

STATE OF MICHIGAN
IN THE 16TH JUDICIAL CIRCUIT COURT FOR THE COUNTY OF MACOMB

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN, *ex rel*
The People of the State of Michigan,

Plaintiff,

No. 22- -CZ

v

HON.

CHRISTOPHER MICHAEL HOLLAND,
AKA KRISTIN HOLLIDAY,

Defendant.

Meghan E. Schaar (P78736)
Assistant Attorney General
Michigan Dep't of Attorney General
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632
schaarm@michigan.gov

Christopher Michael Holland


A civil action (for issuance of civil investigative subpoenas) between these parties or other parties arising out of the same transaction or occurrence as alleged in the Complaint has been previously filed in Macomb County Circuit Court. The action remains pending. The docket number and judge assigned to the action are: 2021-003187-CZ and Judge Michael E. Servitto.

**COMPLAINT FOR DECLARATORY RELIEF, INJUNCTIVE RELIEF,
ATTORNEY FEES, AND COSTS**

PARTIES, JURISDICTION, AND VENUE

1. Michigan Attorney General Dana Nessel brings this civil action on behalf of the People of the State of Michigan. The Michigan Attorney General

(Attorney General) is authorized to bring this action under the Michigan Consumer Protection Act (MCPA), MCL 445.901 *et seq.*, specifically MCL 445.905, and the general statutory and common law authority of the Attorney General to act on behalf of the welfare of the citizens of this state.

2. Defendant Christopher Holland, aka Kristin Holliday, is an individual with an address of [REDACTED], Michigan. Holland has used the alias Kristin Holliday on Facebook.

3. As detailed below, Holland, while using the Kristin Holliday alias, targeted Michigan residents, including residents of Macomb County, Michigan, in a scam that violates the MCPA.

4. Holland conducted business in Macomb County and elsewhere by offering fake vaccine cards for sale on the internet.

5. Jurisdiction and venue are proper in the Macomb County Circuit Court pursuant to MCL 445.905(1).

6. The Macomb County Circuit Court previously exercised jurisdiction over the same transaction or occurrence as alleged in this Complaint. On September 3, 2021, this Court issued an Order Authorizing Issuance of Civil Investigative Subpoenas on the Attorney General's *Ex Parte* Petition that detailed much of the conduct alleged in this Complaint.

7. An Attorney General Investigator confirmed that Defendant resides at the address stated in paragraph 2 but found that Defendant is required to vacate those premises by February 18, 2022, as a result of a court-ordered eviction. Due to

the difficulty existing in finding Defendant, and the likelihood new difficulties will arise once he vacates his current residence, good cause exists to waive the requirement for the Attorney General to notify Defendant of this intended action ten (10) days prior to the commencement of this action pursuant to MCL 445.905(2).

FACTUAL BACKGROUND

8. On August 9, 2021, the Attorney General received an email from a Michigan resident named Lauren ■. Lauren advised the Attorney General that someone named Kristin Holliday was selling blank vaccine cards with plastic card holders on the Moms2MomsSwap-Macomb County marketplace for \$25. Lauren provided screen shots validating her complaint. (Lauren's email and screen shots, **Attachment A.**) The Kristin Holliday profile on Facebook, created the illusion that blank, but otherwise legitimate, vaccination cards were available by claiming an affiliation to Doctors Without Borders. *Id.*

9. The availability of vaccines that are safe and effective in limiting the spread and severity of the Coronavirus have had the unfortunate side effect of creating a black market for fake vaccination cards and for real vaccination cards that can be filled in with false information by the purchaser. The problems surrounding this black market have been detailed in numerous recent media stories.¹

¹ Diaz, Jaclyn, *Fake COVID Vaccine Cards Are Being Sold Online. Using One Is A Crime* (June 8, 2021), NPR, available at <https://www.npr.org/2021/06/08/1004264531/fake-covid-vaccine-cards-keep-getting-sold-online-using-one-is-a-crime>

10. Fake vaccination cards pose a serious public health threat and endanger the lives of Michiganders. Thus, upon receiving Lauren's complaint, the Attorney General made further inquiry. The report of Special Agent Jeff Campbell is included as **Attachment B** to this Complaint and details the Attorney General's investigation.

