

Approved:

Hadassa Waxman
HADASSA WAXMAN/RANDALL W. JACKSON
Assistant United States Attorneys

13 MAG 0011

Before: THE HONORABLE HENRY B. PITMAN
United States Magistrate Judge
Southern District of New York

- - - - - x

UNITED STATES OF AMERICA : SEALED COMPLAINT
- v. - : Violation of
MICHAEL VANHISE, : 18 U.S.C. § 1201(c)
Defendant. : County of Offense:
New York County

- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY FOTO, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

1. From at least in or about January 2012, up to and including on or about October 26, 2012, in the Southern District of New York and elsewhere, MICHAEL VANHISE, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1201.

2. It was a part and an object of the conspiracy that MICHAEL VANHISE, the defendant, and others known and unknown, would unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise, a person, and use a means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the kidnapping, in violation of Title 18, United States Code, Section 1201.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 28, 2012, MICHAEL VANHISE, the defendant, using email, communicated with a co-conspirator not named as a defendant herein ("CC-1"), about kidnapping an identified woman (the "Victim") in exchange for United States currency.

b. On or about March 1, 2012, CC-1 was present on the block in Manhattan on which the Victim's apartment building is located.

(Title 18, United States Code, Section 1201(c).)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Special Agent with the Federal Bureau of Investigation, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with other law-enforcement agents and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. In or about September 2012, the FBI learned that an individual using the email account "mikevanhise81@aol.com," and CC-1 were exchanging emails in which they discussed plans to kidnap, rape and kill the Victim, a woman CC-1 knew who lived in New York, New York.

6. Based on database searches, review of Department of Motor Vehicle photographs and other records, information provided by the Internet service provider AOL, and United States mail checks, the FBI determined that the email account "mikevanhise81@aol.com," was being used by MICHAEL VANHISE, the defendant, and that VANHISE lived in New Jersey.

7. I have reviewed emails between MICHAEL VANHISE, the defendant, and CC-1. The following is an excerpt of a communication that occurred on or about February 28, 2012, during which CC-1 sent VANHISE a photograph of the Victim, and VANHISE agreed to pay CC-1 \$5,000 to kidnap the Victim:

VANHISE: about the price . . . would you do a payment plan or full up front?

CC-1: Full payment due at delivery. Just so that you know she may be knocked out when I get her to you. I don't know how long the solvent I am using will last but I have to knock her out to get her out of her apartment safely.

* * *

VANHISE: I definitely want her and how much again, I'm sorry to ask but I don't remember.

CC-1: \$5,000 and she is all yours.

VANHISE: Could we do 4?

CC-1: I am putting my neck on the line here. If something goes wrong somehow, I am in deep shit. \$5,000 and you need to make sure that she is not found. She will definitely make the news.

* * *

CC-1: It is going to be so hard to restrain myself when I knock her out, but I am aspiring to be a professional kidnapper and that's business. But I will really get off on knocking her out, tying up her hands and bare feet and gagging her. Then she will be stuffed into a large piece of luggage and wheeled out to my van.

VANHISE: just make sure she doesn't die before I get her.

CC-1: No need to worry. She will be alive. It's a short drive to you. I think I would rather not get involved in the rape. You paid for her. She is all yours and I don't want to be tempted the next time I abduct a girl.

VANHISE: I understand. Also, is there anything I can trade you that might knock down the price a bit.

CC-1: No nothing at all. Like I said this is very risky and will ruin my life if I am caught. I really need the money and I can't take under \$5,000 for [the Victim].

8. I have reviewed cell site data obtained pursuant to a Court order, and learned that on or about March 1, 2012, a cellular telephone assigned a telephone number belonging to CC-1 made and/or received cellular communications on the block in Manhattan on which the Victim's apartment building is located.

9. An FBI agent interviewed the Victim, who stated in sum, and in substance, and in part, that she has never invited CC-1 to her home, and does not know him well.

10. On or about October 26, 2012, pursuant to a Court authorized search warrant, FBI agents searched the home of MICHAEL VANHISE, the defendant. VANHISE was present during the search, and agreed to be interviewed by the FBI.


11. I participated in the interview of MICHAEL VANHISE, the defendant. VANHISE stated the following, in sum, and in substance, and in part:

a. VANHISE admitted that he is the individual who participated in the email communications described above in paragraph 7.

b. VANHISE emailed other co-conspirators not name as defendants herein ("CC-2" and "CC-3"), about kidnapping, raping and murdering women and children; and


c. VANHISE emailed to CC-2 and CC-3 photographs of a minor girl known to him. CC-2 and CC-3 expressed interest in kidnapping the child, and VANHISE provided to CC-2 and CC-3 the purported address of the child, which was in close proximity to the child's actual home address.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of MICHAEL VANHISE, the defendant, and that he be imprisoned or bailed, as the case may be.



ANTHONY FOTO
Special Agent
Federal Bureau of Investigation

Sworn to before me this
3rd day of January, 2013



THE HONORABLE HENRY B. PITMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK