

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT

2008 JUL -1 PM 1:30

DISTRICT OF

Vermont

BY

DEPUTY CLERK

UNITED STATES OF AMERICA

V.

MICHAEL JACQUES

CRIMINAL COMPLAINT

Case Number: 2:08-mj-57-1

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about June 25, 2008 in Orange County, in the (Date) District of Vermont defendant(s) did,

(Track Statutory Language of Offense)

use a facility or instrumentality of Interstate or foreign commerce in committing the offense of kidnaping "BB"

in violation of Title 18 United States Code, Section(s) 1201(a)(1)

I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

Official Title

See attached affidavit.

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Daniel G. Rachek  
Signature of Complainant

Daniel G. Rachek, Special Agent, FBI  
Printed Name of Complainant

Sworn to before me and signed in my presence,

7/1/08  
Date

at

Burlington VT  
City State  
[Signature]  
Signature of Judge

William K. Sessions III. Chief U.S. District Court Judge  
Name of Judge Title of Judge

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2008 JUL -3 AM 7:23

**AFFIDAVIT**

CLERK  
BY R. M. W.  
DEPUTY CLERK

I, Daniel Rachek, being duly sworn, depose and say:

1. I have served as a Special Agent with the Federal Bureau of Investigation for 13 years.

During that time, I have participated in the investigation of a wide variety of criminal offenses, including kidnaping and child exploitation.

2. Based on the information described below, I believe there exists probable cause to believe that MICHAEL JACQUES has used of a facility or instrumentality of interstate or foreign commerce in committing the offense of kidnaping BROOKE BENNETT, in violation of 18 U.S.C. § 1201(a)(1).

3. This case is being investigated by agents from the FBI Burlington, Vermont Resident Office, agents from the FBI Albany, New York Division, and Detectives from the Vermont State Police. I have personally participated in the investigation, and make this affidavit based upon my participation, as well as reports made to me by other agents and law enforcement authorities. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included details of every aspect of the investigation.

**A. Disappearance of Brooke Bennett**

4. On June 25, 2008 at approximately 21:00 hours, The Vermont State Police was informed of a missing juvenile, Brooke Bennett ("BENNETT"), age 12, of Braintree, Vermont. Initial investigation conducted by the Vermont State Police revealed that BENNETT was last seen on June 25, 2008 at approximately 09:20 hours at the Cumberland Farms located on Route 12 in the Town of Randolph. BENNETT was dropped off by her uncle, MICHAEL JACQUES ("JACQUES"), age 42, who told Vermont State Police investigators that he believed that

BENNETT was going to be picked up by a friend and then driven to visit the friend's sick relative at Dartmouth Hitchcock Medical Center.

5. The following day, June 26, 2008, JACQUES notified the Vermont State Police that he had located a sneaker by the side of a road in Brookfield, Vermont. VSP Detectives later located other items in a wooded area near where the sneaker was located. The sneaker was identified by JACQUES as belonging to BENNETT. The other items were a white handkerchief containing confirmed human blood and semen, and a pair of torn girl's underwear, found in close proximity to the white handkerchief. Also located in the general area was a plastic sandwich bag.

6. Preliminary results from tests conducted by the Vermont Forensic Laboratory revealed that DNA extracted from the handkerchief and the underwear has a profile consistent with DNA extracted from a hair taken from BENNETT's hair brush. These tests also indicated that the DNA extracted from the semen found on the handkerchief did not belong to JACQUES, who consented to provide a buccal sample for purposes of DNA testing. As set forth below, there is reason to believe that this evidence was planted by JACQUES or at his direction in order to deflect suspicion from themselves and conceal their illegal activities.

7. JACQUES was convicted in Vermont on July 12, 1993 of kidnaping and aggravated sexual assault. The victim in that case was an 18 year old female.

**B. Statements by JACQUES and JUVENILE 1**

8. In addition to the above statements, JACQUES also told VSP Detectives the following regarding the disappearance of BENNETT:

- BENNETT had requested that he bring her to the Cumberland Farms in Randolph Center where she was to be picked up by a friend. They were then going to

Dartmouth Hitchcock Medical Center to visit the friend's sick mother or grandmother.