11. As explained in Special Agent Campbell's report, the Kristin Holliday identity appeared to be a false one. The Facebook profile for Kristin Holliday was: <https://www.facebook.com/kristin.holliday.94>.²

12. Prior to the profile being removed, Special Agent Campbell noted that, according to the profile, Holliday lives in St. Clair Shores, Michigan and is formerly of Clearwater, Florida. But, using both publicly available and law enforcement databases, Special Agent Campbell was not able to find anyone by that name ever living in either location. (*Id.*)

13. Further, Special Agent Campbell performed Google image searches and found that the Facebook profile for Kristin Holliday used stock photos, including one commonly used in marketing Hawaiian vacations. (*Id.*)

Marnin, Julia, *Fake COVID Vaccine Cards Can Be Bought Online for as Little as \$25, Worrying Officials* (August 9, 2021), Newsweek, available at <https://www.msn.com/en-us/news/us/fake-covid-vaccine-cards-can-be-bought-online-for-as-little-as-2425-worrying-officials/ar-AAN75Hz?ocid=uxbndlbing>

² The Kristin Holliday profile appears to have been deactivated on September 1, 2021, and is no longer accessible via the public-facing Facebook website.

14. The Kristin Holliday profile on Facebook was less than two years old before being removed, contained scant information, and had no linked friends. As Special Agent Campbell observed, it contains just enough information to give a superficial impression of being that of a real person. But, in his professional experience, it bears all the hallmarks of being a fake profile created for the purpose of committing fraud. (*Id.*)

15. Based on this investigation, it appears the Kristin Holliday persona was created not to undermine the public health, but to financially exploit the residents of Macomb County. A very short history of sales of varying products was created to that end. (Attachment A.)

16. Holland used the Mom2MomSwap-Macomb County marketplace in an effort to entice purchasers of a good that would likely never be delivered. During this pandemic, it has become a growing trend for fraudsters to take a grass-roots approach to their schemes by infiltrating neighborhood chat groups and other local social media.³

17. Such fraudsters are taking advantage of our desire to trust our neighbors.

18. On September 3, 2021, this Court issued an Order Authorizing Issuance of Civil Investigative Subpoenas in case number 2021-003187-CZ, an

³ Thompson, Carol, *Fake puppies, price gouging and hoax COVID cures: a year in coronavirus scams* (May 4, 2021), Lansing State Journal, available at <https://www.lansingstatejournal.com/story/news/2021/05/04/avoid-online-scams-increase-covid-coronavirus-pandemic/7318443002/>

investigation arising out of the same transaction or occurrence as alleged in this Complaint.

19. On September 15, 2021, Special Agent Campbell served a court-authorized subpoena for records to Facebook. A supplemental report of Special Agent Jeff Campbell is included as **Attachment C** to this Complaint to show Facebook's response to this subpoena.

20. As detailed in Special Agent Campbell's supplemental report, the registered email for the Kristin Holliday Facebook account is listed as [REDACTED].[.com](#), and the verified phone number associated with the account is (586) [REDACTED]. (Attachment C.)

21. Special Agent Campbell checked law enforcement databases for the phone number associated with the Kristin Holliday account and determined the number was registered to Christopher Holland. (*Id.*)

22. Special Agent Campbell found two recent possible addresses for Holland, noting that one of the addresses appears to be within the radius for the approximate location of the IP Address that was used to create the Kristin Holliday Facebook account. (*Id.*)

23. Further, Special Agent Campbell reviewed a subpoena response from Comcast and documented his findings in another supplemental report that is included as **Attachment D** to this Complaint.

24. In response to the investigative subpoena, Comcast indicated that registered IP addresses are assigned dynamically, so it is possible that multiple

subscribers may have been assigned to the specific IP addresses in question over any period of time. Therefore, Comcast requested a narrowed specific time frame in order to provide the subscriber information related to the specific IP addresses identified by Facebook. (Attachment D.)

25. Because the original Facebook post advertising the fake vaccination cards was made on 8/9/21, Special Agent Campbell sent Comcast a second request with a time frame of 8/7/21 through 8/10/21 for the same list of IP addresses identified by Facebook. (*Id.*)

26. Special Agent Campbell received a response from Comcast on 11/22/21, identifying Holland as the subscriber associated with the specific IP addresses in question. (*Id.*) Comcast identified a service address of [REDACTED], [REDACTED], MI [REDACTED] and a telephone number of (586) [REDACTED] related to this account. (*Id.*)

27. The phone number identified by Comcast is the same phone number identified by Facebook, the phone number Special Agent Campbell determined to be registered to Christopher Holland. (*Id.*)

COUNT 1: VIOLATIONS OF THE MCPA

The Attorney General incorporates paragraphs 1 through 27 above.

