

SEALED**FILED****UNITED STATES DISTRICT COURT****August 14, 2026**

for the

KAREN MITCHELL**CLERK, U.S. DISTRICT
COURT**

_____ District of _____

United States of America
v.

Case No.

1056-BW

*Defendant(s)***CRIMINAL COMPLAINT**

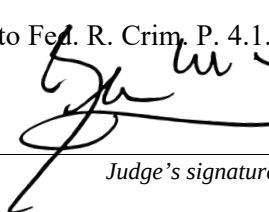
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the
_____ District of _____, the defendant(s) violated:*Code Section**Offense Description*

This criminal complaint is based on these facts:

☐ Continued on the attached sheet._____
*Complainant's signature*_____
Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: August 14, 2026

Judge's signature

City and state: _____

Printed name and title

Affidavit in Support of a Criminal Complaint

I, Marvin Lucas, being duly sworn, declared and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) Dallas Division and have been employed with the FBI since August 2009. I am currently assigned to a Public Corruption Squad, where I specialize in the investigation of corrupt public officials, including violations of wire fraud, mail fraud, bribery, fraud against the government, extortion, and money laundering. In addition, I have received training in the investigation of public corruption and other white-collar crimes. I have participated in and conducted investigations of individuals and organizations involved in fraud. I have investigated ways in which individuals involved in fraudulent activity launder and conceal the proceeds of their criminal acts.

2. In addition, from those investigations and my training, I am familiar with how individuals in official positions or law enforcement positions conceal their activities from the public, and the financial arrangements that they make to benefit from their corrupt actions. I have participated in debriefings and interviews of witnesses and targets involved in white collar offenses and in the concealment of proceeds derived from those criminal acts. In addition, I have experience investigating fraudulent documents and electronic communications between co-conspirators involved in white collar offenses when those communications are made for the purpose of furthering the illegal activity.

3. I submit this affidavit and the following facts that establish that there is probable cause to believe that, from on or about August 1, 2025, to on or about May 31, 2026, MICHAEL RAYMOND ROELL, also known as JOHNATHAN MICHAEL

(“ROELL”), and WENDY BAILEY (“BAILEY”) committed the offense of Title 18 U.S.C. § 1343 (Wire Fraud). Specifically, as established below, ROELL and BAILEY devised and executed a scheme and artifice to defraud the Forney Independent School District (“Forney ISD”) and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises with the intent to defraud Forney ISD, and for the purpose of executing the scheme and in doing so, transmitted and caused to be transmitted by means of wire communication through electronic means in interstate commerce certain signals and sounds between Texas and other states. As discussed further below, ROELL and BAILEY, intending to conceal ROELL’s prior instances of child abuse and sexual assault of a child, sent, and caused to be sent, the interstate transmission of false statements in ROELL’s application for employment at and related materials to Forney ISD, as described further below. Through this fraudulent conduct, ROELL and BAILEY secured ROELL employment at Forney ISD, which included salary and benefits.

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause.

5. Additionally, unless otherwise indicated, wherever in this Affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement. Furthermore, unless otherwise

indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

INDIVIDUALS

At all times relevant to this complaint:

6. ROELL was a certified teacher who had previously held teaching positions at Garland Independent School District (“Garland ISD”) and Dallas Independent School District (“Dallas ISD”).

7. BAILEY was the principal of Crosby Elementary School (“Crosby ES”) in the Forney ISD who hired ROELL as a special needs teacher in or about October 2025. BAILEY had been an employee of Garland ISD contemporaneously with ROELL.

FACTUAL BACKGROUND

8. In or around August 2012, ROELL was hired by Garland ISD and assigned to the Pathfinder Achievement Center (“Pathfinder”). At that time, ROELL’s legal name was MICHAEL RAYMOND ROELL. According to ROELL’s resume, the position at Pathfinder involved “Direct instruction of academic and life skills for students with severe emotional and learning disabilities.” ROELL held this position until approximately December 2015 or January 2016.

9. In approximately December 2015, a parent of an autistic student at Pathfinder submitted a complaint to Garland ISD alleging that ROELL was abusive and broke the student’s arm.