- JUVENILE 1 went with JACQUES and BENNETT to the Cumberland Farms.
- JACQUES spoke with the store clerk and told the store clerk that BENNETT was being picked up by a friend but if the friend did not show up could BENNETT use the phone to call him.
- JACQUES bought a cup of coffee but threw it out because it tasted bad and went to Dunkin Donuts to get another coffee.

9. JUVENILE 1, is a relative of JACQUES. On June 25, 2008, JUVENILE 1 was interviewed by VSP Detectives. JUVENILE 1 initially told the police the following:

- She and JACQUES drove BENNETT to the Cumberland Farms, Randolph, Vermont and dropped her off at approximately 9:00 am to 9:15 am. JACQUES purchased a cup of coffee at Cumberland Farms but it tasted so bad that he threw it away. After leaving BENNETT at Cumberland Farms, JACQUES and JUVENILE 1 drove to the Dunkin Donuts and purchased another cup of coffee. The last time that she saw BENNETT was at Cumberland Farms.

10. Subsequent investigation by the VSP Detectives revealed that JUVENILE 1 and JACQUES did not go to Dunkin Donuts. She was interviewed again on June 26, 2008 and admitted to a VSP Detective that she had been untruthful about going to Dunkin Donuts and had been told by JACQUES to lie to the police because it would look bad if he just dropped off BENNETT and left her at the Cumberland Farms. JUVENILE 1 claimed at that point that the rest of the story was true.

**C. BENNETT'S My Space Page**

11. On June 25, 2008, shortly after BENNETT was reported missing, VSP Detectives went to JACQUES' residence and spoke with JACQUES. JACQUES advised the VSP Detective that he required all his children to provide him with their passwords to their My Space, including BENNETT, his niece, who often used a computer at JACQUES' residence. JACQUES further told the VSP Detective that when BENNETT had not returned home, JACQUES logged onto

BENNETT's My Space account and discovered that BENNETT had accessed the account sometime after midnight on June 25, 2008. JACQUES further advised that BENNETT's relative, JUVENILE 1, had confirmed that she awoke during the night, discovered BENNETT was not in her bed, and went downstairs to find BENNETT using the computer. JACQUES then logged onto BENNETT's My Space page and showed the VSP Detective the following posting:

Just 4 Skittlemeup

I know i promised never 2 post u on this page but i know u read both of mine all the time. I don't care use my other one at my cousins because my aunt and uncle gotta know my passwords and stuff and get freaked. Nobody but u and me can know about the other one! I do want to see you in the morning so please meet me.... u know where. I think i have a good plan to sneak around this. My mom will kill me but then I'm going 2 Texas and she will get over it. Sorry I was such a baby last time. Promise u not this time!! U can bring ur friend but u have 2 admit that's pretty weird.

I cant wait 2 see what u got me 4 my b-day surprise!! Ur so good 2 me when we r able 2 b together. I hate that I wont see u till ur classes start again in the fall but i love that we can b together one more time. It just might last me for the summer. They say ur first is the one u always want and that's u baby! This girl don't sneak out of her house at 2 in the morning 4 just any man! OMG if only people knew me 4 reall

See you there!

12. As set forth below, VSP and Internet Crimes Against Children Task Force investigators and forensic examiners believe this posting, and others, were made from JACQUES' laptop computer. In addition, as set forth below, law enforcement believes that this posting was made to make it appear that BENNETT was abducted by someone she met on the internet or communicated with on the internet.

D. Seizure of JACQUES Laptop Computer and Missing Hard Drive from JACQUES Desktop Computer

13. On June 26, 2008, VSP Detective Brian Penders and Internet Crimes Against Children ("ICAC") Task Force member Jonathon Rajewski, went to the JACQUES residence located at 1820 East Bethel Road in the Town of Randolph Center, Vermont. While at the residence JACQUES advised that he had a laptop computer and desktop computer at the residence. JACQUES told the police that the laptop computer was a "work laptop," belonging to his employer, Thermadyne. Sgt Penders obtained recorded verbal consent from Cary Levitt of Thermadyne to conduct a forensic preview of the laptop and search it for evidence involving the disappearance of BENNETT. Sgt Penders also obtained written consent from JACQUES to conduct a forensic preview of the laptop and search it for evidence involving the disappearance of BENNETT. JACQUES and Levitt later agreed to allow the laptop to be transported to the Computer Forensics Lab in Burlington where a forensically correct image would be obtained. Sgt Penders identified the laptop as a Dell, model PP05XA bearing serial number 1SSSSC1.

