UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| UNITED STATES OF AMERICA |) Criminal No. 25cr10207 |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------|
| v. |) Violations: |
| ERIC SPOFFORD, | Count One: Conspiracy to Commit Stalking Through Interstate Travel and Using a Facility of |
| Defendant. | Interstate Commerce (18 U.S.C. § 371) |
|))))) | Count Two: Stalking Using a Facility of Interstate Commerce; Aiding and Abetting (18 U.S.C. § 2261A(2)(B); 18 U.S.C. § 2) |
| |) Counts Three and Four: Stalking Through Interstate Travel; Aiding and Abetting (18 U.S.C. § 2261A(1)(B); 18 U.S.C. § 2) |

INDICTMENT

At all times relevant to this Indictment:

General Allegations and Overview of the Conspiracy

- 1. Defendant ERIC SPOFFORD ("SPOFFORD") was a resident of Windham, New Hampshire and Miami, Florida. SPOFFORD was the founder of Granite Recovery Centers ("GRC"), a for-profit drug and alcohol treatment company founded in New Hampshire in 2008. SPOFFORD served as GRC's Chief Executive Officer until he sold the company in approximately December 2021. SPOFFORD has since maintained a significant public and online presence that includes a personal website describing SPOFFORD as a "entrepreneur, speaker, coach, recovered drug addict, and student of the game."
 - 2. Eric Labarge ("Labarge") was a resident of Hollis, New Hampshire, and a close

personal associate of SPOFFORD.

- 3. Tucker Cockerline and Keenan Saniatan were New Hampshire residents and acquaintances of Labarge.
 - 4. Michael Waselchuck ("Waselchuck") was a resident of Seabrook, New Hampshire.
- 5. New Hampshire Public Radio ("NHPR") was a news radio organization that broadcasted throughout New Hampshire, as well as portions of Massachusetts, Maine, and Vermont. In addition to producing radio broadcasts, NHPR employed investigative journalists who published written news stories of public interest, primarily on NHPR's website.
- 6. Victim 1 was a senior reporter at NHPR who resided in Melrose, Massachusetts. Victim 1 previously resided in, among other places, Hanover, New Hampshire.
- 7. Victims 2 and 3 were the parents of Victim 1. They resided together in Hampstead, New Hampshire.
 - 8. Victim 4 was a senior editor at NHPR who resided in Concord, New Hampshire.
- 9. Victims 5 and 6 resided together in Hanover, New Hampshire, in a residence formerly inhabited by Victim 1.
- 10. In March 2022, NHPR published an article on its website, authored by Victim 1 and edited by Victim 4, that detailed multiple allegations of sexual misconduct, abusive leadership, and retaliation by SPOFFORD during his time as Chief Executive Officer of GRC. The article garnered significant local and national media attention. SPOFFORD publicly denied the allegations and later sued NHPR for alleged defamation. A New Hampshire judge dismissed SPOFFORD's lawsuit in 2023.

- 11. Beginning in or about March 2022 and continuing through at least May 2022, in response to and in retaliation for NHPR's reporting, SPOFFORD devised a scheme to harass and terrorize Victim 1, Victim 1's immediate family members, and Victim 4 by vandalizing their homes at night with large rocks and bricks, and by spray painting the homes with lewd and threatening language. In order to carry out the scheme, SPOFFORD hired his close friend, Eric Labarge. Among other things, SPOFFORD provided Labarge with the Victims' addresses, gave Labarge specific instructions on how to harass and stalk the Victims, and paid Labarge \$20,000 in cash. Labarge, in turn, obtained assistance from Cockerline, Saniatan and Waselchuck to carry out the stalking campaign.
- 12. The conduct of SPOFFORD and his co-conspirators, caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to the Victims.

Object and Purposes of the Conspiracy

13. The object of the conspiracy was to commit stalking through interstate travel and using facilities of interstate commerce. The purposes of the conspiracy were to harass and intimidate Victim 1, Victim 1's immediate family members, and Victim 4 in response to NHPR's reporting about SPOFFORD, while avoiding law enforcement detection and prosecution.

