

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Michigan

United States of America
v.

Case No. 1:23-mj-312

Rashad Maleek Trice

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 July 2, 2023 in the county of Ingham in the Western District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1201(a)(1) and 2, 18 U.S.C. § 1201(a)(1) and (g)(1), Kidnapping Resulting in Death, Kidnapping a Minor Victim.

This criminal complaint is based on these facts:

See attached continuation

Continued on the attached sheet.

The Court processed the complaint remotely. The Court verified the Affiant's identity (by AUSA confirmation and through Affiant self-identification). Affiant attested to the affidavit and complaint via telephone, which the AUSA transmitted by remote electronic means (e-mail). The Court signed the original complaint and transmitted a correct copy of same to the Applicant, via the AUSA, by remote electronic means (e-mail). The process complied with Rules 3 and 4.1.

Handwritten signature of Christopher J. Rodolico

Complainant's signature

Special Agent Christopher J. Rodolico, FBI

Printed name and title

Date:

Handwritten signature of Ray Kent

Judge's signature

City and state: Grand Rapids, Michigan

Ray Kent, U.S. Magistrate Judge

Printed name and title

CONTINUATION IN SUPPORT OF APPLICATION
FOR CRIMINAL COMPLAINT

I, Christopher J. Rodolico, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2009 and am currently assigned to the Detroit Division, Lansing Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to crimes against children, to include kidnapping cases. I have gained experience through training and everyday work relating to federal violations relating to crimes against children.

2. I have received training in the area of kidnapping and child exploitation. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 1201. I am authorized by law to request a criminal complainant and arrest warrant.

3. This continuation is made in support of an application for a criminal complaint and arrest warrant for **Rashad Maleek Trice** (date of birth */*/1996)¹ for violations of 18 U.S.C. § 1201(a) and (g) (Kidnapping of a minor) and 18 U.S.C. § 1201(a) (Kidnapping resulting in death).

¹ Trice's date of birth is known to me, but I am not disclosing it to protect his personally identifiable information.

4. The statements contained in this continuation are based in part on information provided by law enforcement agents, written reports about this investigation that I have received, directly or indirectly, from other law enforcement agents/officers, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent. Because this continuation 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 probable cause that **Trice** has violated Title 18 U.S.C. § 1201(a) and (g), kidnapping of a minor and § 1201(a), kidnapping resulting in death.

II. PROBABLE CAUSE STATEMENT

5. On July 2, 2023, at around 11:19 p.m., the Lansing Police Department (LPD) responded to a call of a stabbing that had occurred at 3021 BeauJardin Dr, Apartment 107, Lansing, Michigan. The complainant² reported that she had been in an altercation with her ex-boyfriend **Rashad Maleek Trice**. In self-defense, the complainant stabbed **Trice**. **Trice** then stabbed the complainant multiple times and sexually assaulted her. The complainant fled the residence.

6. When the complainant fled the residence, she went to her mother's

² The identity of the complainant is known to me, but I am not including her name to protect her identity.

apartment in the same apartment complex. She left her two-year-old female child (MV1) and her one-year-old male child behind. The complainant reported to law enforcement that MV1 was wearing a white t-shirt with a rainbow pattern when she last saw her.

7. The complainant advised that MV1 is not **Trice**'s biological child, and that **Trice** has no parental rights to MV1. The complainant advised **Trice** is the biological father of her one-year-old minor male child.

8. When LPD checked the residence, **Trice** and MV1 were not present. The minor male was still in the apartment.

9. LPD discovered that **Trice** had stolen a 2013 white Chevrolet Impala that was registered to the complainant's mother. An Amber Alert was subsequently issued for MV1 on July 3, 2023, at around 2:41 a.m. when she could not be located. The Amber Alert included the description of the 2013 white Chevrolet Impala.

10. On July 3, 2023, at around 4:50 a.m., a St. Clair Shores Police Officer, conducting routine patrol in the area of 9 Mile Road in St. Clair Shores, Michigan, identified the white Chevrolet Impala and attempted to stop the vehicle. The driver of the vehicle attempted to flee the stop and crashed into another police vehicle after a brief chase. After the crash, the driver attempted to disarm a police officer and was arrested. The driver was identified as **Trice** and MV1 was not in the Chevrolet Impala.

