

UNITED STATES DISTRICT COURT

for the

District of New Hampshire

United States of America )

v. )

Michael Chick )

Case No. )

22-mj- 177-01-AJ )

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 May 2022 through August 2022 in the county of Rockingham in the District of New Hampshire, the defendant(s) violated:

Code Section 18 USC 2261A Offense Description Interstate stalking

This criminal complaint is based on these facts:

See attached affidavit of SA Ron Morin, incorporated herein by reference.

Continued on the attached sheet.

/s/ Ron Morin

Complainant's signature

Special Agent Ronald Morin, HSI

Printed name and title

Sworn to before me and signed in my presence via telephone conference.

Date: Aug 5, 2022

Andrea K. Johnstone



Judge's signature

City and state: Concord, New Hampshire

Hon. Andrea K. Johnstone, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND ARREST**

**WARRANT**

**INTRODUCTION**

I, Ronald Morin, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), and have been so employed since May 2006. I am currently assigned to the Manchester, New Hampshire field office. As part of my regular duties as a Special Agent, I investigate criminal violations relating to a broad range of immigration and customs related statutes, including those relating to child exploitation, child pornography, and human trafficking. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including Stalking, in violation of 18 U.S.C. § 2261A, and I am authorized to request and execute warrants issued under the authority of the United States.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Michael Adam CHICK** (DOB 1982) for violations of 18 U.S.C. § 2261A (interstate stalking).

3. The statements contained in this affidavit are based in part on: information provided by HSI Special Agents, New Hampshire Internet Against Crimes Task Force (NH ICAC), Greenland (NH) Police Department (GPD), Eliot (ME) Police Department (EPD); written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by HSI Special Agents/Analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with HSI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary probable cause that **CHICK** has violated Title 18 U.S.C. § 2261A.

**Background of Investigation**

4. On April 18, 2022, \_\_\_\_\_ of Greenland, New Hampshire and the parents of an eight-year-old male known herein as AC, reported to the Greenland Central School that their son’s bus driver, “Mike C” (later identified as Michael Chick, DOB \_\_\_\_\_ 82 of \_\_\_\_\_ Eliot, Maine) had been giving AC and his sister gifts (candy, Pokémon paraphernalia, and other small toys) regularly on the bus. Additionally, when the children were absent from school, Mike would leave letters for them at the residence saying how much he misses them. The \_\_\_\_\_ provided a copy of a get-well card from Chick to the family from around Thanksgiving of 2021. \_\_\_\_\_ said that at one point AC had told her about a conversation that he and his sister had while on the bus with Chick. During the exchange Chick shared with them where he hid a key for his house (specifically saying “under a rock near the door”) and AC’s sister started to share that they keep their key under the door mat. (Unknown how much she actually said.) This increased \_\_\_\_\_ concerns.

5. On May 5, 2022, Chick stopped and asked \_\_\_\_\_ if he could attend AC’s Little League baseball game. She was very upset about this request and told him that AC’s games were for family only and contacted her husband. \_\_\_\_\_ later contacted the school to ask for assistance with the matter. School Administration contacted the bus company, First Student, and requested that Chick be assigned to a different route (so he would not drive AC and his sister anymore). The school also suggested that the family contact the Greenland Police Department if they felt they were being harassed. Greenland Central School Principal Hallee also contacted the School Resource Officer, Nicholas Drew, to update him on the complaint from the

6. On May 5, 2022, the \_\_\_\_\_ spoke with Ofc Michael Drake to report the ongoing harassment. The following day, Officer Drake and SRO Drew spoke with Michael Chick about his behavior. When Officer Drake asked Chick why he thought we (Greenland PD) wanted to speak with him, Chick responded that it “probably” had to do with AC. They discussed how he invited himself to AC’s baseball game and Chick justified that he was going to be watching his “nephew” and thought it would get him interested in Little League. SRO Drew and Drake informed Chick that he was to have no more contact with AC or his family.

