

UNITED STATES DISTRICT COURT

for the

Northern District of California

FILED

Nov 20 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

United States of America
v.

ROBERT JESUS BLANCAS
a/k/a "Orgotloth"
a/k/a "MuskOx"

Case No.3:20-mj-71703 MAG

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 May 2020 through August 4, 2020 in the county of San Francisco and elsewhere in the Northern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2422(b)	Enticement of a Minor to Engage in Sexual Activity
	Penalty: Minimum 10 years to maximum lifetime of imprisonment; minimum 5 years to maximum lifetime of supervised release; maximum \$250,000 fine; mandatory \$100 special assessment

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Katherine Wilson

Continued on the attached sheet.

Approved as to form /s/
AUSA Eric Cheng

Sworn to before me by telephone.

Date: 11/19/2020

City and state: San Francisco, California

/s/

Complainant's signature

Katherine Wilson, Special Agent, FBI

Printed name and title



Judge's signature

Hon. Jacqueline Scott Corley, U.S. Magistrate Judge

Printed name and title

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Katherine Wilson, Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby declare as follows:

OVERVIEW AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint against Robert Jesus BLANCAS a/k/a “Orgotloth” a/k/a “MuskOx” (“BLANCAS”). For the reasons set forth below, I submit that there is probable cause to believe he has enticed a minor to engage in sexual activity, to wit, the production of child pornography, in violation of 18 U.S.C. § 2422(b).

2. The facts in this affidavit come from my personal observations, my training and experience, information from records and databases, and information obtained from other agents and witnesses. This affidavit does not set forth all of my knowledge about this matter; it is intended to only show that there is sufficient probable cause for the requested warrant.

AFFIANT BACKGROUND

3. I am a Special Agent with the Federal Bureau of Investigation (FBI). I am currently assigned to the Counter Terrorism Squad of the FBI’s San Francisco Field Office. I successfully completed the 21 weeks of New Agent Training at the FBI Academy in Quantico, Virginia in May 2019. During that time, I received training in physical surveillance, legal statutes and procedures, financial investigations, money laundering techniques, asset identification, forfeiture and seizure, confidential source management, and electronic surveillance techniques, including Title III monitoring.

4. As an FBI Special Agent, I have conducted and participated in investigations of weapons of mass destruction, violent extremist ideologues, organized crime and weapons offenses. During these investigations, I have utilized various types of investigative techniques,

including informants, physical surveillance, and the service of Grand Jury subpoenas. I have participated in the execution of several federal arrest warrants and search warrants.

5. Prior to my employment with the FBI, I worked for U.S. Customs and Border Protection (CBP). During my time with CBP, I was a part of the Counter Terrorism Response Team (CTRT) where I utilized border search authority for inbound and outbound operations focusing on currency, child pornography, narcotics, and terrorism.

APPLICABLE STATUTE

6. Title 18, United States Code, Section 2422(b) – Enticement of a Minor to Engage in Sexual Activity – makes it unlawful to “us[e] the mail or any facility or means of interstate or foreign commerce” to “knowingly persuade[], induce[], entice[], or coerce[] any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense,” or to attempt to do so.

FACTS SUPPORTING PROBABLE CAUSE

7. In the course of investigating the homicide of a Federal Protective Service Officer by Steven Carrillo and Robert Justus, Jr., agents identified Robert Jesus BLANCAS as a member of the “1st Detachment, 1st California Scouts” or “Grizzly Scouts,” an anti-government citizen-militia group associated with the so-called “boogaloo” movement. On August 6, 2020, FBI agents executed federal search warrants on multiple locations associated with BLANCAS. In the course of searching the locations associated with BLANCAS, agents seized, among other things, two assault rifles and a pistol, body armor and other tactical equipment, materials concerning the Grizzly Scouts, as well as multiple electronic devices. Those electronic devices not only contained evidence of BLANCAS’s association with the Grizzly Scouts and communications related to acts of violence against law enforcement, but they also contained evidence that

BLANCAS was engaged in the receipt and possession of child pornography, the enticement of a minor, and the production of child pornography, and discussed the topic of child pornography with other Grizzly Scouts members.

8. Agents obtained additional warrants to search BLANCAS's devices for evidence of his involvement in receiving and producing child pornography, and enticing a minor to engage in sexual activity. Following a search of his electronic devices pursuant to those warrants, agents seized images and videos of a young girl ("Victim 1"), and identified BLANCAS's communications with her along with other girls who also appeared to be younger than 18. Victim 1 is 15 years old.

