

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	CRIMINAL NO. 21cr380
	:	
v.	:	
	:	
BRIAN JEFFREY RAYMOND	:	
Defendant.	:	

STATEMENT OF OFFENSE

The parties in this case, the United States of America and the defendant, Brian Jeffrey Raymond, stipulate and agree that the following facts are true and accurate. These facts do not constitute all of the facts known to the parties concerning the charged offense; they are being submitted to demonstrate that sufficient facts exist that the defendant committed the offenses to which he is pleading guilty: Sexual Abuse of AV-7 and AV-9, in violation of 18 U.S.C. § 2242(2), and transportation of obscene material, in violation of 18 U.S.C. § 1462.

Statement of Facts

1. Between on or about August 21, 2018 and June 1, 2020, Raymond, now 45 years old, was a U.S. government employee working at the U.S. Embassy in Mexico City, Mexico. During that time, Raymond lived in an apartment assigned to him by the U.S. government. Raymond's residence in Mexico City has been leased by the U.S. government since April 2013 for use by U.S. personnel assigned to diplomatic, consular, military, and other U.S. government missions in Mexico City. The U.S. government currently maintains a nine-year lease of the property. This residence falls within the Special Maritime and Territorial Jurisdiction ("SMTJ") of the United States, pursuant to 18 U.S.C. § 7(9).

2. On May 31, 2020, there was an incident at Raymond's embassy-leased residence in Mexico City. During an interview with law enforcement on June 2, 2020, Raymond stated that he had sexual intercourse with an adult woman, hereinafter referred to as AV-1, on May 31 and that it was consensual. AV-1 was interviewed and reported that she has no memory of the incident and did not consent to sexual intercourse with Raymond. After the May 31, 2020 incident, law enforcement executed several premises and device search warrants, including but not limited to search warrants for Raymond's phones, laptops, tablets, thumb drives, and memory cards, Raymond's Mexico City residence, his parents' residence in La Mesa, California, Tinder and other social media accounts, email accounts, and his iCloud account.
3. Internet artifacts on Raymond's devices revealed a number of searches. For example, there were searches for "passed out black girl," on February 8, 2020, for "passed out gorl [sic]" on February 22, 2020, and for "deep sleep" on February 23, 2020. There were multiple videos of unconscious or "passed out" women in his YouTube viewing history. Moreover, law enforcement discovered internet artifacts on one of Raymond's ASUS laptops revealing searches for: "passed out," "ambien," "ambien and alcohol side effects, Zolpidem Tartrate tablets and 10mg," "Ambien," "dissolve," "Zolpidem and pharmacies," "Ambien and alcohol and pass out," "passed out and carried," and "deep sleep" between 2010 and 2011.
4. Agents found approximately 487 videos and images of unconscious women in various states of undress on multiple devices belonging to Raymond and in his iCloud account. The search warrants on Raymond's phones were executed on June 6, 2020. Between May 31, 2020 when the investigation began and June 6, 2020, Raymond deleted numerous images and videos of unconscious women from his phone. He also attempted to delete the images and videos he had made of nude or partially nude unconscious women (to include images and videos of AV-7 and

AV-9) that were saved to his iCloud account, but he was unsuccessful due to a preservation request sent by law enforcement. (The examination of the iCloud account revealed that these materials had been deleted but preserved.) Also, the forensic examination revealed that on June 3, 2020, Raymond conducted the following internet search: “how to save photis from.icloud [sic] to aniother [sic] device” and that the dating application Bumble was deleted from his phone sometime after June 2, 2020.

5. When asked by federal law enforcement agents about his use of dating applications, he answered that he used them very little, when in fact he met many of the women referenced herein on such applications.
6. Through its investigation, law enforcement learned that from 2006 to 2020, while working as a U.S. government employee, Raymond recorded and/or photographed at least 24 unconscious nude or partially nude women (AV-2 through AV-25). Many of these women were identified and interviewed, including AV-7 and AV-9. None of the women interviewed knew that Raymond had recorded them in an unconscious and nude or partially nude state, nor did they consent to any such recordings or depictions or any sexual contact while in that state. All of the women interviewed described drinking alcohol supplied and/or prepared by Raymond and experiencing memory loss during their time with Raymond.
7. During his interviews with law enforcement after the incident on May 31, 2020, Raymond acknowledged having sex with a woman at his embassy-leased apartment in Mexico on May 30, 2020, later identified as AV-7. AV-7 is a resident of Mexico (born in 1994), speaks primarily Spanish and very little English, and works at a call center. Raymond invited her to his apartment on May 30, 2020. AV-7 took an Uber to get to the apartment and did not have a car. Raymond prepared drinks for her in the kitchen, while she sat in the living room. Soon after arriving at

