

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

Ruben A. Verastigui,

Defendant.

:
: Case: 1:21-mj-00202
: Assigned to: Judge Harvey, G. Michael
: Assign Date: 2/5/2021
: Description: COMPLAINT W/ARREST WARRANT

:

:

STATEMENT OF OFFENSE

IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Special Agent with Homeland Security Investigations Raymond Abruzzese, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I have been employed as a Special Agent of the U.S. Department of Homeland Security, Homeland Security Investigations (“HSI”) since in or around March 2003 and I am currently assigned to the Child Exploitation Unit in Dulles, Virginia. While employed by HSI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography, as well as commercial fraud and immigration fraud. I have gained experience through everyday work relating to conducting these types of investigations. I also have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256(8)) including computer media. Due to my experience and training, I can identify child pornography when I see it. Moreover, I am a federal law enforcement officer who

enforces federal criminal laws, including 18 U.S.C. §§ 2252A(a)(5)(B) and 2252(a)(2), and I am authorized by law to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Ruben Verastigui** (date of birth [REDACTED]/1993) for violations of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

3. The statements contained in this affidavit are based in part on my own investigation, as well as upon information provided by other Special Agents of Homeland Security and law enforcement officers; independent investigation and analysis by law enforcement officers/analysts; and my experience, training and background. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Verastigui** has violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B).

II. PROBABLE CAUSE

4. On or about June 12, 2020, HSI Special Agents began investigating a group of individuals who were trading child pornography on a particular website, hereinafter Application A.¹ HSI recovered chat messages from this particular group after executing search warrants to recover several group members' electronic devices. These chats revealed that the group had at least 18 members, one of which was an individual using the display name "Landon" and the username @somethingtaken.

¹ The true name of the website is known to law enforcement but not revealed to protect the integrity of the ongoing investigation.

5. Your affiant identified “Landon” @somethingtaken as **Ruben Verastigui** a resident of [REDACTED] Florida Avenue NE Washington, DC.

6. A review of the group chat conducted by HSI Special Agent Fry revealed Verastigui had a chat conversation with S-1² on or about April 13, 2020. A portion of the chat conversation is as follows:

S-1: So you like babies, huh

Verastigui³: my absolute favorite

S-1: Fuck yeah. How dark are you? What are u into?

Verastigui: Well like I said babies are some of my biggest turn-ons and beast

Verastigui: Young rape...

Verastigui: Fuck I love all that

Verastigui: I have been wanting to see videos of guys hardcore rapping a baby..when a baby screams it's my favorite

Verastigui: I've lost a lot of videos so only have one I've been jerking off to.

S-1: Which one?

Verastigui: The ginger guy fucked the baby...have any good ones?

² S-1's identity is known to law enforcement.

³ Your affiant has substituted Verastigui for @somethingtaken (aka Landon) in the chats and messages on Application A for ease of reading. The chats/Application A content did not actually include the name Verastigui.

S-1: S-1 sends Verastigui a video file depicting a red headed adult male sexually penetrating an infant/toddler.

Verastigui: FUCK YES!!!

S-1 sends Verastigui a few additional video files also depicting during this chat conversation. Your affiant viewed a screen print of the video files and determined the videos contained child pornography. One of the videos as depicts an infant/toddler and an adult male. The adult male puts his erect penis on the infant/toddler's mouth and lips. During this chat conversation, Verastigui requests that S-1 come to DC for the purpose of sexually abusing a minor.

10. On or about April 14, 2020, S-1 and Verastigui had another chat conversation. During this chat conversation S-1 sent Verastigui approximately nine (9) video files. Your affiant viewed screen prints of these video files and determined the video files depict child pornography. One of the video files depicts an infant/toddler who is anally raped by an adult male.

11. In or about April 2020, Verastigui sends S-1 images of himself standing naked in what appears to be a bathroom. Verastigui was holding a phone in a grey colored case in his right hand. Your affiant reviewed this image and observed Verastigui has a tattoo of what appears to be words written in script on his left forearm. Your affiant further observed items in the bathroom such as the color of the sink countertop, the faucet color and a picture leaning up against the wall. Your affiant reviewed an image file posted on Verastigui's Instagram account. This image depicted Verastigui standing clothed in a very similar position as the image he sent to S-1. Your affiant reviewed the image posted on Verastigui's Instagram account and observed the sink countertop and faucet matched colors matched. Your affiant further observed Verastigui was holding a phone with a grey colored case in his right hand and there is a picture leaning up against the wall in the same location in as the image sent to S-1. The picture leaning on the wall appears to be identical.

12. On or about February 5, 2021, HSI Special Agents along with other law enforcement personnel executed a Federal search and seizure warrant at Verastigui's residence located at [REDACTED] Florida Avenue NE Washington, DC. During a forensic preview of Verastigui's cellular phone, HSI located several files of child pornography and also located the Application A group chat. Your affiant viewed these files and determined the files depict child pornography as defined by federal statute. For example, your affiant discovered files that were received by Verastigui in the Application A chat in April of 2020. At least two of these videos depicted an infant toddler being anally raped by an adult male.

13. During the search warrant execution, a tattoo that appears to match the tattoo described previously in the affidavit was located on Verastigui's left forearm.

14. During the above described search warrant execution, Verastigui agreed to speak to law enforcement agents after he was advised of his Miranda rights. During this interview Verastigui (DOB [REDACTED]/1993) admitted that he used the username Landon and that he had been part of the group on Application A and had received child pornography during the time he was a part of that group. The Application A chat revealed that Verastigui was active in the group the week prior to the search warrant execution.

III. CONCLUSION

15. Based on the foregoing, there is probable cause to believe that **Ruben A. Verastigui** has violated 18 U.S.C. §§ 2252A(a)(2) (receipt of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'RA' with a large, stylized flourish.

Raymond Abruzzese
HSI Special Agent

Subscribed and sworn to before in accordance with the requirements of Fed. R. Crim. P. 4.1 by electronic reliable means, by telephone, this 5th day of February, 2021.

G. MICHAEL HARVEY,
UNITED STATES MAGISTRATE JUDGE