14. During a forensic preview of the laptop computer by ICAC Task Force Agent Rajewski, at the ICAC lab at the Burlington Police Department, observed an email from the account of "chvy\_21@yahoo.com." JACQUES told ICAC Task Force Agent Rajewski that "chvy\_21@yahoo.com" was his email address. According to DMV records, JACQUES is the registered owner of a red 2007 Chevy Pickup Truck.

15. JACQUES also told Sgt Brian Penders and ICAC Task Force member Jonathon Rajewski that a few days earlier the hard drive on his desktop had malfunctioned and that the computer did not have a hard drive. JACQUES stated that on June 24, 2008 he had taken the hard drive to Best Buy, in West Lebanon, NH, for replacement or repair. JACQUES later stated he went to Best Buy on June 25, 2008.

16. On June 27, 2008, VSP Detectives contacted Best Buy in West Lebanon, NH, and were advised that Best Buy had no record of JACQUES bringing in a desktop computer or hard drive to that location.

**E. Forensic Examination of JACQUES Laptop - Recovery of Emails and Other Data**

17. On June 28, 2008, and June 29, 2008, VSP and Internet Crimes Against Children Task Force computer forensic examiners conducted a forensic examination of a forensically correct image of the laptop hard drive seized from JACQUES.

18. Forensic examination of the JACQUES laptop has revealed that JUVENILE 1 uses an email address of "[JUVENILE 1 email address]". Forensic examination of this computer also shows that the person identified as Rael Domingo and also known as "C," uses email address "[redacted]". In addition, the forensic examination also reveals emails to and from the email address "[redacted]" and that this email address was used by the person known only as "E." As set forth above, email address "[redacted]" was also used by JACQUES who, on June 26, 2008, told the police that "[redacted]" is his email address.

**1. Email Recovered From JACQUES Laptop Computer Showing the Sexual Exploitation and Sexual Assault of Minors.**

19. On or about May 8, 2008, a person who identifies himself as "E" using the email address "[redacted]" sent an email to JUVENILE 1 which shows, among other things, a relationship among JUVENILE 1, "E" AND "C" (who is also known as Rael Domingo), including a sexual relationship. The email states:

Hey babe-

Well, I thought Panama was bad.....holy shit this place is fucking crazy! I still can't believe I'm in friggin AFRICA!! The people here are some of the strangest people I have ever met and they sure do have some strange customs. I wish I could tell you why I am here, but I have been sworn to secrecy so I can't even tell you. All I can say is that hopefully I will be out of here and back somewhere in the U.S. within the next month or so. The worst part is, I don't have any cell service and the satellite service rarely works here so I can't even get in touch with my woman except through email. Even email doesn't work too good sometimes.

The only good thing about being here in Africa is that I have been able to hunt!! I have gone on a couple of safaris and have shot some animals I have only seen in the zoo or on TV. I got a zebra and a cape buffalo last weekend. Next week I am hoping to go on a lion hunt! It's weird hunting though because instead of hiking around they drive you around in a jeep until you see something and then you get close and shoot from the vehicle. Oh well, at least I get to get out and enjoy the wilderness.

I miss you so much. I am so happy that Breckenridge decided to give you the summer training program. That was a good idea you had, but it took a lot of begging and pleading from me and C to get them to agree. At the moment the committee doesn't really like you too much! I can't wait until you get through all of this and then we can finally be together. I had this wonderful dream last night that you and I were laying in bed in our log cabin, we had just finished having sex and were cuddling together and all of the sudden in walks our little 2 year old....omg babe she was so beautiful and cute. She says "mommy I had a bad dream can I sleep with you and daddy?". Then she climbed in with us and we all fell asleep together. God babe it was such a beautiful dream. I hope more than anything that God lets that happen and we can have such a great life together.