Manner and Means of the Conspiracy

- 14. Among the manner and means by which the defendant and his co-conspirators carried out the conspiracy were the following:
 - a. Identifying addresses associated with the Victims and their immediate family members.

- b. Acquiring bricks and red spray paint.
- c. Using cell phones and the internet to search for and navigate to the Victims' homes.
- d. Traveling from Massachusetts to New Hampshire, and vice versa, to harass and intimidate the Victims.
- e. Offering and paying money and other things of value to induce other members of the conspiracy to harass and intimidate the Victims.
- f. Receiving money and other things of value from other members of the conspiracy in exchange for vandalizing the Victims' homes.

Overt Acts in Furtherance of the Conspiracy

15. From on or about March 22, 2022, through on or about May 23, 2022, SPOFFORD and others known and unknown to the Grand Jury committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracy:

April 2022

- a. During an in-person meeting on or about April 21, 2022, SPOFFORD provided Labarge with the addresses of Victims 2, 3, and 4, and what SPOFFORD believed was Victim 1's address but, in fact, was the address of Victims 5 and 6. SPOFFORD instructed Labarge to vandalize the victims' homes at night with rocks, bricks and red spray paint.
- b. At approximately 8:03 a.m. on April 22, 2022, Labarge called Cockerline on his cell phone and spoke to him for approximately ten minutes.
- c. On or about the afternoon of April 22, 2022, Labarge and Cockerline met in person and discussed vandalizing the home of Victims 5 and 6 in Hanover, New Hampshire (also Victim 1's former home) with a brick and red spray paint.

- Labarge provided Cockerline with the victims' address, which he had previously received from SPOFFORD.
- d. At approximately 5:26 p.m. on April 22, 2022, Cockerline used Google to search for the address of Victims 5 and 6 in Hanover, New Hampshire.
- e. Between approximately 5:41 p.m. and 7:44 p.m. on April 24, 2022, Cockerline used Google to search for and navigate to the address of Victims 5 and 6 in Hanover, New Hampshire.
- f. On or about the evening of April 24, 2022, Cockerline traveled to the vicinity of the home of Victims 5 and 6 in Hanover, New Hampshire.
- g. On or about the evening of April 24, 2022, Cockerline threw a brick through an exterior window of the home of Victims 5 and 6 in Hanover, New Hampshire, and wrote the word "CUNT" in red spray paint on the front of the home.
- h. At approximately 7:51 a.m. on April 25, 2022, Labarge sent the following text message to Cockerline: "We good ..."
- i. At approximately 9:12 a.m. on April 25, 2022, Cockerline responded to Labarge: "All gravy!"
- j. At approximately 9:31 a.m. on April 25, 2022, Labarge called Cockerline on his cell phone and spoke to him for approximately one minute.
- k. On or about April 25, 2022, Labarge and Cockerline met in Nashua, New Hampshire. Labarge paid Cockerline for vandalizing the home of Victims 5 and 6.
- 1. At approximately 8:44 a.m. on April 22, 2022, Saniatan used Google to search for the address of Victims 2 and 3 in Hampstead, New Hampshire.
- m. Between approximately 8:46 a.m. and 8:53 a.m. on April 22, 2022, Saniatan used Google to search for Victim 4's address in Concord, New Hampshire.
- n. Between approximately 3:02 p.m. and 9:10 p.m. on April 23, 2022, Saniatan used Google to search for the address of Victims 2 and 3 in Hampstead, New Hampshire.
- o. On or about the evening of April 24, 2022, Saniatan traveled to the vicinity of the home of Victims 2 and 3 in Hampstead, New Hampshire.

