

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

David Verner

Case No. Case: 2:24-mj-30540
Judge: Unassigned,
Filed: 12-20-2024
CMP USA V. DAVID VERNER (DA)

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 2-16-24, 2-22-24, 3-2-24, 3-7-24 in the county of Washtenaw in the Eastern District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 875(b) - Interstate threats, 18 U.S.C. § 2261A(2)(B) - Online stalking, and 18 U.S.C. § 1791(a)(2) & (b)(4) - Possessing contraband in prisoner, namely a cellular phone.

This criminal complaint is based on these facts:
see attached affidavit.

[X] Continued on the attached sheet.

[Handwritten signature of Adam Christensen]

Complainant's signature

Adam Christensen, Special Agent (FBI)

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 20, 2024

[Handwritten signature of Elizabeth A. Stafford]

Judge's signature

City and state: Detroit, Michigan

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL  
COMPLAINT AND AN ARREST WARRANT**

I, Adam Christensen, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since 2010 and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations including cyber crimes, particularly online sexual exploitation of children, drug trafficking violations, violations related to national security and others. Since January 2023, I have been assigned as the FBI's primary investigator of federal crimes that occur at the Bureau of Prisons Federal Correctional Institution, Milan (FCI Milan) in Milan, Michigan. I have conducted over 30 investigations at FCI Milan since that time. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 1791. I am authorized by law to request an arrest warrant.

2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for David VERNER for violations of 18 U.S.C. § 875(b), threatening interstate communications, 18 U.S.C. § 2261A(2)(B), online stalking, and 18 U.S.C. §§ 1791(a)(2) & (b)(4), possessing contraband in prison (Target Offenses).

3. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement and corrections officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement and corrections agents, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.

4. This affidavit is submitted for the limited purpose of securing an 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 probable cause that VERNER has committed violations of the Target Offenses.

#### **PROBABLE CAUSE**

5. On February 15, 2024, Victim 1, an inmate at FCI Milan, approached FCI Milan staff and requested protective custody. Victim 1 said that he owed \$3,500 to David VERNER stemming from activity prior to his incarceration and could no longer make payments. Victim 1 said that VERNER had received this debt from another inmate.

6. According to BOP records, VERNER and Victim 1 were in the same housing unit for more than one month in 2024.

7. According to Victim 1, VERNER became aware that Victim 1 was serving time for white collar offenses and wanted Victim 1, through his family, to create fraudulent checks for VERNER and his associates. VERNER contacted another inmate who lived in the same hometown as Victim 1 to get personal information on Victim 1. VERNER then planned to extort Victim 1 and his family to force them to either pay back the debt or participate in the fraudulent check scheme.

8. On March 20, 2024, family members of Victim 1 contacted FCI Milan staff. These family members—Victim 2 and Victim 3—provided investigators with communications over text message and social media that appear to be from David VERNER. The initial messages are from a Facebook Messenger account with a display name “David Verner.” The profile photo shows a group of people, including one who appears to match the photograph of VERNER provided by FCI Milan.

9. The initial message from the “David Verner” account, sent on or about February 16, 2024, states, “What’s up [Victim 2] I’m locked up with [Victim 1],, I’m the one that was sending u cash apps.. [Victim 1] checked up the hole he olds me 3,000.. he supposed to had it cashapped to me yesterday.” The user of the account responds that she was not Victim 2, but was Victim 3, and that Victim 2 had been sent to jail. The “David Verner” account then states, “I come home soon

so it's all good I told him before I gave him my money that I was the wrong one to play with. it's all good."

10. After a couple of exchanges, the "David Verner" account asks for the phone number of Victim 2. When Victim 3 asks why, VERNER replies, "[Victim 2] trust me I come home April 12<sup>th</sup>.. it's a dude in here from where y'all from that knows u & [Victim 1] & u know who that is." Victim 3 responds, "This isn't [Victim 2]. This is [Victim 3]." Verner then responds, "I just want my money please don't turn this into something else this is my last inbox; Dude just came to me saying u was supposed to send it to him & he's gonna pay me I told him ima get up with u don't get shit for me." Eventually VERNER again asks for Victim 2's phone number, and Victim 3 responds that they are not Victim 2.

11. During the conversation, Victim 3 asked VERNER to send an image of himself; in response, Victim 3 received two images that depict VERNER, one with another male, and one holding a stack of cash.

12. Victim 2 also provided screenshots of text messages from VERNER to Victim 3. The text messages start on or about February 17, 2024, and are from telephone number 734-219-1801. In those messages, the person texting, believed to be VERNER, initially indicates that Victim 1 told VERNER that Victim 1 has \$100,000 in his parents' attic. Victim 3 responds that she doesn't know why Victim 1 would say that and that Victim 1 is "tripping."