Babe I am a little worried about your mom and dad. I have been hearing some rumors that your mom has done some thinking about divorcing your dad. God honey that can't happen. I would be so, so sad if that happened. And your poor dad doesn't deserve that after everything he has done for you and your mom and [ ]. In my opinion he has given all of you a great life and nobody should have anything to complain about. Your mom has been taking some phonecalls from your FATHER and I guess she hasn't done anything with him recently, I hear that she is flirting with him and all of that crap. I really hope that when you and your mom go to counseling that you will bring up the fact that you don't like the way your mom treats your dad. She isn't really very nice to him a lot of the time and she is snippy and bitchy with him a lot. He doesn't seem like he is the type to really fight back much because he doesn't like a lot of fighting in his life anymore, but she is pretty crappy to him from what I have seen and heard. I don't think she has much to complain about that's for sure. You and your dad are so very close to each other I would hate to see anything happen to that relationship too. I will talk to you more about that later. Please don't say anything to her about it or get into a fight with her about it because it will only cause more trouble and somehow she will probably find a way to blame your



dad for it if you do. God I hope she doesn't kick him out or start cheating on him. Who knows what kind of a lose you and [ ] could end up with!!!

I hope your training is going good. Can't wait until farmer season starts!! C told me you got a wicked hot bathing suit picked out and I bet you are going to drive them all crazy!

Please email me back and I promise I will keep in touch with you as much as I can. I love you [JUVENILE 1] and I want you more than ever. Nothing will ever change the love I have for you. Please remember that!!

Your One And Only True Love,

E

20. JUVENILE 1 sent the following reply email.

Date: Thu, 8 May 2008 12:28:15 -0700 (PDT)

From: "[JUVENILE 1 email address]"

Subject: Re: Missing You

To: "Chevy Pickup" <[REDACTED]>

Babe i cant believe that my mom has been thinking about divorcing my dad. That would ruin my WHOLE life. [ ] would prob wind up killing my mom [ ]. Sorry im just really upset and crying I cant really talk about it.

I am glad that you get to hunt while you are in Africa. Im sure that filles a little whole in your heart. I hope that what you are doing isnt horrible or really unsafe. I would die if you died i just wouldnt be able to do it.

That dream you had was beautiful and I cant wait until the day that does happen. And it will I promise you that.

OMG i cant wait until farming season starts either. Its going to be so much fun teasing them and getting them all worked up so they can fuk the SHIT otta me.

Can you please send that frame to me with that poem. I really want to wake up every morning and look at that to remind me of how much that I have.

Well i love you and that will never change. Please be safe. I love you email me as soon as you can.

21. Forensic Examiners discovered a series of emails dated on or about May 28, 2008, between JUVENILE 1 and the person known as Rael Domingo and also known as "C," further showing the sexual exploitation of JUVENILE 1. These emails include the following:

(a) Rael Domingo "[REDACTED]" wrote to JUVENILE 1, in part:

Did you fuck [JUVENILE 2] already today? If you didn't please do it tonight and the make sure you get some from [REDACTED] too. Love you. Keep an eye on him because he seems weird tonight. Really come on to him hard and make him feel good.

(b) JUVENILE 1 responded to this email, in part as follows:

From: [JUVENILE 1] & [JUVENILE 1 email address]

Subject: Phones and stuff

To: [REDACTED]

C you really need to do whatever you can to stop people from fucking my dad over that just cant happen. If anything happens [ ] will be at my door step within 5min of him knowing and you know that for a damn fact. I will keep an eye on him real good, you need to also and you need to keep a real good eye on the phone company. You need to have people working around the fucking clock on this... Do you understand?? Thats like somebody trying to kill ash or something you would never let that happen to her so don't let this or anything else happen to my dad. I want up dates on everything and i would like them to be good updates please.

Yes I got fucked by [JUVENILE 2] right before [REDACTED] got home we did it in the bathroom and I was on my knees and he blew his load all over my back. I will get some from [REDACTED] tonight tho.

(c) In another email exchange between Rael Domingo (using email address "[REDACTED]") wrote to JUVENILE 1, in part:

"Did you cum when [JUVENILE 2] fucked you today? Do you talk dirty with him or not? What do you say? Does he ever spank you anymore?"

(d) In a reply to this email, JUVENILE 1 wrote on May 28, 2008 at 7:33 p.m.:

"Yha i did cum. I said fuk that pussy and use me like as slut, get that cock off. Yah he spanking me more than usual also."

