

**UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI**

Affidavit

I, Charles Root, a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

1. I have been employed as a police officer with the City of Joplin, Missouri, since November 2004 and a sworn law enforcement officer since 1994. I am currently a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) Cyber Crimes Task Force in Joplin, Missouri. I have been assigned to investigate crimes against children. I have gained expertise in the conduct of such investigations through training in seminars, classes, and everyday work related to conducting these types of investigations. I have attended training provided by the FBI Cyber Crime Division, the FBI's Regional Computer Forensic Laboratory, and the Missouri Internet Crimes Against Children (ICAC) Task Force. I am also assigned to the Southwest Missouri Cyber Crimes Task Force.
2. As a TFO, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. The statements in this affidavit are based on my personal observations, my training and experience, my investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation. I have set forth

the facts that I believe necessary to establish probable cause to believe that Lasonya Poindexter has violated 18 U.S.C. §§ 1201(a)(1) and (d), that is, attempted kidnapping.

STAUTORY AUTHORITY

4. 18 U.S.C. § 1201(a)(1) prohibits any person from unlawfully seizing, confining, inveigling, decoying, kidnapping, abducting, or carrying away and holding for ransom or reward or otherwise any person, or attempting to do so, except in the case of a minor by the parent thereof, which occurs when the person is willfully transported in interstate or foreign commerce, regardless of whether the person was alive when transported across a State boundary, or the offender travels in interstate or foreign commerce or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense..

PROBABLE CAUSE

5. On July 20, 2017, Ashley (hereinafter “Ashley”) and Christian Still (hereinafter “Christian”) went to the Joplin, Missouri, Police Department (JPD) to report that their babysitter, Lasonya Poindexter (hereinafter “Poindexter”), had attempted to take their five-month-old child, Jane Doe 1, by giving her up for adoption. Ashley stated that on July 20, 2017, she was contacted by Laura Parton (hereinafter “Laura”) through Facebook. Laura sent Ashley a private message on Facebook, asking Ashley if she truly wanted to put Jane Doe 1 up for adoption. Laura told Ashley that she and her husband were planning to adopt

Jane Doe 1 through Poindexter. Ashley told Laura that she and Christian had never put Jane Doe 1 up for adoption and never intended to do so. Laura told Ashley that Poindexter had been taking Jane Doe 1 to Laura's home in Arkansas to prepare for the adoption. Ashley stated that she and Christian confronted Poindexter, but Poindexter denied the allegations, claiming that Laura was the current girlfriend of her ex-boyfriend who was trying to ruin her daycare business.

6. On July 20, 2017, JPD Detective Phillip Beckham and Division of Family Services (DFS) Investigator Britnay Kirkland contacted Ashley and Christian at their home in Joplin, Missouri, for further investigation. Ashley stated they found Poindexter through a Facebook babysitter page, and Poindexter had watched Jane Doe 1 and their son, John Doe, since April 2017. Ashley stated that Poindexter ran the day care out of her home in Joplin, Jasper County, Missouri. Ashley stated that Poindexter had a sister who helped take care of the children in the daycare. Ashley stated Jane Doe 1 and John Doe would go to Poindexter's house a few days a week. Ashley would provide clothing, diapers, and formula for the kids; however, Poindexter did not return all the items and Poindexter had kept some of Jane Doe 1's clothes and bottles Ashley had provided at Poindexter's residence. Even though Ashley provided the necessary items, Poindexter also bought Jane Doe 1 formula, clothes, and diapers. Ashley and Christian had not asked Poindexter to buy the additional items, nor had they

paid for them. At the time, Ashley was unsure why Poindexter was buying the additionally items and keeping some of the items she had provided.