28. Defendant has engaged in trade or commerce by advertising and selling goods via websites accessible by Michigan consumers.

29. The MCPA defines unfair and deceptive trade practices that are outlawed in the State of Michigan. See MCL 445.903. Among the prohibited practices are “[c]ausing a probability of confusion or misunderstanding as to the

source, sponsorship, approval, or certification of goods or services.” MCL 445.903(1)(a).

30. As detailed in Special Agent Campbell’s reports, a person named Kristin Holliday is not the true source of the blank vaccine cards and holders that Holland attempted to sell in the Mom2MomSwap marketplace. Rather, Holland is the source of these items. Therefore, Holland has caused confusion or misunderstanding as to the source of goods in violation of MCL 445.903(1)(a).

31. Also illegal under the MCPA is “[r]epresenting that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he or she does not have.” MCL 445.903(1)(c).

32. Upon information and belief, in crafting the Kristin Holliday profile on Facebook, Holland sought to create the illusion that blank, but otherwise legitimate, vaccination cards were available by claiming an affiliation to Doctors Without Borders. Because the identity itself is a false one, this representation is also false, in violation of MCL 445.903(1)(c).

33. Finally, the MCPA also prohibits “[a]dvertising or representing goods or services with intent not to dispose of those goods or services as advertised or represented.” MCL 445.903(1)(g).

34. Upon information and belief, Holland’s postings were made not to actually traffic blank vaccination cards, but to induce Macomb County residents to

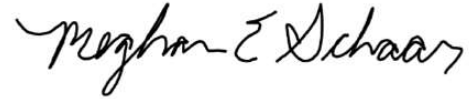
pay for something that would never be delivered. This is a violation of MCL 445.903(1)(g).

RELIEF REQUESTED

Accordingly, the Attorney General respectfully requests that this Honorable Court enter an Order granting the following relief:

- a. Waiving the requirement for the Attorney General to notify Defendant of this intended action ten (10) days prior to the commencement of this action.
- b. Declaring Defendant has engaged in unlawful conduct in violation of the MCPA and permanently enjoining Defendant, whether acting directly or through any person, entity, or other device, from engaging in conduct in violation of the MCPA.
- c. Permanently enjoining Defendant from selling goods and services, whether online or elsewhere in the State of Michigan, by using false or misleading information about his identity.
- d. Requiring Defendant to pay attorney fees, investigation costs and other costs incurred by the Attorney General in conjunction with the prosecution of this action.
- e. Awarding such other relief as the Court determines to be just and proper.

Respectfully submitted,



Meghan E. Schaar (P78736)
Assistant Attorney General
Michigan Dep't of Attorney General
Attorney for Petitioner
Corporate Oversight Division
P.O. Box 30736
Lansing, MI 48909
(517) 335-7632
schaarm@michigan.gov

Dated: February 8, 2022

ATTACHMENT A

Subject: FW: Fraudulent vaccine cards

From: Lauren [REDACTED] <[lauren\[REDACTED\]@miag@michigan.gov](mailto:lauren[REDACTED]@miag@michigan.gov)>
Sent: Monday, August 9, 2021
To: Michigan Attorney General <miag@michigan.gov>
Subject: Fraudulent vaccine cards

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hello,

I'm not sure where exactly this should "officially" be reported, but was hoping sending it here would help get it where it needed to go.

There is a woman posting fraudulent (blank) covid vaccine cards on the "Mom2MomSwap- Macomb County" page on Facebook.

I will post the link, but incase it has been removed, I have also attached screenshots and information of the poster.

Post: <https://www.facebook.com/marketplace/item/219709626742103/>

Posters profile:

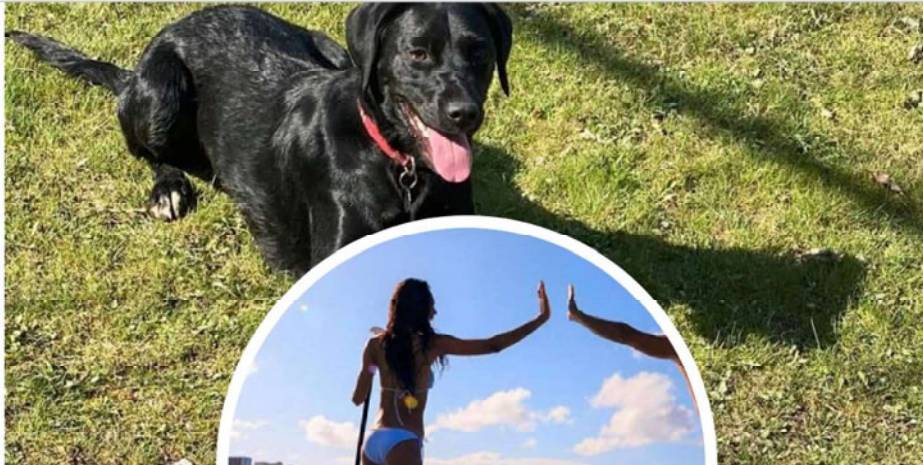
<https://www.facebook.com/kristin.holliday.94>