10. On or about June 6, 2016, ROELL was arrested and charged in Dallas County, Texas, on one count of Indecency with a Child – Sexual Conduct, a Texas state law felony. ROELL was accused of touching at least one student in the groin area and observing the student as they used the restroom. ROELL was terminated from his position with Garland ISD.

11. In or around March 2018, ROELL was acquitted of the charge in Dallas County, Texas.

12. From approximately 2016 – 2022, ROELL worked in the hospice and healthcare industry.

13. In approximately July 2022, ROELL was hired by the Dallas ISD as an “Inclusion Teacher.” ROELL held this position until May 2024.

14. In or around 2024, ROELL sought employment with Plano ISD and was denied due to a sexual misconduct complaint.

PROBABLE CAUSE

ROELL’s Applications to Forney ISD

First Attempted Application

15. On or about August 7, 2025, ROELL sent an email to the Forney ISD Coordinator of Recruitment and Retention (“Forney HR”), using a Hotmail account (hereinafter “HOTMAIL ACCOUNT”). ROELL stated, “Thank you for your time at the job fair. I have submitted my application online and hope to be hearing from you shortly.” In addition, ROELL included his contact information, including the HOTMAIL ACCOUNT and his phone number (hereinafter “ROELL’s PHONE”).

16. On or about August 11, 2025, Forney HR sent an email to Forney ISD principals with ROELL's resume and stated, "Certified SPED and ECR-8 candidate." BAILEY responded utilizing her Forney ISD email address with a photograph of ROELL and stated, "No thank you. LOLLOL! Lelt's [sic] try again. :)". Based on the investigation thus far, the photograph of ROELL that BAILEY included came from an online news article detailing ROELL's prior criminal charges related to Garland ISD. This leads me to believe that BAILEY was aware of ROELL'S prior charges.

17. On or about August 12, 2025, ROELL's PHONE conducted a call with a phone number associated with Crosby ES. The call lasted 1 minute and 52 seconds.

18. On or about August 13, 2025, ROELL's PHONE conducted a call with a phone number associated with Crosby ES. The call lasted 1 minute and 42 seconds.

19. On or about August 15, 2025, ROELL's PHONE conducted a call with a phone number associated with Crosby ES. The call lasted 3 minutes and 52 seconds. On that same day BAILEY sent an email to the HOTMAIL ACCOUNT scheduling ROELL for an interview.

20. On or about August 17, 2025, ROELL's PHONE conducted a call with a phone number associated with Crosby ES. The call lasted 2 minutes and 45 seconds.

21. On or about August 18, 2025, BAILEY sent an email to ROELL's HOTMAIL ACCOUNT with the subject, "Invitation: SLC Interview @Crosby Elem. @ Wed Aug 20, 2025 1:30pm – 2:30pm." The body of the email stated "Looking forward to meeting you! Here is my cell if you need to contact me sooner. Wendy Bailey [phone

number redacted] [hereinafter BAILEY's PHONE]." The invitation included, "Location: Crosby Elementary School, 495 Diamond Creed Dr, Forney TX."

22. On or about August 19, 2025, ROELL's PHONE conducted a call with a phone number associated with Crosby ES. The phone call lasted 2 minutes and 50 seconds. There are then multiple calls between ROELL's PHONE and a phone number associated with Crosby ES. After these calls, BAILEY sent an email to the HOTMAIL ACCOUNT canceling the interview scheduled for August 20, 2025.

23. Throughout the investigation, multiple individuals have been interviewed by law enforcement. A Forney HR representative gave a statement to the Texas Rangers and indicated that she had told Bailey that, with respect to ROELL, "We should not hire this person."

24. On or about August 19, 2025, BAILEY's PHONE and ROELL's PHONE exchanged the following messages:

- a. BAILEY's PHONE: "https://ess.com/apply," "Here is the website and [name redacted] is our contact person. [phone number redacted]. Best of luck Mike. I truly feel for you and the position you have been put in. Definitely explore the name change route!" The hyperlink was to an employment website providing substitute teacher and other employment opportunities across multiple jurisdictions.
- b. ROELL's PHONE: "I got the paperwork for the name change ready. I was going to file it as soon as you were willing to hire me."
- c. BAILEY's PHONE: "It's only my opinion, but if you want to work in education, its going to have to be done before you apply anywhere else."
- d. ROELL's PHONE: "Yes I understand but with non [sic] of my records under the new name it would be hard to explain."

