are two toggle switches. The first toggle is labeled 'Save the Reaction?' and has a green circle to its right. Below it is the text: 'I agree to record this call with the knowledge that the person I am calling is not located in the following states: CA, PA, FL, IL, MI, WA, MD, MA, CT, NV, NH, MT, NJ, DE, or Virgin Islands.' The second toggle is labeled 'Add "You've been pranked by PrankDial" to the end of the call' and also has a green circle to its right.

18. Based on the investigation and records provided by Internet Service Providers (ISPs), the FBI learned Roe utilized Prankowl and Prankdial while simultaneously logged in to his other electronic user accounts from the same IP address. For example, records provided by Prankowl indicate that on January 18, 2020, Roe used IPv6 address 2600:387:5:803::5b on Prankowl to call V1 four times, V3 two times, and himself two times. On the same day, Roe also logged into his own Instagram registered email address richard.michael.roe@gmail.com from an IPv6 address of 2600:387:5:803::5b. Based on my training, knowledge, and experience, I know that IPv6 addresses are unique IP address assignments assigned to one specific device at a time.

19. Based on my training, knowledge, and experience, I know that cyber stalkers often conduct activity to make it appear as though they are the victims. In the above example, as well as numerous similar examples identified in records provided by Prankowl and PrankDial, Roe made calls to himself to make it appear as though he was the victim of harassment. As detailed later, Roe used this strategy to file false complaints in multiple jurisdictions alleging that he was subject to harassment by the true victims.

20. In addition to calls, Roe also sent thousands of text messages with spoofed phone numbers via Pinger/TextFree. TextFree is a mobile application and web service from Pinger that

allows users to send and receive text messages, as well as make and receive VoIP phone calls, for free over the internet.

21. Roe sent group text messages to V1, her family members and her close friends. On at least three different occasions in January 2020, V1 contacted Roe via email or text message asking Roe to stop harassing her and her associates. V1 also put Roe on notice that she intended to report his activity to law enforcement if he did not stop.

22. Rather than ceasing his harassment, Roe escalated his campaign. From January 2020 until December 2020, Roe increased the volume of spoofed calls and text messages to V1 to intimidate, harass, and scare her. On April 4, 2020, V1 received the following text message from a spoofed number controlled by Roe:

“2012 Ford Escape!!! License plate [redacted]3 !!!! Just walked right past that crap car [redacted]!!!!”

23. I believe Roe sent this message indicating he knew V2’s license plate number and vehicle to scare V1 into believing he was physically stalking her.

24. Sometime in 2020, V1’s father was diagnosed with stage 4 cancer. V1 took on the responsibility of her father’s primary caretaker and maintained her existing phone number to coordinate with healthcare professionals treating her father’s illness. Due to Roe’s harassment campaign, V1’s cell phone was inundated with phone calls and text messages and she was unable to communicate reliably with her family during this time. V1 and her family did not know if calls or messages V1 sent or received were legitimate communications from her family or if they were spoofed calls from Roe.

25. V1 abandoned traditional forms of communication such as cell phone calls and SMS and began to use encrypted messaging applications, such as WhatsApp. Roe eventually identified

³ Where [redacted] appears, the United States is protecting the name or other identifying information of the victims.

V1's use of WhatsApp and began harassing her on WhatsApp as well. Due to Roe's cyberstalking, V1 was forced to change her cell phone number. Roe's stalking and harassment caused V1 to feel isolated during this time and prevented V1 from effectively coordinating her father's medical needs and communicating with her family. Roe's stalking and harassment further intensified the strict social distancing measures brought on by the COVID-19 pandemic.

26. In August 2020, V1's father passed away from cancer. On August 18, 2020, V1 received a message from a spoofed number assigned to Roe:

"mike r u goin to ed [redacted] viewing and mass on the 20th???? Thursday!!!! u know leenzys⁴ dad passed away on the 13th???? [redacted] will be there!!!! u should come!!!! does that explain leenzys vacation last week???? and [redacted] ?????"