7. On July 2, 2022, \_\_\_\_\_ came to the Greenland Police Department to report another incident between AC and Chick. \_\_\_\_\_ was cleaning AC's bedroom and located two Tracfone cell phones in a Pokémon lunch box in the closet/under the eaves. \_\_\_\_\_ questioned his son and learned that Chick had given AC the two cell phones. AC admitted that several days after Greenland officers told Chick to have no further contact with AC, Chick called AC over to his bus to offer him a cell phone. AC declined at first but after other offers he eventually accepted them.

8. The \_\_\_\_\_ could not see if any photographs had been sent or received but noted that there were three contacts in stored in the cell phones. AC, BB and CC (with associated phone numbers of: \_\_\_\_\_ 4, \_\_\_\_\_ 05 and \_\_\_\_\_ 39 respectively). \_\_\_\_\_ also advised that AC provided the passcode for both of the cell phones: "8888". AC told his parents that he had only spoken to Chick one time on one of the phones and they talked about Pokémon.

9. The \_\_\_\_\_ provided Officer Drake with the Pokémon lunch box that contained the two Tracfones and a charging cable and speaker. Officer Drake secured the cell phones in a Faraday bag and logged them as evidence. The \_\_\_\_\_ were very concerned for their son's safety as well as their own, verbalizing that they were afraid that Chick would come to their home and kidnap AC. The \_\_\_\_\_ advised that they were going to install surveillance cameras around their home.

10. On July 6, 2022, Greenland Sergeant Wayne Bertogli attended the Portsmouth Child Advocacy Center (CAC) where a forensic interview of AC was conducted. During the interview, AC disclosed the same information that he had obtained the cell phones from Chick and had spoken to Chick one time on the cell phone about Pokémon.

11. On July 12, 2022, Sgt. Bertogli transferred the two Tracfones to the custody of Detective Duane Jacques of the Portsmouth Police Department who is assigned to the NH ICAC Unit and is certified and extensively trained to process electronic data from cell phones via Cellebrite equipment. On July 13, 2022, Detective Jacques advised that all of the data had been extracted

and would provide the information via an electronic storage device (specifically, a "thumb drive").

12. Jacques' report reflected that the Tracfonos were assigned to the following phone numbers: 99 and 14. Both of the phones retained information that they had been connected to a Wi-Fi network named "1986state" and "chickhouse". (Later, a Homeland Security Investigator (HSI) was able to confirm that "1986state" was a network at the home address of Chick: Eliot, ME.)

- On the 99 (22GRE-56-PR) phone, Jacques found a deleted picture ("thumbnail") of Chick's face (while laying on the floor), two (2) incoming SMS messages from Chick's cell phone (including one on 06/02/22 at 4:07 that says, "Gotta do it again bro".), a screenshot of a weather app for the Eliot, ME area, one news story in the web history viewed on 05/21/2022: "A 1-year-old boy died after being raped by 2 Russian soldiers, Ukraine says from Start Magazine".
- On the 14 (22GRE-57-PR) phone, Jacques documented six incoming SMS messages from Chick's cell phone, including one on 06/08/22 at 1:51 that says, "Clearly, you just aren't going to listen. So I think I might tell them to just go ahead and do it." It also contained a screenshot of a weather app for the Eliot, ME area like the other phone.

13. On July 20, 2022, Sgt. Bertogli and Chief Laurent reviewed surveillance footage (received by and through a search warrant) from the First Student buses concerning Chick and AC. They specifically reviewed dates and times before and after school between May 6, 2022 - June 15, 2022. They reviewed each disc and recordings and matched them up by date/time with SRO Drew's school surveillance recordings as well. The bus recordings had both audio and video, although the audio was difficult to hear many times because of the other children on the bus. Excerpts are as follows:

- 05/06/22 @ 1311. Unknown bus.

Chick is talking to another bus driver (female) and explains that he is “switching” with Marcia for today, but unsure what’s going to happen Monday (possibly assigned to another district). @ 1318 Ofc Drake approaches him (both standing outside the bus). Ofc Drake explains that there’s an issue from a parent. Chick says no one has talked about this before, then later admits that it was “already brought up by the manager”. Chick said he didn’t think gift bags were a problem. SRO Drew joins them and explains to Chick that “there’s a line you gotta draw”. He provided his contact cell number as 39. Ultimately Chick says he understands and gets back on his bus at 1325.

- 05/13/22 @ 1123. On Bus E.