7. When asked if Ashley and Christian had given Poindexter permission to take their children anywhere, Ashley stated that they had given Poindexter permission to take Jane Doe 1 and John Doe to a play place in Carthage and Seneca, Missouri. On one occasion, when Ashley went to pick-up Jane Doe 1 and John Doe from Poindexter's home, John Doe was there, however Jane Doe 1 and Poindexter were not there. Poindexter's sister told Ashley that there were not enough car seats, so they had to make two trips to bring all the children back from the play place in Carthage or Seneca to Joplin. However, Jane Doe 1 and Poindexter did not arrive back to Poindexter's residence until 10:30 p.m. that night, hours after John Doe.
8. After speaking with Ashley and Christian, Detective Beckham and DFS Investigator Kirkland contacted Poindexter at her residence in Joplin, Jasper County, Missouri. After Detective Beckham knocked on the door several times, Poindexter finally came to the door and stepped outside. Detective Beckham asked her if she knew why he was there. Poindexter stated it was because her 16-year-old sister, Jane Doe 2, sent messages on Facebook to Laura. Poindexter stated Laura was Lisa Pack's (hereinafter "Pack"), best friend. Pack was Poindexter and Jane Doe 2's aunt. Poindexter stated that the messages Jane Doe 2 sent to Laura, lead Laura to believe Jane Doe 1 was up for adoption. Poindexter stated that they had visited Pack's house in Lincoln, Arkansas, one

time, and that they had taken the kids with them. Poindexter stated Laura was at Pack's house on that occasion. Poindexter denied ever meeting with Laura about an adoption.

9. DFS Investigator Kirkland asked Poindexter how she knew that Jane Doe 2 had sent messages to Laura. Poindexter said that Jane Doe 2 sent the messages through Poindexter's Facebook account under the name "Sonya Bailey." Poindexter stated that she did not get on Facebook very often, but she found the messages between Jane Doe 2 and Laura when she got on one day. Poindexter stated that Jane Doe 2 told her about the messages on July 18, 2017. Poindexter provided written consent to search her Facebook accounts, "Sonya Faye" and "Sonya Bailey." Poindexter also provided the passwords for both of her Facebook accounts; however, when law enforcement attempted to log on to those accounts, the passwords Poindexter provided were not correct.
10. Detective Beckham and DFS Investigator Kirkland spoke with Jane Doe 2. Jane Doe 2 stated she had moved in with Poindexter over a month ago. When asked about the messages sent to Laura, Jane Doe 2 stated she had sent the Facebook messages to Laura as a "practical joke." Jane Doe 2 then stated she sent the messages to try and help Laura by showing her that she could adopt a baby. Jane Doe 2 stated she had sent the messages to Laura using Poindexter's Facebook account. Jane Doe 2 stated she used Poindexter's phone, that was at Poindexter's residence, to send the messages, and she sent the messages while at Poindexter's residence. Jane Doe 2 stated that she used Poindexter's Facebook account

because Poindexter was already Facebook friends with Laura. Jane Doe 2 stated she had never spoken with Laura face to face about the adoption. Jane Doe 2 stated she was not sure which Facebook account of Poindexter's that she used to send the messages to Laura.

11. On July 21, 2017, Detective Beckham met with Laura and her husband, Garry Parton (hereinafter "Garry"), at their home in Lincoln, Arkansas. Laura stated that she was first contacted by Poindexter at Pack's house in June 2017. Poindexter asked Laura if she would be interested in adopting Jane Doe 1. Poindexter told Laura that Ashley had left Jane Doe 1 at her house, and Ashley wanted Poindexter to find a home for Jane Doe 1 because she was the product of a rape. Poindexter claimed that Jane Doe 1 had a grandmother, but that the grandmother was not able to care for Jane Doe 1. Because there was no family to care for Jane Doe 1, Ashley wanted a closed adoption so she would not know who was adopting Jane Doe 1. Poindexter told Laura that she and Garry would have several visits with Jane Doe 1, and the final visit would be an overnight visit before the adoption paperwork was signed.
12. Laura told Detective Beckham that the first visit they had with Jane Doe 1 was at the Pack's house in June 2017. The visit lasted approximately two to three hours. Poindexter also had four other children with her at the time. Laura stated that the second visit with Jane Doe 1 was on June 28, 2017, at Pack's house. Laura stated that the second visit also lasted approximately two to three hours. On that visit, Poindexter asked for Laura and Garry's full legal names,

birthdates, and address. Poindexter and the Parton's also discussed changing Jane Doe 1's name. Poindexter had one other child with her on the second visit. The third visit with Jane Doe 1 was on July 8, 2017, at Pack's house. The visit lasted two to three hours, and Poindexter had three other children with her on that visit. The Partons' final visit with Jane Doe 1 was on July 15, 2017. Poindexter had four other children with her on the final visit.

