

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILEDfor the
District of Vermont

2019 JAN -7 AM 11:38

United States of America
v.

EVERETT A. SIMPSON

Case No.

2:19-MJ-2

CLERK

BY EH
DEPUTY CLERK

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 January 5, 2019 in the county of Windsor in the
District of Vermont, the defendant(s) violated:

Code Section

18 U.S.C. § 1201

Offense Description

Knowingly and willfully kidnapping and transporting victim in interstate
commerce

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.
Complainant's signature

Special Agent Jennie Emmonds, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

Jan. 7, 2019
11:33 am

City and state:

Burlington, Vermont
Judge's signature

Hon. John M. Conroy, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jennie Emmons, having been duly sworn, depose and state as follows:

Agent Background and Introduction

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since 1997. I am currently assigned to the Albany Field Office—Burlington, Vermont Resident Agency. My duties as an FBI Special Agent include the investigation of violent crimes and criminal enterprises, as well as other violations of Title 18 of the United States Code as they pertain to corporate fraud, complex financial crimes, embezzlement, public corruption, money laundering and related white collar crimes. I have participated in investigations of criminal violations of various federal laws. I have executed search and arrest warrants, interviewed and interrogated subjects, witnesses, and victims, and conducted surveillance.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1201 (kidnapping) have been committed by Everett A. Simpson. Accordingly, this affidavit is presented in support of a criminal complaint charging that on January 5, 2019, in locations including the District of Vermont, Everett A. Simpson did willfully and knowingly kidnap two individuals, transport them in interstate commerce, and hold them for various purposes in violation of Title 18, United States Code, Section 1201.

Summary of the Investigation

4. On Saturday, January 5, 2019 at approximately 5:29 pm, the Hartford Police Department received a complaint from the Comfort Inn at 56 Ralph Lehman Drive in White River Junction, Vermont. C.R., whose identity is known to law enforcement, advised that she and her five-year-old child, J.R., had been abducted by an unknown male and that the male then stole her vehicle.

5. Hartford Police Officer Coriander Santagate met with the Comfort Inn desk clerk, Robin Stone, who advised that a male and female had come in earlier and rented a room, and then the male left sometime later. As he was leaving, he handed the clerk a cell phone and told her that it belonged to the female in the room. The clerk also advised that, shortly after the male left, the female (later identified as C.R.) came down and told the clerk that she had been taken against her will.

6. Officers located C.R. in room 106 of the Comfort Inn. C.R.'s son was also present in the room. C.R. started to cry and told officers that she had been shopping at the mall in Manchester, New Hampshire earlier in the day. C.R. and J.R. are New Hampshire residents. C.R. stated that when she went outside to leave the mall with her son, a male pushed her into her vehicle and drove off with her and her son in the vehicle. The vehicle was later established to be a silver 2014 Kia Forte with New Hampshire plates. C.R. advised that she did not want to get out of the car because her son was in the vehicle. She described the male as being white with a medium build and balding hair. The male drove through numerous towns in Vermont and eventually stopped at the Comfort Inn in White River Junction. C.R. told officers that this male raped her in the room in front of her son. C.R. advised that, when the male left, he told her not to

leave the room or contact the police. C.R. advised that she waited about 20 minutes to make sure that he was gone. Officers noted that C.R. was trembling while she was speaking with them, was looking up and down the hallway, and appeared to be scared. They also noted that J.R. was crying and had urinated in his pants.

7. Members of the Hartford Police Department processed the hotel room and noted that one of the two beds was unmade and appeared to have been used.

8. C.R. and J.R. were given a ride to the Hartford Police Department. While there, C.R. advised that she had been at the mall in Manchester, New Hampshire earlier in the day with family. She stated that she had left the mall around 12:45 pm with her son. As she was getting into her vehicle, she was elbowed by a male and pushed into the passenger seat of her vehicle. The male then began driving her vehicle with her and J.R. in it. They traveled north into Vermont from New Hampshire.

9. While on the way to Vermont, the male told C.R. that he had been on the run for three days, that he had escaped from a "rehab," and that he had heard his wife was cheating on him, so he was out looking for his wife, whom he named as Sherise. The male said he was angry with his wife, and C.R. felt that he was trying to find his wife so that he could hurt her. According to C.R., they drove to the area of Bradford and Fairlee, Vermont, where the male made C.R. get out of her car and knock on the door of a house in that area to see if Sherise was there. C.R. stated that the male kept J.R. in the vehicle with him to prevent C.R. from calling the police for help. The male told C.R. that his wife lived in Fairlee and drove a white Avalon.

10. C.R. advised officers that the male pulled over to the side of the road at one point and tried to sexually assault her in the car. C.R. stated that she had her pants down around her

ankles, but tried to get out of the vehicle. C.R. then called to people jogging on the roadway for help. As the joggers came toward the vehicle, the male drove off.

11. At approximately 3:46 pm, the Thetford Vermont Police Department received multiple emergency calls of a silver sedan on Route 5 in the area of Pavillion Road. These calls indicated that a young female with long, brown hair was screaming for help and trying to get out of the passenger side of the vehicle while the car was moving. The calls also indicated that it appeared that the male driver was attempting to hold the female down.