Thank you,

Lauren [REDACTED]



🔍 Search



Kristin Holliday

📧 Message



🏥 Works at **Doctors Without Borders/
Médecins Sans Frontières (MSF)**

🎓 Studied at **Florida State University**

🏠 Lives in **St. Clair, Michigan**

📍 From **Clearwater, Florida**

⋮ See Kristin's About Info

Friends





Kristin Holliday



Follow



Message



Block



More

Things in Common

Also member of Mom2MomSwap - Macomb County

Badges

Based on Kristin's activity in Mom2MomSwap - Macomb County



Highly Rated

4-stars or higher rating from at least 4 buyers

See Kristin's Badges

Seller Rating



Based on 11 ratings

What They Do Well

These are their strengths, according to feedback from others on Facebook.

Pricing (8)

Item Description (8)

Punctuality (5)

+ See All

About

Facebook member since 2020

11 Marketplace followers

Recent group listings



CDC Blank Card and Card Holder

\$25

2 hours ago

Kristin's Listings

Share



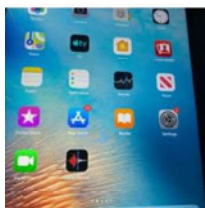
CDC Blank Card and Card Holder

\$25



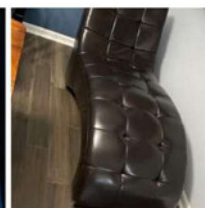
Apple iPhone 5s 16GB

\$40



iPad Air

\$60



Chase lounge chair

\$60 \$80

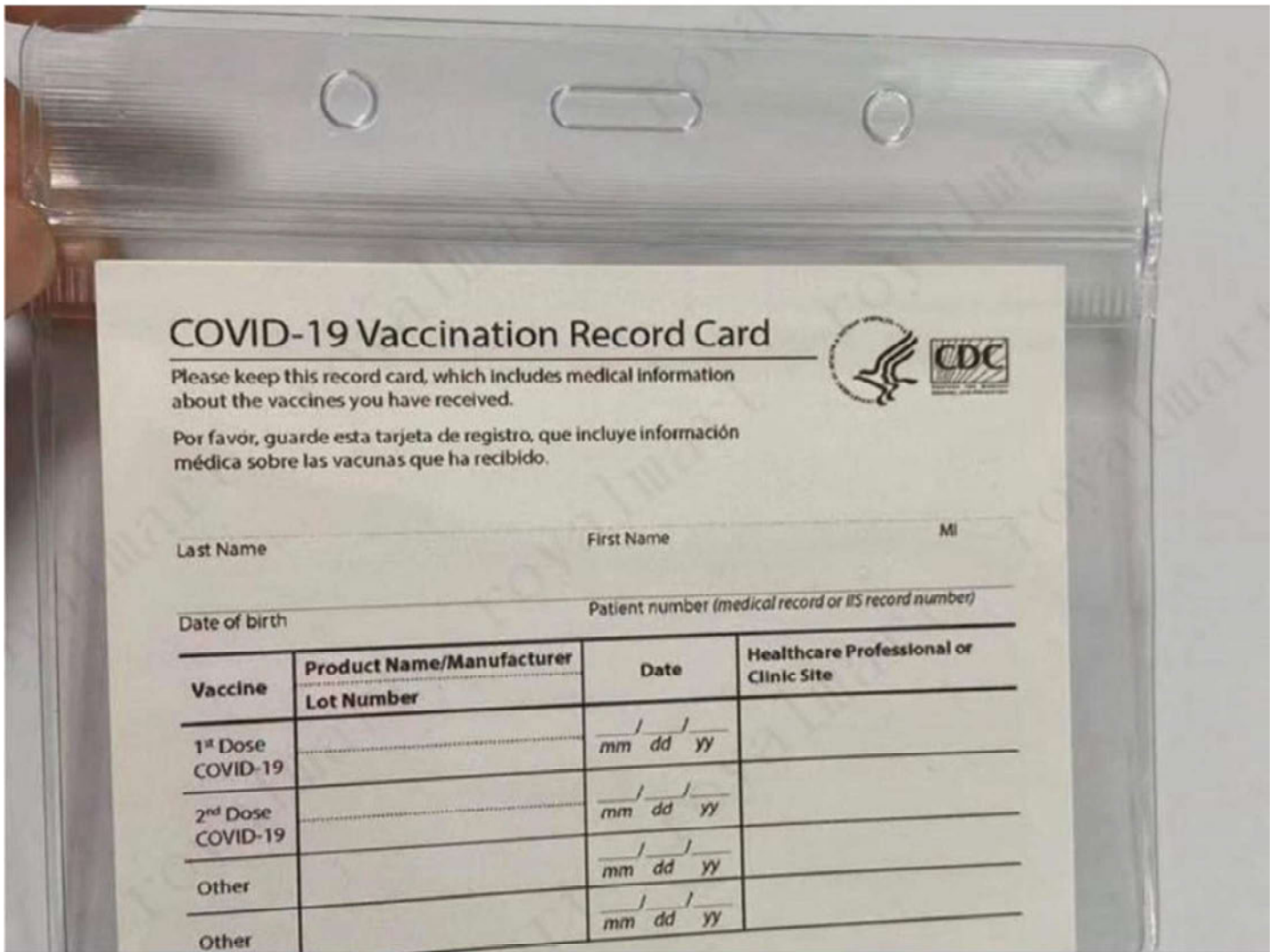


Mom2MomSwap - Macomb County



Kristin Holliday · 3h ·

Covid Vaccination Blank Card and card Holder, CDC Vaccination Card Protector 4 X 3 Inches Immunization Record Vaccine Card Holder Waterproof Clear Vinyl Plastic Sleeve with Type Resealable Zip, If interested send DM.