27. Based on my training and experience, I know that criminals involved in cyberstalking will conduct their activity in such a way that they can deny their role. My review of thousands of text messages sent by Roe using spoofed telephone numbers assigned to him showed Roe usually referred to himself in the third person. I believe Roe did this to mislead law enforcement into believing he did not send the harassing messages.

28. On August 19, 2020, V1⁵ received the following text message from a spoofed number controlled by Roe:

"mike and [redacted] please RSVP for tomorrow!!!! Mass and Visitation: St. Andrews Apostle Catholic Church Interment to follow at: Gate of Heaven Cemetery"

29. The above represents just two of several messages Roe sent V1 related to her father's passing. Based on these messages, V1 was afraid Roe would appear at her father's funeral. V1 asked her relative, a Fairfax County Police Detective, to stay at the back of the church during her father's funeral service and for him to be alert to Roe's potential appearance.

⁴ "Leenzy" was a nickname that Roe used to refer to V1.

⁵ Although the complaint frequently mentions V1 as the recipient of Roe's messages, in many cases, several other phone numbers were on a group text message, including sometimes even Roe's legitimate phone number.

30. Based on my training, knowledge, and experience, I know that cyber-stalkers seek to cause substantial emotional distress to their victims by making their victim believe they will come into physical contact with their stalker. In this case, I believe Roe sent text messages indicating he would attend V1's father's funeral in order to induce substantial distress on V1.

31. Following the funeral, on August 20, 2020, Roe sent a text message to V1 via telephone number 16469261998, stating the following:

“[redacted], I'm texting you from my work phone per my lawyers recommendation. I heard about your dad and made the decision to fly to dc this am. I just landed at DCA and realized it would be so stupid and selfish to drop off flowers and a donation bc of what's going on between us. I will make the donation online in ur name to the Melanoma Copay Assistance Fund. If you start ur own fundraising in his honor please let me no. I'm so sorry about ur dad n hope u and the fam are doing okay during this. Mikey”

32. Based on my training and experience, I believe that Roe sent the above message to make it appear as though he was respected V1's request to cease communication with her and that he only communicated through channels approved by his lawyers. Communications between Roe's attorney's and the USAO indicate that his attorneys did not advise Roe to communicate with V1 in this manner.

33. On August 28, 2020, V1 received the following text message from a spoofed number controlled by Roe:

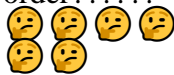
“mikey loves aug 20 2020 cuz it's the day leenzy dropped her dad in a hole 6ft down!!!! leenzy loves aug 20 2021 cu shell be [redacted] date for [redacted] wedding!!!!”

34. Based on my training, knowledge, and experience, I know that criminals engaged in cyberstalking will often disparage victim's family members to inflict substantial emotional distress on their victims. In this case, I believe Roe sent the above abhorrent message to V1 to cause her such substantial emotional distress.

35. Evidence obtained during the investigation revealed that Roe was aware of his cyberstalking activities and admitted to stalking in several text messages sent to V1 and other victims, including the following messages:

Phone Number	Date / Time	Content
1301xxxxx45	02/06/2020 15:49:47 (GMT)	heard mike is stalking you!!!! tell more people!!!! Lolz!!!!!!
1301xxxxx45	28/07/2020 13:39:32 (GMT)	mike we all know u have a pi stalking leenzy and the [redacted] and [redacted]!!! Its so obvious!!!! How else would u know about leenzy hiding [redacted] from u???? or her sleeping at [redacted]???? how would u know about [redacted]??? Or Paris??? Or there inn at perry cabin??? Joe and [redacted] dog??? That leenzys entire fam but mostly pat is paying for her lawyer????? where leenzy was on new years or Jan 3 and 4???? her new email [redacted] @gmail.com??? ? [redacted] poundin her out after watching lsu clemson???? Leenz going to post Malone concert???? watching super bowl with mc's friends???? her newest insta