AC gets on the bus, wringing his hands.

Chick: I’m not mad at you. I understand why you didn’t lie to your mom. **We’re still in this situation, right? Have you been worried about it? (AC: Yeah) Remember our deal? The reason they haven’t gone to that (inaudible) is I’ve been paying \$1,000 a week (inaudible) hold them off while I try to figure out what I gotta do.** At some point I want to give you this (inaudible) cell phone. (AC: I don’t think I can.) You can use it at school. **Use it in the bathroom.** (AC: I don’t think I can take that.) I don’t know what else ... I don’t know what to do then. (AC: Maybe you can figure something out.) I’ll work on it. Have a good day.

- 05/18/22 – Bus E recording shows 05/08/22 @ 1727. NO AUDIO.

AC waves, looks, then pauses. AC gets on the bus. Chick shows AC something. They talk and AC moves his backpack to one shoulder before leaving.

- 05/20/22 @ 0702. On Bus E.

AC gets on the bus.

Chick: Can’t say anything about this. **It has to be done today.** Take this and put it in your backpack. At some point after 9 o’clock go in the bathroom when you’re

by yourself and call the number that's been pre-programmed into it. Ok? (AC: Okay.) The passcode is – just remember your age – it's 8888 ... four 8s.

You won't have to bring this home. You can drop it off (inaudible) (AC: Can I do it at my house?) You'd rather have the – (AC: **I'd rather do it at my house.**)

For today can you just call at the school and then return the phone to me? Sorry.  
8888

@ 1325. On Bus E.

AC gets on the bus.

(AC: I have the phone for you.)

Chick: Yeah? You gonna bring it home with ya? You said you were more comfortable bringing it home. As long as you leave it somewhere they're not gonna see it. **Don't let them see it, ok?**

- 05/24/22 @ 1324. On Bus E.

AC gets on the bus.

Chick: What happened to the thing? I'm sure the battery's dead now. (AC: I couldn't call (inaudible).) Nobody found it, right? (AC: Yeah, nobody found it.)

This one's way easier to use. (AC: What?) This one's way easier to use. (AC: Ok.) There are three (3) contacts in it. (AC: Ok.) The contacts are easy to find – there's an A, a B, and a C, alright? That's the name of the contacts under favorites. If you go to contacts, then favorites ... try A first, then if that doesn't go through, then B, then go to C, ok? **If anyone does find it, you found it on the ground at school near the lost and found.** (AC: Ok.) **I didn't give it to you.**

- 05/27/22 @ 1122. On Bus E.

AC gets on the bus.

Chick: What happened this time? (AC: What?) What happened this time? (AC: I'll save it for tomorrow. I forgot it today.) **I can't keep telling them that you**

forgot. (Inaudible) You know when you plug it in then you hit a button on the side. (AC: I did, but it wouldn't work.)

Did blue lights come on? (AC: No.) (Inaudible.) Can you take this one? This is how you use it – push this button. Contacts in there ...A, B, C ... just hit C. **I can't keep giving them excuses.** (AC: Inaudible.)

- 05/31/22 @ 0702. On Bus E.

AC gets on the bus.

Chick: Did you bring them? (AC: I don't have them.) Well, where are they? (AC: They're at my house.) **So you understand what's going to happen if you don't do it?** (AC: Yeah.) **They're like this close.** (AC: I'll try doing it today (inaudible).)

Well, yeah, but okay. Just return this one later. You don't have to bring this one home. (AC: Ok.) At school. Take this phone. (AC: I can't.) **I can't keep telling them that you forget.** (AC: I'll try doing it today at my house.) They're dead. The phones are dead. (AC: They are?) The batteries are dead.

Just in the bathroom at school. (AC: I can't. I'll try doing it with the other phone, okay?) Okay. The one with the big charger? (AC: Yeah.) If you can't get that one to charge, bring it tomorrow.

- 06/01/22 @ 1324. On Bus E.

AC gets on the bus.

Chick: Hi there. Did you bring one? (AC: Yeah.)

If I give you a fully charged one, will you be able to call? (Inaudible.)

