

UNITED STATES DISTRICT COURT

for the
District of Alaska

United States of America
v.
ROGER VANCE KEELING

Case No. 4:21-mj-00005-SAO

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 10/26/2020 in the county of in the
District of Alaska, the defendant(s) violated:

Code Section 18 USC 2261A(2) Offense Description Stalking

This criminal complaint is based on these facts:
See attached Affidavit.

Continued on the attached sheet.

Complainant's signature

Derik M. Stone, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: January 11, 2021

City and state: Fairbanks, Alaska



Judge's signature

Scott Oravec, United States Magistrate Judge
Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

IN THE MATTER OF THE ARREST OF

Case No.: 4:21-mj-00005-SAO

ROGER VANCE KEELING

AFFIDAVIT FOR CRIMINAL COMPLAINT

I, Derik M. Stone, being duly sworn, depose and say:

Background

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, assigned to the Anchorage, Alaska Division, Fairbanks Resident Agency. I have been a SA since September 2002 and am currently assigned to investigate criminal matters within the jurisdiction of the FBI. In this assignment, I have investigated a number of violations of Title 18, United States Code (U.S.C.), including, but not limited to, mail fraud, wire fraud, murder for hire, possession and distribution of child pornography, financial institution fraud, fraud against the Government, bank robbery, false statements, health care fraud, and various drug crimes (Title 21).
2. This affidavit is in support of a criminal complaint and arrest warrant for Roger Vance Keeling, DOB 06/29/1966 for violation of Title 18, U.S.C. § 2261A (Stalking). The information herein is based upon my personal knowledge, discussions I have had with

other law enforcement officers, reports I have read, or from those specific sources as set forth.

RELEVANT STATUTE

3. In relevant part, 18 U.S.C. § 2261A states that it is illegal for any person, acting with intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to use the mail, any interactive computer[†] service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that
 - a. places the other person in reasonable fear of the death or serious bodily injury to that person or any of that person's intimate partners or immediate family members; OR
 - b. causes, or attempts to cause, or would be reasonably expected to cause substantial emotional distress to the other person or any of that person's intimate partners or immediate family members.

STATEMENT OF PROBABLE CAUSE

4. On 10/26/2020, an individual currently residing in the Fairbanks North Star Borough of Alaska (hereafter referred to as Victim 1 or V-1) contacted the Alaska State Troopers (AST) and reported that her boyfriend, Roger Keeling, had squeezed his hands around her throat and threatened to burn her house down. Keeling fled the

residence before AST arrived on scene but was eventually located and arrested for Assault in the 4th Degree; Keeling pled guilty to this charge.

5. On 10/27/2020, V-1 was granted a short-term, temporary Domestic Violence Protective Order (DVPO). The DVPO was served to Keeling while he was still incarcerated at Fairbanks Correctional Center (FCC).
6. On 11/01/2020, V-1, again, contacted AST to report that Keeling had violated the DVPO. Further investigation revealed that Keeling had a 3rd party contact V-1 telephonically to relay a message. Keeling was, again, subsequently arrested for the DVPO violation and remanded at FCC.
7. On 11/10/2020, V-1 contacted AST to report that she had received an email she believed to have been sent by Keeling. The email was sent to V-1's personal email account from tundradude@hotmail.com on 11/10/2020 at 0756 hours with the subject line, "Good morning [V-1's name]." The body of the email read as follows (verbatim):