13. Laura stated that she and Garry had offered to drive to Joplin, Missouri, to visit Jane Doe 1, but Poindexter always declined their offer to come to Joplin for the visits. Poindexter told Laura and Garry that the adoption would be paid for by Jane Doe 1's grandmother, but later Poindexter stated her fiancée, Terry, would pay for the adoption because he was a doctor. Laura stated that they had not signed any legal documents yet, but Poindexter had sent a photo (screen shot), via Facebook Messenger, of a legal document purported to be from an attorney regarding the adoption. Laura stated that she and Poindexter had exchanged multiple messages via cell phone, and Laura provided written consent to search her cell phone, an LG L8VL.
14. On July 25, 2017, Southwest Missouri Cyber Crimes Task Force (SMCCTF) Officer (TFO) Larry Roller examined Laura's cell phone. He was able to locate multiple Facebook Messenger messages between "Sonya Bailey" and Laura. TFO Roller was also able to locate the messages between Laura and Ashley.
15. On July 26, 2017, Detective Beckham interviewed Pack. Pack stated that Poindexter came to her home in Arkansas and asked if Pack knew of anyone

who wanted to adopt a baby. Poindexter did not have Jane Doe 1 with her on this occasion. Poindexter told Pack that a child had recently been dropped off at her home, and she was told to find a good family for the child. Pack told Poindexter that she did not know of anyone at that time. Pack later learned that her friend Laura suffered a late-term miscarriage. Pack contacted Poindexter and told her that she may know someone who would be interested in adopting a baby. Poindexter brought Jane Doe 1 to Pack's house approximately five times to meet with the Partons. Poindexter told Pack to arrange the visits so that the Partons and Jane Doe 1 would be able to get to know each other. Pack stated that Poindexter usually had some of her own children with her, and the children spoke to Laura as if she was going to be Jane Doe 1's mother. Poindexter told Pack and Laura that Ashley wanted Jane Doe 1 to have a certain number of supervised visits and then an overnight visit. On one visit, Poindexter stated she needed to see Laura's house before the adoption was finalized. Pack started to become suspicious at this point, and Pack gave Poindexter a way out by telling her it was okay if Ashley no longer wanted to go through the adoption. However, Poindexter maintained that Ashley wished to continue the adoption process. When Pack questioned why Partons could not be granted temporary custody, Poindexter told Pack that the court could not grant temporary custody to the Partons because Jane Doe 1 was not in immediate danger.

16. On August 7, 2017, the affiant contacted Laura for a follow-up interview. Laura reconfirmed the details she had previously provided to Detective Beckham.

Laura stated that she and Pack were best friends, and around June 12, 2017, Pack contacted her about possibly adopting a baby. Laura stated that she had just suffered a miscarriage and wanted a baby. Laura stated that she spoke with her husband, Garry, and they agreed to move forward with the adoption. Laura and Garry arranged to meet with Poindexter at Pack's home to discuss the matter further. On or about June 17, 2017, Laura and Garry met with Poindexter and Jane Doe 1 at Pack's residence. Laura stated that Poindexter had driven down to Arkansas from Joplin, Missouri. During this initial meeting, Poindexter and Laura exchanged contact information and befriended each other on Facebook. Poindexter explained to the Partons that Jane Doe 1 was the product of a rape. Poindexter told the Partons that the mother of Jane Doe 1, Ashley, had left Jane Doe 1 at Poindexter's home. Poindexter also told them that Ashley wanted the adoption to be a closed adoption, so that she would not know the names of the adopting parents. Poindexter stated that the adoption was going to be paid for by Jane Doe 1's grandmother, and the adoption would be finalized by July 3, 2017. Laura stated that Poindexter brought Jane Doe 1 to Arkansas approximately five or six times to allow the Partons and Jane Doe 1 to bond. The Partons met with Poindexter and Jane Doe 1 at Pack's residence; however, on one occasion Poindexter brought Jane Doe 1 to the Parton's residence. Laura and Garry had already prepared a nursery room for Jane Doe 1 in their residence.