12. C.R. further stated that she told the male that, if he was going to assault her, he should take her to a hotel for her safety because her son was in the vehicle with her. C.R. stated that she kept asking him to bring her to a hotel because she was afraid that if he raped her beside the road he would kill both her and her son and leave them and because at least most hotels had cameras. The male eventually drove her to the Comfort Inn in White River Junction and made her rent a room with her credit card. C.R. stated that, while they were in the room, the male raped her in front of her son. The male then left her and her son in the hotel room and took her vehicle.

13. According to C.R., at some point while traveling to Vermont, the male took her cell phone and downloaded a "text free" application so his messages could not be traced. He said that he was texting his wife to find out where she was. A law enforcement officer viewed one of the text messages sent from C.R.'s phone, which had been recovered at the Comfort Inn. The text, which was sent to 802-356-8111, said, "is this Sherise, I am with your husband, and he is bleeding." C.R. stated that the male kept her cell phone the entire time that he was with her to prevent her from calling for help.

14. C.R. provided a description of the male: approximately 6' 01", white, with shaved stubble on the side of the head, with blond eyebrows and blue eyes, and a balding head under a black Adidas baseball hat. C.R. stated that the male had taken her driver's license, written down her address, and told her that he knows where she lives and that if she contacts the police he will find her and kill her.

15. Officers contacted the Manchester, New Hampshire Police Department and learned that officers in that department had received information earlier in the day that Everett Simpson (date of birth XX/XX/1977) had "escaped" from a facility in Vermont and had driven to Manchester in a stolen vehicle out of the Bradford, Vermont area. That stolen vehicle was recovered in Manchester, and police there obtained a video surveillance still frame of the suspect leaving the stolen car. The suspect's general appearance matched the description provided by C.R.

16. The Vermont State Police (St. Johnsbury barracks) attempted to locate Everett Simpson's wife, Sherise, and check on her well-being. Sergeant Winn spoke with Sherise on the phone. Sherise stated she had been in hiding for the past couple of days after hearing that Simpson had escaped the Valley Vista Rehabilitation Center in Bradford, Vermont. Sherise advised that she had received a call from Simpson around noon from a cell phone that was later identified as Simpson's phone. Sherise stated she also received a text from an unknown person saying that they were with Simpson and that he was bleeding and going to kill himself. The number sending the text message could not be identified because it was from a text free application.

17. Investigators learned that Everett Simpson had been at the Valley Vista center in

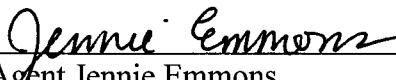
Bradford, Vermont on January 2, 2019, had left the facility, and had stolen a vehicle from Bradford. According to records available to law enforcement, Simpson was apparently subject to conditions of pretrial release from three Vermont Counties, including a case in Chittenden County for Cruelty to a Child and for False Information to Law Enforcement, a case in Caledonia County for Eluding Law Enforcement—Negligent Operation and for Vehicle Operation Without Owner Consent, and a case in Washington County for Failure to Return a Rented or Leased Motor Vehicle and for Operation Without Owner's Consent.

18. On January 6, 2019, Everett Simpson was located by officers of the Upper Darby Police Department near Upper Darby, Pennsylvania, just west of Philadelphia. C.R.'s 2014 Kia Forte had been located with an individual presumed to be Simpson driving it; the vehicle was recovered after the driver abandoned the vehicle on foot following a pursuit. Simpson stole another vehicle, and police located that vehicle while Simpson was still driving it. Simpson crashed that vehicle while being pursued, and police apprehended him at that time.

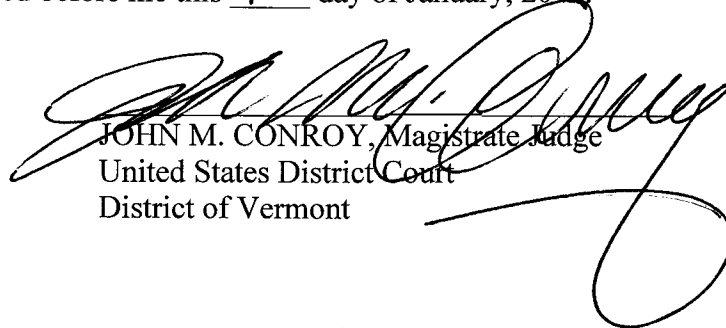
Conclusion and Request

19. Based on the preceding information, I respectfully submit that probable cause exists to charge Everett A. Simpson with willfully and knowingly kidnapping two individuals, transporting them in interstate commerce, and holding them for various purposes in violation of Title 18, United States Code, Section 1201. I request the Court issue both a Criminal Complaint charging him accordingly and also a warrant for his arrest.

Dated at Burlington, in the District of Vermont, this 7 day of January, 2019.


Special Agent Jennie Emmons
Federal Bureau of Investigation

Sworn to and subscribed before me this 7th day of January, 2019.


JOHN M. CONROY, Magistrate Judge
United States District Court
District of Vermont