AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America v. Devonne Keith Brown

DOB: XXXXXX

Case: 1:25-mj-00098 Assigned To: Judge Sharbaugh, Matthew J. Assign. Date: 5/30/2025 Description: COMPLAINT W/ARREST WARRANT

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 ______ April 21, 2024 in the county of ______ in the in the District of ______ Columbia____, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2252(a)(2), Receipt of Child Pornography.

This criminal complaint is based on these facts: See attached statement of facts.

X Continued on the attached sheet.

Complainant's signature

Complainant's signature

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 05/30/2025

Judge's signature

apship

2025.05.30

14:20:06 -04'00'

Matthew J. Sharbaugh, U.S. Magistrate Judge Printed name and title

City and state:

Washington, D.C.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DEVONNE BROWN,

I, |

Defendant.

Case: 1:25-mj-00098 Assigned To: Judge Sharbaugh, Matthew J. Assign. Date: 5/30/2025 Description: COMPLAINT W/ARREST WARRANT

UNDER SEAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AFFIANT BACKGROUND

1. As a Detective with the Metropolitan Police Department in Washington, DC, I am charged with enforcing all federal laws and those in Washington, DC. I am currently a detective with the MPD / FBI Child Exploitation and Human Trafficking Task Force (CEHTTF). My tenure with the MPD spans 15 years, and I have been conducting criminal investigations in this capacity for more than 5 years. I am responsible for investigating possession of child pornography, distribution of child pornography, receipt of child pornography, production of child pornography, commercial sexual exploitation of minors, and human trafficking of minors or adults.

2. As a task force member, I am authorized to investigate violations of United States laws and to execute search warrants issued under the authority of the United States. I have gained experience in such investigations through formal training and on-the-job training with more experienced detectives and agents. I have received training and experience in interviewing and interrogation techniques, peer-to-peer file sharing investigations, arrest procedures, search warrant applications, surveillance, and a variety of other investigative tools available to law enforcement officers.

3. I have been personally involved in the investigation of this matter. I am familiar with the information contained in this Affidavit based on my participation in the investigation, my review of documents and other evidence, my conversations with other law enforcement officers, and my training and experience. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included the details of every aspect of the investigation. Where actions, conversations, and statements of others are related herein, they are related in substance and in part, except where otherwise indicated.

PROBABLE CAUSE

4. On November 7, 2024, an employee of Block Inc. reported a suspicion of child exploitation to the National Center for Missing and Exploited Children (NCMEC) which was occurring on CashApp. The employee reported that a suspected adult's CashApp account had been reported for "grooming minors & purchasing child sexual abuse materials ("CSAM"). CashApp identified three accounts of suspected minors and reported that the adult's account is "C 0se2e1msa."

5. The employee reported that the adults account is registered with a name of Devonne Brown, a phone number ending in -5035, an email address of devonne757@gmail.com, with a display name of "Project Impact Sports."

6. The employee provided the following statement regarding the suspected adult's activity (Minor Victim's names removed from the statement, and Minor Victim #1 (MV-1) is currently 15 years old):

A review was prompted by an internal referral which identified possible OCSE activity. Most of the money transfers identified in the accounts consisted of linear

movement of funds sent from the subject to the minors. For example, on June 22, 2024, 2:31 AM (EST) Brown sent a \$120.00 payment to Minor Victim #2 with the comment "donations light bill". Additional payment comments were examined and found to contain notations such as "lunch donation", "dinner", "lunch, gonna text u", "lunch costed extra", "hope its not too much, if it is send what u can", "donation", and "breakfast, text me on instagram message wont work". These payment comments could be indicative of grooming as sexual grooming is the action or behavior used to establish an emotional connection with a minor under the age of consent, to lower the child's inhibitions with the objective of sexual abuse. On September 20, 2024, at 9:06 PM (EST), Minor Victim #1 sent a payment request of \$10 with the comment "******** on instagram!! text me". Additionally, on April 21, 2024, at 7:41 PM (EST), Minor Victim #2 sent a payment request of \$15 to Brown with the comment "for snacks? more photos otw." suggesting Minor Victim #2 previously sent CSAM to the subject. The payment patterns combined with the inability to establish a legitimate relationship between Brown and the minors suggests that Brown was grooming the minors. Therefore, the activity is and indication the adult is grooming the minor and purchasing CSAM via the internet.

7. On January 23, 2025, this investigation was assigned to your affiant.

8. On January 23, 2025, a member of the FBI CEHTTF conducted a records search of commercial, open source, and law enforcement only databases to identify the reported adult CashApp account. The member subsequently identified Devonne Keith Brown (XX-XX-1968) of XXXX Fort Lincoln Drive, Northeast, Washington, D.C., 20018 as the likely user. Brown was found to be the registered owner of a 2018 Dodge Charger with Maryland registration of XXXXX and believed to be employed by IDEA Public Charter School as a Health teacher. Brown is also believed to be affiliated with a track club called, "Project Impact Sports."