17. During the adoption process, Poindexter provided Laura with constant updates regarding Jane Doe 1 and the legal process. Poindexter and Laura

communicated mostly through messages via Facebook Messenger. Poindexter also sent numerous images of Jane Doe 1 to Laura via Facebook Messenger. Poindexter referred to Jane Doe 1 as the Parton's daughter. For example, in one message after the Poindexter had taken Jane Doe 1 to the Partons' residence for a visit, the following exchange occurred on Facebook Messenger:

Laura: We didn't want to let her go! Did u like her room?

Poindexter: you are so welcome glad she finally has parents who adore her its been a long road with her she deserves so much more than she is getting...I loved her room it was so amazing u wasn't kidding about it being all ready for her

18. Laura stated that Poindexter had requested money for Jane Doe 1's upkeep, but Garry refused to provide any money to Poindexter until after the adoption was finalized. Laura stated that she and Garry had purchased many items for Jane Doe 1 for use after the adoption.
19. Laura stated that Poindexter began to contradict herself, for example, Poindexter originally said Jane Doe 1's grandmother was going to pay for the adoption but later, Poindexter said her boyfriend, who was a doctor, was going to pay for it. Laura and Garry began to become suspicious that the adoption was not valid. Laura expressed her concerns to Poindexter, however, Poindexter continued to reassure her that the adoption was going to go through. Poindexter sent Laura a Facebook message that stated, "Her grandma said that the lawyer told her that if [Ashley] does not contact within two weeks the grandma can make decisions for her cause that's how Ashley had it wrote up...The grandma said to tell u that

you will have your baby soon she won't stop til she is in your arms she said that's a promise u can take to the bank."

20. In July 2017, Laura logged onto Facebook and viewed the Facebook page of one of Poindexter's older children. Laura noticed that Poindexter's child was Facebook friends with Ashley. Laura viewed Ashley's Facebook page and noticed numerous images of Ashley with Jane Doe 1. Laura contacted Ashley through Facebook Messenger. Laura told Ashley that she and Garry were the ones planning to adopt Jane Doe 1, and Ashley told Laura that Jane Doe 1 was not up for adoption.
21. Laura confronted Poindexter after communicating with Ashley, and Poindexter forwarded Laura a screen shot of an e-mail that appeared to be from David Meyer, an attorney in Joplin, regarding the adoption of Jane Doe 1. The e-mail stated,

Mrs. Poindexter,

I am currently working on the intent to adopt papers for [Jane Doe 1]. In order to complete this document that u ask me to complete I need from you the following details:

Adoptive parents full name.

The name chose for the child.

I am unsure of when u need this document. I was hoping that the grandmother will be available next week as I am intending on meeting with the judge to sign the temporary custody order. Once we have those signed the adoptive parents will have the child in question until this process is complete. Please get back to me with this information as soon as possible. Thank and have a blessed day.

Sincerely,

David Meyers

22. The affiant asked Laura if she had ever seen or spoken with Jane Doe 2, and Laura stated that she had never met Jane Doe 2 or spoken with her. Laura stated that she never communicated with Jane Doe 2 via Facebook, and Laura only ever communicated with Poindexter.
23. On August 7, 2017, the affiant interviewed attorney David Meyer (hereinafter "Meyer"). The affiant asked Meyer if he had ever had a conversation with Poindexter. Meyer stated that he had never represented Poindexter, he had never had any communications with Poindexter, he was not involved with any adoption proceeding with Jane Doe 1 or her family, and he had no information or knowledge regarding the e-mail Poindexter sent to Laura.
24. On August 8, 2017, the affiant conducted a follow-up interview with Pack. Pack again confirmed the details she had previously provided to Detective Beckham. Pack told the affiant that she was under the belief that the adoption was to be finalized in August. Pack stated that Poindexter had shown her a legal document from an attorney, but she could not recall what it stated or who the attorney was. Pack stated that Jane Doe 2 had never come to Arkansas with Poindexter and Jane Doe 1. Pack also stated that she never spoke with Jane Doe 2 about the adoption.
25. On August 9, 2017, the affiant conducted a follow-up interview with Ashley. Ashley reconfirmed the details she provided to Detective Beckham. Ashley reiterated that neither she, nor Christian, had ever given Poindexter, or any other

individual permission to take Jane Doe 1 across state lines to Arkansas. Ashley also restated that they had never put Jane Doe 1 up for adoption, nor had they ever told anyone that Jane Doe 1 was available to be adopted. Ashley stated that Jane Doe 1 was her and Christian's daughter, and Ashley had never told anyone that Jane Doe 1 was the product of rape.