Raymond's residence, AV-7 told Raymond that she lost cell phone reception and could not text or call out. At some point, AV-7 became sick and vomited in Raymond's bathroom, during which Raymond came to comfort her. After that, knowing that AV-7 was at the point where she was incapable of appraising the nature of the conduct, Raymond had sexual intercourse with AV-7. Raymond discussed having sex with AV-7 with a friend via text message the following day. AV-7 stated that she could not recall anything after vomiting in the bathroom until she woke up in Raymond's bed naked, other than one fragmented memory of lying face down on a bed when it was very dark and feeling Raymond grabbing her breast. She did not recall consenting to him removing her clothing, and she did not recall consenting to or having sexual intercourse with him after vomiting in the bathroom. She observed a used condom when she awoke the following morning and assumed she and Raymond had sex the night before. After AV-7 awoke, her cell phone was still not working so Raymond used his phone to order an Uber for her.

8. Approximately 77 photographs and four videos of AV-7 were recovered from Raymond's iCloud and MacBook. Those photographs and videos were recorded on the night of May 30, 2020. They depict AV-7 fully nude and unconscious, lying on Raymond's bed. They show Raymond's hand opening her eyelid and pulling down her lower lip. In one video, AV-7 flinches when Raymond's fingers are in her mouth, and he quickly pulls his hand back. There are many close-ups of AV-7's breasts and genitals. Notably, there is a photo in which AV-7 is on her back, with her legs tightly closed, and Raymond is straddling her body, with his knees and inner thighs on either side of her legs on the bed, and his erect penis is visible. AV-7 stated she did not consent to Raymond taking these videos or images, nor was she aware of their existence prior to the interview with law enforcement.

9. In March 2020, approximately two months before his interaction with AV-7, Raymond also texted the same friend mentioned above about having sexual intercourse with AV-9. AV-9 is a resident of Mexico and primarily a Spanish speaker. He texted the same friend that he had to pay for an Uber for AV-9 and expressed that it was annoying but ultimately worthwhile because he was able to have sex with her. After connecting on a dating application, AV-9 and Raymond initially met at a restaurant on or about March 26, 2020 in Mexico City. Later that same day, Raymond invited AV-9 to his embassy-leased apartment, where they drank a lot of wine and tequila. Raymond had sexual intercourse with AV-9 in his bed. During the sexual act, Raymond knew that AV-9 was incapable of appraising the nature of the conduct. AV-9 could not recall anything that occurred that night after she and Raymond drank wine and kissed in his kitchen. AV-9's last memory was of them walking in his hallway. She woke up in his bed naked and did not remember taking off her clothing, and she did not recall consenting to Raymond taking off her clothing or consenting to or having sexual intercourse with Raymond.
10. Raymond recorded/took 20 photographs and 15 videos of AV-9 at his embassy-leased apartment in Mexico City on March 26, 2020. In the photographs and videos, AV-9 is fully unconscious and nude. Some of the photographs show Raymond's hand opening AV-9's eyelid, and some depict close-ups of her breasts and genitals. Raymond also appears to pose her body in different positions throughout the photo set. A video shows Raymond's hand on the outside of AV-9's buttocks. Another video shows Raymond's hand touching AV-9's breast and buttocks. Another video shows Raymond's hand forcefully grabbing AV-9's breast. His hand then appears to move down to her pubic region, out of the frame. In one video, Raymond is nude and lying in bed with AV-9's limp body, manipulating her limbs. Raymond's erect penis can be seen in the video. AV-9 did not

consent to the photographs and videos being taken and was unaware that they existed prior to her interview with law enforcement.

11. The following photos and videos, in addition to those listed above, were recovered from Raymond's phones, iCloud account, email account, several laptops, and several thumb drives:

Victim¹	Number of Photos and/or Videos	Location	Date	Example of Obscene Depiction for this Victim
AV-2	33 photographs and 1 video 44 photographs and 7 videos	California Mexico	February 2, 2018 November 23, 2018	Close-up of breast with shirt pulled down by adult male hand Close-up of genitalia
AV-3	16 Photos and 3 Videos	Country 5 ²	December 1, 2017	Close-up of bare breasts and genitalia
AV-4	8 Photos and 2 Videos	Virginia	May 14, 2017	Close-up of breasts with bra pulled down
AV-5	25 Photos and 10 Videos	Mexico	May 17, 2019	Close-up of adult male grabbing bare breast
AV-6	29 Photos and 6 Videos 35 Photos	Mexico Mexico	June 23, 2019 December 21, 2019	Close-up of bare breasts and genitalia, places her hand on her own breast and genitalia
AV-7	77 Photos and 4 Videos	Mexico	May 30, 2020	Close-up of genitalia, adult male straddling
AV-8	13 Photos and 1 Video	Mexico	March 27, 2020	Close-up of bare breast
AV-9	20 Photos and 15 Videos	Mexico	March 26, 2020	Close-up of adult male touching bare breast