9. On January 23, 2025, an administrative subpoena was issued to Google by a member of the FBI CEHTTF for subscriber information and internet protocol (IP) logs related to Devonne757@gmail.com.

10. On January 23, 2025, Google provided the requested records regarding Devonne757@gmail.com. Google indicated that the account had been created on 09-16-2011 with the name of Devonne Brown. The account had last been accessed on 01-22-2025 from an IP

address of 2600:4040:295c:ae00:f452:9ca2:482f:1981. Google reported that the account was linked to a recovery email of Devonne_brown@hotmail.com and a phone number of ending in - 5035.

11. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to Yahoo for subscriber information and IP logs related to Devonne_brown@hotmail.com.

12. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to T-Mobile by a member of the FBI CEHTTF for subscriber information and call detail records (CDR) related to the phone number ending in-5035.

13. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to X Corp for subscriber information for accounts registered using the phone number ending in -5035.

14. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to Dropbox for subscriber information and IP logs linked to a Dropbox account registered with Devonne757@gmail.com.

15. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to Astound Broadband for subscriber information related to the IP address of 66.44.94.114. This IP address had been used to access the suspected adult's CashApp account on 09-20-2024.

16. On January 23, 2025, a member of the FBI CEHTTF issued an administrative subpoena to Apple Inc. for any Apple iClouds linked to the phone number ending in -5035 and Devonne757@gmail.com.

17. On January 28, 2025, Apple Inc. provided the requested information and indicated that an Apple iCloud is registered to Devonne Brown. The account was created on October 4, 2017 with the phone number ending in -5035 and the email of Devonne757@gmail.com. Apple Inc. advised that both the phone number and email had been verified.

18. On January 28, 2025, Dropbox provided the requested information which indicated that the account had been created on April 18, 2015, with an email address of Devonne757@gmail.com and provided a full name of Devonne Brown. Dropbox also reported that the account had been accessed from an IP address of 66.44.94.114 on 12-09-2024.

19. On January 29, 2025, a member of the FBI CEHTTF issued an administrative subpoena to Verizon Fios for subscriber information for the IP address of 2600:4040:295c:ae00:f452:9ca2:482f:1981 which had accessed from been Devonne757@gmail.com on January 22, 2025.

- a. On January 29, 2025, X Corp provided the requested returns and advised that the telephone number ending in -5035 is linked to the X Corp accounts of @DevonneQB14, @Joeslick14, @Joeslick05, and @Projectimpact05. Your affiant found that all of the accounts had been suspended by X Corp except
 @DevonneQB14.
- b. Your affiant found that @DevonneQB14 had been created on 06-18-2016 using the email address of Devonne757@gmail.com with a display name of "Deezay757."
- c. @Joeslick14 had been created on September 2, 2017, with an email address of Devonne.brown@creativemindspcs.org with a display name of "Project Impact Sports – QB14."

- d. @Joeslick05 had been created on December 24, 2024, with a phone number of ending in -5035 and a display name of "JoeSlick757."
- e. @ProjectImpact05 had been created on December 29, 2024, with a phone number of ending in 5035 and a display name of "Project Impact Sports."

20. On February 4, 2025, Yahoo provided the requested documents regarding Devonne_brown@hotmail.com. Yahoo reported that the account had been created with a name of Devonne Brown on October 14, 2015. The user had provided a date of birth of XX-XX-1968 at that time.

21. On February 10, 2025, T-Mobile provided the requested information the phone number ending in -5035. T-Mobile reported that the account is registered to Devonne K Brown of XXXXX Sir Edwards Drive, Upper Marlboro, Maryland 20772. The account has been active since 04-16-2015.

22. On February 14, 2025, Astound Broadband provided the requested information regarding 66.44.94.114. Astound Broadband advised that the account subscriber is IDEA Public Charter School at 1027 45th Street Northeast, Washington, D.C. 20019. The account has been active since June 30, 2015.

23. On February 18, 2025, Verizon Fios provided the requested information for the IP address of 2600:4040:295c:ae00:f452:9ca2:482f:1981. Verizon Fios advised that the account is registered to Devonne K. Brown of XXXX Fort Lincoln Drive, Northeast, Washington, D.C. 20018. Verizon Fios also advised that the account was associated with the IP address of 173.73.209.88. The account was registered with an email address of Devonne757@gmail.com, a phone number ending in -5035, and had been active since March 25, 2022.

24. On February 21, 2025, at approximately 1:15 pm, your affiant conducted surveillance around IDEA Public Charter School at 1027 45th Street, Northeast, Washington, D.C., 20019. Your affiant located a Dodge Charger with Maryland registration of XXXXXX in the parking lot of the school.