13. A second set of text messages provided by Victim 2 were from telephone number 602-293-7693 and start on or about February 22, 2024. On that date, the following conversation was observed:

- 7693: What's up u still haven't heard from [Victim 2]
- Victim 3: yeah [Victim 2]'s not getting out for a while
- 7693: If not his mother & father needs to know he olds that money can my people tried of waiting & there ready to do something to him
- 7693: Cause
- 7693: I told them to hold off
- 7963: But something needs to come through
- 7693: The cash app is \$virgina verner [Investigator's note: Virginia Verner is listed as a "sibling" in VERNER's BOP records]
- 7693: So tell them aint' nothing happening??
- Victim 3: I honestly doubt they even have the money ngl
- Victim 3: i'll let them know though
- 7693: Let him tell it they do
- 7693: Can u see what they say right quick
- Victim 3: yeha hold on
- 7693: I can't be on this phone long what's up
- Victim 3: they both said they don't have it

- 7693: Well just to let you know shit but to get real I got addresses the whole 9 but ok
- Victim 3: address of who?
- 7693: Everyone he's associated with
- 7693: U don't just take money from people Especially important people
- 7693: U want me to text them to u??
- Victim 3: yeah

There is a break in communication until February 26, 2024:

- 7693: What's up with my money
- Victim 3: we don't have it
- 7693: Send me a pic of that pussy I know it's petty like you
- Victim 3: that's honestly between you and [Victim 1] we know nothing about it
- 7693: U don't love [Victim 1]??
- Victim 3: i love [Victim 1] but don't have that kind of money not even close
- 7693: Well [Victim 1] is honestly about to get fucked up
- Victim 3: just don't kill jim honestly this is his mess
- Victim 3: him\*^

- 7693: Let me see that pussy
- Victim 3: this is harassment please leave me alone i really don't have money and don't know what [Victim 1] did with it but this is between you and him have a nice day.
- 7693: Ima show you ass more then harassment I'll be home soon y'all taken this shit for a joke bitch u have know clue who y'all fucking with but y'all will see
- Victim 3: I have nothing to do with this first of all
- Victim 3: [Victim 1] owes you money not me
- Victim 3: i'm honestly in the dark on everything i only know what you have told me and i have been honest with you unlike [Victim 1]
- 7693: Since he played games every mf close to him gonna feel it
- 7693: He said his Parents will pay it.
- Victim 3: his parent's don't have that kind of money though
- 7693: That's the word he sent out the shu
- Victim 3: well that's news to me cause last time i checked they don't have that kind of money
- 7693: I need to start getting some type of payments
- Victim 3: well you better send word back to him in the shu and tell him that not us cause [redacted] i don't have that kind of money and



[Victim 2] is in jail so she's no help

- 7693: He knows who I am and what I'm capable of that's why I don't see why he playing with me like it's sweet
- Victim 3: I don't know why either you seem to be about business
- 7693: Well I come home me & u gonna do some business
- Victim 3: i don't want any parts of this i'm good
- 7693: it's not this
- Victim 3: what is it?
- 7693: Ima suck that pussy & fuck on u while taking care of u
- Victim 3: I'm good thanks though
- 7693: Just think about it ima hit u later

14. The next text message was sent on March 2, 2024 stating, "Ok bitch I'm tried of playing." On March 7, 2024, the user of 7693 says, "I got a kite from [Victim 1] to day." Victim 3 asks, "what did it say?" The user of 7693 responds, "He said he haven't talked to you & I know that's a lie cause he asked me to please stop Threatening you." He then says, "I'm just trying to see what happened."

15. Based on this and other information, Victim 1 was placed in protective custody by FCI Milan and VERNER was placed in the Special Housing Unit (SHU).

16. The Facebook account which sent the initial messages to Victim 3 has the vanity name: david.verner3. On June 12, 2024, in response to a search warrant, Meta Platforms provided information about this account. The information provided by Meta Platforms shows that this account was been logged into by an iPhone SE (2020). The search warrant return also contained communications between VERNER and Victim 3 that were consistent with the screenshots provided to investigators and set forth above in paragraphs 9-10.

17. Investigators obtained call detail records from T-Mobile for the phone numbers 734-219-1801 and 602-293-7693 which were used to contact Victim 3. The records show that both phones were in the area of FCI Milan when VERNER sent the text messages shown in paragraph 13. The records also show that many of the phone numbers that VERNER listed as his phone contacts on BOP records were contacted by these two phone numbers. For instance, a phone number listed as being a sibling of Verner had 19 toll records (texts or calls) with 734-219-1801 and three with 602-293-7693.

18. On October 7, 2024, investigators spoke with Victim 3 regarding her interactions with VERNER. In addition to recalling the above-described conversations with VERNER on Facebook Messenger and via text messages, she also stated that VERNER video called her from FCI Milan. She could not see his full face, but stated that he was a fat black man, which matches the general

description of VERNER. Victim 3 also provided consent to search her cellular phone and the text messages described above were found to still be on her phone.

### CONCLUSION

19. Based on the foregoing, there is probable cause to believe that David Verner, has sent threatening communications interstate, in violation of Title 18 U.S.C. § 875(b), has conducted online stalking, in violation of Title 18 U.S.C. § 2261A(2)(B), and has possessed contraband, namely a mobile phone, in prison, in violation of Title 18 U.S.C. § 1791(a)(2) & (b)(4).

Respectfully submitted,



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Adam Christensen, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



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Honorable Elizabeth A. Stafford  
United States Magistrate Judge

Date: December 19, 2024