		<p>and fbook friends???? her family and friends criminal records???? how dolled up she got for [redacted] bday???? how quickly she told danny she loved him???? how quickly she met his family??? The Easter zoom with the [redacted] and [redacted] which [redacted] was on???? leenzy hangouT for Laura [redacted] bday???</p>
1301xxxxx45	28/07/2020 13:39:44 (GMT)	<p>Its so obvious ur stalking leenzy mike!!!! Such a pansy move!!!! just drop it and move on!!!! its insane mike and even more pathetic that anyone could ever imagine!!!! just stop it and drop it and move on!!!!</p>
1908xxxxx70	27/08/2020 14:00:10 (GMT)	<p>Leenzy!!!! do u think its strange mike never had time to talk 2 u while u dated but now has all this tile to stalk u???? u think his hedgefund would still have</p>

		him workin if he was guilty of stalking u???? u think they wouldve hired kroll for him n his fam???? would b real bad if he was guilty!!!!
1213xxxxx42	26/09/2020 19:10:06 (GMT)	if mikey is stalking leenzy y is mikey the one getting a restraining order????? 

36. V1 also received communications from spoofed numbers controlled by Roe warning her that he would have his family's legal counsel pursue V1. V1 received subsequent intimidating messages in which Roe told V1 his lawyers would bankrupt V1 and her family. On June 20, 2020, telephone number 18604584064 sent a text message to V1 with the following:

“Leenz!!!! Watchout!!!! Big hedge fund guy said hell spend every dollar he has destroying u and ur family!!!! u no mike is a resentful and spiteful pig!!!! U no hell do it!!!! how big are [redacted], [redacted], and [redacted] wallets????? Look like U will need it!!!! danny really should help!!!! everyone knows how much they pay people at millennium!!!! 6 It’s not [redacted] pay tho!!!!!! or [redacted]!!!!!”

37. I believe Roe sent this message as part of his campaign to intimidate V1, her family, and her associates into believing Roe would use his vast financial resources to tie up V1 in prolonged civil litigation. Indeed, V1 told investigators she spent over \$50,000 of her life savings to defend and protect herself from Roe’s deceitful claims.

38. Although the FBI’s investigation did not uncover any instances of the above-listed victims listed using spoofed telephone numbers or email re-mailers to harass Roe, Roe still accused

⁶ Roe worked at Millennium Management, LLC until in or about February 2023.

V1 of cyberstalking him. Roe, and legal counsel representing Roe, submitted police reports in both New York City and Maryland against V1 claiming she was stalking him. Roe sought a protective order against V1 in New York, which required V1 to expend significant financial resources to retain legal counsel to defend herself. Roe also had a subpoena served to V1 while she was at her workplace, which caused her embarrassment.

39. On November 6, 2020, V1 received the following text message from a spoofed number assigned to Roe:

“danny, u nervous leenzy gonna see mike in court and fall back in love with him?????? i think everyone knows u were her backup!!!! Read her emails and texts to mike!!!!!!”

40. Based on my knowledge and experience of cyber stalkers, I know that cyber stalkers often become jealous of their victims dating other people and seek to disrupt those relationships. In this case, I believe Roe sent V1 this message to create conflict in her relationship with V2 about previous correspondence V1 had with Roe when they were romantically involved.

41. A review of text messages sent by Roe regarding court hearings, subpoena service, and complaints submitted to law enforcement indicates Roe did this in an effort to weaponize the legal and criminal justice system against V1. Roe’s dishonest legal pursuits also misdirected limited government resources already strained by the impacts of COVID-19 pandemic.

ROE’S OTHER VICTIMS

42. In fear of her safety due to Roe’s cyberstalking campaign, V1 installed a Ring camera and surveillance system at her residence. V1 told the FBI that she feared for her life. V3, V1’s roommate in Washington, D.C. too, was terrified of Roe, and left their shared residence for over two months for her safety. V3 also informed her employer and supervisor of Roe’s stalking.

43. In March 2022, the FBI interviewed V3 who told investigators that in April and May of 2020, Roe called V3 repeatedly from V3’s spoofed childhood phone number and other

anonymous phone numbers. Roe also sent V3 a cease and desist message and accused her of viewing his public LinkedIn profile. Based on messages Roe sent, V3 believed Roe hired a private investigator to conduct physical surveillance on her and her residence.

44. On June 18, 2020, from telephone number 1531xxxxx16, Roe sent one of several text messages to V1 related to the commissioning of a private investigator to surveil V1:

“leenzy!!!! mike didnt believe u so much he hired a investigator to follow u!!!! mike!!!! y did u hire a investigator to stalk leenzy????? wat a dum lie!!!! Ur sis saw her at train station!!!! Lolz!!!! no way!!!!!! lie!!!!!! is that normal in ny????? U fuck in g loser!!!!!”

45. On June 26, 2020, from telephone number 1954xxxxx24, Roe sent the following to V1:

“mike!!!! do u still have a private eye tracking leenzy still????? thats insane!!!!!! it needs to stop now!!!!!! how else would u no all this creepy stuff about her????? ur such a fucking loser!!!!!! stop creepin!!!!!!”

46. Based on my training and experience, I believe Roe sent these messages to V1 to instill fear in V1 that she was being watched at all times.

47. Roe's cyber stalking and harassment had a profound impact on V3 both professionally and emotionally. V3 was fearful Roe would physically stalk her and V1 at their residence and lost sleep. V3 told investigators that she had to attend therapy sessions due to the emotional distress caused by Roe's harassment and stalking. Due to the volume of harassing text messages and unauthorized attempts to access her online accounts, V3 also had to change her phone number.

48. The FBI interviewed V1's mother, who told investigators that she was also targeted by Roe. V1's mother would wake up to 40-50 spoofed phone calls. The volume of the phone calls led her and her family had to use WhatsApp. However, after the switch, Roe targeted V1, her mother, and others on WhatsApp.

49. V4, V1's Aunt and former Assistant United States Attorney - Maryland, was also a victim in Roe's cyberstalking campaign. V4 received text messages from Roe and had to change her

phone number due to the disruption caused by Roe's harassment. Roe also sent messages to V1 listing one of V4's residential addresses.

50. V2, too, was a victim of Roe's cyberstalking campaign. Shortly after V1 and V2 started dating, V2 received harassing text messages, voice mails, and phone calls. The harassing text messages started as jokes but progressed to messages that were specific to V1 and her friends and family, such as references to court proceedings and protective orders. V2 and V6 were frustrated by Roe's harassment and called members of Roe's immediate family, including Roe's father, requesting them to tell Roe to stop. Despite their efforts, Roe continued cyber stalking V2 and his other victims.

51. V2's friends were also targeted by Roe. When V2 or V1 added someone as a friend or connection on their social media accounts, Roe began to harass them with telephone calls and text messages. V2 had to apologize and explain to his friends and associates that Roe was harassing them due to their relationship with V1 and/or V2.

ROE TARGETS BUSINESSES

52. In addition to targeting individuals, Roe also targeted both V1 and V2's employers. V1 worked at Victim Business 1 (VB1) in Rockville, Maryland since in or about 2016. As part of his cyberstalking campaign, Roe made repeated phone calls to VB1. VB1 became inundated with telephone calls on the office's primary business phone line 301-xxxxx84 for months. The telephone calls consisted of restaurant reservation confirmations, automated calls from the ride-hailing service Lyft, and PrankDial calls, among other contact.