COVID-19 Vaccination Record Card



Please keep this record card, which includes medical information about the vaccines you have received.

Por favor, guarde esta tarjeta de registro, que incluye información médica sobre las vacunas que ha recibido.

Last Name _____ First Name _____ MI _____

Date of birth _____ Patient number (medical record or IIS record number) _____

Vaccine	Product Name/Manufacturer Lot Number	Date	Healthcare Professional or Clinic Site
1 st Dose COVID-19		mm / dd / yy	
2 nd Dose COVID-19		mm / dd / yy	
Other		mm / dd / yy	
Other		mm / dd / yy	

\$25 · MACOMB, MI

CDC Blank Card and Card Holder

Ships for \$9.00 with Purchase Protection

[BUY NOW](#)

8

6 Comments

ATTACHMENT B



POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 8/20/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

SPECIAL AGENT NAME Jeff Campbell	AAG ASSIGNED Darrin Fowler	CASE STATUS Open
STREET ADDRESS AND CITY OF INVESTIGATOR OFFICE Williams Building - 525 W. Ottawa St. Lansing, MI 48909		REPORT NUMBER AND REPORT TYPE #1 – Initial Report

Report Type

Initial Report – Report #1

Venue:

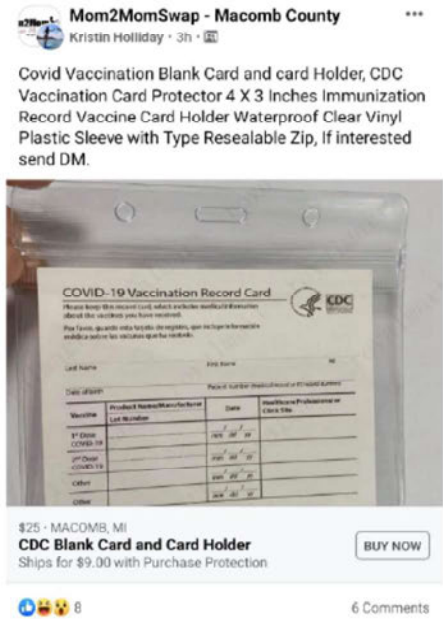
Macomb County, MI

Complainant:

Lauren [REDACTED]
[lauren\[REDACTED\]@gmail.com](mailto:lauren[REDACTED]@gmail.com)

Initial Information:

