UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

V.

CASE NO. 8:21-cr-343-SDM-AAS

DEANNA MARIE STINSON

NOTICE OF MAXIMUM PENALTIES, ELEMENTS OF OFFENSE, PERSONALIZATION OF ELEMENTS AND FACTUAL BASIS

The United States of America, by Roger B. Handberg, United States Attorney for the Middle District of Florida, hereby files this Notice of Maximum Penalties, Elements of Offense, Personalization of Elements and Factual Basis, stating as follows:

ESSENTIAL ELEMENTS

The essential elements of a violation of 18 U.S.C. § 1958(a), murder-for-hire, are as follows:

<u>First</u>: The defendant used the mail or any facility of interstate or foreign

commerce;

Second: The defendant did so with the intent that a murder be committed

in violation of the laws of Florida; and

Third: As consideration for the receipt of, or as consideration for a

promise or agreement to pay, anything of pecuniary value.

PENALTY

The penalty for the offense charged in Count One of the Indictment is not more than 10 years of imprisonment, up to three years of supervised release, and a \$250,000 fine.

FACTUAL BASIS

From an unknown date, but at least beginning on or about June 24, 2021, defendant DeAnna Marie Stinson attempted to hire a hitman on a dark web website ("The Website") to kill the spouse of the defendant's former boyfriend. The Website purports to provide hitman services and collects payment via Bitcoin. The Federal Bureau of Investigation obtained information associated with the defendant's account on The Website and learned that the defendant had paid over \$12,000 in Bitcoin to The Website for the purpose of ordering a hitman. Specifically, on or about July 30, 2021, the defendant placed the following order on The Website:

Order Name: [Victim 1's Name] Address: [Victim 1's Address]

"Do not do at the home. Any place else is fine. Need completed during July - preferably, between July 5th - 11th"

In addition to the "order" described above, the defendant placed four additional orders. Like the first order, the four subsequent orders also included the name, address, and a photograph of the victim. The orders included the following descriptions:

1) **July 15, 2021 - Order #2**. Description: "Do not do at the home. Any place else is fine. Need completed during July. Bonus if completed by July 31st"

- 2) **July 17, 2021 Order #3**. Description: "Do you have a preferred escrow service? I am ready proceed. Can we get this done by month end?"
- 3) **July 17, 2021 Order #4**. Description: Do you have a preferred escrow service? I am ready to proceed. Can we get this done by month end? The escrow account is set up on Coinsavr. Please advise as to your Username."
- 4) **July 22, 2021 Order #5**. Description: "Do not do at the home. Any place else is fine. Need completed during July. Bonus if completed by July 31st"

The FBI obtained records from the defendant's virtual currency exchange service provider, which showed that the defendant had in fact paid Bitcoin to The Website. An undercover FBI agent ("UC") contacted the defendant on WhatsApp via text message and recorded phone call. The UC sent the defendant a text message containing a staged surveillance photo of Victim 1 and the defendant confirmed that it was the same person she wanted to have killed. During the subsequent recorded phone call, the defendant again confirmed her desire to have Victim 1 killed, indicating that she would not have regrets or change her mind. The UC stated he would need money to purchase a weapon. Stinson agreed and sent the UC \$350 via bitcoin for the purpose of purchasing a revolver to complete the murder.

On or about September 23, 2021, the FBI executed a search warrant for the defendant's Tampa residence and arrested her via a criminal complaint. During a post-*Miranda* interview, the defendant admitted that it was her voice on the recorded call with the UC.

FBI agents seized two laptops, a desktop computer, and an Apple iPhone XR from the defendant's residence. A review of the defendant's iPhone revealed the Coinbase application and recent transactions with bitcoin addresses associated with The Website, as well as WhatsApp messages between the defendant and the UC. Agents also found a handwritten note inside the defendant's purse that listed her unique username on The Website, login information for a Bitcoin escrow account that the defendant had referenced in her communications with administrators of The Website, and her login information for her Coinbase account.

Respectfully submitted,

ROGER B. HANDBERG United States Attorney

By: _/s/ Lisa M. Thelwell_

Lisa M. Thelwell
Assistant United States Attorney
Florida Bar No. 100809
400 N. Tampa Street, Suite 3200
Tampa, Florida 33602-4798
Telephone: (813) 274-6000

Facsimile: (813) 274-6358 E-mail: lisa.thelwell@usdoj.gov

U.S. v. DeAnna Marie Stinson

Case No. 8:21-cr-343-SDM-AAS

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Alec. F. Hall, Federal Defender

/s/ Lisa M. Thelwell

Lisa M. Thelwell Assistant United States Attorney Florida Bar No. 100809 400 N. Tampa Street, Suite 3200 Tampa, Florida 33602-4798 Telephone: (813) 274-6000

Facsimile: (813) 274-6358 E-mail: <u>lisa.thelwell@usdoj.gov</u>