25. Your affiant reviewed the contents of Minor Victim #1's CashApp account and found that there was a total of 36 transactions between Minor Victim #1 and Brown's CashApp account. The transactions began on February 18, 2024 and ended on September 22, 2024. The transactions were typically between \$10 to \$35 and had notes linked to them which included the following:

- a. check gmail
- b. for snacks? more photos otw.
- c. food , phone broke text on gmail
- d. lunch donation
- e. hmu on my number XXX XXX 5035 (redaction added)
- f. IG Project Impact Sports

26. On May 2, 2025, members of the FBI CEHTTF met with MV-1 at a family member's home with her guardian present. MV-1 and the guardian were advised that an investigation regarding suspicious CashApp transactions from an adult male to MV-1 were being investigated.

27. During an interview with members of the FBI CEHTTF, MV-1 reported that she had communicated with a person named "Joseph." MV-1 initially stated that "Joseph" was a same age minor. MV-1 later reported that "Joseph" was an adult male whom she had met near a Giant grocery store by her home. MV-1 further stated that "Joseph" had sent her money for ice cream on

CashApp. MV-1 stated that she met this adult male for the first time at the Giant and then she communicated with him via Instagram and iMessage. MV-1 disclosed that she sent the adult male nude photographs of herself in these conversations.

28. MV-1 gave members of the FBI CEHTTF an Apple iPhone that she had used during the time that she was communicating with Brown. A forensic image of the Apple iPhone was extracted, and a report was generated for review.

29. On May 8, 2025, MV-1 was interviewed at Safeshores located at the Child Advocacy Center in D.C. MV-1 disclosed that she had met an adult male at Giant near her home. The adult male had asked her to buy ice cream for him and asked for her CashApp account. MV-1 provided her CashApp to the adult male and bought ice cream for him. MV-1 reported that shortly after this she began communicating with the man via iMessage and after approximately a week he started asking her for sexual content.

30. MV-1 reported that the adult male would send her pictures of nude women and ask MV-1 to recreate the image for him. The adult male also requested videos of her "boobs, butt, and vagina" by sending specific emojis to her. MV-1 disclosed that the adult male had sent a photograph of his penis to her. MV-1 stated that she would send videos to the man and he would send money to her. MV-1 reported that the man became weird when he would tell her he was near her and wanted to link up. MV-1 stated that she stopped communicating with him after that happened.

31. MV-1 was shown an example of the suspected CashApp transactions between herself and Brown. MV-1 reported that the transactions were what she was talking about and identified an emoji on the transaction that was a request for a photograph of her breast. MV-1 also stated that the man's Instagram page was "Project Impact Sports" and believed that the telephone

number on the transaction, ending in -5035, was the number of the adult man to whom she had sent sexual videos.

32. A member of the FBI CEHTTF reviewed the contents of the Apple iPhone used by MV-1 to communicate with Brown. The member found that the Apple iPhone had been linked to an Apple iCloud using the email address xxxxyanaa@gmail.com.

33. The member found that the telephone number ending in -5035 had been blocked on the phone. The member also located a message from the phone number ending in -5035 to the Apple iPhone which stated, "Videos for money?" sent on April 25, 2025, at approximately 12:25 am.

34. The member also located 11 emails from Cash@square.com to an email used on the cellular phone between 9/13/2024 to 9/21/2024. The emails were all indicating CashApp interactions with the CashApp user, "Project Impact Sports" / \$Wissey. Two of the notifications stated, "hmu on my number XXX XXX 5035" (*redaction added*) and "for breakfast, text me on Instagram message won't work."

35. On May 14, 2025, your affiant presented an affidavit in support of a search warrant for the Google account of Devonne757@gmail.com to United States District Court of the District of Columbia (USDC DC) Magistrate Judge Michael Harvey. USDC Magistrate Judge Harvey reviewed the affidavit and authorized a search of the account (25-SC-801). Google was served with the authorized search warrant on May 15, 2025.

36. On May 20, 2025, your affiant was provided with the requested production pursuant to the USDC DC Search Warrant issued on May 14, 2025. Your affiant reviewed the contents of the account and located numerous selfie style photographs of Brown throughout the account.

37. Your affiant located a PDF file saved to Devonne757@gmail.com's Google drive on July 30, 2024. The PDF file is an "Agreement to Mediate" between Devonne Brown and the Fairfax County Public Schools. Brown lists his phone number ending in -5035 on the form. Your affiant also located a photograph for the title of a 2018 Dodge Charger with a vehicle identification number (VIN) of 2C3XXXXXXXXXXXXX and the registration for the same vehicle listing a Maryland tag of 7GXXXXX.