The bus isn't going to leave without you. Can you read this real quick? (AC: What?) **Can you read this real quick? So I don't have to say it.** (AC looking at something in Chick's lap.) (AC: Okay, fine. Gimme it.) **I'm not going to sell your pictures.** Please remember. (AC: I'll try doing it today. There might be a uhhhh ... inaudible.)

- 06/06/22 @ 0700. On Bus E.

AC gets on the bus.

Chick: You didn't bring the dead one?

Yesterday, when your mom and down were in Boston and you were at your grandmother's house, **we were right across the street.** (Inaudible) and **I'm doing everything I can to stop them from doing very bad things.** You remember last week when you called? (AC: Yeah.) I don't know if you listened to everything I said, but you need to check in. (AC: Check what?) You need to check in daily. Thursday you walked by (AC: I'm sorry.) – I called you over and you just kept on walking. **I had to tell them that.** (AC: I don't think I heard you.) (AC: I'll try doing it today.) Alright. Can you stop by the bus this afternoon?

@ 1323. On Bus E.

AC gets on the bus.

Chick: So, Last...Last Wednesday was good (inaudible) and got your call, but then the rest of the week, you didn't(inaudible). If I have to tell you something (AC: Yeah.) in the week to do, **you didn't do it and that's why they followed you to your grandmother's house.** Especially if you're gonna go somewhere, you gotta let me know (inaudible). They were there yesterday, and they were going to cause (inaudible) that needed to be done and you weren't going to do it. I lied to them and said you did it Saturday. (AC: Yeah.) (Inaudible) don't have the **proof that's on the phone** and I can't get the phone right now. So, if I get the phone Monday, I can give it to them Tuesday ... but that means what you were supposed to do Saturday and what I told them was done you obviously haven't done, so **you have to do it today.** (AC: Yeah.) Alright? (AC: Yeah.) So, even if you (inaudible), put that in your backpack (inaudible) charger again, okay?

14. With the additional information from the videos, Greenland Police Department sought the help of HSI, due to the threats (usually via “they/them”) and instructions of something AC needed to do with one (or all) of the cell phones. HSI was able to set up a second CAC interview of AC conducted by an HSI Forensic Interviewer on July 26. During this interview, AC

confirmed that there were actually three (3) cell phones that were exchanged with Chick at different times. (Law enforcement was able to determine the third phone was a Tracfone with the cell number 05.) AC answered most questions during the forensic interview with “I don’t know” or “I can’t remember,” including questions regarding some of the specific conversations outlined above.

15. Chief Laurent summarized the following activity between Chick’s cell phone 39) and the missing Tracfone 05):

T-Mobile records on 39 (Michael Chick’s phone)

All in Coordinated Universal Time (UTC), which is four (4) hours ahead of Eastern Standard Time (EST).

Records involving Tracfone 05 (per VW Records this was purchased on 05/22/22):

05/24/22	03:03:14	TXT to CHICK Phone	
Tuesday	03:04:48	Outgoing call to 1205	28 Seconds
	03:05:51	Outgoing call to 1205	72 Seconds
	03:12:02	Outgoing call to 1205	Abnormal Completion/Network
Interruption			
	03:21:55	Outgoing call to 1205	Abnormal Completion/Network
	Interruption 03:22:24	Outgoing call to 1205	9 Seconds
	16:39:25	Outgoing call to 1205	9 Seconds
	16:39:42	Outgoing call to 1205	Abnormal Completion/Network
Interruption			
	16:39:53	Outgoing call to 1205	5 Seconds
	17:49:56	Outgoing call to 1205	184 Seconds
	18:13:21	Outgoing call to 1205	54 Seconds
	18:18:49	Outgoing call to 1205	192 Seconds
	18:25:34	Outgoing call to 1205	271 Seconds
	18:41:51	Outgoing call to 1205	47 Seconds