- e. BAILEY's PHONE: "A good lawyer can get all documents changed. My friend had to change her name, including her certifications when her adopted husband decided to go back to his birth name, after they were married." "It can be done."
- f. ROELL's PHONE: "Thanks I'll get that started."
- g. BAILEY's PHONE "liked" the message.

25. On or about August 20, 2025, at approximately 12:10 AM UTC, a phone number associated with Crosby ES called ROELL's PHONE and was unanswered. Approximately eleven hours later at 11:08 AM UTC, ROELL's PHONE sent BAILEY's PHONE a text message stating, "You called last night while I was driving. I'm sorry I missed it. My car sometimes does not register calls while driving."

26. In or about early September 2025, ROELL applied for an "Order Changing the Name of an Adult" in Texas District Court, Rockwall County and was thereafter approved. The name change application proposed to change the name "MICHAEL RAYMOND ROELL" to "JOHNATHAN MICHAEL." A close family member of ROELL's gave a statement to the Texas Rangers stating that BAILEY instructed ROELL to submit the name change and apply again to Forney ISD with the new name in order to be hired.

27. On or about September 10, 2025, ROELL obtained a Texas Department of Public Safety temporary permit for the name JOHNATHAN MICHAEL.

28. On or about September 23, 2025, based on subscriber records, ROELL created a new email account using, in part, his new name (GMAIL ACCOUNT).

Second Application

29. On or about September 26, 2025, ROELL applied to Forney ISD under the new name “Johnathan Michael” and utilized the GMAIL ACCOUNT for the submission. The application included the following questions, to which ROELL submitted the following responses.

- a. “Have you ever failed to be rehired, been asked to resign from a position, resigned to avoid termination or investigation, or been terminated from employment?” and the question “Have you ever been placed on disciplinary probation, been suspended from any position, or been placed on administrative leave?”

ROELL selected “Yes” and stated, “At Hudson I was asked to falsify documentation at the end of the year. I refused and the principal put me on admin leave. I was investigated and found to be doing the right thing, but not until after I was non renewed.”

- b. “Have you ever been the subject of a sexual harassment complaint?”

ROELL answered “No.”

- c. “Other names you have worked under or been known by”

ROELL stated, “n/a.”

- d. In regard to criminal activity, ROELL selected, “I have never been charged for, adjudicated for, or convicted of having an inappropriate relationship with a minor.”

Based on my review of the entire application, there was no mention of the prior arrest or allegations of Indecency with a Child – Sexual Conduct which ROELL was charged with in 2016.

30. On or about October 1, 2025, ROELL’s PHONE conducted a call with a phone number associated with Crosby ES. The phone call lasted 3 minutes and 7 seconds.

31. On or about October 2, 2025, BAILEY's PHONE sent ROELL's PHONE a text message reading, in part, "Hey Jonathan... it's Wendy Bailey at Crosby. I need to see if you have room in your schedule to move our interview to either 9 or 10 am?" ROELL's PHONE responded, "Absolutely. I can be earlier if need too. 9:00 if its not too much." BAILEY confirmed the schedule change.

32. On or about October 3, 2025, ROELL's PHONE sent BAILEY's PHONE a text message, "Hey I know you got busy and if you do call I may not pick up as I'm going to be driving soon. Thank you for the interview today and the opportunity to continue teaching. Hope to hear from you Monday." BAILEY's PHONE responded, "Monday for sure. Thanks for being patient."

33. On or about October 6, 2025, BAILEY's PHONE and ROELL's PHONE had the following exchange:

- a. BAILEY's PHONE: "Jonathan...this is so unconventional, I usually don't offer a teaching position via text. But I didn't want the day to get away from me and leave you hanging. Keep in mind that I do not hire, I only recommend, but if your willing, I'd love to recommend you for the SLC position. So what do ya say?? Wanna be a Crosby Cougar?"
- b. ROELL's PHONE: "I would love to sorry for the late response. My phone goes on do not disturb when driving. Yes I would love to be part of the Crosby Family."
- c. BAILEY's PHONE: "That's terrific! I will put the paperwork in tomorrow and you should get a 'Congratulations you have been recommended for a position with ForneyISD' email. The email will ask you to send them various hiring documents, and then send a follow up email with an offer for the position. Keep an eye out on your email that is on file, make sure its correct... I got a return to sender message when I sent you the calendar invite for your interview."