"Good morning my name is Christian and Roger doesn't know I'm doing this I'm doing it from the kindness of my heart..I've known Roger 2 yrs or so now and I'm here to tell you he speaks nothing of good about you from the time you met until this ordeal that happened between the both of you..I've been going to see him constantly as I'm worried about him and and not sure if you know about is health but it's diminishing rapidly..here to say he did vote for Biden/Harris..he's also going to see a Randy Lewis for self help as well and enrolling in numerous other self Help classes...he's been on top of the world since knowing you and cares and loves you dearly..he's even went as far as calling me to let me know of all the projects he's done for you when they are completed..he's even gone as far as wanted to replace your kitchen floor..carpet and counters and cabinetry and other things you've discussed with him because he likes to make you smile...look Roger is very loving and caring and in the time I've known him I can definitely see that in him although he does yell and break things but he's working on it, I'm positive he

would never physically hurt you and promises me he's doing what he can to keep him in your heart..by the way I'm gay and he and I are only friends lol..but Roger does care for you deeply with so much love I'm sure no-one could ever do..he definitely enjoys your company whatever it may be because he's told me so..he also mentioned he misses the guinea pigs? And one of his friends Brian? Has is guns and has given up on hurting or shooting things as well.

Anyway I'm not here speaking for him but more of him..3 yrs is a long time..and I'm asking you as his friend to give him that last chance of hope I'm positive he won't let the both of you down or myself..I sincerely hope the two of you get back together and support each other many years to come as a couple..maybe the 3 of us could do dinner..

Thank you for this time to speak to you as I know it will be beneficial for the both of you to work this out to be together again as a couple,

Sincerely , Christian”

8. On 11/10/2020 at 1212 hours, V-1 received an email on her work email account from tundradude@hotmail.com with the subject of line, “Im [sic] Shocked.” The body of the email read as follows (verbatim):

“I can't believe what I've just heard because I sat in on the call..you've just murdered my friend..I know many of UAF administrative personnel and believe me your funding will be limited and dwindling from future research..from what he told me about you I wouldn't imagine what just happened....take care”

9. On 11/10/2020, AST interviewed Keeling about the emails. Keeling advised that he recalled having a friend named Christian but added that he had not spoke to this individual in a long time; he added that he did not even know Christian’s last name.
10. On 11/10/2020, V-1 was granted a long-term DVPO against Keeling. The DVPO was served to Keeling on 11/16/2020. AST also checked the Alaska Public Safety Information Network regarding Keeling. That database check revealed Keeling was on conditions of release and that one of those conditions was no contact with V-1 in any way.

11. On 11/13/2020, V-1 contacted Fairbanks Police Department (FPD) to report that her tires had been slashed on her vehicle at the Alaska Club while she was inside. FPD investigated the matter and ultimately arrested Keeling for Criminal Mischief in the 5th Degree, Violation of a DVPO, and two counts of Violation of Conditions of Release.
12. On 11/23/2020, V-1 contacted AST to report that she had received additional emails from at least four separate email accounts. V-1 repeatedly replied to each sender (which she believed to be the same individual) to stop emailing her. That same day, V-1 received an email from an individual using then name "Cjris Shiedel," who utilized the email address uafscience@hotmail.com. The subject line read "Great Weather." The body of the email read as follows (verbatim):

"Great weather here at Mt Mckinley Princess Wilderness Lodge this weekend..yes I did see you smiling and enjoying the amenities and the snow.. While your enjoying the weather and snow Roger is in pain probably preparing to have his spleen removed soon, however if he knew the type of person you are or the chain of events that took place I'm sure he wouldn't have done what he did..what you may ask? Well the Friday before all this happened he went and put down over 1000.00 in store credit for you on your birthday, happy eyed and smiling..Skis.. Boots.. Poles..and Bindings to support your passion of skiing and for you being so good to him..he even went as far as to buy some gear to learn to ski and be with you and to enjoy your company and they were going to notify you on your birthday so you could go and choose what you want...that wednesday before he got a raise at work and decided to make your birthday special.