53. Roe made spoofed calls which displayed the names of associates and family of V1 on the caller ID, however, when VB1 employees answered the phone, the line was silent. Roe also called VB1 management and spoofed the calls to appear as though they were coming from V1. On June 12, 2020, Roe acknowledged his intent to disrupt VB1 when he sent V1 the following message from a spoofed number:

“Leenzy!!!! I’m calling ur office from ur phone at least 1000 times today!!!! Good Luck!!!!!!”

54. Roe made repeated calls to VB1 over the course of hours. Based on the VB1 marketing telephone system set-up, when the calls were not picked up immediately by those VB1 marketing, the calls automatically transferred to the VB1 dental practice. This resulted in Roe’s activity disrupting VB1’s dental practice, in addition to the marketing side where V1 worked. A VB1 employee told the FBI she spent hours every day answering Roe’s phone calls over the course of months which caused her substantial stress. V1 was embarrassed and did not initially tell her supervisors the repeated calls to her workplace were from Roe. On September 5, 2020, Roe sent the following text message to V1:

“Can you please stop call [redacted] and landline [redacted])!!!! All these calls in the middle of the night is CcCcRrRrRaAaAzZzZzYyY!!!!!!”

55. VB2, V2’s workplace, was also targeted by Roe. According to FBI interviews, VB2 customer service reps received so many calls each day that it prevented the business from being able to answer client calls. In addition to Roe calling VB2, V5, an employee of VB2, received suspicious calls at all hours, including on her cell phone and in the middle of the night, from a spoofed number represented as V2’s phone number. When V5 picked up the calls, no one would respond. V5 believed that someone was listening to her phone calls.

56. Due to the volume of calls from Roe, on September 2, 2020, V5 filed a police report with the Anne Arundel County Police Department against Roe.

57. According to the Anne Arundel Police report, the police officer attempted to contact Roe via multiple phone numbers that he used but was unable to reach him. According to documentation provided to the FBI by Roe’s counsel, Roe “only learned of the report following numerous anonymous emails and Instagram messages.” Roe’s counsel also stated that, “On September 11, 2020, Michael contacted the Anne Arundel County Police Department to investigate these claims...”

58. On September 13, 2020, two days after Roe allegedly became aware of the police report, V1 received the following message from a spoofed number controlled by Roe:

“mikey!!!! I told u bout anne arundal police report!!!! maybe u should check Baltimore city and mont county and dc for some police reports!!!!”

59. I believe Roe sent the above text message to alert V1 he was aware of the Anne Arundel police report and remind her he had already filed police reports in other jurisdictions alleging V1 was harassing him.

60. As part of his cyberstalking campaign, Roe attempted to gain access to the Apple accounts belonging to V1 and V2. The FBI conducted a review of V1 and V2’s Apple accounts and identified that on approximately 481 occasions, Roe attempted to obtain access to their Apple accounts via Apple iForgot.

61. According to Apple’s website, iForgot is a method of account recovery designed to get you back into your Apple ID account when you don’t have enough information to reset your password.

62. On May 27, 2020, V1 received a message from a spoofed number controlled by Roe indicating that he had gained unauthorized access to V1’s phone:

“Leenz!!!! changing your icloud doesn’t do anything!!!! when im inside your phone!!!!”

63. In addition to attempting to access V1’s Apple account without authorization, evidence obtained from the FBI’s investigation revealed Roe made hundreds of similar attempts to reset V1’s Facebook and Instagram accounts.

64. Based on Roe’s attempts made to access V1’s accounts, I believe Roe knowingly attempted to access V1’s electronic accounts without authorization in furtherance of his cyberstalking campaign.

65. On May 30, 2020, V1 received the following text message from a spoofed number controlled by Roe:

"Leenz does your MasterCard still end in 5278????? Are these still ur login emails????? IG 12[redacted] at gmail dot com Fb 26[redacted] at gmail dot com or [redacted] at [redacted] 4 os dot come Snap 12[redacted] at gmail dot com Amazon 12[redacted] at gmail dot com gmail [redacted] at [redacted] 4 os dot com Apple [redacted] at gmail dot com pleaseeeeeee bring back linkedin and poshmark!!!!!! Lolzzzzzzz!!!!!!"