On 8/20/21, I was assigned to look into a complaint that was emailed to the Attorney General’s Corporate Oversight Division email address by Lauren [REDACTED]. In her complaint, Ms. [REDACTED] advised of a woman who had posted a fraudulent/blank COVID vaccination card for sale on the “Mom2MomSwap – Macomb County” Facebook page. In her complaint email dated 8/9/21, Ms. [REDACTED] included a link to the post about the blank vaccination card. This link is <https://www.facebook.com/marketplace/item/219709626742103/>. She also included a link to the poster’s Facebook profile, which is <https://www.facebook.com/kristin.holliday.94>. Ms. [REDACTED] also included three screenshots of the post she was referring to in her complaint. These are included with the file for this complaint. A copy of the sales post screenshot is included below:



Page 1 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffery J. Campbell</i>	APPROVED BY: <i>[Signature]</i>
			DATE APPROVED: 08/23/2021



POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 8/20/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

Initial Investigation:

I checked the link sent by Ms. [REDACTED] and found that this particular advertisement on Facebook Marketplace was no longer active. The page indicated that the listing was either sold or expired. I searched Facebook Marketplace for similar postings but was not able to locate one posted similar to the listing found by Ms. [REDACTED] anywhere in Michigan on 8/20/21. I was not able to search the "Mom2MomSwap – Macomb County" page because this is a private Facebook group and not publicly viewable by non-members.

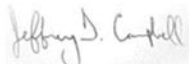

I found that the link to the Facebook profile of <https://www.facebook.com/kristin.holliday.94> was still active as of this report. I noticed that this page had very little publicly available information listed, and included some generic photos posted between 1/29/2020 and 5/24/21. The Intro section listed Kristin Holliday as working for Doctors Without Borders, studied at Florida State University, living in St. Clair, MI and originally from Clearwater, FL.

I searched for Kristin Holliday in both publicly available databases as well as law enforcement databases available to me, but found nobody by the name of Kristin Holliday living in St. Clair, MI. I was also unable to find anyone by that name as having lived in Clearwater, FL. I found several people of the same name living elsewhere in Michigan, and numerous people named Kristin Holliday elsewhere in the United States, but I was unable to link any of them to this particular Facebook page.

I searched several of the images I saw on the Kristin Holliday Facebook page. In Google Images, I searched the profile photo that was posted on the page on 5/24/21 depicting a male and female on paddle boards in the water, giving each other a "high five". This exact same photo is used as a cover photo on several different international travel websites advertising travel to Hawaii. Some of these websites include <https://www.visittheusa.co.uk/state/hawaii>, <https://www.gousa.in/state/hawaii>, and <https://www.visittheusa.fr/state/hawai>. I also searched for the other photos posted on the Facebook page, but was not able to locate exact matches to the ones posted on the Kristin Holliday profile.

Based on my experience investigating various internet-based scams, this Facebook page is similar to others I have seen used to commit fraud. For example, this page uses a common name (Kristin Holliday), and uses generic, stock photos frequently available on the internet. There is also very little posting history, status update history, and no "friends" currently connected with this account. This leads me to believe that the person(s) behind this profile put just enough information into it to make it appear to be a legitimate Facebook page for a real person. These observations, along with the fact that I am not able to find anyone by the name of Kristin Holliday living in or near St. Clair that appears to be connected to this page leads me to believe that it was created for the purpose of committing fraud.

On 8/20/21, I sent a preservation request to Facebook, asking for the preservation of all records pertaining to <https://www.facebook.com/kristin.holliday.94>. I recommend that the Corporate

Page 2 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY 	APPROVED BY: 
			DATE APPROVED: 08/23/2021



STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL

POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 8/20/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

Oversight Division seek a court ordered subpoena for information from Facebook that may lead to the identity of the person(s) who created this profile to further this investigation.

Investigator Bio:

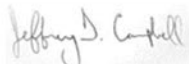

I have been employed as a Special Agent with the Michigan Department of Attorney General since 3/23/2020 and in that time, have been trained in the procedures in which investigations are conducted by the Michigan Department of Attorney General. I became certified as a law enforcement officer in 1994 within the State of Michigan after completing the recognition of prior training and experience program through the Michigan Commission on Law Enforcement Standards. Prior to employment with the Michigan Attorney General, I was a sworn law enforcement officer and investigator for the Eaton County Sheriff's Office in Eaton County, Michigan from March of 1995 through March of 2020. I was assigned to the department's Detective Bureau from 2000 through 2003 and again as commander of the Detective Bureau from 2017 through March of 2020. I have received numerous hours of in-service training to expand his knowledge of criminal investigation and have also conducted hundreds of felony and misdemeanor criminal investigations including but not limited to, homicide, robbery, financial exploitation of the elderly, fraud, embezzlement, theft, organized crime, and securities fraud.