9. BLANCAS appeared to have met Victim 1 on the social media communications platform Whisper¹ in or about April or May, 2020 in a forum labeled "DDLG." I know from my training and experience, and my conversations with other agents who have expertise in child pornography cases, that "DDLG" is an abbreviation for "Daddy-Daughter Little Girl." I also know that men like BLANCAS who frequent that site are seeking young girls, or girls posing as young girls, to help them fulfill fantasies about having sex with young girls. Thus, on May 6, 2020, BLANCAS asked Victim 1, "what did you do today little one?" "Is [sic] did big girl work," she responded. "Daddy teach mee?" she asked. "Well, you gotta undo my pants," BLANCAS said. "Have you had sex before?" he asked. "No daddy," she responded.

10. Shortly after that, BLANCAS suggested they move their conversation to Kik

¹ Based on my training, experience, and open source research, Whisper is a social media application that allows users to communicate without providing or disclosing their identities by posting content for public viewing and/or sending private messages.

Messenger (Kik), a free instant messaging application,² and he gave Victim 1 his User ID on Kik. Once on the Kik platform, BLANCAS instructed Victim 1 to send him specific pornographic videos of herself. For instance, on June 3, 2020, he told her to “Show me how hard and fast you can fuck yourself with your middle finger [two winking emojis].” Two minutes later, she sent him a video of her touching her genitalia while laying on her bed.

11. For the next few months, BLANCAS exchanged thousands of similar messages with Victim 1, including via Kik and other text messaging. For example, the following chat took place via Kik on August 4, 2020:

Date/Time: August 4, 2020, 6:22:45 PM (UTC-7)

User: orgotloth (BLANCAS)

Text: And because you’re such a good girl you can touch the lips of your princess parts³, NOT your button or hood

Date/Time: August 4, 2020, 6:22:54 PM (UTC-7)

User: (Victim 1)⁴

Text: Nnnhhh

Date/Time: August 4, 2020, 6:23:08 PM (UTC-7)

User: (Victim 1)

Text: Tank you dada

.....

Date/Time: August 4, 2020, 6:27:41 PM (UTC-7)

User: orgotloth (BLANCAS)

Text: You may push in with your finger to the first knuckle

Date/Time: August 4, 2020, 6:27:56 PM (UTC-7)

User: (Victim 1)

² According to Kik’s published privacy policy, user information is stored on servers located in the United States, Canada, and Israel, and stores information in other countries. As such, Kik user information may be sent to the United States, Canada, Israel, and possibly other countries.

³ Based on my review of BLANCAS communications with Victim 1, “princess parts” is likely referring to Victim 1’s genitalia.

⁴ Username has been removed to protect the identity of Victim 1.

Text: Second one?

Date/Time: August 4, 2020, 6:28:15 PM (UTC-7)

User: orgotloth (BLANCAS)

Text: The first knuckle only, middle finger only

.....

Date/Time: August 4, 2020, 6:29:09 PM (UTC-7)

User: orgotloth (BLANCAS)

Text: Show me [two upside-down smiling emojis]

Date/Time: August 4, 2020, 6:29:13 PM (UTC-7)

User: (Victim 1)

File Name: 6d2ebbb7-46d9-4738-9f9e-18d7ed1620b2

12. The file that Victim 1 sent BLANCAS in response to his instruction to “Show me,” was a five second video of a nude Caucasian minor female touching and rubbing her genitalia. Depicted in the background of the video was what appeared to be a bedroom with white walls, tan carpet, a white framed mirror attached to the wall, a black nightstand, and approximately two-foot-tall white bookshelf with a white birdhouse sitting on top. The nude Caucasian minor female was Victim 1.

13. I believe BLANCAS was aware of Victim 1’s age before Victim 1 sent him sexually explicit photographs and videos, including the aforementioned video file. First, his communications with Victim 1 prior to August 4, 2020 included references to her parents and schoolwork, including that she was taking a “P.E.” class. Throughout this period, she sent him multiple photographs of her face and bedroom. In an early communication, Victim 1 had told BLANCAS that she was 21 years old. I have viewed the photographs and videos Victim 1 sent BLANCAS and believe they depict a young girl and the bedroom of a young girl. I do not believe Victim 1 could pass for an 18 year old, let alone a 21 year old.