- d. ROELL'S PHONE: "Nothing yet. I made sure the email was working. Hope to get it all done and see you in two weeks after your break. I'll keep you informed as it goes."
- e. BAILEY's PHONE "liked" the message.

34. On or about October 7, 2025, BAILEY submitted a "Hiring Recommendation" for "Johnathan Michael" as a new hire at Crosby ES. The proposed assignment was "Structured Learning Classroom Teacher."

ROELL's Hiring by Forney ISD

35. On or about October 8, 2025, an email was sent to ROELL's GMAIL ACCOUNT from Human Resources at Forney ISD with subject, "Next Steps for Hire with Forney ISD." The email included "Dear Johnathan Michael, Congratulations! You've been recommended for employment with Forney ISD!" The email then included a set of action items to be completed.

36. On or about October 8, 2025, a Forney ISD email was generated to Human Resources with subject, "Hiring Checklist Started for Michael, Jonathan." The email included the position "SPED Teacher, Crosby ES."

37. On or about October 13, 2025, a Forney ISD email was generated to Human Resources with subject, "Hire Approval for Michael, Jonathan" and included the following: "Jonathan Michael (SPED Teacher – Crosby ES) has been approved for hire."

38. On or about October 13, 2025, a Forney ISD email was generated to the GMAIL ACCOUNT, and copied BAILEY's Forney ISD email, with subject "Follow-up on Employment – SPED Teacher Position." Included in the email was an attachment "Offer Summary.pdf." The email stated, "Congratulations! Forney ISD would like to

make you an offer of employment for the SPED Teacher position at Crosby ES.” The position was for a \$67,700 annual salary.

39. On or about October 13, 2025, a Forney ISD email was generated to Human Resources with the subject, “Send Official Offer for Jonathan Michael” and include, “Jonathan Michael (SPED Teacher – Crosby ES) is ready to receive an official offer.”

40. On or about October 13, 2025, a Forney ISD email was generated to the GMAIL ACCOUNT, copied BAILEY’s Forney ISD email, with subject, “Offer of Employment – SPED Teacher at Forney ISD.” The email stated, “Dear Jonathan Michael, Your offer of employment and job description are ready for your review and signature.” An additional email was sent to the GMAIL ACCOUNT, copied BAILEY’s Forney ISD email, with subject, “Confirmation – Your Accepted Offer Document” and an attachment “Offer of Employment.pdf.”

41. From on or about October 8 to 13, 2025, there were a series of text messages between ROELL’s PHONE and BAILEY’s PHONE discussing updates on ROELL’s hiring process.

42. On or about October 17, 2025, a Forney ISD “[redacted]@forneyisd.net” email was generated to the GMAIL ACCOUNT, copied BAILEY’s Forney ISD email, with subject, “Welcome to Forney Independent School District!” The email included instructions for the new employee intake process and new hire important info.

43. On or about October 20, 2025, ROELL started his employment at Crosby ES as “Johnathan Michael” and worked as a special education teacher with students

having varying disabilities including being non-verbal. ROELL worked alongside two teacher's aides in the classroom. According to the Texas Rangers' investigation, ROELL requested to work in a classroom with non-verbal special needs students.

44. On or about October 22, 2025, a Forney ISD employee sent an email to the GMAIL ACCOUNT, with subject, "Reminder - Welcome to Forney Independent School District!" The email instructed ROELL to complete the onboarding forms.

45. From on or about October 23, 2025, to November 17, 2025, there were approximately four additional emails exchanged with the GMAIL ACCOUNT related to ROELL's onboarding. During this time, ROELL submitted multiple documents to Forney ISD included his driver's license, social security card, 2007 Texas Woman's University undergraduate transcript, State Board for Educator Certificate, and 2022 – 2024 Dallas ISD service record. Each of these documents contained the name "Johnathan Michael." In addition to the submitted documents, ROELL affirmatively agreed to abide by Forney ISD's professional responsibilities, which included a policy regarding sexual harassment, and did not disclose any prior criminal history or law enforcement involvement.