Evidence:

1. Electronic folder containing 3 screenshots of the Facebook post and profile information provided by the complainant.
2. Electronic folder containing Facebook profile photos and screenshot collected by SA Jeff Campbell (5 files).

Status:

Open, investigation continuing.

Page 3 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY 	APPROVED BY: 
			DATE APPROVED: 08/23/2021

ATTACHMENT C



POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 10/15/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

SPECIAL AGENT NAME Jeff Campbell	AAG ASSIGNED Darrin Fowler	CASE STATUS Open
STREET ADDRESS AND CITY OF INVESTIGATOR OFFICE Williams Building - 525 W. Ottawa St. Lansing, MI 48909		REPORT NUMBER AND REPORT TYPE #2 – Supplemental Report

Report Type

Supplemental – Report #2 – Facebook Subpoena Service and Response to Subpoena

Subpoena Service:

On 9/15/21, I received notice of a court authorized subpoena for records from Facebook regarding the Facebook profile of “Kristin Holliday”. I served this subpoena to Facebook on 9/16/21 via their online Law Enforcement Response portal. I received confirmation of receipt from Facebook, along with their assigned case number of 6411091. I completed and signed a proof of service for this subpoena and submitted it to Attorney General clerical staff to be filed with the court.

Subpoena Response:

I received notice of Facebook’s response to the subpoena on 10/13/21. Facebook provided its response copied in two formats. On 10/14/21, I logged into the Facebook Law Enforcement portal and downloaded a ZIP file labeled “390721022715370”. I also downloaded a pdf copy of this file, also labeled “390721022715370”. Along with their response, Facebook also provided a file labeled 1136585106871283_affidavit, which contains Facebooks certificate of authenticity for the records they provided in response to the subpoena. All records received from Facebook are included in the electronic evidence folder for this case.

Facebook Evidence Review:

I extracted the data contained in the ZIP file and began reviewing the information provided by Facebook on 10/14/21. In the Index file, I noted that the registered email for the Kristin Holliday account is listed as [REDACTED].com. The verified cell phone number associated with this account is (586) [REDACTED].

Facebook records indicate that this account was created on 1/29/20, and that the IP address associated with the creation of this account is 2600:1700:cdd0:3ce0:2c31:7a4a:a81e:b226. According to www.maxmind.com, this Internet Service Provider (ISP) for this address is AT&T U-verse, with latitude/longitude coordinates of 42.8255, -82.5133 (5 km accuracy radius) in St. Clair, Michigan.

Mastercard number [REDACTED] is listed as the credit card associated with this account, and lists the name associated with the credit card as Kristin Holliday with a 48079 (St. Clair) ZIP code. Facebook’s unique internal identifier number for the payment account associated with this credit card is [REDACTED].

Page 1 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffrey D. Campbell</i>	APPROVED BY: <i>[Signature]</i>
			DATE APPROVED: 10/15/2021



POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 10/15/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

The Kristin Holliday profile appears to have been deactivated on 9/1/21 and is no longer accessible via the public facing Facebook website. I noted that there were no Facebook messenger chats, images or linked media files included with the subpoena response information from Facebook. There was also no information showing any posts made to the Kristin Holliday profile page, and no information showing the blank Covid-19 vaccination card sales listing that was posted on the Mom2MomSwap – Macomb County page.

Facebook Login data shows 24 different IP addresses used to log into the Kristin Holliday. I checked each of these on www.maxmind.com. I created a spreadsheet to show the information found on Maxmind, along with the Facebook login dates/times for each IP address listed in the Facebook subpoena response. That spreadsheet is included with this complaint file. Among the various IP addresses that were used, I noted that 10 of these list Comcast as the ISP, with an approximate location in Macomb, MI with latitude/longitude coordinates of 42.6758, -82.9121. These IP addresses are listed here:

- 2601:406:8300:675:c546:99a1:4768:5bac
- 2601:406:8300:675:80be:9731:9419:e283
- 2601:406:8300:675:99d6:82c6:80ba:2aee
- 2601:406:8300:675:bdc4:62eb:96ce:6fc3
- 2601:406:8300:675:e548:2653:3f9b:463f
- 2601:406:8300:675:7083:892d:dff9:a735
- 2601:406:8300:675:4464:969d:1d9e:274b
- 2601:406:8300:675:a0fb:57ce:cddb:7fe0
- 45.14.195.166
- 2601:406:8300:675:51f4:20f2:7dd7:5243

Suspect Information:

I checked law enforcement databases for phone number 586-██████████. This phone number is listed as the verified cell number associated with the Kristin Holliday Facebook account. I found this number to be a New Cingular Wireless (Affiliate of AT&T) phone number registered to Christopher Michael Holland, date of birth ██████████. I found two recent possible addresses for Mr. Holland. The first is ██████████ MI ██████████. The second address is ██████████ MI ██████████.