66. I believe Roe sent the above message to V1 to make her believe he had access to her electronic accounts, to include emails, Snapchat, Amazon, Apple, LinkedIn, and Poshmark.

67. Although the FBI did not uncover evidence that Roe successfully compromised V1's phone, Roe's attempts to gain access to her electronic device without her consent served Roe's intent of causing V1 further emotional distress. Indeed, in an interview with the FBI, V1 told investigators she was not comfortable using her electronic devices and believed that given Roe's knowledge related to her life, Roe may have had access to her devices.

ATTRIBUTING THE CRIMINAL ACTIVITY TO ROE

68. As previously mentioned, the FBI's investigation identified thousands of text messages, phone calls, and emails believed to have been sent by Roe to V1 and others over the course of his cyberstalking campaign. The FBI attributed the activity to Roe through three primary ways: First, Roe used an IP address leased to his mother, Bonnie Roe (hereinafter B. Roe). Second, Roe used IP addresses to conduct the cyberstalking activity and log into his personal social media and financial accounts in close temporal proximity. Third, as further explained below, Roe used similar subscriber information and language to accounts attributed to Roe by common IP address. The information set forth is a subset of the cyberstalking activity conducted by Roe and does not represent the totality of the methods Roe used to stalk and harass his victims.

69. The FBI's analysis of records from Prankowl, PrankDial and Pinger/TextFree

indicate Roe frequently used IP address 73.86.81.144 to harass and stalk his victims. On August 4, 2021, the FBI obtained records from Comcast which included the following subset of subscriber information associated with IP address 73.86.81.144^{vii}:

Subscriber Name: BONNIE ROE
Service Address: [redacted] TIMON, MD 210931552 Billing Address: [redacted]TIMON, MD 210931552 Telephone#: (410) xxx-4492
Type of Service: High Speed Internet Service
Account Number: xxxx400480744312
E-mail User Ids: [redacted]2007; [redacted]; [redacted]
(the above user ID(s) end in @eomeast.net)
Time: 01/28/2021 - 07/19/2021⁷

70. JP Morgan Chase provided records to the FBI related to bank accounts controlled by Roe which revealed that from September 9, 2019 to March 17, 2022, Roe used IP address 73.86.81.144 approximately 733 times to log in online to his JP Morgan Chase bank account.

71. Additionally, records obtained from Goldman Sachs showed that on June 1, 2020, Roe used IP address 73.86.81.144 to apply for an Apple credit card in his name. Roe was accepted for the Apple credit card and used the card throughout 2020 and 2021 for numerous purchases.

72. Based on the above evidence, I believe that IP address 73.86.81.144 was leased to B. Roe for the duration of the crimes under investigation.

73. As previously mentioned, the FBI obtained subscriber records from Prankowl and conducted an analysis of phone numbers used to harass and stalk V1 and other victims. The follow-on analysis identified approximately 320 calls made via Prankowl, using IP address 73.86.81.144.

74. The FBI also obtained subscriber records from PrankDial and conducted a similar analysis of phone numbers utilized by Roe which revealed at least 73 PrankDial calls/voicemails via IP address 73.86.81.144.

75. The FBI also requested information from Pinger/TextFree for 100 numbers used in

⁷ The FBI requested records from Comcast for the subscriber of IP address 73.86.81.144 from 05/01/2020 to 05/23/2020, however, Comcast was unable to identify a subscriber account associated with the request.

the course of Roe's cyberstalking. Subscriber information from Pinger/TextFree revealed that at least 46 phone numbers were recorded using IP address 73.86.81.144 in the stalking campaign.

76. Records provided by Apple also showed that Roe used IP address 73.86.81.144 to submit approximately 8 iForgot requests for V1's Apple account.