26. The affiant confirmed that Poindexter would have had to cross a state line from Joplin, Missouri, to Lincoln, Arkansas.
27. On September 12, 2017, the affiant applied for and received a federal search warrant for Poindexter's residence in Joplin, Missouri.
28. On September 12, 2017, the affiant went to Poindexter's residence to conduct surveillance prior to executing the federal search warrant. The affiant conducted surveillance for several hours; however, the affiant did not see any activity at the residence. After dark, the affiant did not observe any lights on in the residence.
29. On September 13, 2017, the affiant returned to Poindexter's residence, he was able to look inside the residence through a window, and the residence appeared to have been abandoned. DFS was able to contact Poindexter's ex-husband, Eristis Poindexter (hereinafter "Eristis"). Eristis told DFS Investigator Ashley Adams that Poindexter and their children had moved into his residence approximately a week ago.
30. On September 13, 2017, the affiant, members of the FBI, officers with the JPD, DFS investigators, and members of the SMCCTF responded to Eristis's residence located in Joplin, Missouri. Upon arrival, the affiant made contact

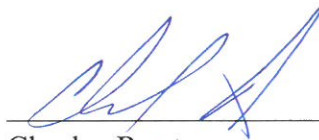
with Eristis in the front yard of his residence. The affiant asked Eristis if Poindexter was there because he wanted to speak with her. Eristis indicated that Poindexter was inside the residence, and he invited the affiant into the residence. Once inside, Eristis told Poindexter that the affiant needed to speak with her. The affiant asked Poindexter if she would be willing to come to the JPD to talk about "the kid case." Poindexter agreed to go with the affiant. Once outside, the affiant placed Poindexter in handcuffs, and the affiant drove Poindexter to the JPD in his unmarked patrol vehicle.

31. Upon arrival at the JPD, Poindexter was taken to an interview room and her handcuffs were removed. The affiant advised Poindexter of her *Miranda* rights. Poindexter agreed to waive her rights, both orally and by written waiver, and to speak with the affiant and SMCCTF TFO Joey Fletcher. Poindexter initially stated that Jane Doe 2 was responsible for everything. After the affiant questioned her further, Poindexter stated that Jane Doe 2 mentioned that Jane Doe 1 would be better off with another family, so Poindexter devised a plan for the Partons to adopt Jane Doe 1. The affiant asked Poindexter how she communicated with the Partons. Poindexter answered that she communicated with the Partons in person while she was in Arkansas. Poindexter stated she also communicated with the Parton's through the video chat function via Facebook and messages via Facebook Messenger. Poindexter stated that she used a cellular telephone to access Facebook video chat and Facebook Messenger. Poindexter admitted that she knew she did not have permission to take Jane Doe

1 outside the state of Missouri, but she had repeatedly taken her to Arkansas. Poindexter stated she lied to Ashley and Christian about the play place in Carthage or Seneca, so that she could take Jane Doe 1 to Arkansas, without them questioning the whereabouts of Jane Doe 1. When questioned about any legal paperwork, Poindexter stated that she had used the Internet to research adoption attorneys in Joplin, Missouri. Poindexter stated after that she found an adoption attorney online and she then created an e-mail from the attorney regarding Jane Doe 1's adoption. Poindexter was shown a screen shot of the e-mail from David Meyer to Poindexter, and Poindexter stated that that was the e-mail she had created. Poindexter stated that she had considered giving the Partons Jane Doe 3, another child she babysat for, but she had not gotten a chance to bring it up after she was confronted by Ashley and Laura.

CONCLUSION

32. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against Lasonya Poindexter, for violation of 18 U.S.C. §§ 1201(a)(1) and (d), that is, attempted kidnapping.



Charles Root
Task Force Officer
Federal Bureau of Investigation

Sworn and subscribed to before me this 14th day of September, 2017



David P. Rush
United States Magistrate Judge
Western District of Missouri