	19:51:29	Outgoing call to 1205	43 Seconds
	20:05:37	Outgoing call to 1205	35 Seconds
	20:31:57	Outgoing call to 1205	21 Seconds
	21:31:55	Outgoing call to 1205	8 Seconds
	21:31:57	TXT to CHICK Phone	
	22:10:23	Outgoing call to 1205	4 Seconds
	22:16:13	Outgoing call to 1205	95 Seconds
	23:26:18	Outgoing call to 1205	39 Seconds
	23:45:25	Outgoing call to 1205	68 Seconds
05/25/22	00:01:00	Outgoing call to 1205	70 Seconds
Wednesday	00:03:42	Outgoing call to 1205	365 Seconds
	10:19:09	Outgoing call to 1205	8 Seconds
05/26/22	00:33:04	Outgoing call to 1205	6 Seconds
Thursday	18:16:37	Outgoing call to 1205	5 Seconds
	19:28:11	Outgoing call to 1205	3 Seconds
	20:35:58	Outgoing call to 1205	2 Seconds
	21:55:09	Outgoing call to 1205	No time noted
	23:19:17	Outgoing call to 1205	2 Seconds
05/27/22	10:46:25	Outgoing call to 1205	2 Seconds
Friday	20:59:21	Outgoing call to 1205	No time noted
	20:59:28	Outgoing call to 1205	2 Seconds
	21:50:36	Outgoing call to 1205	2 Seconds
06/02/22	18:23:17	Outgoing call to 1205	1 Second
Thursday			
06/07/22	01:08:47	Outgoing call to 1205	7 Seconds

Tuesday 01:09:12 Outgoing call to 1205 19 Seconds  
 18:12:57 TXT to CHICK Phone

06/09/22 22:40:58 Incoming: 1205 to CHICK Phone 57 Seconds

Thursday

16. On July 26, 2022, Special Agent Eric Tracy of HSI conducted surveillance of and observed Michael Chick's 2009 Chevrolet Malibu bearing Maine registration 1200HW parked in the driveway of the residence. SA Tracy checked for available Wi-Fi networks while parked to the left of the driveway at the target residence and identified the available secure network "1986state".

17. On August 1, 2022, Greenland PD was advised that Portsmouth Police Department had a complaint about Chick on July 11, 2022. On that date, a caller advised that a male subject sitting in a Chevy Malibu with Maine tags 1200WT (registered to Chick) was parked along the road taking pictures of kids in Water Country (water park). On 08/02/22 Chief Laurent spoke with the complainant, Royce Josey, who said that the individual was taking pictures and/or video using a cell phone. He described the driver as a white male with "brown bushy hair" being the only occupant of the vehicle. He said he drove by very slowly and they made eye contact. After Josey passed, the vehicle pulled out and left. Portsmouth PD was unable to find the suspect or the vehicle.

18. On August 2, 2022, Eliot, ME Police investigators obtained a search warrant issued at Biddeford District Court. Investigators noted that Chick's vehicle was not at the residence during the overnight and early morning hours. Investigators spoke with Judith Chick (Michael's mother that also lives at [redacted] in Eliot, ME) and using a ruse requested to know Michael Chick's whereabouts. During the conversation with Judith, she indicated that he was currently in Old Town, Maine with a friend but had been down in the area for several days with the friend's four-year-old son, WW. I learned that Chick had stayed alone with the boy at the Ramada Inn in Kittery, Maine (6.1 miles from his residence) for the past two (2) nights. Judith

indicated that yesterday (08/02/22), Chick and WW came to the residence to use the pool before returning to Old Town, Maine. Records obtained from the Ramada Inn in Kittery confirmed that Chick was a guest from July 31 through August 2, 2022.

19. Eliot PD Sgt. Ronald Lund then spoke with Michael Chick when his mother called his cell phone, [REDACTED] 39 and indicated that wanted to speak with him. Chick verified that he was at [REDACTED] Old Town, Maine. Sgt. Lund informed Chick that he could send Old Town Police Department over to view his vehicle. Chick stated that he was staying with friend Tyler Wood and wouldn't be back to the area until later in the week.

20. Eliot investigators then communicated with the Old Town Police Department and requested their assistance with executing our search warrant (Chick's person and his vehicle). Other investigators contacted HSI Bangor and Maine Internet Crimes Against Children (ICAC) to attempt an interview with Chick at the same time. Once Old Town Police Department and HSI Agents made contact with Chick and began to interview him and execute the search warrant for his person and vehicle, while other investigators responded to the Eliot home to execute the search warrant of the residence.