77. Analysis of the above records shows that Roe accessed services such as Prankowl, PrankDial, and Pinger/TextFree using B.Roe's IP address at her Lutherville-Timonium home, and that he used the internet connection to cyberstalk V1 and his other victims.

78. The FBI's investigation revealed that in approximately late-May 2020, Roe began using Virtual Private Networks (VPNs) to continue his cyberstalking of V1 and others. A VPN is an encrypted connection over the Internet from a device to a network that is used to obfuscate the true IP address accessing a particular website or service. Based on my training and experience, I know that cyber criminals often use multiple VPNs to obfuscate their criminal activity and avoid detection by law enforcement. In this case, I believe Roe used VPNs for just such purpose.

79. Through use of FBI tools and commercially available datasets, the IP address of 46.277.69.20 was associated with anonymous VPN services. On May 25, 2020, Roe's JP Morgan Chase bank account showed a payment to the VPN service SurfShark for approximately \$47.76. On the same day, IP address 46.277.69.20 was used to access Roe's JP Morgan Chase bank account and Roe's LinkedIn account. IP Address 46.277.69.20 was later used for multiple PrankDial service. This is but one example of Roe's VPN usage to obfuscate his cyberstalking activity activity.

80. Although Roe used VPNs, the FBI was able to attribute continued cyberstalking activity to him via IP correlation. Simply stated, IP correlation is the matching of IP addresses used in criminal activity with IP addresses used to access personal electronic accounts at or around the same date and time. Based on my training and experience, evidence of common IP addresses accessing

multiple accounts around the same timeframe indicates the accounts were likely accessed from the same computer or computers operating on the same network.

81. Through IP correlation, the FBI identified at least an additional 327 Prankowl calls, 448 PrankDial calls, and 129 TextFree calls through 15 separate Pinger/TextFree phone numbers used by Roe to cyberstalk his victims. Based on the above IP correlation, I believe there is probable cause that Roe made calls and sent text messages from Prankowl, PrankDial, and Pinger/TextFree to stalk and harass his victims.

82. Lastly, Roe used similar subscriber information and language as compared to accounts attributed to Roe by IP address.

83. For instance, records from TextFree showed that on April 29, 2020, Roe used B. Roe's IP address to register phone number 12025166293 using email address 229173[redacted]@gmail.com, later used to stalk and harass V1 and others. On June 13, 2020, Roe used IP address 45.43.14.106 and email address 749582962847[redacted]@gmail.com to register telephone number 15712507172, another number he later used to cyberstalk. Further the content of the language used across accounts Roe established with B. Roe's IP address and other accounts is similar.

84. To create an account to register phone number(s), TextFree did not require users to verify their emails. Consequently, users could enter any email address as the registrant email, even if the email address did not exist. Indeed, the FBI's open-source research revealed that neither email address 229173[redacted] @gmail.com nor 749582962847[redacted] @gmail.com existed.

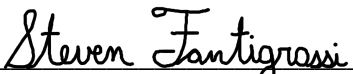
85. Based on my training, knowledge, and experience, I know that cyber criminals often use numerous email addresses to create other electronic accounts to conduct their criminal activity. Due to the volume of email addresses required to obfuscate their criminal activity criminals will often times use the same or similar syntax when establishing emails to more easily remember the email

addresses they created. Based on this, I believe Roe used the same or similar syntax to register phone numbers with B. Roe's IP address and accounts he established with other VPN IP addresses.

CONCLUSION

86. Based on the facts set forth above, I submit that there is probable cause to believe that **RICHARD MICHAEL ROE** committed a violation of 18 U.S.C. § 2261A(2)(B) (Cyberstalking). Therefore, I respectfully request issuance of the above-described criminal complaint and arrest warrant for **RICHARD MICHAEL ROE**.

Respectfully submitted,



Special Agent Steven Fantigrossi
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 17th day of May, 2024.



Honorable Erin Aslan
United States Magistrate Judge