**ROELL's and BAILEY's Alleged Misconduct,
Continued Communications, and State Arrest**

46. In or about May of 2026, the Texas Rangers began an investigation into ROELL's alleged abuse of special needs students. Classrooms for special needs students at Crosby ES have cameras that can and often do record activities in the classroom. The Rangers' investigations found the following:

- a. In approximately December of 2025, a Forney ISD employee began noticing what they described as inappropriate behavior between ROELL and special needs students.
- b. On or about January 20, 2026, ROELL is alleged to have assaulted a student in a classroom.
- c. Also on January 20, 2026, there were at least two calls between ROELL's PHONE and BAILEY's PHONE.
- d. On or about February 23, 2026, at least two Forney ISD employees reported concerns about what they described as ROELL's inappropriate behavior to BAILEY. The investigation thus far indicates that BAILEY took no action.
- e. In or about April 2026, at least two Forney ISD employees again reported concerns about what they described as ROELL's inappropriate behavior to BAILEY. One of the employees provided BAILEY classroom video of ROELL's inappropriate behavior, and reminded BAILEY that there was classroom video available.
- f. Also in or about April 2026, BAILEY also called a meeting between ROELL and the reporting employees. ROELL complained about being harassed by one of the reporting employees, and BAILEY reassigned that reporting employee to another classroom.
- g. Despite the multiple reports described above, ROELL continued in the classroom and continued to commit reported abuse against students.
- h. The reporting employees then reported the issues to the Forney ISD school board.
- i. On or about April 7, 2026, there was at least one call between ROELL's PHONE and BAILEY's PHONE.
- j. At some point between October 2025 and April 2026, ROELL physically abused multiple special needs students and sexually abused at least one special needs student. The investigation thus far revealed that, despite receiving reports of this abuse, BAILEY failed to report the abuse as required by Texas state law.

47. On or about May 26, 2026, ROELL was arrested by the Texas Rangers for Texas state felony child abuse and felony child grooming violations. According to court documents from Kaufman County, Texas, ROELL was charged with the following:

- a. multiple incidents over the course of his employment at Forney ISD including putting children as young as 8-years-old in choke holds, using “arm bar” take downs, pinning them to the ground with his knee, and putting students under his desk and holding them there by force (as seen by the Rangers on classroom video); and
- b. multiple incidents of inappropriate sexualized conduct with and around students, including where ROELL was seen exiting a teacher-only, single-stall, lockable bathroom with a special needs student, and making sexually explicit comments about and to students, including telling a student to “put your hand in my pocket”.

48. In July 2026, the Texas Rangers interviewed BAILEY, who stated she was unaware of any prior allegations of abuse against ROELL. On July 28, 2026, the Texas Rangers arrested BAILEY for Texas state felony child neglect and felony failure to report violations.

49. Based on my training, knowledge, and experience, I know that emails are transmitted electronically. In addition, I know that Google, the provider for the GMAIL ACCOUNT, is headquartered in California, and maintains servers throughout the United States and in foreign countries. I also know that Microsoft, the provider for the HOTMAIL ACCOUNT, is headquartered in Redmond, Washington, and maintains servers throughout the United States and in foreign countries. I know that almost all modern emails cross state lines or international borders to reach their destination. Thus, the email communications described above constitute “interstate wire communication” as part of a scheme to defraud.

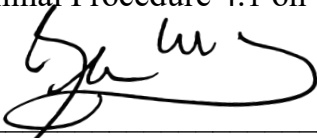
CONCLUSION

13. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that, from on or about August 1, 2025, to on or about May 31, 2026, MICHAEL RAYMOND ROELL also known as JOHNATHAN MICHAEL and WENDY BAILEY committed the offense of Title 18 U.S.C. § 1343 (Wire Fraud).



MARVIN LUCAS
Special Agent
Federal Bureau of Investigation

Agent sworn and signature verified by reliable electronic means pursuant to Federal Rule of Criminal Procedure 4.1 on this 14th day of August 2026.



BRIAN MCKAY
United States Magistrate Judge
Northern District of Texas