22. Forensic Examiners also discovered data which shows that on June 16, 2008, JACQUES ordered sexual items from a online business using the website "extreme restraints." Subsequent investigation revealed that JACQUES placed an order, which totaled \$1033.45, to "orders@extremerestraints.com" for the following items:

- 1 x The Kong Vac-U-Lock Dildo
- 1 x Waist Bar for Doggy Style Fuck Machine
- 1 x Doggy Style Fuck Machine

The delivery and billing addresses were listed as Mike Jacques, [REDACTED] East Bethel Road Randolph Center, Vermont.

**2. Emails Recovered From JACQUES Laptop Computer Showing BENNETT Was Abducted**

23. On June 28 and June 29, 2008, Forensic Examiners conducted a forensically correct examination of the hard drive on JACQUES laptop computer and recovered several emails that show BENNETT was abducted. Among the emails recovered are the following:

- (a) A June 20, 2008 email from the person known as Rael Domingo and also known as "C" to JUVENILE 1:

— On Fri, 6/20/08, Rael Domingo <[REDACTED]> wrote:

From: Rael Domingo <[REDACTED]>

Subject: Update

To: [JUVENILE 1 email address]

Date: Friday, June 20, 2008, 5:56 PM

Hey girl-

I am glad to see that you are trying to keep [REDACTED] calmed down. His anxious I know, but I want to make sure this goes right.

I am a little concerned that you aren't quite ready for this yet. Please do whatever you need to do in your head to get ready for this. Just remember the reasons why it must be done and remember that it will go PERFECTLY if everyone does what they are suppose to do.

I want to know if you are willing to help [REDACTED] with the take-down and the tie up on Wednesday morning when you get back from Cumberland Farms. He can do it himself for sure, but I think it would just be easier on him if you helped. I'm thinking that you could help hold her down or whatever while he gets her all bound up and ready to go upstairs. If you are really against it, let me know now, but I think you can handle it. The best thing is if the take down is quick and quiet and the best chance of that is if you help. I suppose I could just have him tase her and knock her down then do it himself, but that is a little more tramatic than I wanted her to experience that early in the morning . . . . she will have enough of that later.

Let me know

C

- (b) A June 21, 2008 reply email from JUVENILE 1 to the person known as Rael Domingo and also known as "C":

Date: Sat, 21 Jun 2008 11:34:25 - 0700 (PDT)  
From: [JUVENILE 1 email address]  
Reply-To: [JUVENILE 1 email address]  
Subject: Update  
To: [REDACTED]

yes I will help out [REDACTED] witht [sic] the tie down

- (c) A June 20, 2008 an email from a person using email address "Chevy Pickup" <[REDACTED]> to JUVENILE 1 states:

Friday, June 20, 2008 2:02 PM  
From: Chevy Pickup <[REDACTED]>  
To: [JUVENILE 1 email address]

No that's not so bad. At least he was smart enough to say 14! Pretty cool actually, most [REDACTED] wouldn't have been smart enough to realize something was going on and would have blown it for you. Those two, Kevin and raker, are both still wicked hot for you that's why they always seem to be hanging around in the fields as much as they can. They looking for more teasing for sure. I told dad to talk to them next time he sees them and put in a good word for you and maybe that will help get them jumpstarted right to you.

I suppose you already heard, but C wants to postpone Monday now until Wednesday or Thursday. I kind of agree because that way you won't have to worry about you aunt

showing up or anything, plus the cunt Savanna works those days too. [REDACTED] is ripshit because he is about to lose his fucking mind because he just wants it over with. I understand him, but its better to wait until we are more sure of safety for you and him than if we rush it and a mistake is made and things go bad.

You will be getting texts on your phone that look like they are from Sam. The will say basically that he is begging you to move the date of the party from Monday to either Wednesday or Thrusday becasuse he can't make it Monday and he is wicked excited to see Brooke and hang with her. I want you to forward those messages to Brooke's cell so that she can see that he is dying to hang with her and so that you can ask her if Wednesday or Thursday works for her and she could just stay over the night before the party.. It will give you an opportunity to say. . . see Brooke I told you he is all about you right now, [JUVENILE 2] says he talks about you and the party all the time lately.

I will know about tomorrow later this afternoon. Corey has been bugging me about it too. Did you hear about his eye? Guess he will be ok though.

Love you forever babe!

Your Throbbing Man

(d) Later on June 20, 2008, another email to JUVENILE 1 from email address "Chevy Pickup <[REDACTED]>".