¹ This chart only depicts victims whose photographs and/or videos meet the definition of obscenity. Photographs of four additional women were recovered from Raymond's devices and/or accounts. Those photographs were taken while the women were either sleeping or unconscious, without their knowledge or consent. For example, three photos of AV-14 were taken in Virginia on August 4, 2017. She is unconscious and partially nude, wearing only her underwear. Her arm conceals her naked breasts in the photo. Similarly, three photographs of AV-21 were taken in Country 4 on May 30, 2011. Only when lightened do the photographs show that AV-21 is unconscious or sleeping and nude.

² Countries 3, 4, 5, and 6 are known to the government and to the defendant.

AV-11	3 Videos	Mexico	May 11, 2019	Depicts her nude body with her leg draped over adult male whose penis is visible
AV-12	10 Photos	Mexico	September 15, 2018	Close-ups of bare breasts
AV-13	9 Photos	Country 5	November 28, 2017	Depicts close-up side view of bare breast
AV-15	4 Photos	Maryland	April 9, 2017	Depicts fully nude body and buttocks
AV-16	2 Photos	Virginia	November 5, 2016	Depicts bra pulled down exposing bare breasts
AV-17	6 Photos	Virginia	November 6, 2015	Close-up of male hand pulling down underwear to expose genitalia
AV-18	9 Photos	Virginia	November 1, 2015	Depicts bare breasts
AV-20	7 Photos	Country 6	November 2007	Depicts close-up of bare breasts
AV-22	7 Photos	Country 3	April 21, 2006	Depicts close ups of bare breasts and bare genitalia
AV-23	40 Photos	Country 6	December 2013	Depicts bare breasts and genitalia, body stretched and leg to one side; depicts close-up of genitalia
AV-24	27 Photos	Country 6	October 11-12, 2013	Depicts close-up of bare breasts and of bare genitalia
AV-25	6 Photos	Washington D.C.	December 25, 2015	Depicts bare genitalia and breasts

12. The photos and videos taken by Raymond commonly focus on his victim's breasts and genitals. Raymond posed their bodies and manipulated their eyelids, mouths, and limbs. With some of the women, to include AV-4, AV-5, AV-6, AV-7, and AV-9, the recordings depict him touching, or causing them to touch, their breasts, genital area, buttocks, and/or inner thighs. The depictions show Raymond lying in bed with AV-9 and AV-11 while both are nude and unconscious. The

women listed on the chart above did not consent to being recorded or photographed nude, nor did they consent to Raymond touching them while they were unconscious.

13. One or more of the photos and videos Raymond recorded of each of AV-2 through AV-9, AV-11 through AV-13, AV-15 through AV-18, AV-20, and AV-22 through AV-25 constitute obscene material, that is they appeal predominantly to the prurient interest, they depict sexual conduct in a patently offensive way, and they lack serious literary, artistic, political or scientific value. From 2006 to June of 2020, Raymond knowingly imported these photos and videos into the United States, transporting them on his electronic devices. During this same time frame, he also knowingly uploaded the obscene recordings and images of AV-2 through AV-9, AV-11 through AV-13, AV-15 through AV-18 to his iCloud account, an interactive computer service, through servers in the United States. At the time of the importation and uploads, Raymond knew that the videos and images he had made were sexually oriented in nature.

14. Raymond stipulates and agrees that from 2006 until 2020, including on the dates listed on the chart above, he recorded and/or photographed at least 24 unconscious and nude or partially nude women, some of whom are not mentioned in this plea agreement or statement of facts, and that during the same time frame, he touched the breasts, buttocks, groin area, and/or genitalia of numerous women, some of whom he recorded and/or photographed and some of whom are mentioned in this agreement. Raymond engaged in this conduct while the women were incapable of appraising the nature of the conduct. The women who have been interviewed reported commonalities in their contact with Raymond, including Raymond's provision and/or preparation of alcoholic beverages and their subsequent memory loss. None of the women consented to being touched while unconscious and/or asleep, and none of them consented to Raymond's photographing and recording of them in that state.

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DEFENDANT'S ACKNOWLEDGMENT

I, Brian Jeffrey Raymond, have read this Statement of the Offense and have discussed it with my attorney. I fully understand this Statement of the Offense. I agree and acknowledge by my signature that this Statement of the Offense is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

Date: 5/27/21

Brian J Raymond
Brian Jeffrey Raymond
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date: 5/27/21

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