38. Your affiant reviewed the contacts of Devonne757@gmail.com and located a contact named "Yana Ice Cream $\bigcirc \bigcirc \bigcirc$ Shop" with a phone number ending in -5112. The contact also appeared to have a photograph of Minor Victim #1 assigned to the contact card.

39. Your affiant reviewed the email content of the Google account Devonne757@gmail.com Your affiant located twenty-two emails from YanaXXXXXX(@gmail.com to Devonne757(@gmail.com from 04/21/2024 to 07/15/2024 and seven emails from xxxxyanaa @gmail.com to Devonne757@gmail.com from September 23, 2024 to March 29, 2025.

40. On April 21, 2024 at 10:54 pm from YanaXXXXX@gmail.com to Devonne757@gmail.com contained five video files. Your affiant reviewed all the files and found that they were close-up recordings of a female penetrating, manipulating, and opening her vagina with her fingers to masturbate.

41. 4/21/2024, 11:09 email On at pm, an had been sent from YanaXXXXXX@gmail.com to Devonne757@gmail.com which contained two video files. Your affiant reviewed both files and found that the first file displayed a female wearing a black shirt with a silver in color butterfly necklace lifting their shirt to expose their breast to the camera. The second video is a close-up recording of a female penetrating her genitals with her fingers.

42. On April 21, 2024, at 11:10 pm, an email was sent from YanaXXXXX@gmail.com to Devonne757@gmail.com which contained three video files. All three video files displayed a female penetrating her genitals with her fingers while masturbating.

43. On May 4, 2024, at 4:23 pm, an email was sent from YanaXXXXX@gmail.com to Devonne757@gmail.com which contained one video file. The file was reviewed and displayed the body of a completely nude female wearing jewelry around her abdomen, a red bracelet, and a silver in color butterfly necklace. The female appears to be in a bathroom and is observed penetrating her genitals with her fingers.

44. On May 4, 2024, at 4:27 pm, an email was sent from YanaXXXXX@gmail.com to Devonne757@gmail.com which contained one video file. The file was reviewed and displayed the body of a completely nude female wearing a jewelry around her abdomen, a red bracelet, and a silver in color butterfly necklace. The female exposes her buttocks to the camera and penetrates her vagina with her fingers. The female's face is partially visible in the video and resembles MV-1.

45. On May 4, 2024, at 4:30 pm, an email was sent from YanaXXXXX@gmail.com to Devonne757@gmail.com which contained one video file. The file was reviewed and displayed body of a completely nude female wearing a jewelry around her abdomen, a red bracelet, and a silver in color butterfly necklace. The female appears to be in a bathroom and is observed penetrating her genitals with her fingers. The female's face is partially visible in the video and resembles MV-1.

46. Your affiant reviewed the CashApp logs for MV-1 and found that Brown had sent money to Minor Victim #1 with the following notes:

a. 4/21/2024 @ 6:20 pm: \$32.62 "hope its not too mich, if it is send what u can."

b. 4/21/2024 @ 6:41 pm: \$15.00 "for snacks ? more photos otw ."

c. 5/4/2024 @ 6:36 pm: \$25.00 "Dinner"

47. Your affiant reviewed the IP logs of Devonne757@gmail.com and found that the account had been logged into on May 4, 2024, at 5:27 pm, from the IP address of 173.73.209.88. Your affiant knows that this IP address was and still is registered to Devonne Brown of XXXX Fort Lincoln Drive Northeast, Washington, D.C.

48. Your affiant reviewed the rest of the emails between YanaXXXXX@gmail.com and Devonne757@gmail.com and found that 17 of the other emails contained videos of a female engaged in sexual acts, sexual contacts, and/or lewd/lascivious displays of her genitals. One of the emails contained three images with two of the images being lewd and lascivious displays of the females' genitals.

49. On March 28, 2025, at 9:46 pm, an email was sent from xxxxyanaa @gmail.com to Devonne757@gmail.com containing one video file. Your affiant reviewed the file and found that it displayed a completely nude female wearing a silver in color heart necklace sitting on the floor of a bathroom. The female is penetrating her genitals with her fingers and touches her breasts during the video.

50. On May 23, 2025, your affiant met with MV-1 and displayed screenshots of the silver in color heart necklace, silver in color butterfly necklace, and of the partially visible female face from the content distributed to Devonne757@gmail.com. MV-1 reported that the jewelry belonged to her and that the partially visible female's face was herself.

CONCLUSION

17. Based on the aforementioned facts, your affiant respectfully submits that there is probable cause to believe that **Devonne Brown**, committed the offense of Receipt of Child Pornography in violation of Title 18, United States Code, 2252(a)(2).



Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on May 30, 2025.

2025.05.30 14:18:50 applie -04'00'

HONORABLE MATTHEW J. SHARBAUGH UNITED STATES MAGISTRATE JUDGE