Friday, June 20, 2008 5:50 PM

From: "Chevy Pickup" <[REDACTED]>

To: [JUVENILE 1 email address]

We have just run into some unexpected problems. We will get them worked out over the weekend babe, tell [REDACTED] to relax. C is very aware that he is freaking out and worried and wants the thing over, believe me we all do. But C is not going to risk either of you or us or Breckenridge being in danger.

Unfortunately that means we will not be able to get together this weekend. I won't even be in town until Monday night now, unless we can get the problem sorted out before that. Please let Corey know that I will see him, just can't be this weekend. I am hoping that Monday or Tuesday night we can get together and C has said that, right now, we still can.

If you haven't already done so, please call Brooke and let her know you have forwarded texts to her from Sam. I you get any replies from her, or if she says anything when you talk to her, either forward that to [REDACTED] or send me an email and let me know. Hopefully when you sent her the texts you said you got them from Sam. You should let her know when you talk to her tonight that he has been bugging you all day to change the date

because the REALLY wants to spend the day with her. An especially make sure that you tell her that he is planning on coming real ready in the morning, like around 8am at the latest, to help set up and get ready for the party. Say he said that way he gets more time to be around her.

I love you babe but things are just so crazy around her right now. I definately couldn't [sic] do this part of the job for a living that's for sure!  
Did you get laid on your little walk with [JUVENILE 2]? Hope so :)

Love You.

(e) A June 20, 2008 reply email from JUVENILE 1 stating: "[REDACTED] said that C hasnt let him know yet if him and mom can go away this weekend."

24. An earlier email exchange, on May 28, 2008, between JUVENILE 1 and "C," also known as Rael Domingo, provides further evidence of the plan to abduct and injure BENNETT.

During this email exchange, "C," also known as Rael Domingo, wrote, in part:

We got some problems with the phones again and I think those dudes are getting ready to fuck your [REDACTED] over. We need to be extra careful about things. I am worried about him. Please come up with a plan that make it so that Nobody knows were she is. [REDACTED] gets to have a least a few hours with her. You get time with her if you want. Let me know what you come up with. We need to get with this program soon. I would like to have it done before June 7<sup>th</sup> if possible. If not we will have to wait until at least the 16<sup>th</sup> for obvious reasons that you already know about.

25. In response to this email, JUVENILE 1 wrote, in part:

iDk how to get the problem to you really. I guess you could have some hot guy pick her up adn[sic] say that he is going to fuck her at his house then he brings her to his house, which is really to you. [REDACTED] could get with her for a couple of hours by saying that he was down at Vesper, and while he was down playing golf before that he was at these places from a certain time to another certain time. You could send him on a business trip even. I am still not sure yet if I really want time with her. I just want her to suffer and she pissed in her mouth and see how she likes it. Please email me back adn[sic] and tell me if yu like it yes or no and if you do then what could be better and if No then maybe an outline or idea. I LOVE YOU. Keep my dad, me and my family safe please.

3. **Data Recovered From JACQUES Laptop Computer Showing the Planting of Evidence To Conceal JACQUES' Role in BENNETT's Abduction.**

**a. Data Recovered From JACQUES' Laptop Computer Showing Postings to BENNETT's My Space Page**

26. As set forth in paragraph 18 of this affidavit, on the day BENNETT was reported missing to the VSP, JACQUES directed a VSP Detective to a posting on BENNETT's My Space page, which suggested that BENNETT had left to meet someone she had met online. On June 29, 2008, Forensic Examiners recovered data from JACQUES' laptop computer showing that the My Space posting set forth in paragraph 18 of this affidavit was initially posted from JACQUES'S laptop computer on June 24, 2008 at 11:40:35 p.m. Data recovered from the JACQUES' laptop computer further reveals that this posting was edited and reposted from that computer on June 24, 2008 at 11:52:37 p.m. and again on June 25, 2008 at 10:36:40 p.m.

**b. Data Recovered From JACQUES' Laptop Computer Showing the Planting of Evidence**

27. As set forth in paragraph 5 of this affidavit, on June 26, 2008 – the day after BENNETT's disappearance – JACQUES notified the Vermont State Police that he had located a sneaker by the side of a road in Brookfield, Vermont. VSP Detectives later located other items in a wooded area near where the sneaker was located. The sneaker was identified by JACQUES as belonging to BENNETT. The other items were a white handkerchief containing confirmed human blood and semen, and a pair of torn girl's underwear, found in close proximity to the white handkerchief. Also located in the general area was a plastic sandwich bag.