21. After some time, investigators in Old Town advised that in the car they had located a TracFone, a digital camera, duct tape, rubber gloves, sweet (candy) liquor, candy, children's clothing including underwear, children's toys, a magnetic GPS vehicle tracker along with his T-Mobile cell phone [REDACTED] 39 that was on his person. Investigators only seized the two (2) cell phones as authorized by the search warrant that was issued (referenced above) on August 2, 2022. Chick provided limited information in a recorded interview. Chick and his vehicle were released from the Old Town scene.

22. Investigators at the Eliot residence executed the premises search warrant. During the execution of the search, Judith Chick arrived and identified which bedroom belonged to her son, Michael Chick. Located in the bedroom was:

- A TracFone BLU (black),

- An Apple iPhone smartphone (black),
- Two (2) TracFone packaging/boxes,
- T-Mobile billing documents,
- Several surveillance cameras including two (2) “button” cameras (with SD cards) and tracking devices,
- Several notes on school bus student permission slips. One read “I am going to run out of money. \$1,000 per week is what is keeping your family alive and together. And I will run out of money.” This aligned with the above referenced school bus audio recording transcription on May 13, 2022 at 11:23 a.m.
- Large Ziplock baggie of children’s underwear.
- Handwritten notes/instructions (as if written directly to AC), including, but not limited to:
  - “Good job, you were great last night. Thank you. You saved yourself. Would have taken you away on Friday.”
  - “Wasn’t hard to do, right?” This particular note goes on to assign the reader to use the camera and, “Take off your sleeping shorts and put on your undies that you wore today. No shirt, nothing else. Use the phone, go to the camera” and writer gave the reader detailed instructions on how to take body selfies from different angles/positions and then offers the reader to perform “extra credit” by making a “video of anything you would consider naughty”.
  - “Make sure it is a new video.”
  - “Take phone, wrap the phone up in the undies. Put them in a zip lock bag, zip it up tight. Put that in another zip lock bag, zip it up tight. Put that in the lunch box, zip it up. Check to make sure the coast is clear, bring lunch box into bathroom. Open window, drop straight down. Then you’re done.”
  - A series of notebook-lined paper containing handwritten instructions on keeping a secret, specifically from parents, teachers, and police officers in order for your family to not be killed.

- “This whole thing has been very hard for me to talk about. My own family has never heard half of this stuff. But I felt that it was important to tell you. I am only alive today because of you. AC [full name used in actual writing], you saved my life, and for that I will always be thankful and for that I truly love you.”
- A written reward system as well as specific requests for “photos/videos, information, and items such as clothing.”, a notebook where it appears Chick writes to AC and AC writes back to Chick, numerous school writings belonging to AC, and a
- Handwritten note practicing Spanish phrases, including a phrase loosely translated, “Can I suck you off this weekend?” AC speaks fluent Spanish.
- Computer generated documents.
  - “YOU HAD TOO MANY CHANCES THIS IS NOT WORKING WE ARE DONE FUCKING AROUND MAKE THIS HAPPEN NOW OR THE KID DISAPPEARS.” (Attached hereto as Exhibit 1)
  - “TODAY IS THE DAY YOU HAVE HAD FAR TOO MANY CHANCES. SAY GOODBYE. WE ARE DOING THIS. DO NOT RUN. DO NOT HIDE. WE KNOW WHERE TO GET YOU. YOU HAD TO HAVE KNOWN THIS DAY WAS COMING. YOU HAVE BEEN FUCKING UP WAY TOO MUCH. YOU HAVE FAILED TO MEET OUR DEMANDS.”

(These notes are consistent with digital communications which is one of the methods in which Chick was communicating with AC.)

- A printed computer image of what appears to be a young girl with braided hair with a severed head lying next to the rest of her body.
- Digital printed photographs of children at a baseball game and separated by individual child within each envelope.
- Two (2) laptop computers

- Thumb Drives (two (2) Sandisk black 256 GB, one (1) Sandisk with blue cord 8 GB, one (1) PNY black 16 GB, and one (1) plain black 32 GB media storage device,
- Loose SD Cards (one (1) plain black Micro SD card 32 GB)

23. The notes recovered from Chick's bedroom align with the threatening and instructional language heard on the school bus audio recordings.