11. On July 3, 2023, FBI searched the White Chevrolet Impala and found a significant amount of blood was present in the vehicle consistent with **Trice's** stab wounds. DNA samples were collected and analysis is ongoing. Portions of a pink cell phone charging cord were located in the vehicle.



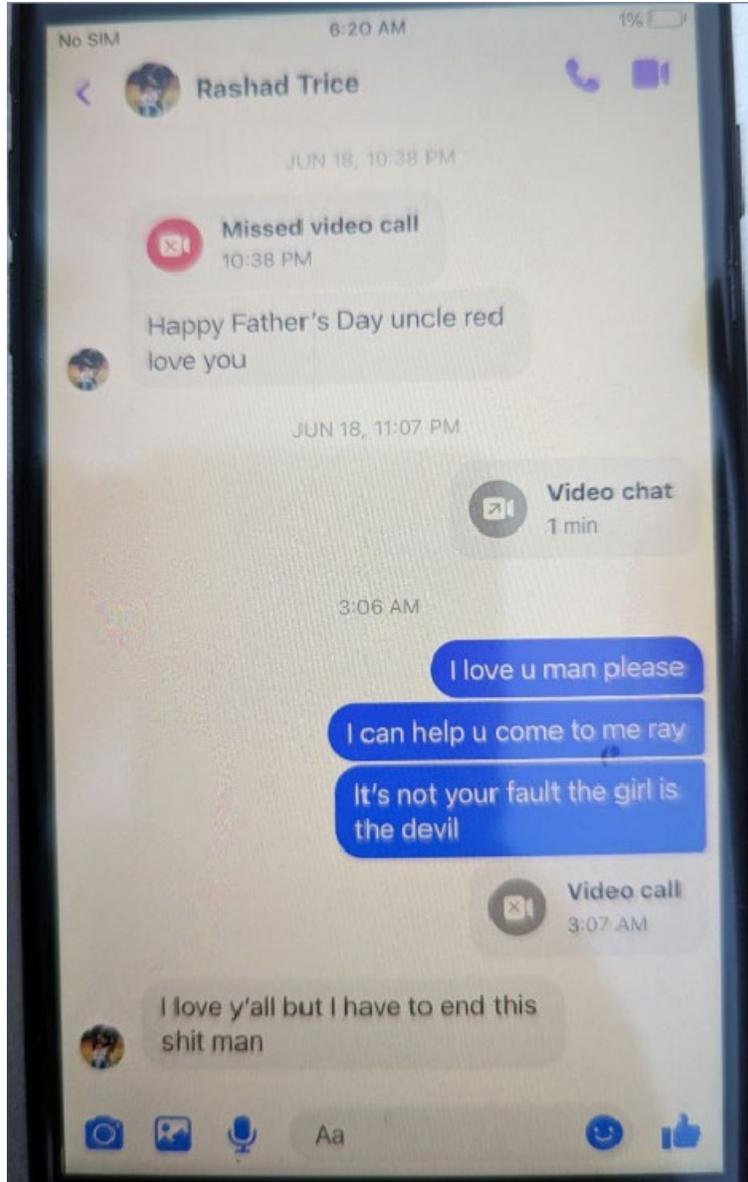
Driver's side area of Chevrolet Impala, with pink cord on floorboard.



Close up of pink cord on floorboard of the Chevrolet Impala.

