

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 21cr409
	:	
RUBEN VERASTIGUI,	:	
	:	
Defendant.	:	

STATEMENT OF OFFENSE

The parties in this case, the United States of America and the defendant, Ruben Verastigui 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 offense to which he is pleading guilty: receipt of child pornography in violation of 18 U.S.C. § 2252(a)(2).

Statement of Facts

1. 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 defendant Verastigui. Verastigui used the display name “Landon” and the username “@somethingtaken.”

2. In the chat, Verastigui shared child pornography videos with another member of the group and made numerous comments about sexually abusing children. He was active in the group from April 2020 through February of 2021. For example, on April 13, 2020, Verastigui, who was on the

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

Internet at his residence in the District of Columbia, indicated his preference for babies, saying they were his “absolute favorite” and soliciting another member for videos of babies being raped. The other group member promptly sent Verastigui a video of a baby being raped, and Verastigui responded, “FUCK YES!!!” The other group member then sent numerous other child pornography videos to Verastigui, including depictions of adults performing oral sex on babies. Verastigui commented on these videos, saying he “wished they were longer.”

3. On February 5, 2021, Homeland Security agents executed a search warrant at Verastigui’s apartment in the District of Columbia. Verastigui was living alone and present during the time of the search. He admitted to being Landon on Application A and acknowledged using the Internet to view, receive, and distribute child pornography in the group while at his D.C. residence. He stated that he knew the purpose of the group was to exchange explicit images of children. He identified his electronic devices.

4. A forensic examination of Verastigui’s phone revealed 162 videos and over 50 images of child pornography. Verastigui downloaded at least one of these videos of child pornography between the dates of April 13, 2020 and the date of the search warrant, and did so from his residence in the District of Columbia. Verastigui received many of the videos and images of child pornography in the Application A and other group chats, or from private users sending him the files directly, and did so between the dates of April 13, 2020 and the date of the search warrant from his residence in the District of Columbia.

Respectfully,
CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

April Russo

April N. Russo
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Ruben Verastigui, 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: 6/15/2021

Ruben Verastigui
Ruben Verastigui
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: June 9, 2021

Kira West
Kira West, Esquire
Attorney for Defendant