Now he's lost his job his insurance is running out of time, lost his truck because of a so called freind and may be sleeping in the cold soon. He's lost close to 20 lbs..has'nt slept much, can't keep food down and your out without a care in the world, from what he's told me about you in the past I wouldn't imagine you doing this to him. However chain of events happen and they did,

Anyway just wanted to shed some lite on his current situation..you will not find anyone as loving and emotional with feelings as he is..he's definitely not fake and very loving as I'm sure you already know that..enjoy the weather and safe travels

Sincerely C.S''

13. This email greatly concerned V-1 as she had just returned from visiting Denali National Park.
14. To date, V-1 has received over 20 emails from four different email addresses. The email addresses are as follows: tundradude@hotmail.com, uafscience@hotmail.com, sciencelife63@hotmail.com, arcticbiologies@hotmail.com, and emilyrusch@hotmail.com. The emails have contained personal information that only V-1 and Keeling would know and also have repeatedly asked V-1 to forgive Keeling, requesting her to rekindle their relationship.
15. V-1 provided AST with Keeling's known email address, rogermonkey808@hotmail.com, and copies of several previous emails V-1 had received from Keeling in the past. AST observed that the writing style in the known Keeling emails was very similar to the emails received from the new email addresses including, but not limited to, Keeling's use of two periods at the end of sentences.
16. On 12/06/2020, AST served a search warrant on Microsoft requesting user account information for the email accounts that were associated with the emails received by V-1. Those subpoena results showed that Keeling's known email address was added as a secondary email account for tundradude@hotmail.com. Additionally, records showed that Keeling sent Instagram photos of himself and V-1 to the sciencelife@hotmail.com address and then, almost immediately, those same photos were sent to V-1's email address from sciencelife@hotmail.com.

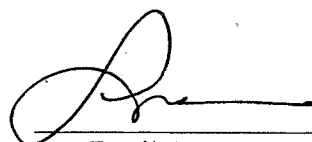
17. The subpoena results further showed that the emails from the unknown accounts were sent from the same IP address as the known emails sent to V-1 from Keeling.
18. On 12/16/2020, Keeling contacted V-1's parents who reside outside of Alaska. V-1 advised AST that she has never given Keeling her parents' contact information.
19. On 12/25/2020, V-1 received an email stating, *"I forgot to mention: did Roger ever tell you he would give his life for you..grow old with you or die beside you?"*
20. On 12/25/2020, V-1 located a backpack with handwritten notes on her normal running route. The notes included the subject of black magic and how V-1 had been cursed. AST contacted Pre-Trial Services (Keeling was then on electronic monitoring) and requested location information for Keeling. Pre-Trial Services advised that, according to the ankle-monitoring tracking data, Keeling had been on the running route prior to V-1.
21. AST contacted Keeling and spoke with him about the incident. Keeling spoke to AST about black magic and witchcraft. Keeling then admitted to leaving the notes on the running trail and was subsequently arrested and remanded to FCC.
22. During an additional interview AST conducted with V-1, V-1 communicated to the officers that Keeling's conduct was causing substantial emotional distress and placing her in fear of death or serious bodily injury. V-1 revealed that she was so concerned that Keeling will harm her that she left Fairbanks for 30 days and stayed in a location over 10 hours away. Additionally, she had her vehicle checked for GPS trackers and has purchased a new cellular telephone.

23. On 01/06/2020, AST and FBI executed a state search warrant on Keeling's residence. Among the evidentiary items seized was an envelope with what appeared to Keeling's handwritten notes on it. The notes documented steps one needs to take to close an email account. Also found was a detailed diagram of the interior of V-1's residence to include where she keeps her pet guinea pigs, several notebooks with handwritten spells/curses in them, and a piece of paper with V-1's name, email address, residential address, phone number, and vehicle description (including the license plate).

CONCLUSION


24. Based on the aforementioned information, your affiant respectfully submits that there is probable cause to believe that Keeling has continuously engaged in acts of stalking against V-1 in violation of Title 18, U.S.C. § 2261A.
25. Your affiant requests the issuance of an arrest warrant for Roger Keeling.

Further your affiant sayeth naught.



Derik M. Stone, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 11th day of January 2021 at Fairbanks, Alaska.



Honorable Scott A. Oravec
United States Magistrate Judge