28. On June 28, 2008, Forensic Examiners recovered several emails which show that the participants in the kidnaping plan manufactured and planted this evidence to conceal their

roles in BENNETT's abduction. On June 23, 2008, the following email exchange took place between a person using the email address "[REDACTED]" and JUVENILE 1:

--- On Mon, 6/23/08, Chevy Pickup <chvy\_21@yahoo.com> wrote:  
From: Chevy Pickup <[REDACTED]>  
Subject: Today  
To: [JUVENILE 1 email address]  
Date: Monday, June 23, 2008, 1:34 PM

Get [JUVENILE 2] to cum on your stomach. Then immediately wipe it up with a CLEAN, PLAIN handkerchief. Then put the handkerchief into a plastic sandwich bag and seal it up and hide it. Text me when it's done and simply say "it's done". Very important, thanks.

Date: Mon, 23 Jun 2008 10:41:16 -0700 (PDT)  
From: "[JUVENILE 1]" [JUVENILE 1 email address]  
Subject: Re: Today  
To: "Chevy Pickup" <[REDACTED]>

babe [JUVENILE 2] just left like 20min ago to go to work.  
I can probaly do it later tonight tho.

F. Evidence that JACQUES was the Author of the [REDACTED] and [REDACTED] emails

29. Information supplied by Yahoo and Comcast, as well as other information from the investigation, suggests that JACQUES was using the "internet identities" of [REDACTED] and Rael Domingo in order to manipulate JUVENILE 1 for purposes of his sexual exploitation plans and the kidnaping plan.

30. Records from Yahoo and Comcast show that these email accounts have only been accessed from two locations, JACQUES' home and his work in West Lebanon, NH. Moreover, on several occasions, the email accounts were accessed from the same location (either the home or the business) immediately after each other.

G. Statements Made by JUVENILE 1 on June 29



31. On the afternoon of June 29, investigators again interviewed JUVENILE 1. During this interview, she gave a number of conflicting statements and initially continued to deny any role BENNETT's disappearance, but after being confronted by some of the emails described above, she admitted that she had participated in helping JACQUES get BENNETT to JACQUES' residence on June 25<sup>th</sup> after BENNETT went to the Cumberland Farms.

32. During the interview, she stated that she had been involved in sex with JACQUES since she was nine years old. She said that when she was nine she got a phone call and a note under her pillow that said that she had been chosen to be in a program for sex called "Breckenridge." She was told that her "trainer" was [ ], JACQUES. She further explained the "Breckenridge" program. She said that in order to graduate she had to attain 75% on how you perform. She said that she was now at 50%, and that men tell her what to work on. She received phone calls and emails from "Breckenridge" with directions, including directions about sex.

33. She said that she understood the emails from Chvy\_21 and the identity [REDACTED] to be emails from "Breckenridge." She said that she had never met or had sex with the man using Raueldom. She said that she had sex once with the person using the [REDACTED] identity, but that she had been drugged and could not identify the man.

34. She said that after dropping BENNETT off at the Cumberland Farms on June 25, she and JACQUES soon picked up BENNETT, who had been falsely told that she would be going to party. JUVENILE 1 said that she understood that BENNETT would be taken into the "Breckenridge" program that day, and that she would have sex with adult males. She said that she, BENNETT, and JACQUES then went to JACQUES' home, where the two girls watched

television for a while. According to JUVENILE 1, JACQUES eventually asked BENNETT to go upstairs in the house with him. JUVENILE 1 did not see BENNETT again. She soon left the home at JACQUES direction. She was driven away by [ ] JUVENILE 2, who did not go into the house. She was directed to lie about what happened that day by JACQUES.

35. She also admitted that she had followed the direction to have JUVENILE 2 ejaculate and to collect his semen on a clean handkerchief. She said that JUVENILE 2, [ ], is not part of "Breckenridge."

Dated at Burlington, in the District of Vermont, this \_\_\_\_ day of July, 2008.

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Daniel Rachek  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this \_\_\_\_ day of July, 2008.

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WILLIAM K. SESSIONS III  
Chief United States District Court Judge