- p. On or about the evening of April 24, 2022, Saniatan threw a large rock through an exterior window of the home of Victims 2 and 3 in Hampstead, New Hampshire, and wrote the word "CUNT" in red spray paint on the front of the home.
- q. On or about the evening of April 24, 2022, Saniatan traveled to the vicinity of Victim 4's home in Concord, New Hampshire.
- r. On or about the evening of April 24, 2022, Saniatan threw a large rock at the exterior of Victim 4's home in Concord, New Hampshire, and wrote the word "CUNT" in red spray paint on the front door.
- s. Between on or about April 21, 2022, and April 25, 2022, SPOFFORD paid Labarge \$10,000 for vandalizing the victims' homes.

May 2022

- t. Between on or about May 1, 2022, and on or about May 18, 2022, the exact date being unknown to the Grand Jury, SPOFFORD provided Labarge with the addresses of Victims 1, 2 and 3, along with specific instructions to vandalize the victims' homes at night with bricks and red spray paint.
- u. At approximately 5:49 p.m. on May 18, 2022, Labarge called Cockerline on his cell phone and spoke to him for approximately fifty seconds.
- v. At approximately 7:00 p.m. on May 18, 2022, Cockerline and Labarge met at Labarge's home in Hollis, New Hampshire, to discuss vandalizing Victim 1's home in Melrose, Massachusetts and the home of Victims 2 and 3 in Hampstead, New Hampshire.
- w. Also at approximately 7:00 p.m. on May 18, 2022, Labarge provided Cockerline with the addresses of Victims 1, 2 and 3, which he had previously received from SPOFFORD.
- x. At approximately 6:49 p.m. on May 19, 2022, Cockerline sent the following text messages to Waselchuck: "Wanna make sum cash? Lil spray paint nd brick through a window \$500. I got 2 spots to hit and would like to split the job."
- y. At approximately 9:47 a.m. on May 20, 2022, Waselchuck responded via text message to Cockerline: "I'm down to do that."

- z. Between approximately 9:44 a.m. and 9:49 a.m. on May 20, 2022, Cockerline used Google to search for the addresses of Victim 1, 2 and 3.
- aa. At approximately 3:34 p.m. on May 20, 2022, Cockerline drove from New Hampshire to Methuen, Massachusetts.
- bb. Also on May 20, 2022, in Methuen, Massachusetts, Cockerline purchased two bricks that he intended to use to vandalize the homes of Victims 1, 2 and 3.
- cc. At approximately 6:00 p.m. on May 20, 2022, Cockerline and Waselchuck met in Salem, New Hampshire to discuss vandalizing the homes of Victims 1, 2 and 3.
- dd. Also at approximately 6:00 p.m. on May 20, 2022, Cockerline provided Waselchuck with a can of red spray paint and one of the bricks he purchased earlier that day in Methuen.
- ee. At approximately 7:35 p.m. and 7:49 p.m. on May 20, 2022, Cockerline used Google to search for Victim 1's address in Melrose, Massachusetts.
- ff. Between approximately 8:09 p.m. and 11:24 p.m. on May 20, 2022, Cockerline used Google to search for and navigate to the address of Victims 2 and 3 in Hampstead, New Hampshire.
- gg. On or about the evening of May 20, 2022, Cockerline traveled to the vicinity of the home of Victims 2 and 3 in Hampstead, New Hampshire.
- hh. On or about the evening of May 20, 2022, Cockerline threw a brick at the exterior of the home of Victims 2 and 3 and wrote the word "CUNT" in red spray paint on the front of the home.
- ii. On or about the evening of May 20, 2022, Waselchuck traveled from New Hampshire to the vicinity of Victim 1's home in Melrose, Massachusetts.
- jj. At approximately 5:50 a.m. on May 21, 2022, Waselchuck threw a brick through an exterior window of Victim 1's home in Melrose, Massachusetts, and wrote the words "JUST THE BEGINNING" in red spray paint on the front of the home.
- kk. At approximately 10:13 a.m. on May 21, 2022, Labarge sent Cockerline the following text messages: "Morning player. Smooth?"