24. Based upon the findings, investigators returned to the Eliot police station in order to write a second search warrant in order to expand the items to be seized to include electronics. It also contained a second section to re-search Chick's vehicle in order to seize items that were observed but not seized by investigators in Old Town, ME. The search warrant was signed by a Judge and returned to the scene. At that time, investigators seized the electronics that were previously identified and summarized above.

25. Chick arrived at the residence around 8:00 p.m. GPD Sgt Bertogli and HSI Agent Perrella greeted him upon his arrival (parking on the front lawn of the home) and asked to speak with him. They stood across the front yard, away from the other investigators who were still performing the search. Chick made the following statements/admissions:

- That he had taken two one minute videos of WW in the bathroom but claimed he did not watch them.
- He threatened AC during conversations on the bus.
- He gave AC three (3) different Tracphones.
- He has stayed at the Ramada Inn in Kittery with WW on more than one occasion.
- He put the computer-generated/printed note (referenced above and attached hereto as Exhibit 1) on his lap and asked AC to read it.
- He said he had some pictures of AC (possibly on the phone) in public settings.
- He said that he cares a lot about AC.
- That he placed magnetic cellular GPS trackers on each of AC's parents' vehicles (described the location he placed them in detail) and, therefore, knew that they had gone to the Greenland police station on several occasions. He said the

trackers were still there and active. [Note: These were subsequently retrieved from the vehicles by Greenland PD. The trackers were located on the vehicles where Chick described having placed them.]

- He stated he had been to the residence between 6 – 10 times during the night just to walk around the house. (He denied doing so with the intent of picking up a lunch box/cell phone that he had instructed AC to take pictures of himself with.)
- He said he spoke with AC several times on the phone (via the cell phones that he provided to AC).

26. When Chick indicated that he didn't want to talk anymore, investigators executed the second search warrant of Chick's vehicle and were able to seize the digital camera, magnetic cellular GPS tracker.

27. Subsequently, Greenland PD met with the family to advise them of some of the additional information that had developed as a result of the search. The were extremely distraught and fearful for the safety of their family. They did not feel it was safe to remain in their home and left to stay in an alternate location.

28. On August 5, 2022, HSI SA Michael Perella met with advised that AC had begun to share information with his parents regarding his interactions with Chick that he had been too fearful to share previously. advised that AC would be willing to participate in a follow up forensic interview to discuss the information. In general, SA Perella learned from that AC had talked about an organization that Chick referred to as "The Team." Chick told AC that "The Team" was the organization that was making threats towards AC and his family. Chick told AC that "The Team" had between 8-800 members, and that if AC did not meet their demands, "The Team" would go to "Plan B," which would result in AC being kidnapped and tortured. [Note: at this time, AC has not disclosed the nature of all of the demands that were made of him by Chick, but he did relay that Chick asked him to make a video and that "The Team" liked clothing and underwear.]

29. gave permission for SA Perella to show AC the note attached hereto as Exhibit 1 to see whether he recognized it and could confirm that the note was shown to him by Chick on the bus. SA Perella met briefly with AC, who reviewed the note and confirmed that Chick had shown him the note on the bus.

**CONCLUSION**

30. Based on the foregoing, there is probable cause to believe Michael **CHICK** has engaged in interstate stalking in violation of 18 U.S.C. § 2261A.

/s/ Ronald Morin  
Special Agent Ronald Morin  
Department of Homeland Security  
Homeland Security Investigations

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. P. 41 and affirmed under oath the contents of this affidavit and application.

Date: Aug 5, 2022

Time: 8:09PM, Aug 5, 2022

/s/ Andrea K. Johnstone  
Hon. Andrea K. Johnstone  
United States Magistrate Judge



NAME: MICHAEL A CHICK

DATE OF BIRTH: 1982

EYE COLOR: Brown

HAIR COLOR: Brown

HEIGHT: 509

WEIGHT: 230

GENDER: Male

SSN: 05

RESIDENCE ELIOT,ME 03903

COUNTRY: United States of America (USA)

# Exhibit 1

YOU HAVE HAD TOO MANY CHANCES

THIS IS NOT WORKING

WE ARE DONE FUCKING  
AROUND

MAKE THIS HAPPEN NOW OR  
THE KID DISAPPEARS