I noted that the ██████████ Street address in ██████████ appears to be within the radius for the approximate location of the IP address that was used to create the Kristin Holliday Facebook account. I also noted that the ██████████ Road address is within the approximate location radius for the Comcast IP addresses in ██████████.

Additional Follow Up Investigation:

On 10/15/21, I sent a follow up message to Facebook via their online portal to request information on the Facebook listing for the vaccination card reported by the complainant, since I

Page 2 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffrey D. Campbell</i>	APPROVED BY: <i>John Pates</i>
			DATE APPROVED: 10/15/2021



STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL

POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 10/15/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

did not see it listed in their subpoena response. I will include any further information they provide in a future supplemental report.

I will consult with the Corporate Oversight Division about seeking a subpoena for Comcast to determine who holds the Comcast account for the IP addresses I found in the Facebook records. I will also attempt to locate and interview Christopher Holland regarding his possible involvement in creating the Kristin Holliday Facebook profile and his possible involvement in attempting to sell Covid vaccination cards.

Additional Evidence:

3. Electronic folder containing files provided by Facebook in response to the subpoena

Status:

Open, investigation continuing.

Page 3 of 3	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffery D. Campbell</i>	APPROVED BY: <i>Lee Pate</i>
			DATE APPROVED: 10/15/2021

ATTACHMENT D



STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL

POLICE REPORT

ORIGINAL DATE 8/9/21	ATTY GEN LEGAL FILES NUMBER 2021-0327312-A
DATE OF THIS REPORT 11/23/21	DIVISION AND UNIT ASSIGNED CID - CORPORATE OVERSIGHT

SPECIAL AGENT NAME Jeff Campbell	AAG ASSIGNED Darrin Fowler	CASE STATUS Open
STREET ADDRESS AND CITY OF INVESTIGATOR OFFICE Williams Building - 525 W. Ottawa St. Lansing, MI 48909		REPORT NUMBER AND REPORT TYPE #4 – Supplemental Report

Report Type

Supplemental – Report #4 – Comcast subpoena response

Comcast Subpoena Response:

On 11/18/21, I received the initial response from Comcast regarding the subpoena served to them on 11/8/21. The response was provided in two separate Word documents. The first one, labeled “final response 646875” indicated that IP address 45.14.195.166 is not a Comcast registered IP address. I checked this IP address again, and found that it is actually registered to Packethub, so it appears that I mistakenly included this IP address in the list of Comcast registered IP addresses.

The second Word document is labeled “final response 64687” and indicates that the list of Comcast registered IP addresses are assigned dynamically, so it is possible that multiple subscribers may have been assigned to these IP addresses over the time specified in the subpoena. Comcast requested a narrowed specific time frame in order to provide the requested information.

Since the original Facebook post advertising the fake vaccination cards was made on 8/9/21, I sent Comcast a second request with a time frame of 8/7/21 through 8/10/21 for the same list of IP addresses. I received a third Word document response from Comcast on 11/22/21, labeled “final amended response 646867”. The following subscriber information was provided:

Subscriber Name: CHRIS HOLLAND
Service Address: [REDACTED]
Bill to Name: CHRIS/MR HOLLAND
Billing Address: [REDACTED]
Telephone #: (586) [REDACTED]
Type of Service: PrePaid Internet
Account Number: [REDACTED]
Account Status: Active
PrePaid Service: Active
IP Assignment: Dynamically Assigned
E-mail User Ids: [REDACTED]
(the above user ID(s) end in @comcast.net)

Page 1 of 2	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffrey D. Campbell</i>	APPROVED BY: <i>Jim Peters</i>
			DATE APPROVED: 11/23/2021



STATE OF MICHIGAN
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Additional Evidence:

4. Electronic folder containing three Word document files from Comcast in response to the subpoena.

Status:

Open, investigation continuing.

Page 2 of 2	INVESTIGATED BY Special Agent Jeff Campbell	REPORTED BY <i>Jeffery D. Campbell</i>	APPROVED BY: <i>Lawrence</i>
			DATE APPROVED: 11/23/2021