- ll. Also on May 21, 2022, Cockerline responded via text message to Labarge: "Relatively."
- mm. Between on or about May 18, 2022, and May 22, 2022, SPOFFORD paid Labarge \$10,000 in cash for vandalizing the homes of Victims 1, 2 and 3.
- nn. At approximately 8:51 a.m. and again at approximately 9:13 a.m. on May 22, 2022, Labarge called Cockerline on his cell phone and, combined, spoke to him for approximately one minute.
- oo. At approximately 10:00 a.m. on May 22, 2022, at Labarge's home in Hollis, New Hampshire, Labarge paid Cockerline for vandalizing the homes of Victims 1, 2 and 3.
- pp. At approximately 10:57 a.m. on May 22, 2022, Cockerline sent the following text message to Waselchuck: "Come thru when you want your paycheck."

COUNT ONE

Conspiracy to Commit Stalking Through Interstate Travel and Using a Facility of Interstate Commerce (18 U.S.C. § 371)

The Grand Jury charges:

- 16. The Grand Jury re-alleges and incorporates by reference paragraphs 1-15 of this Indictment.
- 17. From on or about March 22, 2022, through on or about May 23, 2022, in the District of Massachusetts and elsewhere, the defendant,

ERIC SPOFFORD,

conspired with others known and unknown to the Grand Jury, to commit an offense against the United States, to wit:

- a. stalking through interstate travel, that is, to travel in interstate commerce with the intent to harass and intimidate another person, and in the course of, and as a result of, such travel, engage in conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotion to distress to a person, specifically, Victim 1 and Victim 1's immediate family members (*i.e.*, Victims 2 and 3), in violation of 18 U.S.C. § 2261A(1)(B); and
- b. stalking using facilities of interstate commerce, that is, with the intent to harass and intimidate another person, use any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause

substantial emotional distress to a person, specifically Victim 1 and Victim 1's immediate family members (*i.e.*, Victims 2 and 3), in violation of 18 U.S.C. § 2261A(2)(B).

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

Stalking Using a Facility of Interstate Commerce; Aiding and Abetting (18 U.S.C. § 2261A(2)(B); 18 U.S.C. § 2)

The Grand Jury further charges:

- 18. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 of this Indictment.
 - 19. On or about April 24, 2022, the defendant,

ERIC SPOFFORD,

did, with the intent to harass and intimidate another person, use an interactive computer service, electronic communication system of interstate commerce, and other facilities of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1 and Victim 1's immediate family members (*i.e.*, Victims 2 and 3).

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2.

COUNT THREE

Stalking Through Interstate Travel; Aiding and Abetting (18 U.S.C. § 2261A(1)(B); 18 U.S.C. § 2)

The Grand Jury further charges:

- 20. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 of this Indictment.
- 21. On or about May 20, 2022, in the District of Massachusetts and elsewhere, the defendant,

ERIC SPOFFORD,

traveled in interstate commerce from the Commonwealth of Massachusetts to Hampstead, New Hampshire with the intent to harass and intimidate another person, and in the course of and as a result of such travel, engaged in conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 1 and Victim 1's immediate family members (*i.e.*, Victims 2 and 3).

All in violation of Title 18, United States Code, Sections 2261A(1)(B) and 2.

COUNT FOUR

Stalking Through Interstate Travel; Aiding and Abetting (18 U.S.C. § 2261A(1)(B); 18 U.S.C. § 2)

The Grand Jury further charges:

- 22. The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 of this Indictment.
- 23. On or about May 20, 2022, and May 21, 2022, in the District of Massachusetts and elsewhere, the defendant,

ERIC SPOFFORD,

traveled in interstate commerce from the State of New Hampshire to Melrose, Massachusetts with the intent to harass and intimidate another person, and in the course of and as a result of such travel, engaged in conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 1.

All in violation of Title 18, United States Code, Sections 2261A(1)(B) and 2.

A TRUE BILL.

Jason A. Casey

Torey B. Cummings
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

District of Massachusetts: May 29, 2025 Returned into the District Court by the Grand Jurors and filed.

/s/ Leonardo T. Vieira, 4:13pm

DEPUTY CLERK