

USDC - BALTIMORE
24 JUN 18 PM 12:29

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

RICHARD MICHAEL ROE,

Defendant.

Criminal No.

BAH 24 cr 200

(Cyberstalking, 18 U.S.C. § 2261A(2)(B);
Harassing Phone Calls, 47 U.S.C. § 223)

INDICTMENT

COUNT ONE
(Cyberstalking)

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Indictment:

1. Defendant RICHARD MICHAEL ROE was a resident of New York, whose relatives lived in the District of Maryland.
2. ROE's relatives utilized an Internet Protocol Address that was located in the District of Maryland.
3. Victim 1 is an adult woman who dated ROE for a short time in 2019 and she lived in the District of Maryland for much of that time.
4. Victim 2 was the boyfriend (now husband) of Victim 1 and he lived in the District of Maryland.
5. Victim 3 was the roommate of Victim 1 and she lived, for a time, in the District of Maryland.

6. Victim 4 was the aunt of Victim 1 and was a resident of the District of Maryland and was employed by the United States Attorney's Office for the District of Maryland.

7. Victim 6 was the supervisor of Victim 2 and was a resident of the District of Maryland, who worked for Victim Business 2.

8. Victim Business 1 was a corporation in Rockville, Maryland and was the employer of Victim 1.

9. Victim Business 2 was a corporation in Hanover, Maryland and was the employer of Victim 2.

10. Victim 5 was an employee of Victim Business 2 and work colleague of Victim 2.

The Charge

11. From in or about December 2019, through in or about January 2021, in the District of Maryland and elsewhere, the defendant,

RICHARD MICHAEL ROE,

did, with intent to intimidate and harass another person, to wit: Victim 1, use any interactive computing service and electronic communication service and electronic communications system of interstate commerce, and any other facility of interstate and foreign commerce, including the Internet and telephonic services, to engage in a course of conduct, that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 1.

18 U.S.C. § 2261A(2)(B)

18 U.S.C. § 2

COUNTS TWO THROUGH EIGHT
(Harassing Telephone Calls)

12. The allegations contained in Paragraphs 1 through 11 of Count One of this Indictment are re-alleged and incorporated as though fully set forth herein.

13. On various dates beginning on or around January 2020, the exact date being unknown, and continuing on or around January 2021, in the District of Maryland and elsewhere, the defendant,

RICHARD MICHAEL ROE,


in interstate and foreign communications, did knowingly make telephone calls and utilized a telecommunications device without disclosing his identity and with the intent to annoy, abuse, threaten, and harass a person at the called number and who received the communication; to wit: ROE made calls from New York and elsewhere to the following victims listed below.

Count

2	Victim 1
3	Victim 2
4	Victim 3
5	Victim 4
6	Victim 6
7	Victim Business 1
8	Victim Business 2

47 U.S.C. § 223(a)(1)(C)

Merrick B. Garland, Attorney General
Jessica D. Aber
United States Attorney, Eastern District of Virginia



Alessandra P. Serano
Vanessa Strobbe
Special Attorneys to the U.S. Attorney General

A TRUE BILL:

SIGNATURE REDACTED 6/18/24

Foreperson of the Grand Jury