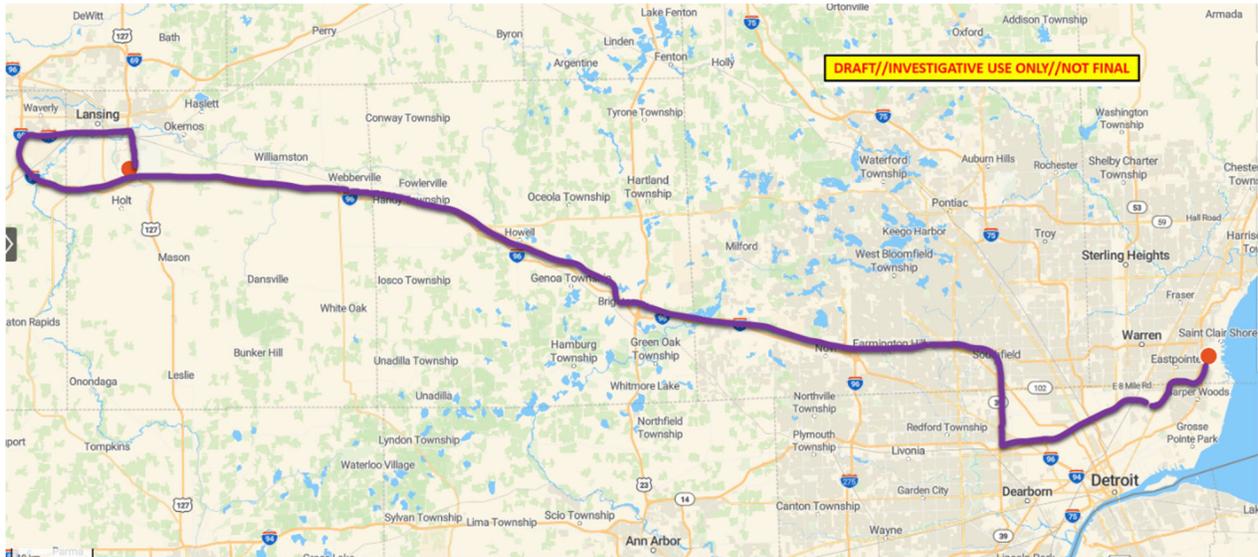
12. **Trice** was transported to the hospital and treated for his stab wounds. **Trice** was given his *Miranda* rights and he agreed to answer questions. **Trice** stated that he never took MV1 and that he last saw MV1 with her mother, the complainant. Agent's note: Law enforcement searched the complainant's residence and her mother's residence and MV1 was not found. Searches were also done of the surrounding area and no evidence of the missing child was found.

13. The FBI interviewed **Trice's** uncle and obtained a screenshot of a text message conversation between **Trice** and the uncle. See below.



*Text message conversation with **Trice's** uncle*

14. A review of cell site information showed that **Trice's** cellular phone traveled from Lansing, Michigan to Detroit, Michigan. The below map is a draft version of the path believed to be taken by **Trice**, based upon collective information, and was used to identify locations to be searched by law enforcement and to assist in investigative efforts.



15. Cumulative data collected by law enforcement, to include cell site location data for **Trice's** phone, license plate readers, and collected video surveillance footage, led law enforcement to conduct searches in numerous areas, to include the area of Erwin Avenue, Detroit, Michigan. On July 5, 2023, law enforcement personnel were deployed to the area and initiated a search. At approximately 6:50 p.m., the body of MV1 was discovered in an alley between Olympia Street and Edgewood Avenue near Erwin Avenue.

16. MV1's cause of death appeared to be strangulation with a pink cell phone charging cord, that was recovered with the body. The pink cell phone charging cord was consistent with the pink cord parts recovered from the Chevrolet Impala. A medical examiner's final report of the cause of death is still pending.

17. MV1 was visually identified by law enforcement after being compared with known photographs. MV1 was found wearing a white t-shirt with a rainbow

pattern, that was consistent with what the complainant reported MV1 was wearing when she was last seen.

18. On July 4, 2023, an FBI Agent interviewed **Trice**, who was *Mirandized* and agreed to speak to the FBI. **Trice** admitted that he and the complainant had been arguing about money on July 2, 2023, and the argument became violent which resulted in **Trice** and the complainant stabbing each other. **Trice** also admitted that he was aware of the Amber Alert. **Trice** stated, words to the effect of, “I am already a monster.” **Trice** also stated that he wanted to kill himself. As part of a ruse during the interview, the FBI Agent informed **Trice** that video surveillance showed **Trice** and MV1 in the vehicle together. **Trice** stated that if law enforcement showed him the video surveillance footage, then **Trice** would be forced to admit his involvement.

19. The Vehicle Identification Number (VIN) of the vehicle showed that the 2013 white Chevrolet Impala was manufactured in Canada. Based on the collective location data, there is probable cause to believe that **Trice** traveled with MV1 on interstate highways including Interstate 96.

20. Based on my training and experience there is probable cause to believe that MV1 was kidnapped from her home and transported to Detroit. There is probable cause to believe that MV1 was murdered by **Trice** and left in the alley, where her body was discovered.

III. CONCLUSION

21. Based on the foregoing, there is probable cause to believe **Rashad Maleek Trice** has violated 18 U.S.C. § 1201(a) and (g) (Kidnapping of a minor) and 18 U.S.C. § 1201(a) (Kidnapping resulting in death).