14. Moreover, on July 21, 2020, Victim 1 sent him an image of a report card showing

quiz results with her first and last name on it. Victim 1 had been exchanging text messages with BLANCAS using a phone number with an area code located in a state other than California, and earlier that month BLANCAS mentioned to another individual on Whisper referencing “[o]ne gf” in one location and “[t]he other is in” that same state. Agents conducted a simple Google search of Victim 1’s first and last name as identified on the report card and found, among the first few search results, multiple references to her enrollment at a middle school in that same state as recently as 2019, as well as her participation in a junior sports team in that same state. That latter search result indicated that she was 15 years old. A further official records search for Victim 1’s name confirmed that she lives in that same state and is 15 years old. Agents obtained a photo of Victim 1 from those official records and confirmed she is the girl in the videos and photos sent to BLANCAS.

15. BLANCAS’s electronic devices also contained evidence of similar online communications with users who appeared to be girls younger than 18, in addition to Victim 1—including users who identified their ages to BLANCAS as 13, 15, and 16. For example, in July and August 2015, BLANCAS asked a user on the Whisper application “how old are you?” and the user responded “16.” BLANCAS then sent the user an image of male genitalia, exchanged sexually suggestive messages with the user, and asked if the user had Kik, to which the user responded with a user ID.⁵ Kik messages recovered from the device from October 2015 showed

⁵ Date/Time: 7/31/2015 9:41:52 PM (UTC)
From: “KinkyChef”
Message: “...how old are you?”

Date/Time: 7/31/2015 09:42:05 PM (UTC)
From: “pineapple”
Message: “16”

Date/Time: 7/31/2015 10:13:30 PM (UTC)

BLANCAS exchanged other sexually explicit messages with that user ID and sent an explicit video of masturbation to the user.

16. On September 8, 2020, a Child Adolescent Forensic Interviewer conducted an interview of Victim 1. Victim 1 confirmed she was 15 years old and had sent explicit photographs and videos to a person she knew as “Robert B” at his request. When showed photographs of BLANCAS, Victim 1 confirmed BLANCAS and “Robert B” were the same person. Victim 1 stated that she believed she had told BLANCAS she was 18 years old or older

From: “KinkyChef”
Message: [image file 063b24a8-5bdb-4444-a8bf-c852e2db6b9a]

Date/Time: 7/31/2015 10:14:06 PM (UTC)
From: “pineapple”
Message: “so you need to come to Ohio like ASAP lol”

Date/Time: 7/31/2015 10:15:30 PM (UTC)
From: “KinkyChef”
Message: “why come? [wink emoji]”

Date/Time: 7/31/2015 10:16:23 PM (UTC)
From: “pineapple”
Message: “because I need to touch that”

Date/Time: 7/31/2015 10:16:51 PM (UTC)
From: “KinkyChef”
Message: “I’d rather it were inside of you”

Date/Time: 7/31/2015 10:17:17 PM (UTC)
From: “pineapple”
Message: “I would enjoy that”

Date/Time: 7/31/2015 10:17:43 PM (UTC)
From: “KinkyChef”
Message: “Mmm, I bet you're nice and tight”

Date/Time: 8/1/2015 12:35:22 AM (UTC)
From: “KinkyChef”
Message: “Do you have kik?”

in previous conversations. Victim 1 further stated that she had many Skype video calls with BLANCAS. Based upon my review of the video of Victim 1's interview, I believe that her voice and speech patterns are those of a young girl, not a young woman.

17. Victim 1's parents consented to a search of Victim 1's mobile phone. That search revealed additional communications between Victim 1 and BLANCAS, including calls and messages sent and received via the mobile messaging application Skype. The communications showed that BLANCAS resumed contact with Victim 1 on a new device immediately after the August 6, 2020 search warrant execution, during which FBI seized his electronic devices.

18. Victim 1's parents also consented to the FBI photographing Victim 1's bedroom, which was located at her parents' residence. A review of these photographs determined it was likely the same location in which Victim 1 had recorded videos sent to BLANCAS, including the video mentioned above sent on August 4, 2020.

CONCLUSION

19. Based on the above information, I submit that there is probable cause to believe that ROBERT JESUS BLANCAS has committed the federal offense, Enticement of a Minor to Engage in Sexual Activity, to wit, the production of child pornography, in violation of Title 18 United States Code, Section 2422(b). I respectfully request that the Court sign the requested criminal complaint and issue the requested arrest warrant for BLANCAS.

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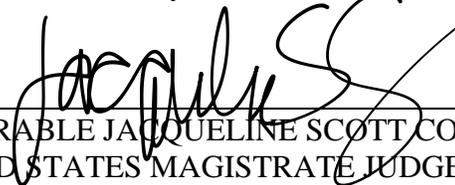
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I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/

Katherine Wilson
Special Agent
Federal Bureau of Investigation

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) this 19th day of November 2020.



HONORABLE JACQUELINE SCOTT CORLEY
UNITED STATES MAGISTRATE JUDGE